

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission in respect of the **PROPOSED WAIKATO DISTRICT PLAN** by **AMBURY PROPERTIES LIMITED** pursuant to Clause 6 of Schedule 1 of the Act to rezone 178ha of land at Ohinewai

**STATEMENT OF REBUTTAL EVIDENCE OF
ROBERT JAMES HAMILTON WHITE**

1. **INTRODUCTION**

1.1 My full name is Robert James Hamilton White. I am employed by GHD Limited as the Business Group Leader: Northern Water and Wastewater Group, a position I have held since July 2016.

1.2 I have outlined my qualifications, experience and commitment to comply with the Environment Court Expert Witness Code of Conduct in my evidence in chief ("EIC").

1.3 I have read the statements of evidence of all the following witnesses:

(a) Kenneth John Tremaine for the Future Proof Implementation Committee; and

(b) Ian David Mayhew for Waka Kotahi NZ Transport Agency and Waikato Regional Council.

Purpose and scope of rebuttal evidence

1.4 This statement of rebuttal evidence addresses additional points raised in the evidence of other submitters or where a contradicting expert opinion has been made to that which I put forward in my EIC. It does

not restate matters addressed in my EIC but addresses new issues raised in the evidence of other submitters.

1.5 I note that the Mid-Waikato (Water & Wastewater) Servicing Strategy¹ (MWSS) has now having been issued by Waikato District Council (WDC) /Watercare Waikato (Watercare) for comment by stakeholders. The MWSS is a key strategic document that I referred to often throughout my EIC – with this document now been issued, I can provide further comment, in particular where other submitters’ evidence has referred to it.

1.6 Specifically, I address the following:

- (a) Overview of the MWSS (Section 2);
- (b) Staging of the development of the OSP area (Section 3);
- (c) Upgrades required to existing infrastructure (Section 4);
- (d) Long term servicing – MWSS (Section 5);
- (e) Cost of water and wastewater servicing for the OSP area (Section 6); and
- (f) My conclusion (Section 7).

2. **OVERVIEW OF THE MWSS**

2.1 The MWSS was commissioned by Watercare (on behalf of WDC) and has now been released for comment by key stakeholders. The MWSS has been developed on the basis that: ²

"the mid-Waikato region is undergoing rapid population growth and required a long-term strategy for water and wastewater servicing".

2.2 The purpose of the MWSS is to:

"develop the strategy, including analysing options and determining a preferred set of solutions for water supply and wastewater servicing".

¹ Mid-Waikato Water & Wastewater Servicing Strategy (MWSS), June 2020, prepared by Mott MacDonald and Stantec on behalf of Watercare Services Limited.
² Section 1.1 MWSS, June 2020.

- 2.3 The MWSS area *encompasses five urban centres within the mid-Waikato Region: Meremere, Te Kauwhata, Rangiriri, Ohinewai and Huntly*³. As the long term strategic plan for Ohinewai, the MWSS is highly relevant to the OSP area, and how the OSP area should be serviced for water and wastewater, in particular, to align service level, investment and timing across the sub-region.
- 2.4 The MWSS builds on previous studies with updated growth forecasts, revised options to suit the new growth predictions and updated costings. The MWSS identifies a long-list phase to capture all possible options, including alternative water sources, alternative treatment and disposal technologies for wastewater and complementary strategies such as demand management and re-use⁴.
- 2.5 The MWSS identifies options that were short-listed through a series of workshops with Watercare and WDC, including identification of fatal flaws, high-level costings and assessment against the key environment, social, cultural, operational and financial criteria.
- 2.6 Based on the multi-criteria analysis, the MWSS identified the following preferred options:
- (a) **For water supply:** A centralised scheme for Mid-Waikato, with a new water intake and treatment plant at Te Kauwhata. Ohinewai is serviced initially from Huntly and then from Te Kauwhata. Huntly continues to be supplied from the Huntly WTP⁵.
 - (b) **For wastewater:** A centralised WWTP for the Huntly and Ohinewai catchments, located in Huntly. A standalone WWTP in Te Kauwhata for that catchment. Both WWTPs will be discharging to the Waikato River⁶.
- 2.7 I have attached figures from the MWSS which show each of the above preferred options for water and wastewater servicing (see **Attachment A** and **Attachment B**). I had discussions with Watercare staff in early June, and my EIC was prepared on the basis of these discussions and the likely options – which have been confirmed with release of the MWSS.

