

Submission on Watercare's Proposed Central Interceptor

Submission No: 95

1.0 Introduction

1.1 My great grandparents, bought property at Little Huia on the Manukau in the 1880's. My grandfather was born at Little Huia. My great grandfather was instrumental in getting the road built to Little Huia and paid for the construction of the wharf at Little Huia which my great uncles helped build. They also built the heavily used boat ramp, which still gives boaties the quickest access to deep sea fishing in the Tasman Sea. And now over one hundred direct descendents of my great grandparents continue to own Jackie's Peak and its bush and farmland for which Little Huia is renowned. Over 25 descendent families representing 6 generations own adjacent individual parcels on which they have lived, farmed and holidayed ever since – for close to 125 years. As a family we have also given and sold parcels in the valley to the regional park system including substantial areas with riparian rights along the foreshore of the harbour.

1.2 I am the deputy chair of the Manukau Harbour Restoration Society, (MHRS) a volunteer member-based organization dedicated to restoring the environmental and recreational quality of the Manukau Harbour.

1.3 Today I am speaking on behalf of MHRS, as well as Strategic Property Advocacy Network, a volunteer organization representing several hundred landowners in the coastal villages and foothills of the Waitakere Ranges and residents of Cornwallis and Little Huia who had submitted in opposition to the Central Interceptor.

2.0 Overview of Presentation

2.1 This morning I plan to cover the following:

1. Provide some background on the Manukau Harbour

I will then be calling upon 3 expert witnesses

Dr Mels Barton, who will address combined storm and wastewater systems; and consistency of the Central Interceptor (CI) with the Unitary Plan;

Mr Ted Kitching, who will address the vulnerability of migratory birds on the Manukau

And Ms Gillian Vaughn, speaking in place of Mr David Lawrie who will address the international importance of the wetlands, mudflats and migratory bird populations of the Manukau

Following their testimony I will continue with my submission and cover:

2. The Emergency Pressure Relief facility and the potential risk it poses to the Manukau Harbour.
3. Why I believe the alternatives analysis to the CI is inadequate and effect on the Manukau Harbour hasn't been addressed adequately.
4. I will show that Watercare's long term plans and the CI are not coordinated with the Unitary Plan and why this is an issue.
5. I will question the urgency of the decision on the Central Interceptor and recommend more time be taken.
6. And finally, provide my conclusions and request that the Commissioners recommend the NOR be withdrawn and the resource consents be declined.

3.0 Background on the Manukau Harbour

3.1 Past:

- 3.1.1. The Manukau is New Zealand's second biggest harbour, but it is a shallow harbour with a constantly moving bar at its entrance. Before roads and rail lines were built the only way to reach communities around the harbour was by boat and in fact, sailing out of Onehunga was how you reached New Plymouth and Wellington. Up until the 1950's ferries plied the harbour and connected Onehunga and Waiuku.
- 3.1.2 Much of Auckland's early "heavy" industry – the tannery, freezing works, carpet mills and so on - were located around Mangere Inlet and discharged their waste directly into the harbour. This contributed to poor water quality in the inlet.

3.2 Present:

- 3.2.1 Improvements to some aspects of the harbour's water quality began with the opening of the original Mangere Wastewater Treatment Plant (MWWTP) in the 1950's as industrial waste began receiving municipal treatment. But the MWWTP ponds and discharges had a negative effect on both the immediate neighborhoods and the quality of the harbour's water generally. Recreation use of the harbour has declined as beaches have been destroyed, boats became more mobile and Waitemata became more popular. Sediment runoff from urbanization has been curtailed. But mangroves and introduced

species such as Pacific oysters and Asian date mussels have been allowed to proliferate and destroy our beaches and fish nursery areas.

3.2.2 Auckland has regarded the Manukau as its back door and receptacle for its waste. Watercare acknowledges that improvements to MWWTP in last decade have improved water quality in Manukau Harbour. We agree, but is it back to an acceptable level of quality? The MWWTP is not operating at full capacity or volume of discharge permitted under resource consent. We don't know what the effect on the harbour is now, let alone the effects if the plant was discharging at the maximum rate permitted under its resource consent. As residents we do not believe the water has been returned to an acceptable quality that sustains the marine life at previous levels.

