
I hereby give notice that a hearing by commissioners will be held on:

Dates: **Monday 24 February 2019**
Wednesday 26 February 2019
Thursday 27 February 2019
Friday 28 February 2019
Wednesday 04 March 2019
Thursday 05 March 2019
Friday 06 March 2019
Monday 09 March 2019
Wednesday 11 March 2019
Thursday 12 March 2019
Friday 13 March 2019

Time: **9.30am**

Meeting Room: **Council Chamber**

Venue: **Level 3, Henderson Civic Building,
6 Henderson Valley Road, Auckland**

SUBMISSIONS AND LOCAL BOARD COMMENTS

VOLUME FOUR

WOODLANDS PARK ROAD / MANUKA ROAD, WAIMA (TITIRANGI)

WATERCARE SERVICES LTD

COMMISSIONERS

Chairperson
Commissioners

Philip Brown
Hugh Leersnyder
Michael Parsonson
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Note: The reports contained within this document are for consideration and should not be construed as a decision of Council. Should commissioners require further information relating to any reports, please contact the hearings advisor.

WHAT HAPPENS AT A HEARING

At the start of the hearing, the Chairperson will introduce the commissioners and council staff and will briefly outline the procedure. The Chairperson may then call upon the parties present to introduce themselves to the panel. The Chairperson is addressed as Mr Chairman or Madam Chair.

Any party intending to give written or spoken evidence in Māori or speak in sign language should advise the hearings advisor at least five working days before the hearing so that a qualified interpreter can be provided.

Catering is not provided at the hearing. Please note that the hearing may be audio recorded.

Scheduling submitters to be heard

A timetable will be prepared approximately one week before the hearing for all submitters who have returned their hearing attendance form. Please note that during the course of the hearing changing circumstances may mean the proposed timetable is delayed or brought forward. Submitters wishing to be heard are requested to ensure they are available to attend the hearing and present their evidence when required. The hearings advisor will advise submitters of any changes to the timetable at the earliest possible opportunity.

The Hearing Procedure

The usual hearing procedure is:

- The applicant will be called upon to present his/her case. The applicant may be represented by legal counsel or consultants and may call witnesses in support of the application. After the applicant has presented his/her case, members of the hearing panel may ask questions to clarify the information presented.
- The relevant local board may wish to present comments. These comments do not constitute a submission however the Local Government Act allows the local board to make the interests and preferences of the people in its area known to the hearing panel. If present, the local board will speak between the applicant and any submitters.
- Submitters (for and against the application) are then called upon to speak. Submitters may also be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker. The council officer's report will identify any submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
- Should you wish to present written information (evidence) in support of your application or your submission please ensure you provide the number of copies indicated in the notification letter.
- Only members of the hearing panel can ask questions about submissions or evidence. Attendees may suggest questions for the panel to ask but it does not have to ask them. No cross-examination - either by the applicant or by those who have lodged submissions – is permitted at the hearing.
- After the applicant and submitters have presented their cases, the chairperson may call upon council officers to comment on any matters of fact or clarification.
- When those who have lodged submissions and wish to be heard have completed their presentations, the applicant or his/her representative has the right to summarise the application and reply to matters raised by submitters. Hearing panel members may further question the applicant at this stage.
- The chairperson then generally closes the hearing and the applicant, submitters and their representatives leave the room. The hearing panel will then deliberate "in committee" and make its decision.
- Decisions are usually available within 15 working days of the hearing.

SUBMISSIONS AND LOCAL BOARD COMMENTS

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From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5222] Submission received on notified resource consent
Date: Monday, 2 September 2019 12:45:49 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Kate Brookson-Morris

Organisation name:

Contact phone number: 02102472255

Email address: katebrookson_morris@hotmail.com

Postal address:
68 Waima crescent Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

(1) Vegetation removal (2) Earthworks and contamination (3) Watercare's site selection process (4) Other issues

What are the reasons for your submission?

(1) Vegetation removal I am opposed to the cutting down of thousands of trees in this day and age when we need to be doing all we can to protect forests, fauna, animals, insects and our unique native bush! This totally flies in the face of all climate change research and the Auckland Council's own self-professed "climate emergency". You cannot mitigate for removal of mature trees. Don't let's forget Watercare have not even counted all the Kauri trees under 20cm in diameter! Insane. There are thousands of young Kauri trees that Watercare wants us to not believe even exist in that piece of land. I used to walk lots on the Clark Bush trail before it was closed, and even as non-expert I can see the value of the vegetation they are proposing to cut down. The vegetation by the road may not look like much, but once you are a little way back from the road the full scale of this proposed destruction becomes apparent. Simply put, no-one should be allowed to do any works at all anywhere in NZ where there are Kauri growing. Anything else is totally hypocritical and goes against stated Auckland Council and national government policy. End of story! (2) Earthworks and cross-contamination This area is very unstable - you only have to look at the effect of cutting down ONE tree above Scenic Drive - a massive land slide that closed Scenic traffic to two way traffic for months. The root system is phenomenally important to the whole stability of the area. If you pour thousands of tons of concrete to "mitigate" for the loss of roots, you will create massive problems of flooding as the water will run off and cause land stability issues further down the hill. Let's not forget just how many thousands of people live directly below the proposed plants/resevoirs and the Manukau Harbour - and the effect flooding will have on Huia road, one of the main arteries in the area. Removing soil when we are all being expressly forbidden from even WALKING around near Kauri trees is totally insane. Allowing this to happen will mean Kauri outside of the construction site are put at risk due to soil movements. There is no way the bio-security risk can be managed when you have thousands of trucks removing thousands of tons of soil and trees from the area. Truck movements - the roads around Titirangi cannot cope with the traffic they currently have passing through them each day and cannot support thousands of additional truck movements during the so called "enabling stage" (which is just bluster - the enabling and construction stages are one and the same for this!) The roads are too narrow to support numerous heavy truck movements and the footpaths inadequate. I can virtually guarantee there will be fatal accidents to drivers and/or pedestrians on Scenic Drive as a result of this insane project. This is a heavily built up area with numerous schools, kindergartens, daycares, elderly person provision. It's like proposing to build an industrial plant in the middle of Mount Eden! This is a residential and environmental zone, not suited to a massive industrial plant. (3) Watercare's site selection process This process was totally flawed and subject to unacceptable interference from councillors. The proposed site should not even have made it onto the longlist, yet alone a short list. There are numerous other sites far more suited - that are clear and have better road access. Just because powerful people live in Oratia and have friends in the right places, a totally unsuitable site has been chosen instead. Watercare had to adjust their own scoring to even get this site onto the list - just because they own the land it does not mean it is at all suitable for building a massive water treatment plant and massive resevoirs. Yes, they can use it for SMALL projects but not to built something so huge. Let's not forget this will only marginally increase the amount of water being treated in the area - it is an insane waste of public money to build something which has no further room for expansion and will only increase supply by such a small amount. As climate change progresses and the dams continue to dry up, this monstrous edifice will all too soon need to be moth-balled. Rather than wasting money on building this plant here and now, Watercare need to focus on smart solutions and diversification of water-sourcing and treatment. (4) Other issues There is absolutely NO social mitigation attached to this proposal at all. Waterview got a new school, new footpaths and a new playground, and probably a lot more I am unaware of. Watercare are offering NOTHING to the local community in terms of social improvements. All they are doing are taking away what we as Titirangi residents hold exceptionally dear - nature and the bush. Given how entirely unsuited the roads and area is to construction of such a massive plant, Council needs to reject this plan. Construction will makes the lives of thousands of people utterly miserable - during 6 days a week of truck movements, horrendous traffic already adding to awful commuting times (due to the lack of decent public transport out here). It is already tearing the community apart and giving some people profound anxiety and mental health issues. So much for Auckland Council's commitment to making Auckland "one of the most

liveable cities" and the government's commitment well-being. This plant will make Titirangi UNliveable for thousands of people, for near on 10 years.

What decisions and amendments would you like the council to make?

(1) Vegetation removal A full count of ALL Kauri trees and other native trees on the proposed sites. This application should be thrown at now - chopping down native trees should be forbidden to all.

(2) Earthworks Another site found where the land is more stable, will not require cutting down thousands of trees and moving thousands of tons of contaminated soil around the area, and that is not going to mean thousands of trucks trundling through the center of a VILLAGE and past numerous schools, etc.!

(3) This was totally flawed and needs to be scrutinised. A full inquiry needs to take place and the interfering councillors held to account. The list should be re-evaluated sticking to the original scoring process, which means this site should not even have been considered. (4) Full consideration of Watercare's total lack of concern for the residents of the area.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5223] Submission received on notified resource consent
Date: Monday, 2 September 2019 12:45:51 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Roger Farley

Organisation name: Syntech NZ Ltd

Contact phone number: 021476437

Email address: roger@syntechnz.co.nz

Postal address:
6c Westech Place Kelston Auckland 0602

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

earthworks and effects on people

What are the reasons for your submission?

I ask Council to deny the application based on considerations for the mental well-being of local residents. Staff of this business in particular, as well as others I'm certain, will be negatively impacted and I have concerns due to the strain of such a long, invasive and stressful situation and the on-going ability to get to work on time and perform the roles effectively over a sustained period of time.

What decisions and amendments would you like the council to make?

Decline the application in its entirety and have the applicant move the plans to an area that has no immediate affect on people.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5224] Submission received on notified resource consent
Date: Monday, 2 September 2019 12:45:55 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Christine Rigby

Organisation name: local resident

Contact phone number: 021824973

Email address: christinerigby191@gmail.com

Postal address:
112 Woodlands Park Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

1. Safety and hazards of every aspect of the construction and operation of this giant plant with trucks, chemicals, infrastructure failures, floods, and leaks all set to occur to threaten people's lives and homes. 2. Significant environmental damage to a rich unique native ecological area with precious bird, insect, plant and tree life. This in the context of global warming, deforestation, species extinction, tree diseases, and so many recognised reasons to preserve the environment. 3. Serious community disruption and danger during and after construction to families, pedestrians, cyclists, children, schools, pets, outdoor activities, pollution, and every conceivable aspect of ordinary hard-working, law-abiding, rate paying people going about their everyday business seeking some reasonable quality of life. 4. Traffic, travelling and commuting will be severely impacted by heavy road use of truck and other machinery on unstable, narrow, winding roads that are already struggling to cope with the amount of cars. This will wreak havoc with every aspect of people moving around in the community to go about their essential working and leisure 5. Damage to our homes and properties. Titirangi is known to have land stability issues and the heavy road users will shake out sections and houses causing irreversible damage. Already when buses and truck go past we can feel them and have had to spend huge amount stabilising our driveway and section. We have a large sink hole in the middle of the road directly outside our house which a few years ago had water bubbling up through the tar seal with a Watercare leak under the road, the repairs were slow and inadequate, that piece of road is hollow and unstable. 6. No faith in Watercare to manage this project in the interests of the community or environment. Their current properties are in a shameful disgusting state of disrepair. There was a broken plastic picnic chair outside the current Huia Treatment Plant last year for months on end and Watercare did nothing and I saw it ended up in the forest, likewise for all sorts of rubbish, maintenance and repairs are neglected by Watercare.

What are the reasons for your submission?

I vehemently oppose this project going on the selected site. Placing a large scale industrial plant in a residential and heritage forest area is completely unacceptable for every conceivable reason to do with people's lives and the environment. Regardless of any historical land use rights (real, perceived or concocted) that Watercare thinks gives them this right to do as they please, this is now 2019. Agencies responsible for running the city and country need to think into the future and act responsibly in line with population health, community mental health and wellbeing, and preserving the planet to sustain human, flora, fauna and animal life.

What decisions and amendments would you like the council to make?

Find an alternative site for a smaller operation that does not ruin communities and the environment. Upgrade the existing site footprint. Introduce eco solutions for water supply - rainwater tanks on every home, recycling water, fixing leaks and inefficiencies in the supply chain.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5225] Submission received on notified resource consent
Date: Monday, 2 September 2019 12:46:23 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Sarah couch

Organisation name:

Contact phone number: 0211883818

Email address: kalista44@hotmail.com

Postal address:
63 Paturoa Road Titirangi Auckland 0604

Submission details

This submission: is neutral regarding the application in whole or in part

Specify the aspects of the application you are submitting on:

Future proofing. Longevity of the plant. Plans for plant once at end of life span. How are existing unused plants being managed? Long term damage of surrounding area due to work. Once done how will any future issues be managed eg. Road slips etc.

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

Consider alternative location to answer question above in regard to scale and future proofing - to be weighed up against initial investment and ecological damage and community disturbance that could have long term effects.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5226] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:01:47 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Deborah Hager Neil Miller

Organisation name:

Contact phone number: 098169339

Email address: debbiehager33@gmail.com

Postal address:
216 Huia Road Titirangi Auckland 0604

Submission details

This submission: supports the application in whole or in part

Specify the aspects of the application you are submitting on:

We support Watercare using that land that was purchased approximately 100 years ago and designated for an extension of the water treatment plant. We support Watercare planning for the ongoing supply of safe clean water to Auckland. We recognise that this will cause considerable disruption in our community for a number of years, but feel that since this land has been designated for this purpose - and we need clean water - that this will be a small disruption over a life time.

