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

STATEMENT OF EVIDENCE OF DEAN JOHN MORRIS
ON BEHALF OF PORTER GROUP AND EMPIRE COMPORATION LIMITED

1. INTRODUCTION

1.1 My full name is Dean John Morris. I am a Director and Principal Engineer of Maven Waikato Limited ("Maven") based in the Waikato, which provides specialist civil engineering and infrastructure design services.

1.2 I hold a New Zealand Diploma in Engineering (Civil), a National Diploma in Civil Engineering (Applied). I am a Chartered Professional Civil Engineer with over seventeen years of experience, with fifteen years of experience in New Zealand.

1.3 I have been engaged by Porter Group Limited and Empire Corporation Limited (referred to herein as '**the Submitters')** to provide civil engineering evidence in relation to Proposed Plan Change 17 (PC17) – *Te Rapa North Industrial Private Plan Change* to the Hamilton City Operative District Plan.

1.4 I have over seventeen years of experience in civil engineering and have led a diverse range of large-scale projects in the public and private sectors. I am experienced in the design of residential, commercial, and industrial developments including bulk earthworks, roading, three waters drainage and utilities.

1.5 I confirm that the issues addressed in this statement of evidence are within my area of expertise.

Code of conduct

1.6 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.

2. SCOPE OF EVIDENCE

2.1 This evidence is provided on behalf of the Submitters and relates to civil engineering and three waters infrastructure servicing matters under Plan Change 17 – Te Rapa North Industrial Private Plan Change ('**PPC17'**)

2.2 My evidence will address the servicing strategy of land owned by Empire Corporation Limited and Porter Group within the Te Rapa North Industrial Zone ('TRNIZ').

2.3 This evidence is provided on behalf of the Submitters and addresses three waters servicing and infrastructure feasibility for the Porters' landholdings Porters West (Onion Road); and Porters South (Southern Triangle):

(a) Porters West: Lot 7 DP 602298; Lot 2 DP 602298; Lot 500 DP 602298

(b) Porters South: Part Allot 8 Pukete PSH; Lot 1 DPS 58299

2.4 The purpose of this evidence is to:

(a) Confirm that the Porters' land can be feasibly serviced for water, wastewater, and stormwater;

(b) Identify any infrastructure triggers or amendments required within the PC17 provisions to ensure that the land can be effectively "live-zoned"; and

(c) Comment on the adequacy of the PC17 servicing approach and its alignment with Hamilton City Council's standards and long-term network planning.

2.5 My assessment draws upon the Infrastructure Assessment and Technical Reports prepared for PC17 by Harrison Grierson, the Section 42A Report technical review memos prepared by Council Development Engineers, the evidence of Mr Farrell and Mr King, and my own review of the site conditions.

3. OVEVIEW

3.1 Overall, the technical assessments supporting PC17 have been prepared to a satisfactory engineering standard and demonstrate that the Te Rapa North Industrial Zone (TRNIZ) can be feasibly serviced from a three-waters perspective. The key assessments informing this conclusion are:

(a) Infrastructure Assessment and Three Waters Report prepared by Harrison Grierson Consultants Limited (2024) on behalf of Fonterra Limited, which provides the basis for the proposed servicing strategy for water supply, wastewater, and stormwater.

(b) Stormwater Evidence Statement prepared by Harrison Grierson Consultants Limited (2025) on behalf of Fonterra Limited, which outlines the hydraulic catchment modelling, attenuation, and treatment approach within the Plan Change area.

(c) Council's Section 42A Report authored by Hamilton City Council's planning and infrastructure specialists (2025), which provides an independent review of the above assessments and identifies matters requiring further clarification around staging, integration, and infrastructure delivery.

(d) The Primary Statements of evidence prepared by Mr Farrell (Water Supply and Wastewater and Mr King (Stomrwater) on behalf of Fonterra Limited.

3.2 However, I agree with the Council's Section 42A Report, which concludes that while PPC17 aligns with regional and district planning direction, further clarification and integration of the servicing strategy is required. The Section 42A Report, (page 4; paragraph 4) states that:

"Additional information relating to strategic three waters infrastructure staging has been supplied but this is not clear as to how it is linked and considered under the plan change. The relationship between all strategic infrastructure requirements and how this can be delivered across stages is a matter that requires further consideration and clarity within PPC17."