3.3 Future:

3.3.1 While Auckland may have turned its back on the Manukau there are many of us who have continued to cherish it and look out for its precious resources – splendid, uncrowded beauty, perfect for boating and kayaking, its internationally renowned population of migratory and wading birds, the winter resident fur seals and visiting pods of orca, the critically endangered Maui dolphin and the diverse fish life. We see the harbour's potential and have a vision of the harbour being restored to its former condition with Onehunga once again a hub and ferries connecting our communities. And as residents we want to be able to swim and eat the fish and seafood anywhere in the harbour.

3.3.2 Damage to areas within the harbour such as killing of shellfish beds or other food sources or changes to salinity of areas of the harbour can have serious effects on our wildlife as you will hear from expert witnesses. Residents don't want the quality of water to be degraded again, we want it restored. Our harbour is too fragile and too important. As the previous speaker Mr Skeates outlined, the entire Manukau Harbour is identified as an Area of Significant Conservation Value (ASCV) in the Auckland Council Regional Plan (Coastal).

3.3.3 Watercare and therefore we, don't know what damage the current discharges are causing to the harbour. We need to embark on more robust monitoring and assessment before we agree to further discharges as predetermined by the Central Interceptor project (CI). In the absence of this data residents believe we must keep waste and fresh water discharges to a minimum.

Now I would like to call on expert witnesses:

Dr. Mels Barton; Mr Ted Kitching; and Ms Gillian Vaughn

I will continue with my submission after their testimony.

4.0 Emergency Pressure Relief Facility is ill defined and discharges could cause negative effects on the receiving environment – the Manukau Harbour

4.1 **Overview**

The Emergency Pressure Relief outfall structure is a critical component of the proposed Central Interceptor project, located at the Mangere WWTP and designed to allow for controlled overflows in the infrequent occurrence of a 10 year storm events coupled with a pumping station failure “of extended duration”. P23 Vol1 Hearing Agenda. In the event the EPR structure is used, “discharges of untreated wastewater would occur directly to the CMA within the Manukau Harbour.” P23 Vol1.

4.2 **Unanswered Questions about the EPR Facility**

4.2.1 What is the projected volume of discharge?

The Hearing Agenda documents say that the potential discharges can be compared to “bypasses from the Mangere WWTP that occur on a number of occasions annually during storm events.” P23 Vol1. But Watercare is not clear as to a volume in its application for consent to discharge from the EPR.

4.2.2 Watercare estimates the scale of the discharge will be at a maximum rate of 20 m³/sec. (Peter Roan Evidence Sect 3.8) That translates into 72 million litres per hour. But it could be greater than that given the capacity of the Central Interceptor and the MWWTP and the possibility that the Western Interceptor could be kept in operation. In other words the volume of discharge could be substantial and this is untreated sewage and stormwater.

4.2.3 Why hasn't Watercare included a more accurate estimate of the expected volume of discharge from the EPR in its application for consent to discharge?

4.2.4 How long will it discharge for?

Watercare has not provided information on the length of time the discharge could run. Watercare will rely on portable generators to reengage the pump station. But if generators are also required for other pump stations simultaneously, which is possible in a major storm event, how long will it take to activate emergency generators at the EPR? Will generators of sufficient size be available? If it takes several hours to put them in place (and Watercare suggests up to 4 hours) the volume of raw sewage and storm water discharged into the

foreshore of the Manukau could be substantial. And if the discharge takes place when the tide is out the discharge will occur directly onto exposed mudflats.