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

We believe the council should support the Watercare applicaiton

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5227] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:01:05 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Fenton Rigby

Organisation name: Tangata Whenua local resident

Contact phone number: 0278179633

Email address: bustarigby@xtra.co.nz

Postal address:
112 Woodlands Park Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

1. Safety and hazards of every aspect of the construction and on-going running of this large scale plant with trucks, chemicals, infrastructure failures, floods, and leaks all set to occur to threaten people's lives and homes. 2. As tangata whenua my connection to the land is sacred, hence making this massive environmental damage a major insult. So much of the Waitakere Ranges were wiped out last century with clear felling obliterating indigenous vegetation, birds, fish and insects. Hasn't anything been learned from past wrong doing to the environment and irreversible long term damage. This is on-going colonisation and a TOW breach. 3. Serious community disruption and danger during and after construction to families, pedestrians, cyclists, children, schools, churches, pets, outdoor activities, parks, bush tracks, pollution, and every conceivable aspect of people living their lives. 4. Health and wellbeing will be negatively impacted. Maori already suffer worse health than the rest of the population and this project further erodes community, whanau and individuals wellness. 5. Traffic, travelling and commuting will be severely impacted by heavy road use of truck and other machinery on unstable, narrow, winding roads that are already struggling to cope with the amount of cars. This will wreak havoc with every aspect of people moving around in the community to go about their essential working and leisure. Noise, dust, speeding, mud, puddles, etc. 6. The roads will fail, crumble and there will be more slips. Previous damage has been slow to be fixed and caused major problems. There's a ribboned strip of Scenic Drive between the village and Woodlands park Rd turnoff that has been left unrepaired for months. 7. Damage to our homes and properties. Titirangi is known to have land stability issues and the heavy road users will shake out sections and houses causing irreversible damage. Already when buses and truck go past we can feel them, this will increase exponentially with the thousands of truck movements. 6. No faith in Watercare to manage this project in the interests of the community or environment. As a large commercial operation in our neighbourhood they do nothing to contribute to or enhance the community. They treat the community with disdain as evidenced by their woefully inadequate consultation with and engagement with the local community about this project over the past 5 years.

What are the reasons for your submission?

Totally opposed to the community risk and ecological damage this will cause, and no amount of safety procedures at the industrial plant or mitigation will convince me otherwise.

What decisions and amendments would you like the council to make?

Polices for sustainable eco friendly water solutions that fit with modern environmental consciousness and take into account Maori indigenous as well as western worldviews.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5228] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:01:08 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Rebecca Dixon

Organisation name:

Contact phone number: 0276989414

Email address: rebecca_dixon29@hotmail.com

Postal address:
46a Landing Rd Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The decimation of a large area of beautiful, valuable, iconic NZ bush.

What are the reasons for your submission?

It is somewhat ludicrous that this plant is even being considered for this site. Titirangi is known throughout Auckland for its beautiful bush setting. We are declaring climate emergencies in Auckland and hearing the mayor state how many trees are going to be planted throughout the region to try to combat some of the effects of the climate emergency we are facing globally, yet this proposal will tear down thousands of trees, including healthy kauri trees that are not suffering from kauri die back. It is such a vast area of bush that will disappear, and that is without mentioning the precious wildlife that will lose its habitat. The local Titirangi primary schools pride themselves upon their eco teachings. As recently as Friday of last week a gardening group at Woodlands Park Primary school stood up and shared their winter planting successes - saplings grown from scratch at the school were planted locally and the children celebrated their hard work. How do we teach children that they live in such a stunning, magical place and it is to be cherished and protected when this plant site is even being considered?!?

What decisions and amendments would you like the council to make?

Other sites have been considered for this project - look at the bigger picture. Find another option. Does this proposal fit in with what we now know about climate change and the recently declared climate emergency? Is it in keeping with this area, famous for its beautiful bush walks and setting? If not, then it should not go ahead. Whilst roads and safety is not being considered yet, the narrow, windy roads in this area alone surely makes this even being considered here a total waste of people's time and energy. The footpath walks up to the village are single path l'm places currently with a pram - will I feel safe walking with my baby as trucks try to squeeze past one another on these narrow roads? No, nobody would.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5229] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:17:51 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Kay Warner

Organisation name:

Contact phone number: 0221009005

Email address: kaywarner101@gmail.com

Postal address:
22 Kawaka Street Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The level of work being undertaken. The amount of disruption to an area that is already struggling with Kauri dieback which can only be to the forests detriment. Also the volume of heavy vehicle traffic going in and out of our tiny village. Particularly in respect to the safety of our children.

What are the reasons for your submission?

We are a young family who want to preserve our environment and have a safe and happy place to raise our children.

What decisions and amendments would you like the council to make?

An alternative site be found with an infrastructure that can cope with build.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:



Titirangi Protection Group Incorporated
5/506 South Titirangi Road
PO Box 60156
Auckland 0604

2 September 2019

Dear Sir/Madam,

RE: Submission to **OPPOSE** the Huia Replacement Water Plant Resource Consent Application by Titirangi Protection Group Incorporated (2676633)

Application numbers BUN60339273, LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441, relating to the Watercare Huia Replacement Water Treatment Plant (WTP) Project at Woodlands Park Road, Waima

Mandatory information:

1. Megan Fitter and Gina Mitchell as Co-chairs of the Titirangi Protection Group
meganfitter@xtra.co.nz 021 619854, 09 8168528, ginafmitchell@gmail.com 0210465797
2. 5/506 South Titirangi Road, PO Box 60156, Auckland 0604.
3. The Titirangi Protection Group Inc opposes this application in its entirety.
4. The reasons for the submission are set out in the document below.
5. We wish the Council to decline the Consent Application in its entirety.
6. The Titirangi Protection Group Inc wish to be heard to support this submission.
7. We do not wish to present a joint case.

Introduction

The Titirangi Protection Group (TPG) was formed in 2017. It is a registered Incorporated Society (2676633). The TPG was formed by local residents with the following objectives:

1. To oppose Watercare's plans to build a water treatment plant on protected land bordered by Woodlands Park Rd, Manuka Rd.
2. To raise public awareness and to encourage Watercare to engage in meaningful consultation efforts with the local community and conservation groups.
3. To hold Watercare to a sense of social and environmental responsibility as demanded by s59c of the Local Government Act.
4. To ensure that Auckland Council show impartiality and avoid political interference when assessing the resource consent and considering the impacts on the environment and the surrounding communities.

This submission is submitted on behalf of the TPG Executive Committee, its members and supporters.

The TPG opposes the resource consent applications in their entirety and requests that the Independent Commissioners decline the applications. In essence, this action will have the consequential effect of directing Watercare to return to the original Tonkin and Taylor Report on Longlist Options 2016 of sites and to review again using more robust/transparent methods and with a more strategic, environmentally sustainable and socially responsible view to providing for the future water needs of the growing Auckland region, the latter of which are not disputed by TPG.

Whilst we oppose the applications in their entirety, the TPG reserve the right to comment at the hearing on all tabled draft consent conditions and the proposed compensation package, including the mechanics of the proposed Trust to administer the compensation funds, should the Commissioners be minded to grant resource consent.

Why this is important to us

The site forms part of a network of habitat through the Waima area and adjoins regional parkland habitat to the south and west and forms an important connection for wildlife in the extensive network of forest in the Titirangi area. The Yorke and Armstrong Gullies provide high quality freshwater habitats. Longfin eel and inanga are present in the catchment.

The area is well known for its rich biodiversity in flora and fauna, including rare species of ferns, epiphytes, butterflies and snails. The site contains habitat for nationally threatened plant species and is also home to a range of native invertebrates that help keep nutrients cycling and are our key pollinators. Most recently a new species of native wasp was identified on the site.

The sites are almost exclusively (save for the areas already cleared for buildings and impermeable surfaces) identified as being of significant ecological value, having a Significant Ecological Area (SEA) Overlay applicable to all of the sites in the Auckland Unitary Plan (Operative in Part) [AUP (OP)]. They are also within the Waitakere Ranges Heritage Area, protected by the Waitakere Ranges Heritage Area Act 2008. They are ONE of only 0.62% (20 of 3226) that meet all 5 criteria for qualifying as a SEA (i.e. representativeness; threat status and rarity; diversity; stepping stones, migration pathways and buffers; uniqueness or distinctiveness). The SEA is SEA_T_5539, as per page 18 of Schedule 3 of the AUP (OP).

SUBMISSION

PROCESS FLAWS, ALTERNATIVES AND DESIGNATION

We submit that the subject site was selected based on irregularities in scoring and weighting throughout the process. To ignore the significant process flaws would undermine the integrity of the RMA process. These should be fully examined and the selection process declared invalid. Alternative arrangements need to be explored for a new Water Treatment Plant.

The process which Watercare used to establish their final site selection should be an important consideration for the Commissioners. The process rightly needs to ensure that an option, other than the designated site could have been chosen to avoid the Significant Ecological Area.

At the outset Watercare established a first principles concept which consisted of eliminating bias against any one site and starting afresh. However the Woodlands Park Road sites were kept in the running even when their failings suggested they should be eliminated if Watercare's consultants applied the same principles to these as to other identified sites. There were decisions about which sites should be included in the long list and then the shortlist. For instance, Watercare included a site in the shortlist that they had no intention of using (the existing WTP).

Ahead of making the short-list open for public consultation Watercare had effectively already decided on their favoured site and were preparing the necessary documentation for a notice of requirement. This was just one of many failings in the public consultation process.

Transparency and robustness was lacking from the process at several stages. The true independence of Watercare's consultants is open to question: some parts of the selection process were actually scored by Watercare themselves and they intervened inappropriately with their consultants. Consultants failed to stick to the brief that they were given at the start of the process.

Those overseeing the process for Watercare have stated that it should be robust, transparent and replicable, free from political influence and assessed by independent subject matter experts. However the process was subjected to considerable political pressure. Local and national politicians intervened on many levels to influence the choice of site. Elected representatives lost sight of their responsibilities to serve all of their constituents to such an extent that they began forwarding emails received from Titirangi residents to a "rival" campaign group creating ill feeling in both communities. During a period of high emotion Councillors, and others, do not appear to have weighed up the pros and cons of each site before seeking to interfere with the process. One common false assumption is that the designation makes resource consent easier to obtain.

However it is a condition of the designation that the future Outline Plan of Works (OPW) application includes a statement on the relevant Plan objectives, policies and rules, which we assume means how the proposal satisfies these. Similarly required is a statement on any adverse effects the works will have on the environment and the mitigation measures to be carried out.

These requirements are expressed in the explanation to these conditions of the designation which states:

'While it is accepted that the project or works will be (or should be) in accordance with the designated purpose, the Council wishes to be reasonably assured that the specific works to be carried out will not unnecessarily compromise the objectives, policies and rules of the Plan or adversely affect the environment.'
(Chapter K of AUP (OP), Designation 9324, p.45)

We accept that these requirements relate to those aspects of the works that are to be considered by a future OPW application to Council under s.176A RMA, which lie outside of the scope of these proceedings. This said, the RMA approvals required to facilitate the project comprise more than one OPW application. In our view the above conditions of the designation are reflective of the myriad of other planning and resource management considerations that apply to this designated site, which, in turn, are reflected by the high number of regional plan rules for which resource consents are triggered by the proposal.

Accordingly the aforementioned explanation to conditions 1(a) and (b) of Designation #9324 manifests itself in the matters subject to these resource consent applications. Such matters lie at the heart of much of the following points of our submission.

Watercare have filed the application as non-complying which by its definition usually cannot be seen as meeting the aims, plans and objectives of the AUP (OP). We submit that the designation cannot meet its own conditions with regard to using this site. By choosing one of the other sites on the long list the applicant could have avoided compromising the AUP (OP) in this way, so it cannot claim that this was necessary because there were simply no other options that would work from a technical perspective.

The Long List report contains options that -

- a. Will not result in the extensive loss of protected, endangered native flora and fauna.
- b. Is not constrained and will allow for the future expansion requirements.
- c. Takes into account the changed threat status of kauri.

Site options on the long list have been removed without sufficient or demonstrable justification.

To that point, we submit that the first principle of the Resource Management Act to avoid irreversible adverse environmental effects has not been satisfactorily achieved with the project being proposed in this location. Accordingly we consider that the proposal does not satisfy the purpose and principles of the Act, as expressed in Part 2, and notably s.5 (sustainable management), s.6(c) (the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna), s.7(aa) (the ethic of stewardship), (c) (the maintenance and enhancement of amenity values), (d) (the intrinsic values of ecosystems).

We also submit that the proposal is inconsistent with the relevant objectives and policies of the Auckland Unitary Plan, particularly (but not limited to) those relating to the protection and enhancement of indigenous biodiversity, including vegetation and terrestrial and freshwater fauna habitats, namely:

Regional Policy Statement Objectives and Policies:

- B3.2.1 (8), B3.2.2 (6), B3.2.1 (8) – Infrastructure, transport & energy
- B4.4.1 (1), B4.4.1 (8), B4.4.2 (4), B4.4.2 (6), B3.2.2 (6), B3.2.1 (8) – Natural Heritage (Waitakere Ranges Heritage Area)
- B7.2.1 (1), B7.2.1 (2), B7.2.2 (5) – Natural Resources

Regional Plan & District Plan Objectives and Policies:

- D9.2 (1), D9.2 (2), D9.3 (1) D9.3 (1) D9.3 (2), D9.3 (3), D9.3 (5), D9.3 (6), D9.3 (8) – Significant Ecological Areas Overlay & Vegetation Management
- E26.2.1 (9), E26.2.2 (4), E26.2.2 (5), E26.2.2 (6) – Infrastructure.

