

BEFORE AN INDEPENDENT COMMISSIONER

IN THE MATTER of the Resource Management Act 1991 (**Act**)

AND

IN THE MATTER Resource consent application to construct a storage and distribution facility and three warehouses and ancillary offices in the Rural Zone at 16A Wickham Street, Hamilton

COUNCIL REFERENCE Resource consent – LU/0038/23

Summary Statement of Adair Brimelow on behalf of Industrie Property Rua Limited

DATED: 22 NOVEMBER 2023

MAY IT PLEASE THE COMMISSIONER

INTRODUCTION

1. My name is Adair Brimelow. I am a Senior Civil Engineer at Stiffe Hooker Limited. I have the qualifications and experience set out in my Statement of Evidence on this matter dated 8 November 2023.
2. In this summary statement I am addressing the following matters that have been raised in the evidence by Mr van Rooy:
 - (a) Future services connection.
 - (b) Wastewater.
 - (c) Water.
 - (d) Stormwater.
3. As noted in my primary statement of evidence, I have read the Code of Conduct for expert witness contained in the Environment Court's Practice Note 2014. I have complied with the Code in preparing this statement. This statement is within my area of expertise and represents my best knowledge about this matter except where I note that I am relying on the evidence of another witness. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

FUTURE CONNECTION

4. In paragraph 21 of Mr van Rooy's evidence he states that the site excludes itself from connecting to future public infrastructure.
5. I can confirm that the site is not excluding itself and the proposed private infrastructure design allows for connections to the future public infrastructure for water and wastewater at Wickham Street. A watermain will be laid within the site during construction to allow for a future connection, and the wastewater holding tank will simply be removed and connected to the public mains (Refer to DWG SD-RC03).
6. The development of the site will not constrain or compromise the provision of water and wastewater infrastructure for the site, or the wider area. The site is being developed so that it can connect when these public services are available.

WASTEWATER

7. In paragraph 24 of Mr van Rooy's evidence, he perceives there to be a risk of wastewater being stored on site and then conveyed on the road network and associated additional traffic.
8. I do not consider there to be elevated risks of this type of operation, and I understand this waste disposal operation is occurring on site now with portaloos. Waste trucks utilise the roading network all over the country. These are professional licensed companies and therefore I conclude the risk to the public is very low.
9. I have spoken to the HCC City Waters Unit, and they advised that depending on the usage, a septic tank should be cleaned out every 3-5 years. Some Waikato companies' websites recommend every 2-3 years while Auckland Council requires every 3 years. Therefore, trucks carrying waste are not uncommon on the roads and this septic tank waste material may be up to five years old while the site waste would be only 7 days old.
10. A Google search of septic cleaning companies in the Waikato Region returned over 15 companies that perform this task, so it is not an uncommon operation. Additionally, a google search of portable toilets and showers companies (portaloos) in the Waikato Region returned over 10 companies that perform this task, again it is not an uncommon operation.
11. In paragraph 25-26 of Mr van Rooy's evidence he has a concern that if this wastewater storage tank or transportation fails, then HCC would be required to provide a solution.
12. I can confirm that if the wastewater storage tank were to fail then it would simply be re-built. It is of simple prefabricated construction and would only take 2-3 days to replace. I also consider failure to be a very low risk as it would be appropriately designed, consented and construction observations completed by a suitably qualified engineer.
13. In paragraph 27 Mr van Rooy's evidence he states that the installation of an alarm is helpful but in his view there is insufficient certainty that the wastewater will be managed at all times.
14. The wastewater tank is only used when people are within the office and using the facilities taps/toilets. Appropriate inductions to new staff would also be effective to manage expected weekly volumes.
15. Should risk remain in the view of the Commissioner, then I propose to simply oversize the holding tank by 50% to provide additional storage as an additional safety measure. However, I do not consider that this is required.
16. Mr van Rooy has cited the Regional Infrastructure Technical Specifications (RITS). This document that sets out how to design and construct transportation, water supply, wastewater,

stormwater and landscaping infrastructure for participating Council areas. HCC is a participating Council.

