
To:	Emily Buckingham Chloe Trenouth	From:	Jim Bradley
	Hill Young Cooper		Auckland
File:	Ohinewai Rezoning	Date:	August 27, 2020

Reference: Ohinewai Rezoning – Key Issues Update – Water and Wastewater**Purpose**

The purpose of the Memo is to review the Ambury Properties Limited (APL) evidence and prepare a short summary of outstanding issues. Now that the Waikato Watercare Mid-Waikato Water & Wastewater Servicing Strategy June 2020 (MWSS) has been provided, I have also made some additional comments on that document.

Previous information supplied by Jim Bradley, Stantec

- Stantec Three Waters Report February 2020, included as Appendix 8 of the Section 42A Report
- Stantec Memo Water Supply and Wastewater Summary Update, June 9, 2020
- Input into the Joint Witness Statement of Experts in Relation to Water Supply & Wastewater Servicing

It is noted that there has been an ongoing development and refinement of water and wastewater matters beginning with the Woods November 2019 reports, through to the GHD Memos and now the APL evidence and the MWSS.

Most recent information considered

- APL evidence in chief and rebuttal of Robert White which addresses water and wastewater.
- APL evidence in chief of David Gaze which includes comments on water and wastewater matters including Attachment F which contains the correspondence from the Te Kauwhata Water Association Inc.
- Bloxam, Burnett and Olliver Memo regarding the removal of the discount factory outlet, 27 July 2020.
- Mott MacDonald, Stantec Mid Waikato Water & Wastewater Servicing Strategy (MWWSS), June 2020, prepared for Waikato Watercare.
- APL rebuttal evidence of David Gaze including the signed (21 August 2020) Memorandum of Understanding between APL and Waikato District Council.
- Statement of evidence of David Mayhew for Waka Kotahi NZ Transport Agency and Waikato Regional Council – Planning.
- Statement of evidence provided by Gavin Donald on behalf of Waikato-Tainui.
- Statement of evidence provided by Kenneth Tremaine on behalf of the Future Proof Implementation Committee.

Limitations and Assumptions

Stantec's February 2020 Report (being Appendix 8 to the Section 42A Report) sets out the scope in terms of it principally being a technical assessment including consideration of resource consents/water take permits in place and required in the future.

That Report lists a number of limitations and assumptions relating to Stantec's involvement. In respect to Stantec's further involvement since that Report these limitations and assumptions now also include:

- Detailed assessment of the MWSS Report has not been undertaken other than a relatively high level technical and consents requirement assessment
- Consideration of the ease or difficulty of securing future new water take permit(s) and a wastewater discharge consent(s) has not been undertaken and is generally outside the area of my expertise.
- Assessment of Maori cultural values integrated with meeting the Te Ture Whaimana Vision and Strategy for the Waikato River has not been undertaken as this is outside my area of expertise.

- Detailed consideration of agreements between APL and WDC in respect to funding and other requirements has not been undertaken other than the need for agreement on technical aspects of the infrastructure APL will install.

Summary update of key issues

APL has proposed the following staged development of the water supply and wastewater services

- **Short term 0-2 years.** This allows for the development of the initial stages of the Sleepyhead factory which will employ approximately 50 people.
 - Water supply will be provided by on-site servicing including rainwater tanks augmented from an on-site bore if required¹. The groundwater take(bore) is authorised as a permitted activity under the Waikato Regional Plan².
 - Wastewater will be serviced on-site by an existing Biocycle Aerated Wastewater Treatment System discharging to land. This system has already been consented³. The Joint Witness Statement agreed that this system is appropriate provided maintenance and operations are undertaken in line with the manufacturer's specifications. APL has engaged A-Rated Wastewater Services Ltd to ensure the wastewater system is operated in accordance with the system's requirements⁴.

Providing the relevant drinking water requirements are achieved and the wastewater system is appropriately operated then the proposed short-term approach is in my opinion appropriate.

- **Medium term 3-6 years.**
 - Water Supply - the GHD Memo recommended (Recommendation 1) that the preferred option was the use of the existing capacity at the WDC Huntly Water Treatment Plant via a dedicated delivery main. The Memo acknowledges the need to secure a resource consent to take additional water from the Waikato River to cater for growth and suggested consideration should also be given to the reallocation to the Huntly water take of the underutilised Te Kauwhata Water Association allocation.

The APL evidence confirms this approach highlighting that additional consent capacity would be needed when demand exceeds the consented take volume for the Huntly Water Plant.

Attached to David Gaze evidence is correspondence from the Te Kauwhata Water Association which sets out that the Association agrees to supply APL with up to 4,300m³ per day of untreated water for a period of not less than 10 years. This volume is the same amount required for the peak daily demand identified in the Woods Water Supply Report.