3.3 Notwithstanding these uncertainties, my evidence confirms that based on the approach taken by Mr Farrell and Mr King, it is feasible to service Porters land from a three-waters infrastructure strategy perspective. I support the reinstatement of the Infrastructure Plan requirement as set out in Mr Nick Grala's planning evidence (page 55) on behalf of Fonterra. In my opinion, this

provision is required and positive inclusion within PPC17, as it provides a clear instruction to coordinate development staging, confirm downstream capacity, trigger points and aligns network upgrades with each development phase. The Infrastructure Plan now reinstated will ensure that water, wastewater, and stormwater infrastructure, including roading, is delivered in an integrated manner and gives Hamilton City Council certainty that the development within both the Plan Change area and adjoining land such as Porters West and Porters South can proceed without adverse effects on the wider network.

4. WATER SUPPLY

4.1 I have reviewed the water supply technical information prepared by Mr Mathew Farrell. From my perspective, I consider the water supply assessment within PC17 lacks sufficient clarity regarding the basis of its demand assumptions and whether network modelling has been undertaken for dry or wet industrial scenarios. This is critical, as industrial land use can generate higher peak and daily water demands compared to standard commercial or light industrial activities. The assumed figure of 70 litres per person per day referenced as an alternative demand scenario appears insufficient for potential wet-industrial operations and, in my opinion, would not meet actual water requirements. I consider that to enable efficient, long term network performance and provide a more resilient network, a more integrated approach is required to avoid the need for a reactive infrastructure need across the TRNIZ. This will also provide better certainty for the landowners within the TRNIZ.

4.2 While I agree that the conceptual design is technically sound, it lacks the necessary linkage to confirm available capacity and upgrade timing within the wider city network.

4.3 I note that this is consistent with the Section 42A findings that further information and integration are required to demonstrate how water infrastructure staging will occur in tandem with development.

4.4 While the timing of the water supply upgrades requires confirmation through more robust modelling, the network layout is feasible to service Porters Land to the south and east. This would be achieved via existing and proposed water mains along the eastern side of Onion Road. Updated modelling to encompass the Porters land can be confirmed through the Infrastructure Plan process at the resource consent stage. These connections are consistent with Hamilton City Councils long-term servicing strategy for the TRNIZ.

5. WASTEWATER

5.1 In my opinion, the wastewater network assessment prepared by Mr Mathew Farrell in support of PPC17 provides a suitable high-level servicing concept and confirms that the Plan Change Area can discharge to the Pukete Wastewater Treatment Plant (PWWTP).

5.2 I agree with the findings of Mr Mathew Farrell that a new rising main and downstream upgrades along Pukete Road will be required to provide long-term capacity for both the Plan Change Area and adjoining TRNIZ land. The assessment methodology — using RITS and AS/NZS1547:2012 standards — is appropriate for preliminary flow estimation.

5.3 Within the Plan Change Area, the proposed layout of multiple pump stations provides flexibility but may not represent the most efficient configuration. Based on the site's topography, the northern part of the West Block could be serviced via a single pump station. Multiple pump station sites would require ongoing maintenance, power supply and monitoring which increases long term costs. With a central Pumpstation, gravity mains would be utilised to convey wastewater with the key infrastructure required early which provides certainty for landowners, including Porters, and enabling emergency storage tanks to be added as and when demand is connected. In my opinion, the optimal location for a central Pumpstation should be at the north end of the 'West Block' but recommend it be confirmed at detailed design and with workshops with Hamilton City Council. I consider that this would achieve long term efficiencies for wastewater servicing.

5.4 There also remains uncertainty regarding the capacity of the existing downstream 150 mmØ gravity main and the timing for its upgrade which would be required to service TRNIZ. In my opinion, this uncertainty isn't consistent with the integrated approach required to efficiently service large areas of greenfield land. The constraints downstream limit the ability to connect or require interim solutions that wouldn't be required under an integrated servicing requirement. To ensure future flows from both PPC17 and Porters land, in accordance with best practice, I consider that modelling needs to consider all land and adjoining land what could be serviced to achieve a catchment wide integrated approach to infrastructure upgrades. The modelling would highlight required upgrades that should be reflected in a Strategic Infrastructure Table with clear triggers and upgrades responsibilities.