- 4.2.5 What is the effect of the discharge on the harbour?
The documents provided by Watercare and Council tend to brush aside concerns about the effect of the discharge on the harbour (the receiving environment). Yet, Watercare has made the opposite argument in other locations around the foreshore. In the proceedings regarding the restoration of the Onehunga foreshore, Watercare argued that the impact of the raw sewage discharges from the outfall in the vicinity of the restoration project was so severe that a swimming beach adjacent to the outfall was eliminated from the project. I believe that the risk of negative effects of discharges from the EPR on the receiving environment in the harbour could be substantial, particularly on migratory bird habitat as you have heard from Mr Kitching and Ms Vaughn.
- 4.2.6 In her review Auckland Council's Senior Wastewater Consents Adviser Ms Floyd writes: "The proposal to directly discharge large volumes of diluted raw sewage in an emergency event to a shallow and at times exposed part of the restored foreshore is an issue". P735 Vol 2 Hearing Agenda.
- 4.2.7 Council's Senior Planner Mr. Galimidi in his review stated "the concerns raised in respect of the nature of the discharge in the submission are valid". P713 Vol2 Hearing Agenda.
- 4.2.8 In the Part A of the AEE, it states that "the mean residence time of water in the harbour is in the order of 20 days". (P90) It also shows the tide flow patterns hold water in the bays directly opposite the MWWTP. Please refer to Attachment A. Thus raw discharges will take time to dissipate from the area.
- 4.2.9 As the expert witnesses have stated, even minor changes to the salinity of the water, the availability of food and disturbances to feeding and roosting areas at the wrong time could have disastrous effects on the harbour's migratory birds.
- 4.2.10 Why haven't alternatives been analyzed and provided?
Watercare's proposed outfall from the EPR is a simple structure discharging the full volume of untreated waste and stormwater coming from the CI directly into the Coastal Marine Area (CMA) of the harbour. The proposal contains no plans to reduce this discharge such as through the use of holding tanks on site, bunds or retention ponds, to hold the waste till it can be treated or discharge pipes that

would carry the waste and stormwater to a discharge location potentially causing less damage to the CMA environment.

4.2.11 Ms Floyd states: “The applicant has not provided a lot of detail on alternatives for the discharge””there is inadequate information on the assessment of alternatives to support the proposed actual discharge location.”“ The applicant should provide further information to confirm the proposed discharge point is the Best Practicable Option at the hearing. Such further information should include the assessment of alternative discharge locations where better dispersion could be achieved. This could include the option of a longer buried pipe further into the CMA or the discharge into an upgraded Island Road channel where an EPR discharge is then likely to be subject to better instantaneous dilution and less impact on the marine ecology and sediments.” P737 Vol2

4.2.12 I agree with Ms. Floyd there is inadequate information or assessment of alternatives to support the proposed actual discharge location and insufficient information to assess Watercare’s conclusion it can’t discharge into the current discharge channel. I believe alternatives should be reviewed carefully with a view to avoiding untreated raw sewage and storm water discharges into the Manukau Harbour and further disturbance to the foreshore and seabed. Mr. Jackson and Mr. Demler will be discussing options in more detail in their submissions.

4.2.13 I find it hard to understand why a private company is fined for discharges into the harbour, yet Watercare could be allowed to discharge raw sewage into the harbour.

4.3 **Conclusion:** I believe consideration of alternatives has been inadequate and as designed now, the EPR poses the risk of more than minor damage to the Manukau Harbour.

5.0 Analysis of Alternatives to the Central Interceptor is inadequate but the CI will lock the Manukau Harbour into another 50+ years of receiving waste discharges

5.1 **Alternatives review identifying the Central Interceptor project**
The following are my conclusions as a resident attempting to evaluate the large volume of material on the project.

5.1.1 Lack of public input into criteria: Watercare conducted an alternatives analysis that resulted in the identification of the Central Interceptor project which would take combined waste and stormwater to the MWWTP. This alternatives analysis is summarized in the Three

Waters Final Strategic Plan 2008 (Three Waters Plan) P26 – 48. What is striking about this alternatives analysis is that it did not include any community input. Criteria used to assess alternatives, anticipated costs and significant items such as desired outcomes were all developed absent general public review and input. For instance, had the list of important outcomes on p35 been reviewed by residents around the Manukau Harbour it most likely would have included the desire to minimize further increases in discharges to the Manukau Harbour. The public has been given no opportunity to make tradeoffs between options based on broader outcomes desired by the community around water, storm water and wastewater, than the narrow set defined by Watercare.