VEGETATION REMOVAL

Noting that Auckland Council declared a climate emergency on 11th June 2019, we submit the removal of thousands of trees, including mature and mostly native species, is irresponsible and out of step with best practice, the findings of international experts and council's own policies. According to a recent report from the United Nations Intergovernmental Panel on Climate Change, deforestation is a massive factor in climate change. "Global deforestation is a major source of greenhouse gas emissions. Of all the land-use-related carbon dioxide emissions between 2007 and 2016—between 2.6 and 7.8 gigatonnes of carbon dioxide yearly—most of it comes from deforestation, the IPCC report's authors estimate." Auckland has already lost a significant percentage of tree cover and we should be doing all we can to turn that trend around.

As with the Muddy Creeks Local Area Plan of 2014 the ecology reports confirm this site forms linkages and corridors for wildlife with adjoining regional parkland including the North-West Link. *"While there is a gradient of ecosystem condition across the site, the forest adjoins and links with areas of forest to the south and the north. These connections should be described and recognised. The vegetation types on site are all part of a*

continuum. It is a single piece of forest, with mosaic of successional stages and canopy patterns that are connected." (Myers 2018)

We support the submission of Waituna Action Group who further expand on this linkage significance. The damage of interruption was successfully argued in the Environment Court in 2000 (WRPS vs Eggnik).

Furthermore edge effects will compromise the trees that remain outside but adjacent to the construction site including the scheduled kauri (scheduled item #1836) which stands no more than 20m away, its canopy and root spread even closer.

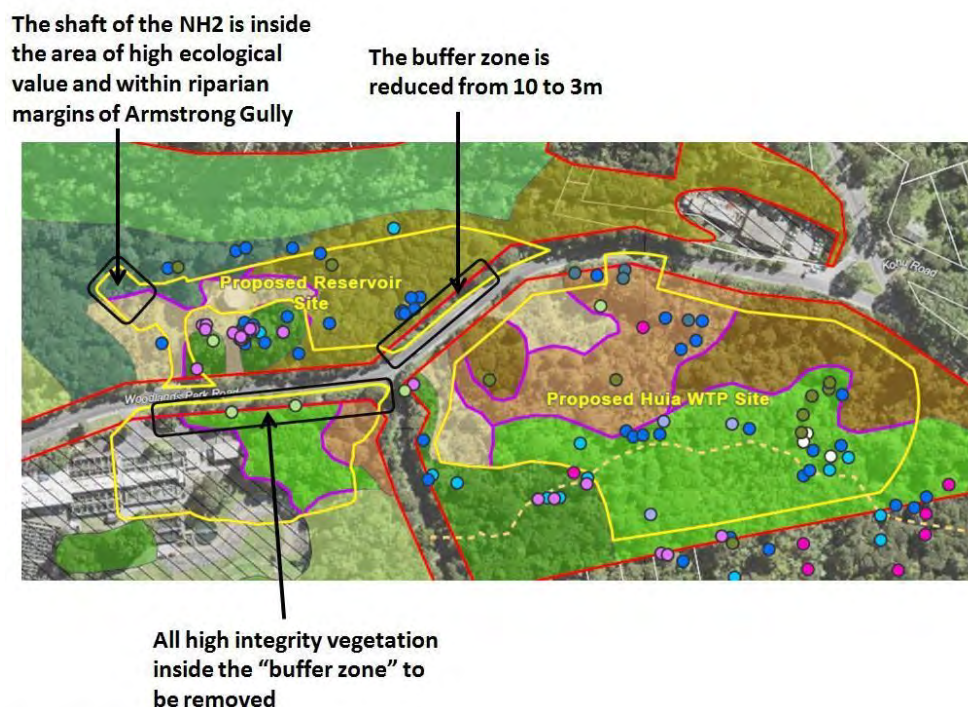
On the WTP site the critically endangered Kaihikatea-puketea forest (WF8) surrounds the Yorke-ephemeral stream headwaters and is within the WTP footprint. This area is not specifically mentioned in the AAE.

We submit that proposed roadside buffer zones at both reservoirs site are totally inappropriate in size. Reservoir 1 has had the buffer reduced from 10m to 3m which will completely change the forest character of the neighbourhood. Additionally at the Reservoir 2 site all high integrity bush inside the "buffer zone" will be removed, and replaced by low value vegetation. Watercare already plan that that new vegetation may need to be removed in the future for pipe maintenance (Beca Reservoir Site Layout Development Report, May 2019, p7)

The new AUP included a change from 3m to 10m front yard setback for building and has implemented this over the Large Lot areas in the Waitakere Ranges Heritage Area Overlay. This reduction is in direct contradiction to this new rule in the plan for residents in the area and will not only affect the character of the WRHA but will set precedents for the 10m front yard rule.

The shaft of the NH2 (a new connection to a planned main trunk water line receiving bulk water from the reservoirs) is actually inside the area of high ecological value and also within riparian margins of Armstrong Gully. This "creep" of add-ons, in our opinion, is indicative of further encroachment over time and shows little commitment to onsite mitigation. This is further demonstrated by the statement that Watercare have no intention to replant the existing site:

"Revegetation of the decommissioned WTP site is not proposed, in order to preserve the long term resilience of the water supply system through allowing space for future refurbishment and/ or expansion of the plant." (Boffa Miskell Memorandum Huia WTP: Preliminary comments regarding S88/S92 response queries, p5)



THE PROPOSED TRUST

We oppose the proposed 'mitigation', regarding it as a blunt, archaic tool and out of step with progressive thinking to development in our city.

Watercare are attempting to justify the extent of clearance of ecologically significant native forest by proposing pest (including weed) control and other initiatives via the Waima Biodiversity Management Plan, to be administered through a Charitable Trust. The applications do not include a clear methodology or basis on which the \$5m compensation figure was derived. There needs to be (1) a sound ecological basis for it, (2) more transparency around the methodology of derivation (i.e. an equivalent of a SEV analysis for streams), and (3) how this will achieve a positive net gain to the biodiversity of the area, as espoused by Boffa Miskell.

Titirangi Protection Group submit that this is only compensation (and should in no way be referred to as "mitigation") and is focused on Biosecurity not Biodiversity. Compensation must also be over and above what is currently planned or supported by other means and entities.

We note there are multiple groups in the proposed zone who have support to increase biodiversity in the area via Auckland Biodiversity expertise and Auckland Council Grants. The Natural Environment Targeted Rate has increased this assistance. Many of these groups, as documented in the Local Area Plan, have been in place for many years and continued even after the Sustainable Neighbourhoods Funding ceased.

Notwithstanding our opposition to the way the SEA vegetation clearance is proposed to be offset by off-site compensation, we raise the following concerns about the proposed Trust:

- Any Trust should be in existence for the whole operational life of the plant, not just the period when it is being built and commissioned.
- It is not clear whether the purpose of setting up the Trust as a charity is for tax purposes, however \$5,000,000 would be eligible for a 33% rebate under current legislation. The net cost to Watercare would therefore be circa \$3,300,000.
- The expected high level of engagement in the catchment is based on the aspirations of the community in relation to the Muddy Creeks Local Area Plan, however this does not take into account the resistance of many in the catchment who oppose the project and want no part in perceived blood/hush money. This also has the possible adverse reputational damage to existing groups who may lose support if they engage with the Trust.
- The quorum of the Trustee structure favours the applicant rather than the community it will be mandated to serve. The process for the appointment of Trustees is not clear.
- Given quorum is 50%, the community is not adequately represented by the composition of Trustees. The CLG and Community Conservation representatives should be demonstrably connected to the Catchment.
- Clarification is sought on the goal of 20% of homes or 400, are these in ADDITION to those currently trapping? How has this been assessed?
- Re Kauri Rescue it is not clear if that is the group or methodology. Paul Jones stated at CLG on 30/05/19 that it is a general term for the "rescue of kauri".
- The group Kauri Rescue is well-established in the area and has had encouraging results, however phosphite treatment should be in line with the MPI national strategy before the implementation as part of the Trust program. To do otherwise uses the entire area as a large scientific experiment. This methodology of "rescuing kauri" should be decided in conjunction by the appointed Trustees not prior to their appointment as it assumes a portion of the \$5,000,000 allocated to this purpose in year 1 without being ratified.
- We reject the suggestion that information is not available for the plans of groups in the area. Several groups in the area have websites or pages which outline their plans, long term goals and roadmaps. We are not aware of the applicant or their consultants making any phone calls or sending any emails to establish what these are.

EFFECTS ON BIODIVERSITY

We submit that due consideration has not been made to the following:

The impact of noise on surrounding wildlife and possible interruption to their breeding habits of which there is considerable research. Furthermore, in our view a satisfactory understanding of the underlying wildlife habitat that will be disturbed has not been established. For example, a single bird survey period of 3 days (December 7th, 12th, 21st) for the 5 Minute Bird Count (5MBC) is inadequate. Winter/Spring or Summer/Autumn would have been the optimal time periods for capturing the highs and lows baseline data for these sites.

We consider that the bat survey was also inconclusive and further investigations are warranted.

We agree with the Shona Myers review 2/7/18 that other survey methods such as tree warps could have been used to increase the chance of detecting geckos, as trees are where geckos are more likely to be, rather than on the ground. Forest gecko (Nationally at risk) has been recorded previously at the site, and Green gecko (Nationally at risk) are likely to be present.

The applicant was notified by entomologist Peter Maddison on 10 June 2019 of the discovery of a new insect species and the presence of other rare insect species, and therefore further investigations were warranted before the applications were lodged. The five examples of a flightless female Pteromalid wasp were found at Clark's Bush; this new species is yet to be named by John Early, Curator of Entomology, Auckland Museum, and advises that no one in New Zealand has done any research on this particular family of wasps.

According to Maddison the site is remarkable for another reason, "The lack of invasive ant species and particularly of Argentine ant, (*Linepithema humile*) is notable. A large ground beetle, *Mecodema*, is indicative of a low presence of rodents. This is probably associated with pest control activities in the area."

KAURI AND KAURI DIEBACK

We support the submission of Save Our Kauri Trust. We are grateful to Dr Nick Waipara for his contribution to the following submission points.

Large parts of the Waitakere Ranges have been closed by Te Kawerau ā Maki and Auckland Council to prevent the spread of *Phytophthora Agathidicida*, a pathogen with a serious and rapid virulence to NZ kauri and no known cure or treatment. Despite this 3.5ha of mature native vegetation is proposed to be cleared, including significant numbers of kauri trees. Watercare accept that this is "ecologically significant native forest", which is classified and protected as a 'Significant Ecological Area' under the Unitary Plan. We would also like to point out that:

1. No investigations specific to the proposed development have been undertaken and the Ecological Report does not address the sensitive root systems of kauri or the impact of stress on vulnerability of kauri to dieback. Edge Effects will be widespread and have not been addressed satisfactorily in the application.
2. To the above point, three of the largest and oldest kauri in Auckland are downhill from this site. One of these, Clark's Kauri has a girth of 864cm on a scale close to Tane Mahuta), is only 100m away. The scheduled kauri (#1836) on the corner of Woodlands Park and Manuka Roads, is no more than 20m away from the construction footprint with a girth of 624cm. An operation of this scale presents a serious risk of introduction/spread of kauri dieback into the proximate neighbouring kauri stands/trees including these ancient, iconic kauri trees.
3. Spread Buffer zone needs to be increased up to 50 – 60 metres of the root zonation. Three times the dripline is not a sufficient buffer.
4. Site surveys ignored kauri under 20cm in diameter and so underestimates kauri area affected. The number of these smaller kauri proposed to be felled is unknown and this is unacceptable.

5. No fit for purpose biosecurity risk assessment has been undertaken for a project of this scale. Such a risk assessment should include detailed surveillance and mapping of kauri dieback in the proposed area as well as adjacent kauri stands and vegetation. It would appear no adequate surveillance, which includes diagnostic sampling, has been undertaken. Mapping the known areas of kauri dieback is also required.
6. The Standard Operating Procedures (SOPs) for kauri dieback were not designed for projects of this scale and we do not consider these can be effectively done at the frequency and to the level required for the entire period of construction. For example:
 - a. The approved disinfectant (Sterigene) is only effective on 2 out of the 3 Phytophthora spores. Hence even after disinfection the ability to spread kauri dieback remains. Total removal of soil containing kauri dieback is not possible as numerous spores are carried in a pin head of soil.
 - b. "Where possible, machinery and vehicles will remain on site for the duration of works" is tantamount to an admission that, in spite of their best precautions, there is a risk that any vehicle coming into contact with the site might spread Kauri Dieback Disease. For the vast majority of vehicles involved in the project staying on site will not be a practical option. There is also the inside of vehicles that can easily become a source of contamination. The workability of protocol is questionable, for example normally you would use two pairs of footwear - one for field work (which can then be isolated in a bag/bin while returning to the depot for thorough cleaning) and one for travelling.
7. The movement of 100,000m³ of soil could potentially contribute to the introduction and/or spread of the kauri dieback pathogen in the Waitakere Ranges Area. All soil from the project site must be considered as contaminated for the purpose of the potential spread of kauri dieback disease to kauri beyond the project footprint and treated in accordance with this assumption. Therefore the Parau Landfill site is therefore wholly unsuitable for this purpose, as is chipping vegetation on site.

