

09 February 2024

Watercare Services Limited
c/- BECA
Private Bag 92521
Auckland 1142
Attention: William Hung
By email: William.Hung@water.co.nz

Dear William

Request for additional information in accordance with section 92 of the Resource Management Act 1991

Notice of requirement: Watercare Services Limited – **Whenuapai & Redhills Wastewater Scheme**

I am writing with respect to the lodged notice of requirement described above.

After completing a preliminary assessment of the notice of requirement documents, it is considered that further information is required to enable an adequate analysis of the proposal, its effects on the environment and the way in which any adverse effects on the environment may be mitigated.

Under section 92 of the Resource Management Act 1991, I request additional information as set out in Attachment 1 to this letter. The information requested will enable the council to undertake a full and proper assessment of the notice of requirement and provide a recommendation on it.

The table in Attachment 1 of this letter sets out the nature of the further information required and reasons for its request. In addition, Attachment 1 includes general comments that are for information only.

As the Requiring Authority did not respond within 15 working days or arrange an alternative date (before 5 December 2023) relating to the request for information on 13 November 2023, the Notice of Requirement must be publicly notified under 169(1A)(b)(i)(A).

Provided that some information in the request for additional information may be of interest to submitters, notification will occur after the information on this response is provided. This might be delayed further if further additional information requests are required.

In accordance with the Resource Management Act 1991, processing of your notice of requirement will remain on hold, pending your response to this request. Please note that the processing clock will remain stopped.

If you have any queries regarding the above, please contact Todd Elder on Ph 021 870 282.

Yours sincerely

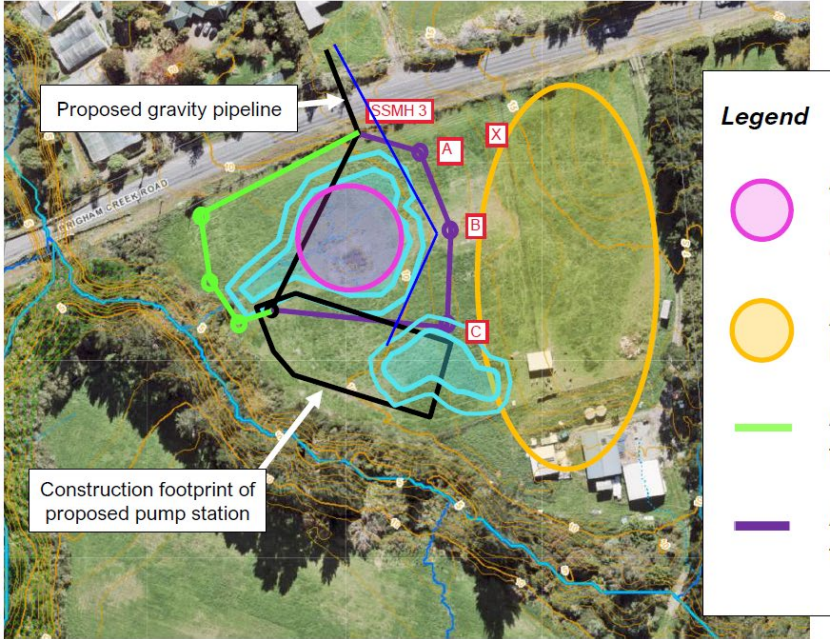


Todd Elder
Senior Policy Planner
Regional, North, West and Islands
PLANS AND PLACES

Attachment 1:

Additional information requested under Section 92 of the Resource Management Act 1991

#	Category of information	Specific Request – 13 November 2023	Reasons for request – 13 November 2023	Additional information request – 09 February 2024
Transport				
TRA 1 – TRA 7	Transport	Appendix 1 to this request relates to Transport matters. There are seven requests, please provide a response to all five requests.	The reasons for the seven requests can found in Appendix 1 of Appendix 1.	Appendix 1 to this additional information request relates to Transport matters. There are four additional information requests relating to the 10 November request. Can you please respond to these requests, if not, why not.
Engineering				
	Engineering	<p>Greg Hall, Senior Development Engineer</p> <p>Comment: The Functional Need memorandum appears to make statements with regard to the assessment of the east of Wetland C route, but does not seem to be supported by a specialist and I consider there are potential inconsistencies.</p> <p>The Requiring Authority states that a layout as per Figure 3 would be required to route the pipeline east of the wetland.</p>		

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		 <p data-bbox="624 1023 1323 1046">Figure 3. Considerations for pump station and gravity pipeline location</p> <p data-bbox="624 1086 1368 1182">The Requiring Authority states that this will make the pipeline 3 metres deeper, and that the construction would then be 7m deep.</p> <p data-bbox="624 1222 1400 1388">However, from the above, 'Manhole A' is shown on the 11m contour, manhole B is at about 11.7m and manhole C about 11.5m, but this is at a completely unrealistic location as it should be further to the west. From the design drawing MH, manhole 'A' would have an invert level of</p>		