- 5.1.2 Little public review means too narrow a focus on how costs are defined: The public may take a broader view of costs, such as those to society, than Watercare’s narrow focus on the costs incurred by its customers. For instance, the public may be willing to accept higher costs entailed in some options to achieve other outcomes such as improved environmental outcomes, reduced harbour discharges or reduced societal costs for fresh water by reusing water and thus reducing takes of fresh water from the Waikato. And in the cost analysis, where is the cost to Watercare for discharging into the harbour. Why is Watercare allowed to do so at no cost?
- 5.1.3 Lack of public submissions. The Three Waters Plan was developed with input from stakeholders, but did not include an opportunity for the public to make submissions on alternatives prior to the Central Interceptor being identified as a preferred option. As said before, the general public, people such as myself and residents around the harbour, have not had input into the alternatives from which the CI was selected, even though the project will have a profound and long term impact on our harbour. A project of this magnitude, with these long term ramifications and significant costs deserves rigorous public and professional scrutiny. This has not happened.
- 5.1.4 Lack of “3 waters” integration: The Central Interceptor was quickly identified without apparent analysis and inclusion of options such as:
- separation of stormwater and wastewater systems;
 - use of distributed stormwater holding tanks to reduce peak flows to treatment plants and minimize wet weather overflows;
 - reduction in stormwater infiltration into wastewater systems;
 - on-site design approaches to reduce peak storm water flows from private property; and
 - reuse of storm or wastewater for urban purposes or reinjection for aquifer recharge.

All these options could produce a different type of project. All were identified in the Three Waters Plan as important components of an integrated “3 waters” system and the future of Auckland’s water system. None of these components are fully incorporated in the CI project. Because the CI combines storm and wastewater, it could limit Auckland’s future options for better reuse of its water resources, stormwater in particular. Given the increasing scarcity and cost of water, should the city be turning its back on major sources of water that could have multiple applications – irrigation for instance, water for toilet flushing and other nonpotable household purposes or specific industrial processes as called for in the 3 Waters Plan (p6)?

- 5.1.5 Reducing raw sewage flows to the Manukau: The alternatives analysis does not appear to include reducing the overflows of raw sewage into the Manukau Harbour. The focus has been on cleaning up the Waitemata Harbour.
- 5.1.6 Lack of consideration of effects on the Manukau: Assessment of impacts and benefits of alternatives to harbours appear to be confined to the Waitemata harbour. Alternatives to additional discharges into the Manukau Harbour do not appear to have been assessed adequately. Assessment of the effects of the current discharge on the Manukau Harbour focused on nitrogen and did not address the suspended solids and other components of the discharge. And there appears no assessment of the cumulative effects on the Manukau harbour of the maximum discharge allowed under current resource consents, plus the projected maximum discharges that the CI is sized to carry in the future and additional discharges from other growth. This focus on the Waitemata and absence of evaluation of the cumulative effects on the Manukau is continued from the 3 Waters Plan through the AEE conducted on the Central Interceptor.
- 5.1.7 Analysis of the effects of the CI project on the Manukau Harbour as a whole in the AEE appears inadequate and confined to a one and a half page description of the harbour (Pages 90 and 91 Part A AEE See Attachment A). Changes to salinity due to the large volumes of stormwater carried by the CI have been assessed on a generalized basis rather than the specific effects this could have on marine habitats which, as the experts have testified, are extremely sensitive to such changes. Again, assessment of environmental effects appears focused on the benefit to the Waitemata Harbour and the localized effects at the various construction sites.
- 5.1.8 Summary: Thus in both the 3 Waters Plan and the AEE there appears to be inadequate assessment of alternatives to discharging into the Manukau Harbour; inadequate assessment of the current condition of

the harbour; inadequate assessment of the effect of increasing discharges to the harbour and cursory analysis at best of changing the concentration of discharges that will occur as a result of the CI on the Manukau Harbour.

5.2 **The CI predetermines an increase in capacity at MWWTP and the CI locks the Manukau Harbour into discharges for next 50 – 100 years**

- 5.2.1 The Central Interceptor is being sized to serve the central isthmus for another 50+ years. It is also viewed by Watercare as a foundation element in its future wastewater system into which will be connected additional new interceptors. (As stated in numerous places in the AEE and Evidence). All this waste is to be treated at the MWWTP.
- 5.2.2 However, Watercare says the capacity of the MWWTP will be reached in approximately 2027 and the resource consents to discharge expire in 2032. To discharge the volume of waste that can be carried by the Central Interceptor will require new resource consents for the MWWTP with greater discharge volumes. The CI presupposes these consents will be granted.
- 5.2.3 Watercare has identified that current discharges are degrading the quality of the Manukau Harbour and has begun a project to reduce nitrogen discharge load. And future increases in discharge are dependent on lower nitrogen discharge loads (p43 Three Waters Final Strategic Plan).
- 5.2.4 Clearly Watercare is acknowledging the discharges are creating water quality problems for the Manukau Harbour. What else is unknown is the effect of other components of the discharge such as the effect of the 7 tonnes of suspended solids discharged every day on the noticeable sedimentation occurring in the harbour. Are suspended solids and nutrients in the discharge contributing to the general problems in the harbour such as siltation of the Mangere Inlet, around the Onehunga Wharf and in streams, or the proliferation of mangroves?
- 5.2.5 Watercare has been unable to provide MHRS with information that demonstrates that it is evaluating the effect of current discharges on the harbour. What is important to know is how these effects compare to the NIWA modeling upon which the current resource consents to discharge into the harbour are based, before approving a project that has the capacity to bring greater volumes of discharge to the harbour. And Watercare has not been able to provide MHRS with accurate