IMPACTS DOWNSTREAM OF THE SITE

We support the submission of Waituna Action Group and Little Muddy Creek Rehabilitation Project. We submit that sediment controls are inadequate and the risk of failure could be catastrophic.

Auckland Council has the responsibility to avoid, remedy and mitigate flood hazards. Titirangi-Laingholm Catchment Modelling, including flood profiling is still underway (by AECOM Consulting Service for Auckland Council) giving insufficient information regarding the risk on any scale.

Given all soil is assumed to be contaminated with die back such an event would risk healthy and genetically diverse kauri downstream. It would also risk the population of inanga at Little Muddy Creek.

The applicant affirms that all Erosion and Sediment Control practices shall be constructed in accordance with Auckland Councils GD05 guidance document, however given the effects of sediment on inanga (at risk, declining) are well documented, Whitebait Connection recommends "*sediment control measures should therefore go above and beyond what is currently required by Council.*"

SITE STABILITY

We are concerned that the site stability has not been satisfactorily established. The applicant has indicated further detailed studies will be done when consent is granted, however it is our opinion that this is unacceptable. There are several areas of concern for both during and post the proposed construction:

1. The Cook Costello Stormwater and Erosion and Sediment Control Report observes "The difficulty in achieving 3% for SRP 1 is due to constraint of the landform and the retention volume cannot be practically increased."

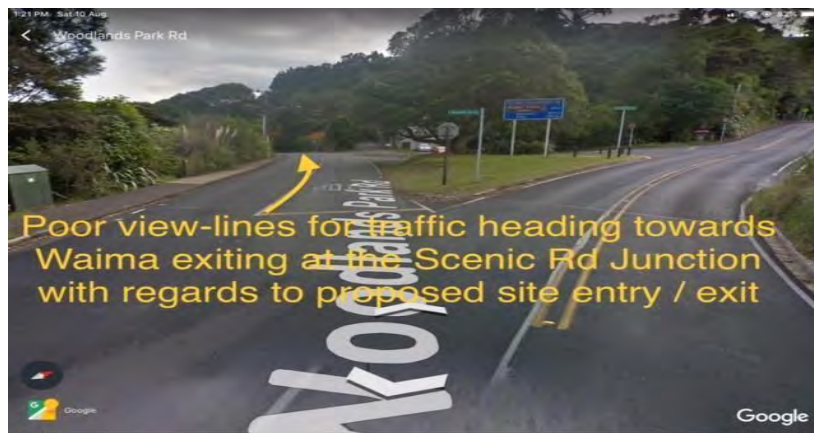
2. It also references climate change, scope of consideration for flooding, rainfall adjustments. Given the site is above many hundreds of homes Failure Mode 1 does not adequately address the evacuation or warning systems with downstream residents or the school which tests water in Kopai Gully.
3. The expanded dry pond proposes a 3.5m high earth embankment, referred to as a dam. The supplied Damwatch report is dated 2012. These are due every 5 years and a more recent report should be submitted.
4. We note that emergency discharge and failure is a rationalisation the applicant has used for discounting other sites on the Long List.
5. The Tonkin and Taylor Groundwater and Settlement Effects Report confirms “No investigations specific to the proposed development had been undertaken at the time of the preparation of this report due to access restrictions.” Given the risk factor and project cost why have these access restrictions not been resolved?
6. We are disappointed that the applicant has rejected additional testing for stability analysis of Scenic Drive and disagree that the request is unjustified.

Further site stability measures required will have further adverse effects on the high value ecosystem. Without Watercare providing a full and complete analysis of how it will achieve all site stability measures and comply with council regulations in this way, the adverse effects cannot be assessed.

TRAFFIC IMPACT

This proposal has an 8 year construction period. Consideration must be made of the ongoing effects and impacts of such a lengthy period, not only for local traffic that use these roads every day, but for tourist traffic, school buses and cyclists. Pedestrian safety for school children and recreational users of both the popular Exhibition Drive and surrounding roads will be compromised.

It is unclear how the site entry and exit will remain safe given the road layout on Woodlands Park Rd from Scenic Drive to the current WTP site adjacent Waima Crescent. For example, to sunstrike when coming up Woodlands Park Road which can be severe at certain times of the year. We do not consider that any rework of this junction can be classified as mitigation in any way shape or form.



NOISE AND VIBRATION

There are very limited Monitoring Pins on the route of trucks. Following the issues of damage to homes from the Southern Motorway expansion works, we are aware of insurers exploring these risks with home owners currently. Vibration damage of hundreds of homes along the truck routes will be an additional cost to the project not budgeted for.

The recreation users of the popular Exhibition Drive will be negatively impacted by the noise of the works for long periods of time, including Saturdays when the car park is overflowing. Due to the closure of many tracks this is one of the most accessible and popular options in the Waitakere Ranges.

TOURISM AMENITY IMPACTS

The proposed construction site is at the gateway to the Waitakere Ranges and would be a very visual scar and tarnish our international image. The Waitakere Ranges are listed as number 8 of 258 attractions in Auckland according to TripAdvisor and they regularly feature in promotional videos for tourism in Auckland.

In 2017 Auckland had a record number of cruise ships, Australian and Chinese short stay visitors. Even at 10am on a weekday Arataki Visitor's Centre has 3 or 4 small tour buses. The ATEED report highlights our area as having huge potential. Showing tourists our beautiful rainforest is a wonderful way to encourage a love of nature and conservation. The proposed sites in Woodlands Park Road affect this tourism during the period of construction. The additional traffic along Scenic Drive would disrupt access, including to the West Coast beaches.

Local users of Exhibition Drive will be impacted by the unavailability of car parking at one end of Exhibition Drive and face the potential danger of trucks accessing the Parau landfill site at the other end of the popular walk which also connects to other tracks in the regional park.

SOCIAL IMPACT

We support the submission of Waima and Woodlands Park Residents and Ratepayers.

The social impact reporting for Titirangi was wholly inadequate. Social impact data gathering was constrained by the desire to keep to the already agreed timeframe, in part due to the political pressure arising from the stress faced by residents of Oratia waiting for a decision. As a result no credible reporting on social impact was carried out for Titirangi before the site decision was made.

Just ten Waima residents were surveyed by Beca. Soon after completion of the surveys they were given a draft of the social impact assessment for feedback. They were received by the residents on Thursday, 25th May at 9.30pm with a deadline for feedback of Monday 29th May. Very basic errors demonstrated that this was very hastily put together, for example, the footer still had the text "Oratia Social Impact Report" in it. The Watercare Board made their decision on Tuesday 30th May at 10am.

The majority of Waima & Woodlands Park residents have chosen to live in the area because of the unique bush-living environment. They have a strong connection with and love for the forest. Many of us take our responsibility as kaitiaki very seriously as evidenced by the myriad active community groups working to conserve and improve our local environment and by the strong outcry against Watercare's proposal. The WRHAA constrains what residents are permitted to do on their property and this is something we abide by because it protects the ecology and heritage of the Waitakere Ranges. For the community to bear witness to the destruction of a forest by a council controlled organisation will have significant impact on the mental health and wellbeing of the community.

A number of studies have shown the psychological benefits of natural environments in terms of lower levels of depression, anxiety and stress. The Waima area is very popular as an area for walking and running due to the relative quiet, lack of heavy traffic and green vistas. With heavy machinery and traffic present Monday to Saturday that amenity will be totally lost during whilst vegetation clearance and earthworks are underway and will continue to be severely restricted until construction is complete 8 years later. Many local families choose to walk or cycle with their children to school. That opportunity would also be lost.

The loss of forest, together with the noise and disruption will be distressing for the community over a long period of time and has not been given due consideration.

The number of engagements to the Auckland Council “Our Water Future” consultation was reported to be 7000. This project is contrary to many aspects regarding the environment and sustainable growth. The consultation submissions should be considered in relation to the project.

DESIGNATION AND SIGNAGE

Council documentation shows that it was the Regional Park designation which took precedence. The designation was quietly removed in 2010. Judicial review would probably be required to establish whether the public were informed of this change in a way which would have allowed them to make submissions at that time.

Note also the AUP (OP)’s Schedule 10 - Notable Trees Schedule, under item #1836, the location reference uses “Auckland Centennial Memorial Park, Corner of Woodlands Park and Manuka Roads”, (i.e. there is no mention of Watercare).

On 10 April 2017, the day after Watercare had held public tours of the existing plant, Paul Jones, Watercare’s Project Manager, wrote to Beca social impact consultant, Amelia Linzey:

‘...But there were landowners that back on to Manuka Road that said you haven’t approached them. They were very upset about the proposal as they were led to believe that the land was a reserve- which in a way is understandable in that the walkway (sign) that enters Watercare property off Manuka Road has Clark’s Bush on it.’ (released under LGOIMA, SKMBT_C754e17100910040 9 October 2017)

Clearly the project manager recognised that fact that the land was not marked as Watercare land and was used as a public walking track was a problem. Nowhere is this land sign-posted as Watercare land. The Manuka Road site has entry to the Clark’s Bush track, and is indistinguishable from the regional park land it adjoins and the track runs through continuously, exiting further down Tainui Road.

The belief that they were living next to a reserve in the shape of a regional park was understandable in that that is exactly what it was. Until 2010 the Manuka Road parcel of land had a double designation status: it was both designated as a Regional Park (under designation 418) and designated for Water Supply Purposes.

Waitakere Ranges Heritage Area Act 2008 (WRHAA)

Section 13 of the WRHAA states that in relation to discretionary and non-complying resource consent applications in the Heritage Area, a consent authority must have particular regard to the purpose of the WRHAA and any relevant objectives, as well as any relevant provisions of any National Policy Statement or New Zealand Coastal Policy Statement.

The applicant is correct in saying that the purpose of the WRHAA is given effect to in the AUP (OP) through the Waitakere Ranges Heritage Area Overlay and B4.4 of the RPS (p. 117). It also states:

“It is noted that the WRHA overlay is a district plan provision, and is therefore not considered in this application but will be addressed in the subsequent OPW.”

Whilst the overlay may be a district plan provision, the purpose of the proposed vegetation clearance and consequential habitat loss is to directly facilitate the water infrastructure works that will be subject to the OPW. Moreover, in our view the Regional Policy Statement objectives and policies are directly relevant to the subject regional resource consents, and those that are most relevant are quoted in italics below.

The AEE attempts to address this important issue for which a particular statute of Parliament was introduced to supplement the RMA and planning instruments prepared under it, in one simple paragraph as follows:

“The public water supply system is recognised by the WRHAA as a heritage feature that contributes to the national significance of the heritage area. However the proposed development will adversely affect other identified heritage features, including terrestrial and aquatic ecosystems of prominent indigenous vegetation, and, temporarily during construction, the quiet of this particular part of the Waitakere Ranges. As described throughout this application, the adverse ecological effects of the project have been avoided, remedied and mitigated as far as practicable, and any residual effects will be compensated for by the WBMP.”

This assessment acknowledges that the proposed development will adversely affect other identified heritage features, including terrestrial and aquatic ecosystems of prominent indigenous vegetation, but dismisses this through two means:

- (1) The footprints of the WTP, reservoirs and associated plant and infrastructure have been minimised as much as practicable to minimise the amount of indigenous vegetation required to be cleared and the amount of streams to be impacted; and
- (2) A compensation package is proposed to sweep up all other residual adverse effects, to be implemented off-site, albeit within the catchment.

However, this methodology does not recognise the national importance of the Waitakere Ranges Heritage Area, which has elevated status for protection, even above other Significant Ecological Areas of the region. As such it does not address the relevant objectives and policies of B4.4 of the AUP (OP), which give effect to the WRHAA, as follows:

B4.4.1. Objectives

(1) The natural and historic resources, including the significant environmental values and heritage features of the Waitākere Ranges, are protected, restored and enhanced for the benefit, use and enjoyment of the community.

(2) Resources that are of significance to Mana Whenua are protected and maintained including:

(a) the spiritual dimension and the mauri of natural and physical resources and of people;

(b) the kaitiaki of these resources and significant sites and wāhi tapu; and

(c) those institutions that are integral to the relationship of Mana Whenua with their environment in a way that promotes the expression and practice of kaitiakitanga.

..

(4) Cumulative effects of activities on the environment, including amenity values and heritage features, are recognised and avoided.

..

..

(7) Enable social, economic, environmental, and cultural well-being of people that live and work in the area.

(8) The water supply catchments and their related supply functions are protected.

..

B4.4.2. Policies

(1) Design and locate structures and impermeable surfaces and undertake activities in a way that does not impede or adversely affect the potential for the regeneration of native vegetation or reduce the extent and range of areas of native vegetation and linkages between them.

(2) Prevent activities from releasing pest species likely to harm native plants and animals and their habitats.

(3) Where clearing vegetation for infrastructure is necessary, it should be undertaken only where the vegetation is of lower value and there is no practicable alternative option.

(4) Manage activities to minimise their adverse effects on water quality, soil, native vegetation and fauna habitats, mauri of the waterway, taiāpure and mahinga mātaītai.

..

(7) Adopt a cautious approach when considering proposals that threaten serious or irreversible damage to a heritage feature.