17. The RITS Section 5.1.4 "*Areas not Serviced by Public Wastewater Systems*" refers to the Waikato Regional Council Plan (WRCP) Section 3.5.7 on-site sewage discharge. Although this section is more relevant to on-site discharge (spray to ground or soakage to ground), it does have a section "*Good Practice*" and references and promotes the use of Auckland Regional Council On-Site Wastewater Systems Design and Management Manual (TP58). TP58 has a dedicated section on holding tanks. The TP58 typical detail for a holding tank is as I had previously proposed in my evidence 8 November of an underground tank with a high-level alarm. The system proposed for the site complies with RITS. I reiterate that I have designed and consented these arrangements for a number of sites and had no reported issues.

WATER

18. In paragraph 29 Mr van Rooy's evidence he considers tanker water supply is not a reliable solution and is a potential health risk.
19. I have previously covered rainwater supply and harvesting in my original evidence statement and again conclude that the site can be self-sufficient for water supply by capturing roof water alone in a typical year. It would only be in an extreme dry period (i.e., no rainfall for greater than 12-days for Watty office and greater length of time for the other warehouses), that the tanks may need to be topped-up.
20. Within the RITS, Section 6.2.3.2 Rural Area Design, Item b) notes "*individual rainwater tanks, individual privately owned bores, wells or restricted supply, may adequately serve isolated small subdivisions in rural settings*".
21. As there are no public connections currently available, I consider this development to be an isolated small development that can be successfully self-sufficient and the water tanks in a typical year would be filled and supplied through rainfall.

Fire queries will be responded to by Mr Simon Pottow. However, I note that during construction it would be possible to initially capture the roof water from the buildings and pump this up into the fire water tank to reduce the water required to initially fill the tank.

STORMWATER

22. In paragraph 33 of Mr van Rooy's evidence he states that he is concerned that the stormwater discharge will impact HCC's ability to achieve compliance with its stormwater discharge consent.
23. The WRC consent states "*Hamilton City Council holds a consent to divert and discharge urban stormwater to the Waitawhiriwhiri Stream (AUTH105279.01.01). However, as no*

catchment management plan has been prepared for the catchment the site discharges into, the discharge is not authorized via the Hamilton City Council consent and as a result a discharge consent is being sought”.

24. Based on this statement by the Waikato Regional Council (WRC) and their assessment of the proposed stormwater infrastructure, I do not consider that the discharge from the site will affect the ability for HCC to achieve compliance for their consent.
25. In paragraph 34a) of Mr van Rooy's evidence he states that in order to achieve compliance, HCC requires the development stormwater discharge to be limited to 80% of pre-development volumes.
26. The development is not limiting the discharge to 80% of pre-development as this was not required by WRC and is not a condition of the approved consent. Notwithstanding this, volume reduction will occur through groundwater recharge (into peat soils), and rainwater harvesting, both of which are not included in the volume calculations. The applicant is providing six 25m³ tanks at the site for potable water use.
27. The WRC consent, in respect to Water Quantity effects, concluded ... *'I consider that provided the application is undertaken in general accordance with the application, and proposed conditions, the proposal will have less than minor effects associated with water quantity'*. "I" is the assessment/view of the Consents officer for WRC.
28. I also agree with the WRC assessment and conclusion.
29. In paragraph 34b) of Mr van Rooy's evidence he states that in order for HCC to achieve compliance they require stormwater attenuation at the site for the 10% ARI and 2% ARI rainfall events.
30. I confirm that this is achieved as recorded in my evidence (8 November) and as required by the WRC consent.
31. In paragraph 34c) of Mr van Rooy's evidence he states that he is concerned that the stormwater discharge will impact HCC's ability to achieve compliance and a two-stage quality treatment system is required.
32. This will be provided as recorded in the WRC consent, Water Quality Effects ... *'Based on Ms Wood's assessment (WRC Doc # 27129449), and provided the application is undertaken in general accordance with the application and recommended conditions, I consider the effect on water quality to be less than minor'*. I confirmed in my previous evidence (8 November) that a two-stage quality treatment system will be provided.

CONCLUSION

33. I believe that the site can be serviced on site and be a self-sufficient development.
34. The rainwater harvesting tanks will provide sufficient water for the offices in a typical year. Tanker water may not be required for the site.
35. The wastewater holding tank proposed is typically implemented on sites that do not have public connection and I do not believe this will create a health risk.
36. The WRC stormwater consent states that the site will be an improvement in respect to stormwater quantity and quality discharge and does not affect HCC's stormwater consent.
37. Should public services be available in the future, the site will have constructed infrastructure to enable the site to connect to these utilities.

Adair Brimelow

22 November 2023