Appendix C: Table of points raised by Iwi and Hapu referenced to Watercare witnesses' evidence

Submission Point	Evidence Reference	
Te Ākitai Waiohua Waka Taua Trust on behalf of Ngāti Pare Waiohua, Ngāti Pou Waiohua and Te Ākitai Waiohua		
Additional flows to the Mangere WWTP.	Mr Munro, Mr Cantrell and Mr Cooper.	
Discharge from the EPR Structure.	Mr Cantrell and Mr Roan.	
Risk with retention of the Manukau Siphon.	Mr Cantrell.	
Commitment to the construction of the additional planned projects over the next 20 years at the Mangere WWTP.	Mr Munro.	
The need for clarification and certainty around what offsets, remediation and mitigation will be implemented as part of the Project in the event that undiluted wastewater discharges to the Manukau Harbour.	This evidence.	
The need for clarification and certainty around what remediation and mitigation will be implemented to offset increased wastewater discharges to the Manukau Harbour that will occur as a result of the project.	This evidence.	
The need for Watercare commitment to a timetable for the construction and operation of the Biological Nutrient Removal Plant, Wet Weather Treatment Plant and Northern Interceptor within a set timeframe as part of a mitigation package.	This evidence, Mr Munro.	
A partnership agreement with Watercare in relation to the occurrence of the above matters.	This evidence.	
Inadequate consultation with Tangata Whenua.	This evidence.	
Ngāti Tamaoho		
The Notice of requirement does not address or mitigate the adverse environmental effect on the Manukau Harbour in terms of: Ecological values	Mr Slaven (ecology), this evidence (cultural), Mr Cantrell (public health).	
Cultural and spiritual values		
Public health		
The Central Interceptor Project will significantly increase the volume of "freshwater" discharged to Manukau instead of Waitemata.	Mr Cantrell.	
That the full impacts of the Project on the Manukau Harbour have not been	This evidence, all expert evidence, particularly Mr Slaven, Mr Cantrell and Mr Roan.	

thoroughly investigated.	
Ngāi Tai Ki Tamaki Tribal Trust (David Beamish)	
Notice of Requirement and associated project work is contrary to and inconsistent with section 5 (2) of the Resource Management Act and in particular to part (c) relating to avoiding remedying or mitigating adverse effects of activities on the environment.	This evidence, Mrs Russ, legal submissions.
The Notice of Requirement and associated project work is contrary to and inconsistent with section 7 of the Resource Management Act (in terms of the Manukau Harbour) relating to: i.The maintenance and enhancement of amenity values ii.The intrinsic values of the ecosystems	This evidence, Mrs Russ, legal submissions.
iii.The maintenance and enhancement of the quality of the environment	
The Notice of Requirement and associated project work does not address or mitigate the adverse environmental effect on the Manukau Harbour, in terms of: i. Public health ii. Ecological values iii.Amenity values iv.Cultural values	Mr Slaven (ecology), this evidence (cultural), Mr Cantrell (public health), Mr Goodwin (amenity), Mr Munro/Ms Peterson (costs).
v.Costs	Mar Dung and In and authorization
The Notice of Requirement and associated project work is not in accordance with the objectives and policies of the New Zealand Coastal Policy Statement 2010 in terms of discharges and potential overflows to the Manukau Harbour.	Mrs Russ and legal submissions.
The proposed project work does not include any work that will avoid or mitigate any actual or potential discharge or overflow of wastewater to the coastal marine area of the Manukau Harbour.	Mr Munro and Mr Cantrell.
The Notice of Requirement, Consent Application and supporting documentation does not include adequate information to support the statement that the proposed work is within the scope of the existing designation for the Mangere Wastewater Treatment Plant and especially the: capacity of the network (existing and proposed), hydrological modelling, including discharge capacity, and potential discharge from the emergency outlet.	Mr Munro and Mr Cantrell.
The Notice of Requirement and supporting documentation is inconsistent in the assessment of the reduction of average annual wastewater discharge for wet and dry weather events.	Mr Cantrell.

The Notice of Requirement and supporting documentation is inconsistent with Auckland Council policy relating to population growth (intensification and containment within the existing urban area).	Mrs Russ and legal submissions.
The Notice of Requirement and project work does not include provision of work which will reduce or mitigate the discharge of overflows from existing outlets and network into the Manukau Harbour.	Mr Cantrell.