

PC17 HAUTAPU INDUSTRIAL
Three Waters Rebuttal Statement

13th June 2023

Prepared for:
Waipā District Council

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Consultants Limited

PC17 Hautapu Industrial

Revision	Description	Author	Date
0	Final	BJ	13 th June 2023

Acronyms / Abbreviations

Council

PC17

TMW

Wāipa District Council

Proposed Plan Change 17 Hautapu Industrial Zones

Te Miro Water Consultants

1. QUALIFICATIONS AND EXPERIENCE

- 1.1. My full name is Britta Jensen. I am Three Waters Engineer and the Managing Director Te Miro Water Consultants (**TMW**).
- 1.2. My experience, involvement and technical Three Waters assessment is outlined in my statement of evidence which I will take as read.

2. REBUTTAL STATEMENT

- 2.1. The purpose of my rebuttal statement is to address matters relevant to three waters management raised in the evidence and associated reports of Mr Dickey (13/03/2023) as well as Mr Dickey's supplementary statement of evidence and attachments (26/03/23) and Mr Crisps statement of supplementary evidence(26/03/23).
- 2.2. My evidence addresses the following matters:
 - 2.2.1.The suitability of the HGL stormwater management solution to integrate with PC17 structure plan.
 - 2.2.2.Whether there is sufficient three waters technical information for a "live" zone a proposed by HGL.

3. REBUTTAL EVIDENCE

- 3.1. I don't not have any concerns around the water or wastewater proposals with respect to PC17 and as it relates to whether HGL is a live or deferred zone.
- 3.2. With regards to stormwater management Mr Dickey presents two options:
 - 3.2.1. Soakage to ground (as is the current stormwater management approach for the proposed PC17 area).
 - 3.2.2. Constructed wetlands with controlled discharge to the Mangaone Stream.
- 3.3. The wetland option is the preferred solution outlined in both Mr Dickey's evidence and supplementary evidence, as stated "the preferred option reduces the footprint and size of the system required to manage post development flows, and therefore provides an improved land use for PC17".
- 3.4. I have undertaken a technical review of Mr Dickey's proposed options and acknowledge that while I agree in principle (as noted in the conferencing minutes) that it is possible to service the HGL site as an integrated solution with PC 17, the technical reports completed by HGL are not accepted or approved by Council for the following reasons:
 - 3.4.1. The proposal by Mr Dickey for the HGL site does not include management of Area 5 (Basin 4). This volume has not currently been included in the HLG wetland and soakage basin design under the assumption that original proposed location of Basin 4 is still in Area 5 (as per the original C9 Master plan). Keeping Basin 4 in Area 5 is currently not viable and the layout does not align with the PC17 structure plan. I am of the opinion that the HGL design should account for all contributing areas.
 - 3.4.2. The proposed option assessment does not provide suitable levels of detail for Council to assess the risks of the application, such as.
 - 3.4.2.1. Demonstration of an understanding of potential integration with Karma Trust (Area 6) and Area 5.
 - 3.4.2.2. Assessment of natural wetland areas which Mr Dickey notes as a risk to stormwater device placement.
 - 3.4.2.3. It appears that some of the devices are located very close to the stream and an assessment of filling of these areas and impacts on the wider floodplain has not yet been demonstrated.
 - 3.4.2.4. There has not been an assessment of the downstream receiving environment in relation to device sizing (for example, there are a range of options for discharge of 100 year ARI peak flows which Mr Dickey states would be dependent on flood impacts downstream).

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- 3.4.2.5. On site soakage testing has not yet been undertaken. Based on previous reporting, it is expected that soil profiles will be variable across the site and this may change device types, dimensions and locations.
 - 3.4.2.6. Ground water testing and assessment of groundwater interaction with the proposed wetland or soakage basin has not yet been confirmed. Based on previous reporting this is also expected to be variable across the site and may alter device types, dimensions and locations.
 - 3.4.2.7. Overland flow path management from Area 5 and Karma Trust is currently unknown.
 - 3.4.2.8. A solution to accommodate peak flow and volume from Area 5 (C9) has not been confirmed.
- 3.4.3. Mr Dickey proposes a direct outlet to the Mangaone stream. This may result in significantly higher discharge volumes to the stream across a range of return period storm events. A new outlet and increase in discharge volumes require an assessment of effects. It is my understanding that a discharge consent approval from Waikato Regional Council (WRC) is required, and this consent has not been sought. I am of the opinion that a technical approval by WRC should be provided, which is in line with the Masterplan and PC17 approach.
- 3.4.4. Mr Dickey proposes planting and discharge to the stream. Both stormwater related aspects require engagement with Iwi. I am unaware of this engagement being undertaken.

4. OVERVIEW

- 4.1. Having reviewed the three waters report and evidence from Mr Dickey, I have the opinion that we do not oppose HLG's application for deferred industrial from a three waters management point of view.
- 4.2. However, the technical assessment by Mr Dickey for live zoning is not acceptable to Council in its current state. I therefore oppose live industrial zoning due to the level of uncertainty.
- 4.3. As outlined in this rebuttal statement, there are substantial design elements that need to be addressed by HLG before we can consider a solution for the HLG area.