

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Plan Change 17: Te Rapa North
Industrial Private Plan Change to the
Hamilton City Operative District Plan

**SUMMARY STATEMENT OF EVIDENCE OF DEAN JOHN MORRIS
ON BEHALF OF EMPIRE CORPORATION LIMITED AND PORTER GROUP**

1. SUMMARY OF EVIDENCE

- 1.1 My full name is Dean John Morris. I am a Director of Maven Waikato Limited ("Maven"). My qualifications and experience are set out in my Evidence In Chief (EIC) for PPC17 dated 30 October 2025.
- 1.2 I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that the opinions expressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.
- 1.3 I confirm I have read the section 42A report as well as the addendum 42A report and supporting documentation, as well as all submitter evidence available in relation to infrastructure.
- 1.4 My evidence concludes that the three-waters servicing framework proposed under PPC17 is fundamentally sound and provides a workable platform for development. However, I identify several areas where additional clarity and integration would improve certainty for adjacent landowners and support long-term infrastructure delivery.
 - (a) The Water supply confirming demand assumptions, particularly regarding wet-industrial scenarios and ensuring clear responsibility for network upgrades.

- (b) Wastewater refining the proposed pump station layout to avoid unnecessary duplication and better reflect the catchment's topography and long-term servicing needs.
- (c) Stormwater confirming downstream capacity, updating mapping to reflect existing infrastructure (including the Porters wetland system), and ensuring alignment with staging and land release.

1.5 In conclusion, it is my professional engineering opinion that the three-waters servicing framework for PPC17 is fundamentally sound and can be implemented in a coordinated and efficient manner. With the refinements I have identified, particularly clarity around water demand assumptions and upgrade responsibilities, optimisation of the wastewater pump station configuration and confirmation of stormwater staging and downstream capacity—the network can reliably support development across both the PPC17 area and the wider Deferred Industrial Zone.

1.6 On this basis, there is no technical or servicing constraint that would prevent the Porters land from being included and live-zoned alongside PPC17. Their inclusion would in fact support an integrated, catchment-wide approach to infrastructure delivery and duplicated servicing solutions in the future.

2. RESPONSE TO OTHERS

2.1 In this statement I also respond to matters raised in response to my EIC. This addresses matters raised in:

- (a) Statement of rebuttal evidence of Mr Scott King on behalf of Fonterra Limited dated 20 November 2025;
- (b) Statement of rebuttal evidence of Mr Cameron Farrell on behalf of Fonterra Limited dated 20 November 2025;
- (c) PCC17 Addendum-Appendix B (Water & Wastewater Review) memo of Mr Chris Hardy dated 26 November 2025; and
- (d) PCC17 Addendum-Appendix C (Stormwater Review) memo of Mr Iain Smith dated 26 November 2025.

Response to Mr Farrell

Water

- 2.2 The rebuttal evidence of Mr Mathew Farrell responds to the water supply matters raised in my primary evidence. I note and accept Mr Farrell's clarification that wet-industrial water demand is not anticipated within the PPC17 area and therefore modelling based on dry-industrial demand scenarios is appropriate for the type of development enabled by the plan change.
- 2.3 With this clarification, I am satisfied that the demand assumptions used in the applicant's Infrastructure Assessment are appropriate for PPC17 and are consistent with the expected land-use outcomes. My remaining concern relates not to the demand assumptions themselves but to the timing and confirmation of bulk water supply upgrades and establishing clear responsibility for their delivery as development progresses.

Wastewater

- 2.4 The rebuttal evidence of Mr Farrell also confirms the need for downstream upgrades along Pukete Road, which I agree with. However, Mr Farrell's rebuttal maintains the proposal for multiple pump stations within the PPC17 area.
- 2.5 As set out in my EIC, the use of multiple pump stations is unlikely to represent the most efficient long-term configuration across the wider Deferred Industrial Zone. Multiple stations introduce duplication of infrastructure, increased operational costs and reduced opportunities for integrated emergency storage solutions.
- 2.6 A single northern pump station remains, in my view, the most efficient and resilient option when considering the full catchment. This approach also provides greater servicing certainty for Porters land, enabling gravity conveyance where practicable and minimising the need for interim facilities.

Response to Mr King

Stormwater

- 2.7 The rebuttal evidence of Mr King maintains that the PPC17 stormwater strategy is aligned with Council's ICMP. I agree with this general conclusion but highlight Hamilton City Council have completed consultation on their ICMP

(including with Fonterra) and submitted the ICMP to WRC for certification on 3 November 2025 as a final version.

- 2.8 However, the rebuttal does not fully resolve the need for clarity around downstream capacity, sub-catchment integration and the inclusion of the existing Porters wetland system within the updated catchment mapping.
- 2.9 These matters are important to ensure that staging, attenuation and discharge pathways are coordinated across the wider catchment, and that neighbouring landowners such as Porters are not required to install temporary or redundant solutions if the PPC17 network is commissioned in stages.

Response to PPC17 Addendum Water and Wastewater Review

- 2.10 I agree with Mr Hardy that wastewater from the PPC17 area will ultimately be conveyed directly to the Pukete Wastewater Treatment Plant via new infrastructure and that any potential connections from a portion of Porters land into existing 300mm diameter pipes can be addressed through the staging and Infrastructure Plan mechanisms.
- 2.11 I note Mr Hardy's comments that water allocation will remain a constraint for Hamilton City until the current consent expires in 2044, and that allocation availability will need to be confirmed at each stage through the Infrastructure Plan. This is an important point because Mr Farrell's rebuttal evidence on water supply does not address allocation matters, focusing instead on network capacity and demand modelling.
- 2.12 While allocation is ultimately a city-wide governance issue rather than an engineering constraint within PPC17, I agree with Mr Hardy that the Infrastructure Plan provides the appropriate mechanism for confirming allocation availability at each stage of development. This requirement applies equally to all landowners including Porters and does not create a unique servicing limitation for the Porters land.
- 2.13 I acknowledge Mr Hardy's clarification and agree that wet-industrial activities are not proposed within the TRINZ area and therefore the assessment of dry-industrial water demand is appropriate for PPC17. My earlier reference to wet-industrial demand was made in the absence of that confirmation. With this clarified, I am satisfied that dry-industrial assumptions are the correct basis for water modelling, and I agree that the detailed network modelling and confirmation of upgrade requirements can appropriately occur through the Infrastructure Plan at the resource consent stage.

Response to PPC17 Addendum Stormwater Review

2.14 I agree with Iain Smith statement from my EIC:

'In my opinion, there is no technical stormwater reason to object to these requests. The PPC17 stormwater infrastructure is designed to accommodate future growth. Therefore, responses to the Submitter's concerns are planning related and I defer to Mr McGahan's Addendum S42A Report for resolution.'

2.15 As a final comment, having reviewed the rebuttal evidence and the Section 42A addendum, none of the matters raised change my overall conclusion that the PPC17 servicing framework is technically feasible, integration will improve certainty and Porters Land can be serviced efficiently and appropriately as part of the PPC17 network supporting a coordinated and catchment-wide three-waters strategy. I consider that conferencing would be useful to resolve the outstanding matters of disagreement and that this could be undertaken in a timely and efficient manner.

Dean John Morris
2 December 2025