

**BEFORE THE INDEPENDENT HEARINGS PANEL
OF HAMILTON CITY COUNCIL**

UNDER

the Resource Management Act 1991 ("RMA")

AND

IN THE MATTER

of Private Plan Change 17 to the Hamilton City
Operative District Plan ("PC17")

**STATEMENT OF REBUTTAL EVIDENCE OF MATTHEW CHARLES FARRELL
ON BEHALF OF FONterra LIMITED**

WATER SUPPLY AND WASTEWATER

20 NOVEMBER 2025

**Russell
McLeagh**

D J Minhinnick / K L Gunnell
P +64 9 367 8000
F +64 9 367 8163
PO Box 8
DX CX10085
Auckland

1. INTRODUCTION AND EXECUTIVE SUMMARY

1.1 My full name is Matthew Charles Farrell.

1.2 I was engaged by Fonterra Limited ("Fonterra") to assess the wastewater and water requirements for PC17. I authored the wastewater and water sections of the Infrastructure Assessment, and the Technical Memo entitled "**Wastewater and Water Updates 2025**" within Appendix 3 of the Supplementary Information Report dated August 2025 for PC17.

1.3 My qualifications and experience are set out in my statement of evidence filed in respect of PC17 dated 7 October 2025.

Scope and structure of evidence

1.4 In this statement, I respond to matters raised in the statements of evidence filed on behalf of submitters on PC17, specifically the Statement of Evidence of Dean Morris (Engineering) on behalf of Porter Group and Empire Corporation Limited (collectively referred to in this statement as "**Porters**").

Code of conduct

1.5 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving oral evidence before the Hearings Commissioners. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

2. PORTER GROUP AND EMPIRE CORPORATION LIMITED

2.1 Mr Morris states further clarification is required regarding the staging and servicing of the "**Plan Change Area**", being approximately 91 hectares of land surrounding the Te Rapa Dairy Manufacturing Site at Te Rapa North.¹ PC17 deliberately avoids locking in a specific staging sequence for the reasons that were set out in Mr Grala's Primary Statement of Evidence.²

¹ Statement of Evidence of Dean Morris on behalf of Porter Group and Empire Corporation Limited dated 30 October 2025 at [3.2].

² Statement of Evidence of Nick Grala on behalf of Fonterra Limited dated 7 October 2025 at [10.12]-[10.15].

2.2 PC17 introduces the Te Rapa North Industrial Zone ("TRNIZ") Strategic Infrastructure Table which has been prepared to connect land release to the required three waters infrastructure. This allows the flexibility to determine staging at the consenting stage in order to respond to the developer's specific requirements and market conditions efficiently and effectively.

2.3 Mr Morris' evidence proposes a three waters infrastructure triggers table for the Porters' land,³ be included in PC17. I consider the proposed water and wastewater servicing for the Porters' land, namely "**Porters Onion Road West**" and "**Porters Onion Road South**", represent logical and practical approaches to providing infrastructure connections through the Plan Change Area (if the Porters' land was to be included in PC17) subject to the following comments:

- (a) The water main Mr Morris proposes along Onion Road is not required for servicing the Plan Change Area itself but would provide additional resilience within the wider water network and I consider will be required to support servicing of the greater TRNIZ land west and north of the Plan Change Area. As such, this water main would need to be included as part of the enabling works for the Porters Onion Road West land.
- (b) The wastewater provisions proposed by Mr Morris do not align with the existing infrastructure constructed as part of the subdivision consent for the Porters Onion Road West land (although this does not preclude the infrastructure connections proposed by Mr Morris).⁴

Water Supply

2.4 Mr Morris questions the water usage rate of 70 litres per person per day on which the water demand assessment for PC17 is based. His evidence considers the rate to be insufficient to allow for wet-industrial activities.⁵

2.5 In consultation with Hamilton City Council ("Council"), and as stated in the Infrastructure Assessment, the development of the Plan Change Area will be subject to a moratorium on wet industry.⁶ This restriction reflects the current uncertainty and constraints associated with water allocation at source.

³ Statement of Evidence of Dean Morris on behalf of Porter Group and Empire Corporation Limited dated 30 October 2025 at [7.1].

⁴ Subdivision Consent No. 011.2019.00007131.001 – September 2021.

⁵ Statement of Evidence of Dean Morris on behalf of Porter Group and Empire Corporation Limited dated 30 October 2025 at [4.1].

⁶ Proposed provisions 3.9.2.2(b).