information on the raw sewage discharges from the approximately 46 other sewage and stormwater outfalls around the Manukau Harbour.

5.2.6 If current effects are unknown how can the Commissioners know that future discharges to be carried by the CI (and on which the economics must rely) will be not cause or compound negative effects on the receiving environment?

5.2.7 In essence by building the Central Interceptor as currently conceived, Watercare is forcing the hand of regulators in the future to grant consent for increased discharges into the Manukau Harbour. It is doing so without understanding the effect of discharges on the harbour. The Manukau Harbour will be locked into another 50 + years of receiving large volumes of waste discharge.

5.3 **There are other unknown elements of the CI project affecting its assessment**

5.3.1 There are two other important unknowns that will affect future discharges into the Manukau Harbour. The discussion in the Three Waters Plan casts doubt on whether the current discharge point from MWWTP can continue yet it eliminates both the Papakura Channel and a Tasman Sea discharge pipe as options. How then will future waste be discharged from the MWWTP? And as I will cover later, how will projected growth in South Auckland be served by the wastewater system and will it entail discharges at other locations in the harbour?

5.3.2 Other details of the Central Interceptor haven't been finalized and therefore the full effect of the project can't be evaluated. These details are of concern for communities adjacent to the individual construction sites as the "details" could have considerable impact on the communities at the time of construction. In the case of Kiwi Esplanade and the Mangere foreshore could have considerable impact on roosting sites as described by Mr Kitching and Ms Vaughn. "Details" could also affect the long term usability of the parks and open spaces. Where is the Community Liaison Group to work along side Watercare to ensure these details are acceptable to the community?

5.4 **Why doesn't CI include upgrades to reduce current raw sewage discharges into Manukau Harbour?**

5.4.1 Watercare makes the statement in the Three Waters Final Strategic Plan on P28: " It is no longer acceptable to the people of Auckland to have: Sanctioned discharges of untreated or poorly treated wastewater to water; and unlimited wastewater overflows.." Yet this is happening in the Manukau Harbour now through its approximately

46 outfalls and Watercare has made no effort to address these discharges in the Central Interceptor Project.

- 5.4.2 And why is there a double standard – why is Watercare allowed to continue with raw sewage discharges without penalty while a private party would be fined? It makes a mockery of Council’s efforts to have the farmers on the Manukau fence off their streams to avoid contamination of water flowing into the harbour when Watercare discharges raw sewage on a regular basis. And why haven’t upgrades to these outfalls on the Manukau been included in the Central Interceptor project?
- 5.5 **Is Council’s review independent and sufficiently rigorous?**
Auckland Council is the regulator, but it owns Watercare, the applicant. How can the public be assured rigorous review of the proposed project has occurred? Have Council officers been pressured to provide favorable reviews of the project? We note that the evidence supplied by Watercare includes evidence by Craig McIlroy who is employed by Auckland Council as the Manager, Stormwater, not Watercare. This is an example of why we question the independence of Auckland Council’s review.
- 5.6 **Local Boards have been excluded:** As designs for the Central Interceptor Project have progressed, selected Local Boards, who should provide some of the citizens viewpoints on the projects, were briefed but not all Local Boards that are affected, for instance all the boards around the Manukau Harbour, were briefed. Local Boards have been prohibited by the Governing Body from submitting on resource consents and hence the project. The process has lacked sufficient input from citizens and our elected representatives.
- 5.7 **Summary:** The Central Interceptor predetermines that the Manukau Harbour will receive increased waste and storm water discharges for the next 50+ years, without there being analysis of the effect of current and cumulative future discharges on the receiving environment (the Manukau Harbour) or sufficient public scrutiny of alternatives and effects and public buy in to the preferred future system. We believe the evaluation of alternatives to the CI is inadequate, evaluation of the environmental effects of the CI has been inadequate and the potential damage to the harbour over the long term could be substantial. The Central Interceptor essentially transfers a problem from the Waitemata Harbour to the Manukau Harbour.