For the reasons outlined earlier in this submission, we submit that the proposal is contrary to each of the above objectives and policies. Without derogating from this, we make the comments about some specific objectives and policies, as follows:

There is no possible way it can be said that Policy B4.4.1 (2) is satisfied without a CIA being prepared by the relevant Mana Whenua entities. Indeed, it is astounding that a public project of this scale and importance has been lodged for resource consents whilst CIA(s) are still being prepared.

With regard to Policy B4.4.2 (1), the proposed vegetation clearance, once undertaken and particularly, once covered by the built structures that will be enabled by the OPW is irreversible. As such, this will (i) irreversibly adversely affect the potential for the regeneration of native vegetation and (ii) reduce the extent of native vegetation and linkages between the vegetation on the site and the adjacent Regional Park.

With regard to Policy B4.4.2 (2), we accept that the proposal will not deliberately release pest species likely to harm native plants and animals and their habitats. However, as explained earlier, we consider that the scale, duration and complexity of this construction project is such that the spread of Kauri Dieback and Myrtle Rust is almost inevitable, no matter what precautions and management plans are implemented.

In respect of Policy B4.4.2 (3), Watercare's justification for the proposed vegetation clearance relies on avoiding the highest value vegetation on the site and its 'reduction' of the footprint now proposed (compared with the earlier proposal for two new reservoirs north of Woodlands Park Road). This revision is acknowledged and welcomed., but this does not detract, that the adverse effects involved with this proposal, particularly regarding the SEA vegetation clearance and habitat destruction could instead be avoided entirely by choosing an alternative. We emphasise that it is not too late to reverse Watercare's site selection decision.

In the Group's view this is, in essence, summed up by Policy B4.4.2 (7), that the most appropriate action is to adopt a cautious approach and decline the consents as the proposal is one that threatens serious and irreversible damage to a heritage feature. This is particularly so given the prevailing risk of the spread of Kauri Dieback and Myrtle Rust diseases, for which the science is still emerging. An alternative site, not necessitating such significant SEA vegetation and habitat destruction, should be chosen instead.

Community support in Conclusion

We are very pleased that the community has been behind the TPG, and considerable time and effort has been put towards ensuring the information of the 2028 page application is accessible to as many people as possible in a 20 working day period. We value that our committee is structured to have open and distributed responsibilities where all voices at the table are heard.

A petition in support of this submission has been signed by over 2000 signatories since its launch 7 days ago on Saturday 25th August.

<https://www.toko.org.nz/petitions/sign-on-to-the-submission-in-opposition-to-the-replacement-water-treatment-plant-in-titirangi>

Below are a small number of comments from the signatories of the Toko petition, in support of this submission.

<p>“ The impact on our communitys roads , schools, would be devastating and dangerous. The removal of so many wonderful native trees is blindly shortsighted. The risk to all the housing areas below this site from future slips and flooding is not worth taking . This is protected foothill land which is why I chose to live here.</p> <p>Awhi O. 5 days ago</p>	<p>“ The first principle of the RMA, to AVOID irreversible adverse environmental effects, has not been satisfactorily achieved with the project being proposed in this location. It is also inconsistent with the relevant objectives and policies of the Auckland Unitary Plan.</p> <p>Jill P. 4 days ago</p>
<p>“ Why does Native Bush have to suffer the consequences? Isn't it obvious that we cannot afford to loose another acre of our most precious resource. We need these trees to survive and thrive here in Aotearoa where they belong. He Whakaaro ā-Māori tēnei.</p> <p>Kali H. 4 days ago</p>	<p>“ 8 years of trucks thundering down roads not designed for them, past numerous schools and child care centres. The Waitakere ranges are mostly closed, with the impact of walkers on spreading Kauri dieback. But Watercare want to bulldoze healthy Kauri, and spread potentially contaminated soil in a wider area.</p> <p>Christopher B. 3 days ago</p>
<p>“ Significant ecological areas are few and far between. They should never be destroyed for infrastructure. Surely there is a better solution. Our critically endangered native species need as much habitat as they can get.</p> <p>Susan S. about 24 hours ago</p>	<p>“ Scenic Drive and Woodlands Park Roads are used constantly by local residents, tourists, and school bus users. In addition to road use, there is steady use of these roads by pedestrians, school pupils and others, moving between Waima and Titirangi Village. Trucks will by passing pedestrians at 1 meter distance in places. Heavy trucking, as proposed by Watercare, places both road users and pedestrians at high risk.</p> <p>Owen M. 4 days ago</p>
<p>“ The Titirangi area is absolutely precious, both in terms of living conditions for people, and natural habitat for plants and wildlife. It is essential to reconsider this project, and look to developing other possibilities with small, less intrusive and non-destructive techniques, which make use of the better sides of modern technology. Burn and slash is essentially a warfare technique, which should in no circumstances be used here.</p> <p>Louise T. 4 days ago</p>	<p>“ We need protect our precious forest, I cannot believe they would clear so much forest when we are fighting kauri die back. What is going on?</p> <p>Martien J. a day ago</p>

References

Auckland Unitary Plan (Operative in Part) 2016.

Myers 2018. Huia Water Treatment Upgrade - Assessment and Review of Ecological Values, 2 July 2018

2014 Muddy Creeks Local Area Plan

Tonkin and Taylor Report on Longlist Options 2016

LGOIMA, SKMBT_C754e17100910040, 9 October 2017

Psychology for a Better World, Niki Harre

Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems, August 2019



Titirangi Protection Group Incorporated
5/506 South Titirangi Road
PO Box 60156
Auckland 0604

2 September 2019

Dear Sir/Madam,

RE: Submission to **OPPOSE** the Huia Replacement Water Plant Resource Consent Application by Titirangi Protection Group Incorporated (2676633)

Application numbers BUN60339273, LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441, relating to the Watercare Huia Replacement Water Treatment Plant (WTP) Project at Woodlands Park Road, Waima

Mandatory information:

1. Megan Fitter and Gina Mitchell as Co-chairs of the Titirangi Protection Group
meganfitter@xtra.co.nz 021 619854, 09 8168528, ginafmitchell@gmail.com 0210465797
2. 5/506 South Titirangi Road, PO Box 60156, Auckland 0604.
3. The Titirangi Protection Group Inc opposes this application in its entirety.
4. The reasons for the submission are set out in the document below.
5. We wish the Council to decline the Consent Application in its entirety.
6. The Titirangi Protection Group Inc wish to be heard to support this submission.
7. We do not wish to present a joint case.

Introduction

The Titirangi Protection Group (TPG) was formed in 2017. It is a registered Incorporated Society (2676633). The TPG was formed by local residents with the following objectives:

1. To oppose Watercare's plans to build a water treatment plant on protected land bordered by Woodlands Park Rd, Manuka Rd.
2. To raise public awareness and to encourage Watercare to engage in meaningful consultation efforts with the local community and conservation groups.
3. To hold Watercare to a sense of social and environmental responsibility as demanded by s59c of the Local Government Act.
4. To ensure that Auckland Council show impartiality and avoid political interference when assessing the resource consent and considering the impacts on the environment and the surrounding communities.

This submission is submitted on behalf of the TPG Executive Committee, its members and supporters.

The TPG opposes the resource consent applications in their entirety and requests that the Independent Commissioners decline the applications. In essence, this action will have the consequential effect of directing Watercare to return to the original Tonkin and Taylor Report on Longlist Options 2016 of sites and to review again using more robust/transparent methods and with a more strategic, environmentally sustainable and socially responsible view to providing for the future water needs of the growing Auckland region, the latter of which are not disputed by TPG.

Whilst we oppose the applications in their entirety, the TPG reserve the right to comment at the hearing on all tabled draft consent conditions and the proposed compensation package, including the mechanics of the proposed Trust to administer the compensation funds, should the Commissioners be minded to grant resource consent.

Why this is important to us

The site forms part of a network of habitat through the Waima area and adjoins regional parkland habitat to the south and west and forms an important connection for wildlife in the extensive network of forest in the Titirangi area. The Yorke and Armstrong Gullies provide high quality freshwater habitats. Longfin eel and inanga are present in the catchment.

The area is well known for its rich biodiversity in flora and fauna, including rare species of ferns, epiphytes, butterflies and snails. The site contains habitat for nationally threatened plant species and is also home to a range of native invertebrates that help keep nutrients cycling and are our key pollinators. Most recently a new species of native wasp was identified on the site.

The sites are almost exclusively (save for the areas already cleared for buildings and impermeable surfaces) identified as being of significant ecological value, having a Significant Ecological Area (SEA) Overlay applicable to all of the sites in the Auckland Unitary Plan (Operative in Part) [AUP (OP)]. They are also within the Waitakere Ranges Heritage Area, protected by the Waitakere Ranges Heritage Area Act 2008. They are ONE of only 0.62% (20 of 3226) that meet all 5 criteria for qualifying as a SEA (i.e. representativeness; threat status and rarity; diversity; stepping stones, migration pathways and buffers; uniqueness or distinctiveness). The SEA is SEA_T_5539, as per page 18 of Schedule 3 of the AUP (OP).

SUBMISSION

PROCESS FLAWS, ALTERNATIVES AND DESIGNATION

We submit that the subject site was selected based on irregularities in scoring and weighting throughout the process. To ignore the significant process flaws would undermine the integrity of the RMA process. These should be fully examined and the selection process declared invalid. Alternative arrangements need to be explored for a new Water Treatment Plant.

The process which Watercare used to establish their final site selection should be an important consideration for the Commissioners. The process rightly needs to ensure that an option, other than the designated site could have been chosen to avoid the Significant Ecological Area.

At the outset Watercare established a first principles concept which consisted of eliminating bias against any one site and starting afresh. However the Woodlands Park Road sites were kept in the running even when their failings suggested they should be eliminated if Watercare's consultants applied the same principles to these as to other identified sites. There were decisions about which sites should be included in the long list and then the shortlist. For instance, Watercare included a site in the shortlist that they had no intention of using (the existing WTP).

Ahead of making the short-list open for public consultation Watercare had effectively already decided on their favoured site and were preparing the necessary documentation for a notice of requirement. This was just one of many failings in the public consultation process.

Transparency and robustness was lacking from the process at several stages. The true independence of Watercare's consultants is open to question: some parts of the selection process were actually scored by Watercare themselves and they intervened inappropriately with their consultants. Consultants failed to stick to the brief that they were given at the start of the process.

Those overseeing the process for Watercare have stated that it should be robust, transparent and replicable, free from political influence and assessed by independent subject matter experts. However the process was subjected to considerable political pressure. Local and national politicians intervened on many levels to influence the choice of site. Elected representatives lost sight of their responsibilities to serve all of their constituents to such an extent that they began forwarding emails received from Titirangi residents to a "rival" campaign group creating ill feeling in both communities. During a period of high emotion Councillors, and others, do not appear to have weighed up the pros and cons of each site before seeking to interfere with the process. One common false assumption is that the designation makes resource consent easier to obtain.

However it is a condition of the designation that the future Outline Plan of Works (OPW) application includes a statement on the relevant Plan objectives, policies and rules, which we assume means how the proposal satisfies these. Similarly required is a statement on any adverse effects the works will have on the environment and the mitigation measures to be carried out.

These requirements are expressed in the explanation to these conditions of the designation which states:

'While it is accepted that the project or works will be (or should be) in accordance with the designated purpose, the Council wishes to be reasonably assured that the specific works to be carried out will not unnecessarily compromise the objectives, policies and rules of the Plan or adversely affect the environment.'
(Chapter K of AUP (OP), Designation 9324, p.45)

We accept that these requirements relate to those aspects of the works that are to be considered by a future OPW application to Council under s.176A RMA, which lie outside of the scope of these proceedings. This said, the RMA approvals required to facilitate the project comprise more than one OPW application. In our view the above conditions of the designation are reflective of the myriad of other planning and resource management considerations that apply to this designated site, which, in turn, are reflected by the high number of regional plan rules for which resource consents are triggered by the proposal.

Accordingly the aforementioned explanation to conditions 1(a) and (b) of Designation #9324 manifests itself in the matters subject to these resource consent applications. Such matters lie at the heart of much of the following points of our submission.

Watercare have filed the application as non-complying which by its definition usually cannot be seen as meeting the aims, plans and objectives of the AUP (OP). We submit that the designation cannot meet its own conditions with regard to using this site. By choosing one of the other sites on the long list the applicant could have avoided compromising the AUP (OP) in this way, so it cannot claim that this was necessary because there were simply no other options that would work from a technical perspective.

The Long List report contains options that -

- a. Will not result in the extensive loss of protected, endangered native flora and fauna.
- b. Is not constrained and will allow for the future expansion requirements.
- c. Takes into account the changed threat status of kauri.

Site options on the long list have been removed without sufficient or demonstrable justification.

To that point, we submit that the first principle of the Resource Management Act to avoid irreversible adverse environmental effects has not been satisfactorily achieved with the project being proposed in this location. Accordingly we consider that the proposal does not satisfy the purpose and principles of the Act, as expressed in Part 2, and notably s.5 (sustainable management), s.6(c) (the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna), s.7(aa) (the ethic of stewardship), (c) (the maintenance and enhancement of amenity values), (d) (the intrinsic values of ecosystems).