Consequently, the water demand assessment for PC17 appropriately focuses on dry industrial activities only.

- 2.6 The adopted demand rate of 70 litres per person per day, together with an occupancy rate of 45 people per hectare (equating to approximately 3,000 litres per hectare per day ("L/ha/day")), is based on my review of similarly occupied dry industrial sites within the Waikato region. Metered supply data from these sites indicate average daily demands typically ranging between 700 L/ha/day and 1,400 L/ha/day. Accordingly, the adopted rate represents a conservative and reasonable estimate of expected water use for dry industry development.
- 2.7 Further integration and confirmation of infrastructure upgrade timing will occur through ongoing modelling and the Infrastructure Plan process through future consenting processes in collaboration with the Council.

Wastewater

- 2.8 Mr Morris' evidence queries the number and location of wastewater pumpstations within the Plan Change Area.⁷ He also suggests that modelling needs to consider the inclusion of land adjacent to the Plan Change Area.⁸
- 2.9 While indicative locations of the proposed wastewater pump stations have been identified in the current concept layout,⁹ these locations have not been optimised to a specific development sequence and are not final. I expect that they will continue to be developed, refined and optimised through the preliminary (resource consent) and detailed design (engineering plan approval) stages in consultation with the Council / IAWAI Flowing Waters, as the ultimate infrastructure owner.
- 2.10 The configuration presented at this plan change stage is intended to demonstrate servicing feasibility and flexibility across the Plan Change Area rather than define the final and optimised infrastructure layout.
- 2.11 I agree that the proposed rising main and gravity section along Pukete Road, as well as the wastewater lift station connection to the Pukete Wastewater Treatment Plant, will be required to provide long-term capacity for the Plan Change Area. These elements represent the core components of the wastewater servicing strategy and will be confirmed and implemented at the resource consent stage as part of the staged infrastructure delivery process.

⁷ Ibid at [5.3].

⁸ Ibid at [5.4]-[5.5].

⁹ Proposed provisions 3.9.3.3 Strategic Three Waters Infrastructure.

2.12 Further consultation by the resource consent applicant will be undertaken with the Council / IAWAI Flowing Waters at the detailed design stage to confirm the catchments to be serviced by each pump station, along with any easements or infrastructure corridors that may be required to accommodate servicing of adjacent areas or land further north that are currently outside the Council's boundary.

2.13 Mr Morris also queries the potential upgrading of the existing 150 mm diameter wastewater gravity main.¹⁰ It is unclear which specific gravity main Mr Morris is referring to. As outlined in the Infrastructure Assessment, the existing wastewater network is already operating at capacity. Accordingly, it is neither feasible nor proposed to upgrade the existing network. Instead, the preferred servicing strategy involves construction of a new rising main and gravity section along Pukete Road, together with a wastewater lift station connection to the Pukete Wastewater Treatment Plant. This approach provides a more robust and future-proof solution for both the Plan Change Area and the wider TRNIZ.

2.14 The inclusion of adjacent land (including Porters Onion Road West and Porters Onion Road South land) within the wider TRNIZ network has been anticipated and can be accommodated through the proposed Pukete Road rising main and gravity section without adverse impacts on network capacity. This is expected to be addressed during the detailed design stage (as part of resource consent applications) in consultation with the Council.

3. CONCLUSION

3.1 Overall, the evidence provided by Mr Morris aligns closely with the servicing strategy presented in the Infrastructure Assessment, particularly in relation to the general approach for wastewater and water infrastructure within the Plan Change Area.

3.2 The key points of difference relate primarily to assumptions around potential wet-industry demands, which have been clarified through consultation with the Council and confirmation of a moratorium on wet-industry development.

3.3 The concept servicing strategy that PC17 is based on demonstrates the Plan Change Area can be efficiently and sustainably serviced through appropriately staged delivery of key infrastructure, including the new rising main, gravity

¹⁰ Ibid at [5.4].

main along Pukete Road, and lift station connection to the Pukete Wastewater Treatment Plant.

- 3.4 Further refinement of pump station locations, catchment boundaries, and infrastructure corridors will occur at detailed design (as part of the resource consenting process) in consultation with the Council / IAWAI Flowing Waters to ensure integration with both existing and future servicing networks.
- 3.5 I therefore remain of the view that the proposed servicing strategy remains robust, flexible, and fit for purpose to support the intended dry-industry development within the Plan Change Area.

Matthew Farrell

20 November 2025