- 6.0 Watercare's long term system plans, including the Central Interceptor, are not coordinated or consistent with the Unitary Plan
- 6.1 Substantial issues with the capacity of water, stormwater and wastewater systems have arisen through the Unitary Plan process that call into question the advisability of approving the Central Interceptor project at this time.
- 6.2 **Different growth projections:** Of concern is that Watercare and Auckland Council are using substantially different population projections, a difference of approximately 250,000 new people over the next 30 years. Watercare is using medium growth projections while Auckland Council is using high growth projections. Obviously the difference in projected new residents and households could have an important bearing on the size of future wastewater systems required to serve them, with the danger that Watercare's system will be substantially undersized.
- 6.3 **Different growth areas:** The Unitary Plan is indicating future new growth areas with more population in different locations than Watercare's plans. In Watercare's submission to Council on the Unitary Plan it asks for clarity on the sequencing of growth areas. This is particularly important in the southern RUB as plans have not been finalized as to how wastewater service will be provided. If another treatment plant is proposed that discharges into the Manukau or if this growth is to be served by interceptors connected to the MWWTP, either way, discharges into the Manukau will be increased. These increases have not been accounted for with the proposed additional future discharges coming to the Manukau from the Central Interceptor.
- 6.4 **Insufficient capacity for intensification:** Watercare's submission on the Unitary Plan says that Watercare's existing water and wastewater infrastructure does not have the capacity to serve the level of intensification in existing areas of Auckland as provided for in the Unitary Plan.
- 6.4.1 Watercare's submission states:
"Since the AMP (asset management plan) process was completed, the Auckland Plan has been approved and the draft Auckland Unitary Plan has been released for consultation. Both of these documents indicate different patterns of land use development than have been provided for in Watercare's AMP." (P1 Issue Paper2: Growth and Intensification. Watercare submission to Auckland Council on the Unitary Plan. See Attachment C)

6.4.2 Continuing “In particular, the Unitary Plan indicates a substantial amount of infill intensification in suburban areas in the form of new Mixed Housing and Terraced Housing and Apartment Building zones. Together these zones are extensive and cover approximately 56% of the residential zones in the existing metropolitan area. In a number of areas, the existing networks do not have enough capacity to cater for the full development potential of these zones as proposed in the draft Plan. Unless upgraded there will be a loss of service in the water supply network (resulting in lower water pressure and fire fighting capability) and increases in the overflows from the wastewater network, potentially exceeding the design target of no more than two per discharge per location per year.” P1 Issue Paper2: Growth and Intensification.

6.4.3 Intensification is focused on the Central Isthmus and West areas, all areas to be served by the Central Interceptor.

6.4.4 If major components of the existing network have to be replaced either because its reached the end of its life (as indicated by Watercare) or capacity needs to be expanded, doesn't this give Watercare and Council the opportunity to require private developers to separate storm and wastewater pipes and incorporate designs that reduce stormwater flows? And if private developers are footing this cost doesn't that alter Watercare's cost estimates for separation of storm and wastewater? And if its own system needs expanding and replacing, doesn't this provide Watercare with the opportunity to separate storm and wastewater in its own infrastructure? Should the Central Interceptor continue to be designed as a combined waste and stormwater interceptor? Dr Barton's testimony has pointed to some of the potential problems with pursuing this strategy.

6.5 **Lack of integration of water, wastewater and stormwater policies in the Unitary Plan:** The 3 Waters Plan calls for better integration of water supply, wastewater and stormwater services (P2). In particular it calls for reduced leakage in systems, reducing water use, increasing reuse of wastewater, reducing stormwater contaminants and reducing stormwater flows through greater use of low impact design techniques. When we asked Watercare about how these are implemented in the Unitary Plan the response was that was not Watercare's concern, it was that of Auckland Council. (Personal notes; Meeting with Jim Hodges, Alistair Shanks March, 2013). Where are these policies in the Unitary Plan?

6.5.1 Are you as Commissioners satisfied that these provisions are included in the Unitary Plan and that everything is being done to develop the

most appropriate and cost effective waste and stormwater system possible for Auckland that reduces the flows into the Central Interceptor and hence flows into the Manukau Harbour, and hence keeps to a minimum the effect on the Manukau Harbour?