We also submit that the proposal is inconsistent with the relevant objectives and policies of the Auckland Unitary Plan, particularly (but not limited to) those relating to the protection and enhancement of indigenous biodiversity, including vegetation and terrestrial and freshwater fauna habitats, namely:

Regional Policy Statement Objectives and Policies:

- B3.2.1 (8), B3.2.2 (6), B3.2.1 (8) – Infrastructure, transport & energy
- B4.4.1 (1), B4.4.1 (8), B4.4.2 (4), B4.4.2 (6), B3.2.2 (6), B3.2.1 (8) – Natural Heritage (Waitakere Ranges Heritage Area)
- B7.2.1 (1), B7.2.1 (2), B7.2.2 (5) – Natural Resources

Regional Plan & District Plan Objectives and Policies:

- D9.2 (1), D9.2 (2), D9.3 (1) D9.3 (1) D9.3 (2), D9.3 (3), D9.3 (5), D9.3 (6), D9.3 (8) – Significant Ecological Areas Overlay & Vegetation Management
- E26.2.1 (9), E26.2.2 (4), E26.2.2 (5), E26.2.2 (6) – Infrastructure.

VEGETATION REMOVAL

Noting that Auckland Council declared a climate emergency on 11th June 2019, we submit the removal of thousands of trees, including mature and mostly native species, is irresponsible and out of step with best practice, the findings of international experts and council's own policies. According to a recent report from the United Nations Intergovernmental Panel on Climate Change, deforestation is a massive factor in climate change. "Global deforestation is a major source of greenhouse gas emissions. Of all the land-use-related carbon dioxide emissions between 2007 and 2016—between 2.6 and 7.8 gigatonnes of carbon dioxide yearly—most of it comes from deforestation, the IPCC report's authors estimate." Auckland has already lost a significant percentage of tree cover and we should be doing all we can to turn that trend around.

As with the Muddy Creeks Local Area Plan of 2014 the ecology reports confirm this site forms linkages and corridors for wildlife with adjoining regional parkland including the North-West Link. *"While there is a gradient of ecosystem condition across the site, the forest adjoins and links with areas of forest to the south and the north. These connections should be described and recognised. The vegetation types on site are all part of a*

continuum. It is a single piece of forest, with mosaic of successional stages and canopy patterns that are connected." (Myers 2018)

We support the submission of Waituna Action Group who further expand on this linkage significance. The damage of interruption was successfully argued in the Environment Court in 2000 (WRPS vs Eggnik).

Furthermore edge effects will compromise the trees that remain outside but adjacent to the construction site including the scheduled kauri (scheduled item #1836) which stands no more than 20m away, its canopy and root spread even closer.

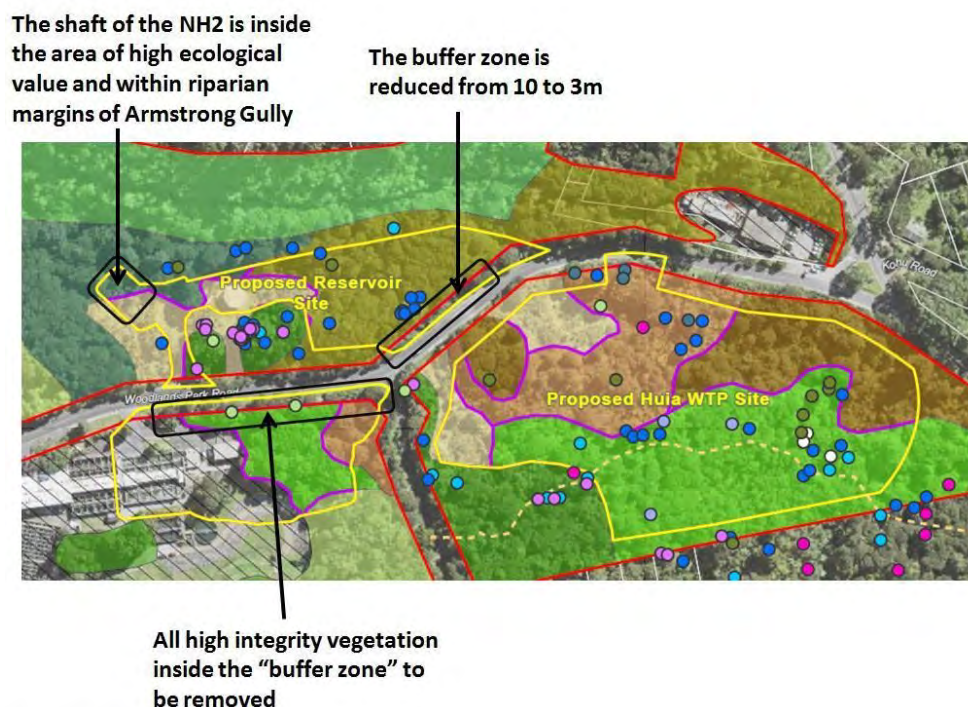
On the WTP site the critically endangered Kaihikatea-puketea forest (WF8) surrounds the Yorke-ephemeral stream headwaters and is within the WTP footprint. This area is not specifically mentioned in the AAE.

We submit that proposed roadside buffer zones at both reservoirs site are totally inappropriate in size. Reservoir 1 has had the buffer reduced from 10m to 3m which will completely change the forest character of the neighbourhood. Additionally at the Reservoir 2 site all high integrity bush inside the "buffer zone" will be removed, and replaced by low value vegetation. Watercare already plan that that new vegetation may need to be removed in the future for pipe maintenance (Beca Reservoir Site Layout Development Report, May 2019, p7)

The new AUP included a change from 3m to 10m front yard setback for building and has implemented this over the Large Lot areas in the Waitakere Ranges Heritage Area Overlay. This reduction is in direct contradiction to this new rule in the plan for residents in the area and will not only affect the character of the WRHA but will set precedents for the 10m front yard rule.

The shaft of the NH2 (a new connection to a planned main trunk water line receiving bulk water from the reservoirs) is actually inside the area of high ecological value and also within riparian margins of Armstrong Gully. This "creep" of add-ons, in our opinion, is indicative of further encroachment over time and shows little commitment to onsite mitigation. This is further demonstrated by the statement that Watercare have no intention to replant the existing site:

"Revegetation of the decommissioned WTP site is not proposed, in order to preserve the long term resilience of the water supply system through allowing space for future refurbishment and/ or expansion of the plant." (Boffa Miskell Memorandum Huia WTP: Preliminary comments regarding S88/S92 response queries, p5)



THE PROPOSED TRUST

We oppose the proposed 'mitigation', regarding it as a blunt, archaic tool and out of step with progressive thinking to development in our city.

Watercare are attempting to justify the extent of clearance of ecologically significant native forest by proposing pest (including weed) control and other initiatives via the Waima Biodiversity Management Plan, to be administered through a Charitable Trust. The applications do not include a clear methodology or basis on which the \$5m compensation figure was derived. There needs to be (1) a sound ecological basis for it, (2) more transparency around the methodology of derivation (i.e. an equivalent of a SEV analysis for streams), and (3) how this will achieve a positive net gain to the biodiversity of the area, as espoused by Boffa Miskell.

Titirangi Protection Group submit that this is only compensation (and should in no way be referred to as "mitigation") and is focused on Biosecurity not Biodiversity. Compensation must also be over and above what is currently planned or supported by other means and entities.

We note there are multiple groups in the proposed zone who have support to increase biodiversity in the area via Auckland Biodiversity expertise and Auckland Council Grants. The Natural Environment Targeted Rate has increased this assistance. Many of these groups, as documented in the Local Area Plan, have been in place for many years and continued even after the Sustainable Neighbourhoods Funding ceased.

Notwithstanding our opposition to the way the SEA vegetation clearance is proposed to be offset by off-site compensation, we raise the following concerns about the proposed Trust:

- Any Trust should be in existence for the whole operational life of the plant, not just the period when it is being built and commissioned.
- It is not clear whether the purpose of setting up the Trust as a charity is for tax purposes, however \$5,000,000 would be eligible for a 33% rebate under current legislation. The net cost to Watercare would therefore be circa \$3,300,000.
- The expected high level of engagement in the catchment is based on the aspirations of the community in relation to the Muddy Creeks Local Area Plan, however this does not take into account the resistance of many in the catchment who oppose the project and want no part in perceived blood/hush money. This also has the possible adverse reputational damage to existing groups who may lose support if they engage with the Trust.
- The quorum of the Trustee structure favours the applicant rather than the community it will be mandated to serve. The process for the appointment of Trustees is not clear.
- Given quorum is 50%, the community is not adequately represented by the composition of Trustees. The CLG and Community Conservation representatives should be demonstrably connected to the Catchment.
- Clarification is sought on the goal of 20% of homes or 400, are these in ADDITION to those currently trapping? How has this been assessed?
- Re Kauri Rescue it is not clear if that is the group or methodology. Paul Jones stated at CLG on 30/05/19 that it is a general term for the "rescue of kauri".
- The group Kauri Rescue is well-established in the area and has had encouraging results, however phosphite treatment should be in line with the MPI national strategy before the implementation as part of the Trust program. To do otherwise uses the entire area as a large scientific experiment. This methodology of "rescuing kauri" should be decided in conjunction by the appointed Trustees not prior to their appointment as it assumes a portion of the \$5,000,000 allocated to this purpose in year 1 without being ratified.
- We reject the suggestion that information is not available for the plans of groups in the area. Several groups in the area have websites or pages which outline their plans, long term goals and roadmaps. We are not aware of the applicant or their consultants making any phone calls or sending any emails to establish what these are.

EFFECTS ON BIODIVERSITY

We submit that due consideration has not been made to the following:

The impact of noise on surrounding wildlife and possible interruption to their breeding habits of which there is considerable research. Furthermore, in our view a satisfactory understanding of the underlying wildlife habitat that will be disturbed has not been established. For example, a single bird survey period of 3 days (December 7th, 12th, 21st) for the 5 Minute Bird Count (5MBC) is inadequate. Winter/Spring or Summer/Autumn would have been the optimal time periods for capturing the highs and lows baseline data for these sites.

We consider that the bat survey was also inconclusive and further investigations are warranted.

We agree with the Shona Myers review 2/7/18 that other survey methods such as tree warps could have been used to increase the chance of detecting geckos, as trees are where geckos are more likely to be, rather than on the ground. Forest gecko (Nationally at risk) has been recorded previously at the site, and Green gecko (Nationally at risk) are likely to be present.

The applicant was notified by entomologist Peter Maddison on 10 June 2019 of the discovery of a new insect species and the presence of other rare insect species, and therefore further investigations were warranted before the applications were lodged. The five examples of a flightless female Pteromalid wasp were found at Clark's Bush; this new species is yet to be named by John Early, Curator of Entomology, Auckland Museum, and advises that no one in New Zealand has done any research on this particular family of wasps.

According to Maddison the site is remarkable for another reason, "The lack of invasive ant species and particularly of Argentine ant, (*Linepithema humile*) is notable. A large ground beetle, *Mecodema*, is indicative of a low presence of rodents. This is probably associated with pest control activities in the area."

KAURI AND KAURI DIEBACK

We support the submission of Save Our Kauri Trust. We are grateful to Dr Nick Waipara for his contribution to the following submission points.

Large parts of the Waitakere Ranges have been closed by Te Kawerau ā Maki and Auckland Council to prevent the spread of *Phytophthora Agathidicida*, a pathogen with a serious and rapid virulence to NZ kauri and no known cure or treatment. Despite this 3.5ha of mature native vegetation is proposed to be cleared, including significant numbers of kauri trees. Watercare accept that this is "ecologically significant native forest", which is classified and protected as a 'Significant Ecological Area' under the Unitary Plan. We would also like to point out that:

1. No investigations specific to the proposed development have been undertaken and the Ecological Report does not address the sensitive root systems of kauri or the impact of stress on vulnerability of kauri to dieback. Edge Effects will be widespread and have not been addressed satisfactorily in the application.
2. To the above point, three of the largest and oldest kauri in Auckland are downhill from this site. One of these, Clark's Kauri has a girth of 864cm on a scale close to Tane Mahuta), is only 100m away. The scheduled kauri (#1836) on the corner of Woodlands Park and Manuka Roads, is no more than 20m away from the construction footprint with a girth of 624cm. An operation of this scale presents a serious risk of introduction/spread of kauri dieback into the proximate neighbouring kauri stands/trees including these ancient, iconic kauri trees.
3. Spread Buffer zone needs to be increased up to 50 – 60 metres of the root zonation. Three times the dripline is not a sufficient buffer.
4. Site surveys ignored kauri under 20cm in diameter and so underestimates kauri area affected. The number of these smaller kauri proposed to be felled is unknown and this is unacceptable.

5. No fit for purpose biosecurity risk assessment has been undertaken for a project of this scale. Such a risk assessment should include detailed surveillance and mapping of kauri dieback in the proposed area as well as adjacent kauri stands and vegetation. It would appear no adequate surveillance, which includes diagnostic sampling, has been undertaken. Mapping the known areas of kauri dieback is also required.
6. The Standard Operating Procedures (SOPs) for kauri dieback were not designed for projects of this scale and we do not consider these can be effectively done at the frequency and to the level required for the entire period of construction. For example:
 - a. The approved disinfectant (Sterigene) is only effective on 2 out of the 3 Phytophthora spores. Hence even after disinfection the ability to spread kauri dieback remains. Total removal of soil containing kauri dieback is not possible as numerous spores are carried in a pin head of soil.
 - b. "Where possible, machinery and vehicles will remain on site for the duration of works" is tantamount to an admission that, in spite of their best precautions, there is a risk that any vehicle coming into contact with the site might spread Kauri Dieback Disease. For the vast majority of vehicles involved in the project staying on site will not be a practical option. There is also the inside of vehicles that can easily become a source of contamination. The workability of protocol is questionable, for example normally you would use two pairs of footwear - one for field work (which can then be isolated in a bag/bin while returning to the depot for thorough cleaning) and one for travelling.
7. The movement of 100,000m³ of soil could potentially contribute to the introduction and/or spread of the kauri dieback pathogen in the Waitakere Ranges Area. All soil from the project site must be considered as contaminated for the purpose of the potential spread of kauri dieback disease to kauri beyond the project footprint and treated in accordance with this assumption. Therefore the Parau Landfill site is therefore wholly unsuitable for this purpose, as is chipping vegetation on site.