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		<p>about 6.70m. Therefore the depth of this manhole would be around 4.3m.</p> <p>This is a long way short of the stated 7.0m. For manhole 'A' to be at 7m deep it would need to be at RL 13.7; or around Location X.</p> <p>At a depth of 4.3m a trench shield can be used to minimise trench width, and therefore benching is unlikely to be required. Therefore the alignment shown, could likely move closer to the wetland, noting also the difference between the wetland boundary and the 1% AEP boundary. This would potentially mean that the 4.3m depth is likely to be less than 4m if the Requiring Authority were to attempt to make this design efficient.</p> <p>It is noted that throughout the alignment most manholes and trench lines are around 3m deep, so a 4m deep manhole is not exceptional.</p> <p>The deepest manhole is SSMH-4 at about 5.5m. It is noted that SSMH-3 if left in its current position, would likely need to be raised to the same depth due to the widening of Brigham Creek Road.</p> <p>The Requiring Authority state that an eastern alignment would require 3 additional manholes. However, it would be perfectly feasible to have an alignment from SSMH-3 to approximately 'B', and then into the WSL owned land, which would then only require one additional manhole. Alternatively, laying away from the BCR crossing</p>		

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		<p>without installing SSMH-3, could allow for no additional manholes, and remove the need for the extra deep SSMH-3.</p> <p>It is possible to reposition the pump station structures, including the inlet manhole based on what suits an eastern route, so the assumption of a western inlet manhole gives the longest possible gravity pipe, but this could be shorter. A rearrangement of pump station structures may be necessary anyway due to the discovery of Wetland D. This may also shorten the rising main length which would be a positive benefit, and offset any additional length of gravity main, which is likely to only slightly add to the depth of the station. If this were really a substantial factor, WSL could look at 'shallowing up' opportunities back at the existing pump station area.</p> <p>Therefore, I have concerns that the location of the pump station is not supported by a functional requirement assessment that demonstrates that alternative locations aren't possible.</p>		
ENG1	Engineering	Can you please consider the comments above, and reconsider the functional requirement for the location East of the wetland. Please include pipe route, including consideration of rearranging	<i>To ensure a complete assessment has been considered.</i>	<i>The response has provided some detail, but does not provide any clarity or information if the rearrangement of the structures were considered. Did the Requiring Authority consider a different layout of structure(s) on the site? If not why not?</i>

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		structures within the WSL pump station land in this assessment.		
ENG2	Engineering	It appears that bringing in power and water supply from the alignment of the new Spedding Road and through the ROW area may be a better long term option, which would also avoid these services going through the toe of Wetland C. Can this please be considered? If not why not.	<i>The request it to ensure a complete assessment has been considered</i>	No AIR
ENG3	Engineering and Planning	The functional requirement memorandum has BECA and Watercare in the header. Can you please clarify who prepared the memo, and provide the specialists who contributed?	<i>Currently, it has an employee from Watercare as the author, and I have concerns about the independence of the document.</i>	<p><i>Planning – The response from the Requiring Authority states: “The memo is jointly prepared by Watercare and BECA with technical input from the designer (GHD and WSP).”</i></p> <p><i>The information request from Council acknowledges BECA and Watercare. The information request seeks details of each person that contributed to the preparation of</i></p>

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				<p><i>the report and their specialisation.</i></p> <p><i>Can you please confirm the name of the person(s) who authored the report and their specialization and qualification.</i></p> <p><i>We are currently determining if the report was prepared by an appropriate person, and if the Council is required to commission a report under section 92(2)(b) of the RMA regarding functional requirement.</i></p>
ENG4	Planning	Please provide an analysis against Auckland Unitary Plan RPS Chapter B7 Toitū te whenua, toitū te taiao – Natural resources, provided this application will modify multiple wetlands.	<i>To ensure a complete assessment has been considered</i>	<i>Please update the supporting Assessment of Environmental Effects to include this assessment.</i>
Ecology				

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Eco1	Ecology	<p>Please update the ecological assessment and AEE to acknowledge the Significant Ecological Area (and Significant Natural Area under the National Policy Statement on Indigenous biodiversity). A consequential assessment may be required.</p> <p>Please update the fauna assessment and provide the surveys; to identify lizards and bat habitats that are likely to need management plan(s).</p> <p>Please include controls (standards) to manage the effects on the bats, for example, exterior lighting (e.g. security / flood lighting) and noise management.</p>	<p><i>Private Plan Change 69: Spedding Road Block, identified critically endangered long-tailed bats in the vicinity of the construction and operational areas. The Precinct implemented controls (standards) to manage the effects on the bats, for example, lighting and noise management.</i></p>	<p><i>Thank you for providing the response in the table. Can you please update the technical documents and Assessment of Environmental Effects to include the additional information?</i></p>