³ Section 1.2 MWSS, June 2020.

⁴ Section 3.1 and 3.2 of the MWSS, June 2020

⁵ Identified as "Option 1a" for water supply in the MWSS, 2020.

⁶ Identified as "Option 2b" for wastewater in the MWSS, 2020.

- 2.8 The MWSS is a document of key strategic importance, and in my view any development within the mid-Waikato area needs to be cognisant of, and seek to implement this long term strategy.
- 2.9 The MWSS outlines long-term servicing solutions for the OSP area in relation to water and wastewater. These options align with the proposed solutions from Stage 2 onwards of the OSP area as outlined in my EIC (with Stage 1 being on-site solutions).
- 2.10 Further work needs to be undertaken in relation to the development of the options in the MWSS, in particular the 'risks and opportunities' (Section 7) and the 'next steps' (Section 8) of the MWSS. However, the MWSS, in my view provides the framework for how decisions should be made so as to enable the identified mid-Waikato strategic approach and also to discourage proposals which do not align, or detract from the potential realisation of the wider strategy.
- 2.11 I consider that the OSP area can and will align with the MWSS identified preferred water and wastewater options as currently proposed. address specific issues relating to the MWSS in in response to the evidence of Mr Mayhew and Mr Tremaine in the following sections of this statement of rebuttal evidence.

3. **STAGING OF DEVELOPMENT**

- 3.1 Mr Tremaine states, in paragraph 8.4 of his evidence, that he has:

"...concerns about the relationship between the staging of the development and the provision of infrastructure".

- 3.2 In my view, the proposed staging is entirely appropriate, with the initial stage being serviced via on-site means for both water and wastewater. The initial on-site servicing during Stage 1 also provides time for the interim solution for servicing the Ohinewai development to be developed and implemented. The interim/medium term solutions for water and wastewater are not required until approximately 2023 as per Section 2.22 of my EIC.
- 3.3 The MWSS has identified preferred options for both water and wastewater for the long term with which the OSP area 'interim' (from Stage 2 onwards) solutions can effectively align. As per paragraph 7.2 of my EIC, it is important to have in place plan provisions that restrict development until such a time as suitable water supply and wastewater infrastructure is confirmed to be available, as is proposed.

4. **UPGRADES REQUIRED TO INFRASTRUCTURE**

4.1 In paragraph 7.27 of his evidence, Mr Mayhew states that he remains:

"...concerned as to how the critically important issues of water and wastewater servicing are to be addressed in a way that will ensure that the Vision and Strategy objectives in respect of the protection and restoration of the River will be given effect to. While Mr White identifies medium term options for water supply and wastewater, these options appear to rely on additional consenting and/or plant upgrades."

4.2 For water supply, the medium term solution is proposed to be via the existing Huntly WTP water take or Te Kauwhata water take. This solution also aligns with the water take approach outlined as the preferred long-term option in the MWSS. As per my EIC, the proposed approach utilises existing consented water take capacity. The Te Kauwhata water take consent expires in 2024 and I agree that a new resource consent would need to be sought.

4.3 APL has an agreement in place that TKWA will supply water to the OSP area – therefore I understand the OSP area will form part of this expected demand through the re-consenting process.

4.4 Mr Mayhew states that APL has *"not identified the scope of what upgrades are required to the Huntly WWTP nor the feasibility of doing so"* to address the non-compliance of the WWTP discharge.

4.5 As per my EIC, upgrade options are available to achieve compliance that are technically feasible and APL will work with WDC to agree a way forward to achieve compliance in the required timeframes. Further work and discussions are underway with WDC in relation to potential solutions and funding arrangements.

4.6 Importantly, the connection of the OSP area to the Huntly WWTP would only occur if the WWTP was compliant (before, and after, connection). This was also agreed during expert conferencing, and I reiterate my support and agreement to this stance. Upgrading of the Huntly WWTP to meet consent compliance will result in reduced nutrient loading on the Waikato River and thus align with the Vision and Strategy with regards to "betterment".