The key issue is the availability of this water once the Association's consent expires on 30 June 2024. Given that the Association is not a municipal supplier there is a lack of certainty regarding whether it will be allocated the volume of water provided under its current take. It is also noted that the agreement with the Association is for not less than 10 years.

- Wastewater servicing – both the GHD Memo and the APL evidence of Robert White propose conveyance of the wastewater to WDC's Huntly Wastewater Treatment Plant (WWTP) which has capacity to accommodate the proposed volumes under the existing discharge consent. This is confirmed in the Joint Witness Statement. However, the Huntly WWTP is not in compliance with its current consent. The non-compliance needs to be addressed before the WWTP receives the proposed volumes. There are also some planning issues that need to be addressed with the existing consent to enable it to accommodate the proposed Ohinewai volumes.
- **Long term 7 years +**
 - Water supply - the APL evidence of Robert White sets out that in the long-term water will be supplied by WDC / Watercare Waikato as proposed by the MWSS. The MWSS identifies that the preferred option (Option 1a) is a centralised scheme for the Mid Waikato, with a new water take from the Waikato River and a new treatment plant at Te Kauwhata. Ohinewai will initially be serviced from the Huntly Water Plant and then from the new plant at Te Kauwhata.

¹ Evidence Robert White para 2.3

² Evidence Davis Gaze para 6.6, 7.11

³ Evidence Robert White para 2.28, 6.2

⁴ Evidence Davis Gaze para 6.6

The MWSS identifies that the new Te Kauwhata Water Plant will be constructed in 2025 horizon. The key issue is that WDC has yet to lodge a consent for the water take for the new Te Kauwhata Plant and WDC / Watercare Waikato has yet to develop a strategy for procuring the required take. There is therefore uncertainty regarding securing the future water supply for the Te Kauwhata Plant. This is the same issue identified above in terms of the medium term for the supply of water.

- Wastewater servicing - the APL evidence of Robert White sets out that in the long-term wastewater servicing will be supplied by WDC / Watercare Waikato as proposed by the MWSS. The MWSS identifies that the preferred option (Option 2b) is a centralised WWTP for the Huntly and Ohinewai catchments at Huntly. The MWSS identifies that the new Huntly WWTP will be constructed in 2025 horizon. It is noted that new consents will be required for the discharge from the new Huntly WWTP.
- **Removal of the discount factory outlet** - Bloxam, Burnett and Olliver Memo regarding the removal of the discount factory outlet raises the issue of whether the additional 5.5ha of industrial zoning will substantially increase the water supply requirements and wastewater generation over and above the volumes previously advised by APL in the Woods reports. This matter needs to be addressed by APL.

Summary and Conclusions of Key Issues

- For both the medium and long term the proposals involve the utilisation of WDC / Waikato Watercare schemes.
- A Memorandum of Understanding has been signed between APL and WDC relating to the provision of the proposed infrastructure for the medium and long term development. This includes that the proposed infrastructure will need to be consistent with the MWSS.
- The proposals for all three stages of development are all technically feasible.
- A staged development as summarised above is appropriate. The short term 0-2 years with onsite servicing of the Sleepyhead factory should allow time for the medium terms solutions to be implemented providing the water take matter is resolved.
- Planning provisions need to be put in place that restrict proposed development in the medium and longer term until the necessary water take permits and wastewater discharge consents as required for each stage are in place.
- The medium term proposal for water supply is dependent on the Te Kauwhata Water Association obtaining a new consent for its water take for at least the volume required for the Ohinewai development.
- The long term proposal for water supply is dependent on WDC securing a water take consent for the required volume for the new Te Kauwhata Water Plant.
- The medium term proposal for the wastewater servicing will require WDC to address the compliance issues with the current Huntly WWTP and the planning consent issues in terms of connecting the Ohinewai development. Feasible and technically proven solutions are available to address the compliance issues. The GHD consultants report of 15th May 2020 identifies some of these possible solutions.
- Agreement was reached during expert conferencing that the Huntly WWTP needs to be compliant with its current consent before and after connection of the proposed medium term development.
- The long term proposal for wastewater servicing is dependent on WDC securing a discharge consent for the new Huntly WWTP.
- All proposals for the medium and long term are dependent on APL obtaining servicing, engineering standards for infrastructure installation and funding agreements with WDC.
- The MWSS has identified preferred technical solutions for the long term provision for water and wastewater. That report identifies several areas that require further investigation and consultation with stakeholders. These include developing a consenting strategy, securing water takes early, receiving environment investigations and iwi and stakeholder consultation.
- The MWSS assumes advanced wastewater treatment processes will be required for the future discharge consent(s) for a Waikato River discharge as increasingly more stringent standards are expected to be required. Such consent(s) will be required for an (extensively) upgraded Huntly WWTP after expiry of the current consent in 2029.

- Clarification is required from APL regarding the implications for water supply and wastewater servicing associated with the additional 5.5ha of industrial zoning.

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