6.6 **Asset Management Plan:** Watercare develops an Asset Management Plan every 3 years. It is about to embark on a new AMP. The Unitary Plan is being refined and there will be greater clarity on new growth areas and levels of intensification by next year.

6.6.1 Watercare identified a large number of problems with the Unitary Plan. I refer you to all the issues papers submitted by Watercare on the draft Unitary Plan. Shouldn't these issues with the Unitary Plan be resolved before the CI project is approved and Auckland is locked into this solution which may not be appropriate, when the future entire system for water, wastewater and stormwater across Auckland are evaluated? Shouldn't Watercare be taking more time for the Unitary Plan and their AMP to be completed, allowing greater integration between Watercare and Auckland's growth plans, before approval of the Central Interceptor is finalized? Given all the new information, changes and unknowns indicated by the Unitary Plan, is the Central Interceptor project as currently conceived still the right project to pursue? Would other alternatives or combination of options and alternatives to the Central Interceptor make more sense, cost less comparatively and have lesser effects on the Manukau Harbour?

6.7 **Summary: Delay the Central Interceptor decision:** Watercare and Auckland Council have a significant opportunity to reassess the need for and configuration of the CI and hence flows into the Manukau Harbour if they take more time. Can the Commissioners be satisfied that the Central Interceptor as currently envisioned is the appropriate investment at this time? Can the Commissioners be satisfied that there is sufficient consistency between Auckland Council policy and Watercare's system plans? Wouldn't we be better off as a community if the Central Interceptor was put on hold until these major issues are resolved?

7.0 What is the urgency?

7.1 **Life expectancy of key components:**
As stated by Watercare, two drivers for the Central Interceptor are: 1. replacing the final 7 kms of the Western Interceptor - the Hillsborough Tunnel and the Manukau Siphon. This section has an estimated remaining life of between 15 and 25 years. And 2. adding capacity to the Orakei Interceptor which is expected to reach capacity

in 10 to 15 years. The third driver is to significantly reduce the major wet weather overflows in areas of central Auckland. (1.12 a,b,c P4 Munro.)

7.2 While it is clear from these timeframes it is prudent for Watercare to be planning for infrastructure improvements, it is not so urgent that Watercare should hurry a decision and potentially not make the best decision. Watercare argues that it is urgent to reduce the raw sewage discharges into the Waitemata. But if that is so, why isn't it equally urgent to stop the raw sewage discharges into the Manukau? The proposed CI project does not include any plans to reduce these discharges.

7.3 **Summary:** Given the size of the investment proposed, that the CI is slated to be a pivotal piece of the system going forward into the future, and the life expectancy and capacity of its existing system, Watercare has the time to reconcile its plans with those of Auckland Council, determine key components of its system in the future such as facilities to serve the Southern RUB and conduct the necessary analyses we've identified as lacking and consider modifications and alternatives to the CI as currently planned.

8.0 Conclusions

8.1 EPR as presently planned by Watercare has insufficient protections for the Manukau Harbour and poses the risk of significant environmental damage to the harbour. Alternatives should be pursued further that could better protect the Manukau Harbour.

8.2 The Central Interceptor as presently conceived is not adequately integrated with Auckland's future wastewater, water and stormwater system needs or Auckland's future development patterns. Evaluation of the long term effects of the CI on the Manukau Harbour was inadequate and alternatives to discharging into the Manukau Harbour were not evaluated adequately.

8.3 The Central Interceptor locks the Manukau Harbour into another 50 or more years of increased waste discharges without any analysis of the impact of current or cumulative future discharges on the harbour and without including strategies to reduce the existing significant raw sewage discharges into the harbour.

8.4 What is the urgency? The Central Interceptor is putting in place a foundational piece of infrastructure for the next 50- 100 years. The cost is substantial. The potential impact on urban development of

Auckland is significant. Given the sensitivity of the harbour's bird and marine life, the long term effect on the Manukau Harbour if Auckland's wastewater and storm water systems are not planned correctly, could be devastating. Shouldn't we be taking the extra time needed to get this right?

9.0

Request

That the Commissioners recommend the applications for NOR be withdrawn and applications for resource consent be declined.

Thank you for your consideration.