5. **LONG TERM SERVICING - MWSS**

5.1 As outlined in my EIC, I consider it entirely appropriate that the OSP is serviced for water and wastewater via a strategically identified solution such as that identified within the MWSS. Mr Mayhew states in paragraph 7.31 that *"any consenting of additional water takes and wastewater discharges should not be considered a 'given'"*.

5.2 I reiterate that the proposed solutions for water and wastewater in the medium (post Stage 1 of the OSP development) to long-term utilises existing consented capacity. I acknowledge that resource consents that are due to expire will need to be 'reconsented', however, I leave the consentability of those options to others.

5.3 Mr Mayhew raises points in paragraphs 7.29 and 7.30 that there is concern around the level of detail for the MWSS to deliver on the Vision and Strategy for water supply and wastewater. I note that re-consenting, and option development of MWSS solution(s) would require assessment against the Vision and Strategy and would occur regardless of whether the OSP area was included, or whether equivalent growth was proposed elsewhere - for instance, at Huntly.

5.4 The MWSS has identified preferred options, which is at a high level with much more work to come. However, in my opinion there are technical solutions for servicing Ohinewai which are in alignment with the preferred MWSS options and that would service the mid-Waikato area, including the OSP area and/or other envisioned growth.

6. **COST OF WATER AND WASTEWATER SERVICING FOR THE OSP AREA**

6.1 Mr Tremaine identifies costs being key concern, with the total cost of water and wastewater upgrades as outlined in the MWSS being \$178.4M and that this is a very significant cost of the Waikato area.

6.2 In paragraph 8.5 of his evidence, Mr Tremaine states that

"unless the existing water and wastewater infrastructure investment deficits can be funded, there is a significant challenge for the Ohinewai development once it moves beyond stage One and has to connect to reticulated services if these are not available".

- 6.3 There are two aspects of this statement that I would like to comment on.
- 6.4 Firstly, the OSP area enables additional funding to be sourced to contribute towards the reticulated servicing requirements for water and wastewater. This can be undertaken in a manner that aligns with the preferred solutions identified in the MWSS, for instance, contribution to the reticulated water pipelines linking Huntly and Te Kauwhata, a new Te Kauwhata WTP or upgrades to the existing Huntly WWTP. The OSP is therefore an enabling factor for getting this infrastructure in place. Discussions in respect of funding are underway between APL and WDC and it is intended that a private developer agreement ("PDA") will be in place between APL and WDC in relation to these aspects and the level of contribution. The PDA will outline and confirm the level of contribution and how this would be delivered.
- 6.5 Secondly, Mr Tremaine has also referred to existing infrastructure deficits. Most notably, this is in relation to the performance of the Huntly WWTP, which in recent years has not met the resource consent discharge quality requirements. Beyond Stage 1, the OSP area, will convey wastewater to the Huntly WWTP, which I note is also in accordance with the identified preferred option in the MWSS. As outlined in my EIC, APL have outlined that they will contribute to required works commensurate to the level of demand that the OSP area will place on the WWTP.
- 6.6 These required works would need to be undertaken and the WWTP compliant with its discharge consent conditions before connection to the OSP area – with compliance levels also maintained after connection. Again, the levels of this contribution will also be addressed and secured via the PDA that is currently under development. In my view, the incorporation of the OSP area and the staging proposed for the development, enables and contributes to addressing the existing infrastructure deficits. It is appropriate that these are addressed prior to connection of OSP area wastewater flows.

7. **CONCLUSION**

- 7.1 I have reviewed other relevant evidence submitted in relation to water and wastewater servicing of the OSP area. I remain of the view that the OSP area can be appropriately serviced for water and wastewater in accordance with the staging and planning provisions proposed. Upgrades and contributions to infrastructure that will ultimately be held

and operated by WDC will continue to be refined, as will the development of the PDA. However, there are technical solutions available which, in my view, do not provide any reasons why the OSP area proposed zoning should be rejected from a water and wastewater servicing basis.