IMPACTS DOWNSTREAM OF THE SITE

We support the submission of Waituna Action Group and Little Muddy Creek Rehabilitation Project. We submit that sediment controls are inadequate and the risk of failure could be catastrophic.

Auckland Council has the responsibility to avoid, remedy and mitigate flood hazards. Titirangi-Laingholm Catchment Modelling, including flood profiling is still underway (by AECOM Consulting Service for Auckland Council) giving insufficient information regarding the risk on any scale.

Given all soil is assumed to be contaminated with die back such an event would risk healthy and genetically diverse kauri downstream. It would also risk the population of inanga at Little Muddy Creek.

The applicant affirms that all Erosion and Sediment Control practices shall be constructed in accordance with Auckland Councils GD05 guidance document, however given the effects of sediment on inanga (at risk, declining) are well documented, Whitebait Connection recommends "*sediment control measures should therefore go above and beyond what is currently required by Council.*"

SITE STABILITY

We are concerned that the site stability has not been satisfactorily established. The applicant has indicated further detailed studies will be done when consent is granted, however it is our opinion that this is unacceptable. There are several areas of concern for both during and post the proposed construction:

1. The Cook Costello Stormwater and Erosion and Sediment Control Report observes "The difficulty in achieving 3% for SRP 1 is due to constraint of the landform and the retention volume cannot be practically increased."

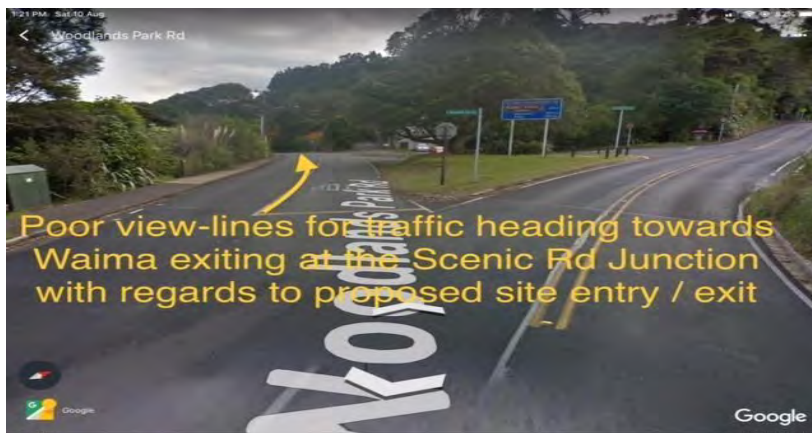
2. It also references climate change, scope of consideration for flooding, rainfall adjustments. Given the site is above many hundreds of homes Failure Mode 1 does not adequately address the evacuation or warning systems with downstream residents or the school which tests water in Kopai Gully.
3. The expanded dry pond proposes a 3.5m high earth embankment, referred to as a dam. The supplied Damwatch report is dated 2012. These are due every 5 years and a more recent report should be submitted.
4. We note that emergency discharge and failure is a rationalisation the applicant has used for discounting other sites on the Long List.
5. The Tonkin and Taylor Groundwater and Settlement Effects Report confirms “No investigations specific to the proposed development had been undertaken at the time of the preparation of this report due to access restrictions.” Given the risk factor and project cost why have these access restrictions not been resolved?
6. We are disappointed that the applicant has rejected additional testing for stability analysis of Scenic Drive and disagree that the request is unjustified.

Further site stability measures required will have further adverse effects on the high value ecosystem. Without Watercare providing a full and complete analysis of how it will achieve all site stability measures and comply with council regulations in this way, the adverse effects cannot be assessed.

TRAFFIC IMPACT

This proposal has an 8 year construction period. Consideration must be made of the ongoing effects and impacts of such a lengthy period, not only for local traffic that use these roads every day, but for tourist traffic, school buses and cyclists. Pedestrian safety for school children and recreational users of both the popular Exhibition Drive and surrounding roads will be compromised.

It is unclear how the site entry and exit will remain safe given the road layout on Woodlands Park Rd from Scenic Drive to the current WTP site adjacent Waima Crescent. For example, to sunstrike when coming up Woodlands Park Road which can be severe at certain times of the year. We do not consider that any rework of this junction can be classified as mitigation in any way shape or form.



NOISE AND VIBRATION

There are very limited Monitoring Pins on the route of trucks. Following the issues of damage to homes from the Southern Motorway expansion works, we are aware of insurers exploring these risks with home owners currently. Vibration damage of hundreds of homes along the truck routes will be an additional cost to the project not budgeted for.

The recreation users of the popular Exhibition Drive will be negatively impacted by the noise of the works for long periods of time, including Saturdays when the car park is overflowing. Due to the closure of many tracks this is one of the most accessible and popular options in the Waitakere Ranges.

TOURISM AMENITY IMPACTS

The proposed construction site is at the gateway to the Waitakere Ranges and would be a very visual scar and tarnish our international image. The Waitakere Ranges are listed as number 8 of 258 attractions in Auckland according to TripAdvisor and they regularly feature in promotional videos for tourism in Auckland.

In 2017 Auckland had a record number of cruise ships, Australian and Chinese short stay visitors. Even at 10am on a weekday Arataki Visitor's Centre has 3 or 4 small tour buses. The ATEED report highlights our area as having huge potential. Showing tourists our beautiful rainforest is a wonderful way to encourage a love of nature and conservation. The proposed sites in Woodlands Park Road affect this tourism during the period of construction. The additional traffic along Scenic Drive would disrupt access, including to the West Coast beaches.

Local users of Exhibition Drive will be impacted by the unavailability of car parking at one end of Exhibition Drive and face the potential danger of trucks accessing the Parau landfill site at the other end of the popular walk which also connects to other tracks in the regional park.

SOCIAL IMPACT

We support the submission of Waima and Woodlands Park Residents and Ratepayers.

The social impact reporting for Titirangi was wholly inadequate. Social impact data gathering was constrained by the desire to keep to the already agreed timeframe, in part due to the political pressure arising from the stress faced by residents of Oratia waiting for a decision. As a result no credible reporting on social impact was carried out for Titirangi before the site decision was made.

Just ten Waima residents were surveyed by Beca. Soon after completion of the surveys they were given a draft of the social impact assessment for feedback. They were received by the residents on Thursday, 25th May at 9.30pm with a deadline for feedback of Monday 29th May. Very basic errors demonstrated that this was very hastily put together, for example, the footer still had the text "Oratia Social Impact Report" in it. The Watercare Board made their decision on Tuesday 30th May at 10am.

The majority of Waima & Woodlands Park residents have chosen to live in the area because of the unique bush-living environment. They have a strong connection with and love for the forest. Many of us take our responsibility as kaitiaki very seriously as evidenced by the myriad active community groups working to conserve and improve our local environment and by the strong outcry against Watercare's proposal. The WRHAA constrains what residents are permitted to do on their property and this is something we abide by because it protects the ecology and heritage of the Waitakere Ranges. For the community to bear witness to the destruction of a forest by a council controlled organisation will have significant impact on the mental health and wellbeing of the community.

A number of studies have shown the psychological benefits of natural environments in terms of lower levels of depression, anxiety and stress. The Waima area is very popular as an area for walking and running due to the relative quiet, lack of heavy traffic and green vistas. With heavy machinery and traffic present Monday to Saturday that amenity will be totally lost during whilst vegetation clearance and earthworks are underway and will continue to be severely restricted until construction is complete 8 years later. Many local families choose to walk or cycle with their children to school. That opportunity would also be lost.

The loss of forest, together with the noise and disruption will be distressing for the community over a long period of time and has not been given due consideration.

The number of engagements to the Auckland Council “Our Water Future” consultation was reported to be 7000. This project is contrary to many aspects regarding the environment and sustainable growth. The consultation submissions should be considered in relation to the project.

DESIGNATION AND SIGNAGE

Council documentation shows that it was the Regional Park designation which took precedence. The designation was quietly removed in 2010. Judicial review would probably be required to establish whether the public were informed of this change in a way which would have allowed them to make submissions at that time.

Note also the AUP (OP)’s Schedule 10 - Notable Trees Schedule, under item #1836, the location reference uses “Auckland Centennial Memorial Park, Corner of Woodlands Park and Manuka Roads”, (i.e. there is no mention of Watercare).

On 10 April 2017, the day after Watercare had held public tours of the existing plant, Paul Jones, Watercare’s Project Manager, wrote to Beca social impact consultant, Amelia Linzey:

‘...But there were landowners that back on to Manuka Road that said you haven’t approached them. They were very upset about the proposal as they were led to believe that the land was a reserve- which in a way is understandable in that the walkway (sign) that enters Watercare property off Manuka Road has Clark’s Bush on it.’ (released under LGOIMA, SKMBT_C754e17100910040 9 October 2017)

Clearly the project manager recognised that fact that the land was not marked as Watercare land and was used as a public walking track was a problem. Nowhere is this land sign-posted as Watercare land. The Manuka Road site has entry to the Clark’s Bush track, and is indistinguishable from the regional park land it adjoins and the track runs through continuously, exiting further down Tainui Road.

The belief that they were living next to a reserve in the shape of a regional park was understandable in that that is exactly what it was. Until 2010 the Manuka Road parcel of land had a double designation status: it was both designated as a Regional Park (under designation 418) and designated for Water Supply Purposes.

Waitakere Ranges Heritage Area Act 2008 (WRHAA)

Section 13 of the WRHAA states that in relation to discretionary and non-complying resource consent applications in the Heritage Area, a consent authority must have particular regard to the purpose of the WRHAA and any relevant objectives, as well as any relevant provisions of any National Policy Statement or New Zealand Coastal Policy Statement.

The applicant is correct in saying that the purpose of the WRHAA is given effect to in the AUP (OP) through the Waitakere Ranges Heritage Area Overlay and B4.4 of the RPS (p. 117). It also states:

“It is noted that the WRHA overlay is a district plan provision, and is therefore not considered in this application but will be addressed in the subsequent OPW.”

Whilst the overlay may be a district plan provision, the purpose of the proposed vegetation clearance and consequential habitat loss is to directly facilitate the water infrastructure works that will be subject to the OPW. Moreover, in our view the Regional Policy Statement objectives and policies are directly relevant to the subject regional resource consents, and those that are most relevant are quoted in italics below.

The AEE attempts to address this important issue for which a particular statute of Parliament was introduced to supplement the RMA and planning instruments prepared under it, in one simple paragraph as follows:

“The public water supply system is recognised by the WRHAA as a heritage feature that contributes to the national significance of the heritage area. However the proposed development will adversely affect other identified heritage features, including terrestrial and aquatic ecosystems of prominent indigenous vegetation, and, temporarily during construction, the quiet of this particular part of the Waitakere Ranges. As described throughout this application, the adverse ecological effects of the project have been avoided, remedied and mitigated as far as practicable, and any residual effects will be compensated for by the WBMP.”

This assessment acknowledges that the proposed development will adversely affect other identified heritage features, including terrestrial and aquatic ecosystems of prominent indigenous vegetation, but dismisses this through two means:

- (1) The footprints of the WTP, reservoirs and associated plant and infrastructure have been minimised as much as practicable to minimise the amount of indigenous vegetation required to be cleared and the amount of streams to be impacted; and
- (2) A compensation package is proposed to sweep up all other residual adverse effects, to be implemented off-site, albeit within the catchment.

However, this methodology does not recognise the national importance of the Waitakere Ranges Heritage Area, which has elevated status for protection, even above other Significant Ecological Areas of the region. As such it does not address the relevant objectives and policies of B4.4 of the AUP (OP), which give effect to the WRHAA, as follows:

B4.4.1. Objectives

(1) The natural and historic resources, including the significant environmental values and heritage features of the Waitākere Ranges, are protected, restored and enhanced for the benefit, use and enjoyment of the community.

(2) Resources that are of significance to Mana Whenua are protected and maintained including:

(a) the spiritual dimension and the mauri of natural and physical resources and of people;

(b) the kaitiaki of these resources and significant sites and wāhi tapu; and

(c) those institutions that are integral to the relationship of Mana Whenua with their environment in a way that promotes the expression and practice of kaitiakitanga.

..

(4) Cumulative effects of activities on the environment, including amenity values and heritage features, are recognised and avoided.

..

..

(7) Enable social, economic, environmental, and cultural well-being of people that live and work in the area.

(8) The water supply catchments and their related supply functions are protected.

..

B4.4.2. Policies

(1) Design and locate structures and impermeable surfaces and undertake activities in a way that does not impede or adversely affect the potential for the regeneration of native vegetation or reduce the extent and range of areas of native vegetation and linkages between them.

(2) Prevent activities from releasing pest species likely to harm native plants and animals and their habitats.