5.5 The Porters South and Porters West site could connect via gravity or a small local pump station into the northern PC17 network and wider network upgrades

are not required. The addition of Porters Land would have small impact on overall network capacity if allowed for within the integrated approach. This avoids coming back and upgrading to allow for this. Wastewater generation from both Porters Land would be minimal compared to the wider TRNIZ.

6. STORMWATER

6.1 In my opinion, the stormwater strategy from Mr Mathew Farrell is generally well-founded and consistent with the Hamilton City Integrated Catchment Management Plan (ICMP) and Regional Infrastructure Technical Specifications (RITS).

6.2 The PPC17 design approach incorporates on-lot retention, water-quality treatment, and attenuation of post-development peak flows, which meets Council standards and best practice.

6.3 I note that the Porters West land already discharges through a newly constructed wetland system on Onion Road. This system controls runoff from the wider catchment and ultimately outlets through the PPC17 area. These assets are operational and demonstrate that stormwater servicing is feasible for both Porters West and the adjoining PPC17 land.

6.4 The Porters South land naturally drains northwards and can be easily integrated into the downstream network proposed under PPC17.

6.5 I agree with the findings of the Section 42A Report that further clarification is required around how stormwater staging aligns with land release, particularly in relation to the sequencing of downstream network capacity, discharge points, and the timing of treatment and attenuation facilities. The reinstatement of the Infrastructure Plan requirement, as outlined in Mr Nick Grala's planning evidence (page 55), is a positive step that provides an appropriate mechanism for confirming sub-catchment readiness prior to development. In my view, the reinstated provision is broadly sufficient, provided that the Infrastructure Plan requires demonstration of downstream capacity, integration of existing Porter's wetland assets, and confirmation of connectivity through the PC17 network.

6.6 If these matters are not addressed as outlined above in 6.5, there is a risk that upstream landowners such as Porters may experience delays in establishing compliant stormwater outlets or may need to construct interim measures that could later become redundant once the full network is commissioned. Ensuring these requirements are captured in the integrated Infrastructure Plan will provide certainty for land catchments to come online.

7. PROPOSED CHANGES TO PPC17 PROVISIONS

7.1 Given the above, I recommend amendments to the PPC17 provisions as follows to identify the relevant three waters infrastructure triggers for Porters' land.

Stage	Preceding stage(s) required	Wastewater	Water	Stormwater
Porters Onion Road West	Onion North*** Onion South***	PS3 PS6 Gravity Main 3	W3, W4, W6 and W7	-
Porters Onion Road South	Onion North*** Onion South***	PS3 PS7 Gravity Main 3	W3, W4, and W5	Wetland C

8. CONCLUSION

8.1 In my opinion, the overall PPC17 servicing is sound and technically capable of supporting the proposed industrial development. While additional detail and coordination is required to ensure alignment between staging, capacity, and downstream integration, these matters can be resolved through the Infrastructure Plan process, future resource consenting, detailed design, and ongoing engagement with Hamilton City Council.

8.2 From a three-waters engineering perspective, it makes sense and is efficient for Porters' land to be included and live-zoned. The existing and proposed three waters infrastructure including the stormwater, wastewater, and water supply networks can include the Porters West and Porters South sites without adverse effects on the downstream network. Incorporating this land now would also create efficiencies and provide greater certainty for network design and delivery, reducing the likelihood of piecemeal three-waters solutions being developed in the future in turn creating redundant infrastructure over time.

8.3 Specifically:

(a) Water Supply: Modelling assumptions should be confirmed for both wet and dry industrial demand scenarios, with clear responsibilities established for any required upgrades or supply connections.

(b) Wastewater: The pump station layout should be refined to reflect the actual topography and consolidate infrastructure to avoid long-term operational inefficiencies.

(c) Stormwater: Catchment mapping should be updated to include the existing Porters wetland system and confirm downstream connectivity within the PC17 network.

8.4 Taking these into account, I consider there is no technical or servicing reason why Porter's land cannot be included within the live zoning under PPC17.

Dean John Morris
30 October 2025