Robert James Hamilton White

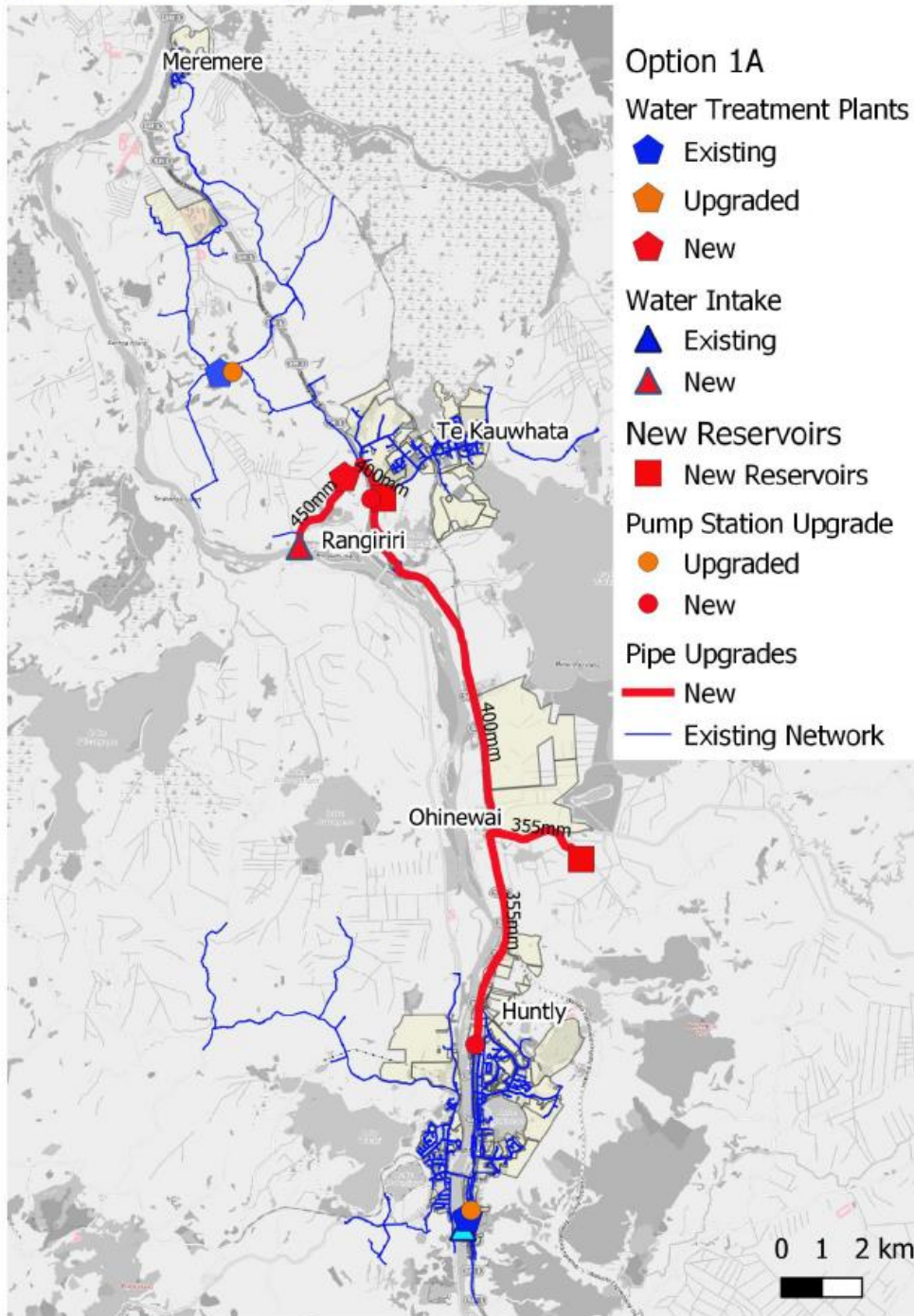
24 August 2020

ATTACHMENT A: MWSS PREFERRED WATER SUPPLY SOLUTION

Option 1a for water supply:

A centralised scheme for Mid Waikato, with a new water intake and treatment plant at Te Kauwhata and Ohinewai being serviced initially from Huntly and then from Te Kauwhata. It is proposed to continue to source water from the Waikato River and for Huntly to continue to be supplied from the Huntly WTP. Figure 0-1 from the MWSS is shown below⁷.

Figure 0-1: Preferred Water Supply Solution – Option 1a



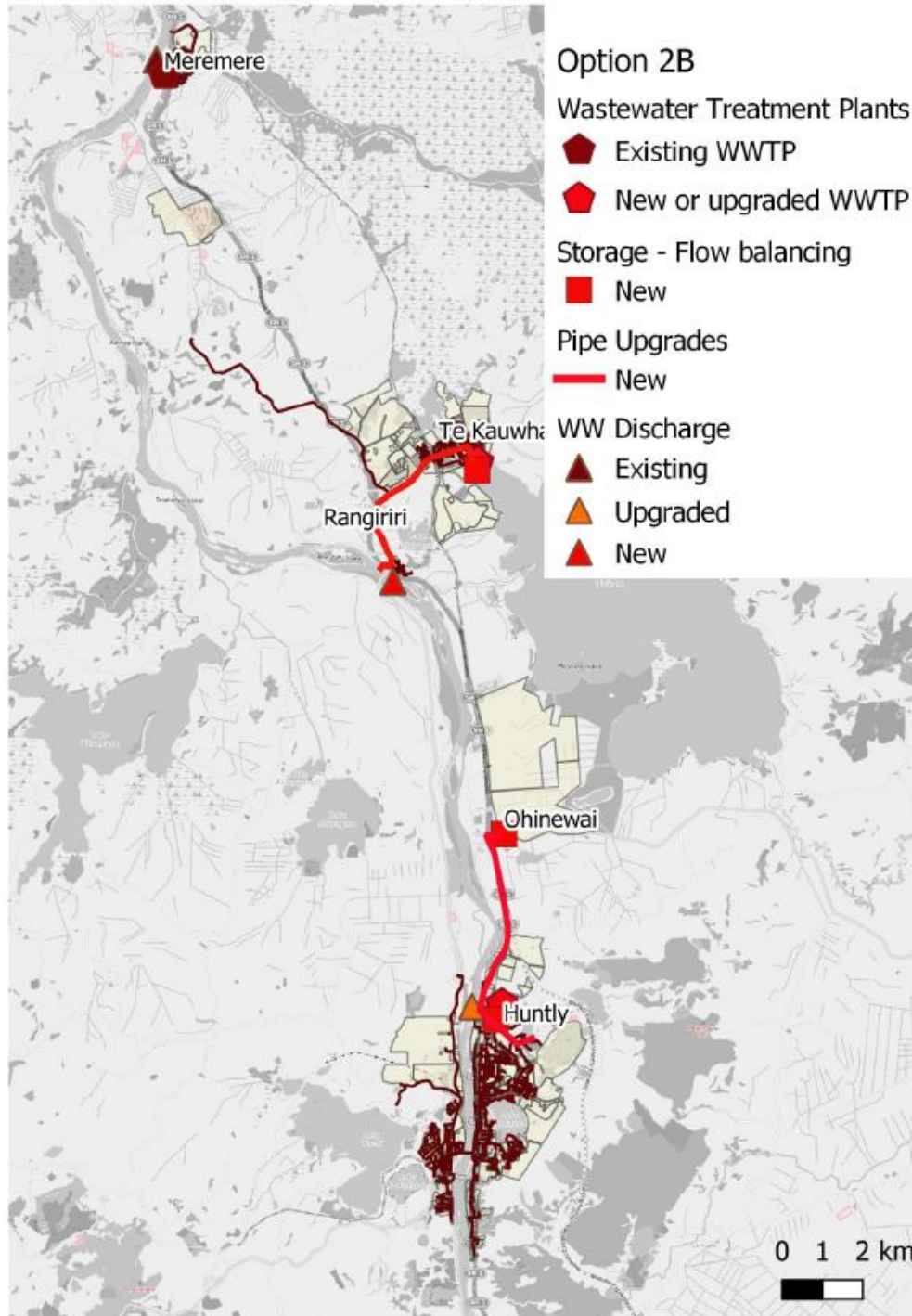
⁷ Pages 1 and 2, Executive Summary, MWSS, 2020.

ATTACHMENT B: MWSS PREFERRED WASTEWATER SOLUTION

Option 2b for wastewater:

A centralised WWTP for the Huntly and Ohinewai catchments located in Huntly and a standalone WWTP in Te Kauwhata for that catchment. Both WWTPs are proposed to discharge to the Waikato River. Figure 0-2 from the MWSS is shown below⁸

Figure 0-2: Preferred Wastewater Solution – Option 2b



⁸ Pages 1 and 3, Executive Summary, MWSS, 2020.