(3) Where clearing vegetation for infrastructure is necessary, it should be undertaken only where the vegetation is of lower value and there is no practicable alternative option.

(4) Manage activities to minimise their adverse effects on water quality, soil, native vegetation and fauna habitats, mauri of the waterway, taiāpure and mahinga mātaītai.

..

(7) Adopt a cautious approach when considering proposals that threaten serious or irreversible damage to a heritage feature.

For the reasons outlined earlier in this submission, we submit that the proposal is contrary to each of the above objectives and policies. Without derogating from this, we make the comments about some specific objectives and policies, as follows:

There is no possible way it can be said that Policy B4.4.1 (2) is satisfied without a CIA being prepared by the relevant Mana Whenua entities. Indeed, it is astounding that a public project of this scale and importance has been lodged for resource consents whilst CIA(s) are still being prepared.

With regard to Policy B4.4.2 (1), the proposed vegetation clearance, once undertaken and particularly, once covered by the built structures that will be enabled by the OPW is irreversible. As such, this will (i) irreversibly adversely affect the potential for the regeneration of native vegetation and (ii) reduce the extent of native vegetation and linkages between the vegetation on the site and the adjacent Regional Park.

With regard to Policy B4.4.2 (2), we accept that the proposal will not deliberately release pest species likely to harm native plants and animals and their habitats. However, as explained earlier, we consider that the scale, duration and complexity of this construction project is such that the spread of Kauri Dieback and Myrtle Rust is almost inevitable, no matter what precautions and management plans are implemented.

In respect of Policy B4.4.2 (3), Watercare's justification for the proposed vegetation clearance relies on avoiding the highest value vegetation on the site and its 'reduction' of the footprint now proposed (compared with the earlier proposal for two new reservoirs north of Woodlands Park Road). This revision is acknowledged and welcomed., but this does not detract, that the adverse effects involved with this proposal, particularly regarding the SEA vegetation clearance and habitat destruction could instead be avoided entirely by choosing an alternative. We emphasise that it is not too late to reverse Watercare's site selection decision.

In the Group's view this is, in essence, summed up by Policy B4.4.2 (7), that the most appropriate action is to adopt a cautious approach and decline the consents as the proposal is one that threatens serious and irreversible damage to a heritage feature. This is particularly so given the prevailing risk of the spread of Kauri Dieback and Myrtle Rust diseases, for which the science is still emerging. An alternative site, not necessitating such significant SEA vegetation and habitat destruction, should be chosen instead.

Community support in Conclusion

We are very pleased that the community has been behind the TPG, and considerable time and effort has been put towards ensuring the information of the 2028 page application is accessible to as many people as possible in a 20 working day period. We value that our committee is structured to have open and distributed responsibilities where all voices at the table are heard.

A petition in support of this submission has been signed by over 2000 signatories since its launch 7 days ago on Saturday 25th August.

<https://www.toko.org.nz/petitions/sign-on-to-the-submission-in-opposition-to-the-replacement-water-treatment-plant-in-titirangi>

Below are a small number of comments from the signatories of the Toko petition, in support of this submission.

<p>“ The impact on our communitys roads , schools, would be devastating and dangerous. The removal of so many wonderful native trees is blindly shortsighted. The risk to all the housing areas below this site from future slips and flooding is not worth taking . This is protected foothill land which is why I chose to live here.</p> <p>Awhi O. 5 days ago</p>	<p>“ The first principle of the RMA, to AVOID irreversible adverse environmental effects, has not been satisfactorily achieved with the project being proposed in this location. It is also inconsistent with the relevant objectives and policies of the Auckland Unitary Plan.</p> <p>Jill P. 4 days ago</p>
<p>“ Why does Native Bush have to suffer the consequences? Isn't it obvious that we cannot afford to loose another acre of our most precious resource. We need these trees to survive and thrive here in Aotearoa where they belong. He Whakaaro ā-Māori tēnei.</p> <p>Kali H. 4 days ago</p>	<p>“ 8 years of trucks thundering down roads not designed for them, past numerous schools and child care centres. The Waitakere ranges are mostly closed, with the impact of walkers on spreading Kauri dieback. But Watercare want to bulldoze healthy Kauri, and spread potentially contaminated soil in a wider area.</p> <p>Christopher B. 3 days ago</p>
<p>“ Significant ecological areas are few and far between. They should never be destroyed for infrastructure. Surely there is a better solution. Our critically endangered native species need as much habitat as they can get.</p> <p>Susan S. about 24 hours ago</p>	<p>“ Scenic Drive and Woodlands Park Roads are used constantly by local residents, tourists, and school bus users. In addition to road use, there is steady use of these roads by pedestrians, school pupils and others, moving between Waima and Titirangi Village. Trucks will by passing pedestrians at 1 meter distance in places. Heavy trucking, as proposed by Watercare, places both road users and pedestrians at high risk.</p> <p>Owen M. 4 days ago</p>
<p>“ The Titirangi area is absolutely precious, both in terms of living conditions for people, and natural habitat for plants and wildlife. It is essential to reconsider this project, and look to developing other possibilities with small, less intrusive and non-destructive techniques, which make use of the better sides of modern technology. Burn and slash is essentially a warfare technique, which should in no circumstances be used here.</p> <p>Louise T. 4 days ago</p>	<p>“ We need protect our precious forest, I cannot believe they would clear so much forest when we are fighting kauri die back. What is going on?</p> <p>Martien J. a day ago</p>

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Auckland Unitary Plan (Operative in Part) 2016.

Myers 2018. Huia Water Treatment Upgrade - Assessment and Review of Ecological Values, 2 July 2018

2014 Muddy Creeks Local Area Plan

Tonkin and Taylor Report on Longlist Options 2016

LGOIMA, SKMBT_C754e17100910040, 9 October 2017

Psychology for a Better World, Niki Harre

Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems, August 2019

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5230] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:31:57 PM
Attachments: [Titirangi Protection Group Submission - Huia WTP.pdf](#)

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Megan Fitter and Gina Mitchell as Co-chairs

Organisation name: Titirangi Protection Group

Contact phone number: 09 8168528

Email address: protecttitirangi@gmail.com

Postal address:
PO Box 60156 Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

As attached

What are the reasons for your submission?

As attached

What decisions and amendments would you like the council to make?

As attached

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Titirangi Protection Group Submission - Huia WTP.pdf

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5231] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:33:33 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Sarah Pearce

Organisation name:

Contact phone number: 0211955113

Email address: sarah@allergenics.co.nz

Postal address:
110 Glengarry Rd Glen Eden Auckland 0602

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

All of it in its entirety

What are the reasons for your submission?

Our submission relates to the whole of the application. 1. We support and adopt the submission/petition to be filed by Titirangi Protection Group Incorporated. That submission forms part of this submission and a copy will be provided on request. 2. The application should not be approved having regard to: a. RMA Part 2; b. The actual and potential effects on the environment of the proposed works; c. The adverse effects on the environment which will be more than minor and the policies and objectives of the Auckland Unitary Plan; d. The inadequacy of the proposed mitigation measures. No mitigation can adequately compensate for the adverse effects of the works; e. The inadequacy and ineffectiveness of the proposed conditions of approval. f. The other statutory provisions relevant to this application. 3. The information provided with the application is inadequate to enable a proper assessment of the effects of the proposed works, and to enable the submitters and Commissioners to ascertain whether adequate conditions can be formulated to address the adverse effects. This is, in part, because an inaccurately narrow view has been taken by the Applicant of the effects of the proposed works. Traffic effects, noise effects, landscape effects, ecology and heritage effects, and a wide range of other effects, including some construction effects, are directly effects of the proposed works. Those effects must addressed and considered as part of this application. They must not be deferred to the OPW or left to numerous ex post facto "Plans" (as proposed in the Draft Conditions). 4. The proposed works will have and is already having a devastating effect on the social fabric of the Waima/Woodlands Park community including their safety, well-being, and health. Their neighbourhood will be part of a construction site for at least 8 years (and recently what project has been finished on schedule?). 5. Having lived in the surrounding area for over 15 years now I fully understand the consequences of the devastating effects and disruption this proposed project will have on the community and the already difficult Titirangi roundabout by having so much extra traffic on it on a daily basis. 6. People move to Titirangi and particularly Woodland's Park/Waima for its natural beauty and it being nestled in the bush and consider it a wonderful, quiet and peaceful neighbourhood with a strong sense of community in which to bring up a family. Both my children went to Woodland's Park school and walked on the walking school bus and to think how much of a devastating effect of all that excessive heavy traffic is going to make to that school and the safety of all the children it breaks my heart. 7. The consequences of so many large trucks a day driving through the village and the level of congestion and disruption it will cause will tear the heart out of Titirangi. It is a unique place and a real focal point for the community itself and the surrounding suburbs. This heart will be lost and will have a massively detrimental effect on the businesses that support it. Working in Titirangi myself, I understand how difficult it can be to park and get around already, let alone if this project goes ahead. 8. It also absolutely astounds me that considering the huge threat Kauri Dieback is to the health of the Waitakere Ranges as a whole, that pulling out healthy Kauri is even under consideration and the risks involved in spreading the disease further by the whole process surely cannot be seen as a risk worth taking. On top of this it would destroy beautiful wetlands and all the indigenous species that make it up. The loss of all of this cannot be a justifiable cost.

What decisions and amendments would you like the council to make?

To decline the application in its entirety

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Huia Treatment Plant Submission

Watercare: committed to New Zealand's unique biodiversity in a Significant Ecological Area?

Three simple words should ensure that the current proposal is ruled 'out of court' - Significant Ecological Area. That this site is even being considered, at a time when Auckland Council is actively supporting a Rahui that aims to protect native Kauri, displays a lack of joined-up thinking.

Watercare is no doubt aware of this. As its own statement on Biodiversity states:

“New Zealand’s native biodiversity is unique. The high percentage of endemic species (those found nowhere else in the world) makes New Zealand’s native biodiversity both special and highly vulnerable”.

It is difficult to square this promissory statement with the facts, which are:

- That of the eight sites on Watercare’s list this was the only one which involves extensive damage to a SEA.
- The construction will damage the ecology of this area, with the removal of rare native trees (34 with diameters greater than 20cm and including 14 Kahikatea trees aged 80-120 years old; rerouting of three streams; spread of kauri dieback through removal of earth which is in the vicinity of kauri trees and therefore according to the protocols applying to the Waitakere ranges must be assumed to be contaminated with kauri dieback; destruction and disruption of the habitat for rare species including a newly discovered and as yet unnamed species of wasp, a very rare thread bug and a very rare slave ant.
- The site is part of a fragile ecological area rich in biodiversity. Independent ecologist Shona Myers has highlighted the area's high ecological value. Her report showed the area was home to regenerating kauri, broad-leaved forest, kahikatea-swamp maire forest, and that it forms wildlife corridors to adjoining forest (Myers, 2018).

Watercare: trustworthy operators?

The same statement on Biodiversity makes a promise:

“As many of Watercare’s operations are located in areas of cultural and ecological significance, we need to operate in a way that minimises harm and even protects and enhances these ecosystems”.

From the proposal it is hard to see how Watercare will keep its promise to minimise harm, protect and even enhance this Significant Ecological Area.

We know that Kauri dieback is spread by the activities of forestry contractors and the movement of trucks. It will be impossible to adequately ensure that trucks do not spread contaminated soil around the area of the site and Titirangi. Phytophthoras (the fungus responsible for dieback) are invading new areas where plants have no resistance to them, hitching a lift on new species of plants and on vehicles in particular (Hansen et al, 2000; Hansen, 2008; Scott & Williams, 2014). In the Watercare report this is compared to the protocols for building the Waterview motorway but the Waitakere ranges are different in being an area heavily infected with Kauri dieback (Hill et al 2017, Myers, 2018) and therefore posing risks that the motorway site did not.

No doubt Watercare will seek to downplay the impact of these activities and claim that these lie outside the Waitakere Regional Park. However:

In terms of scale, the Waitakere Ranges Regional Park (WRRP) represents the most heavily kauri dieback infected area currently recorded in New Zealand. This survey has reaffirmed that kauri dieback disease is a widespread biosecurity issue within the WRRP.

(Hill et al, 2017, p. 18)

And of course, natural systems and processes do not obey boundary lines on a map. As the discipline of ecology teaches us, ‘everything is connected to everything else’. The number of trucks and the need to move earth material make the recommended guidelines for vehicle hygiene impractical and unlikely in an area where kauri dieback has already been identified and where tracks have been closed to prevent further spread. As even one spore, that can live for years can infect a new area how can you guarantee that the disease will not be further spread by frequent truck movement in and out of a kauri forest and the deliberate removal and dumping of huge quantities of infected earth? The pathogen was identified in 4 out of 6 samples taken from trucks working in kauri dieback zones indicating the high level of risk (Ashcroft, 2017). The removal of vegetation will cause Significant Damage to the Ecology of the area rather than honoring the status of a significant ecological area.

Watercare in the community

“We care about Auckland’s future and are proud to play an active role in our community”.

The residents of Tititirangi, Waima, Huia and Parau will be excused if they do not have much faith in Watercare’s claim – although, it is the case that Watercare will be playing an active role in the community. An active role that involves around 100 trucks pounding up and down the already pressurized roads. This will have an impact of course on the two access roads to the Titirangi roundabout from Glen Eden and New Lynn. Six days a week. For eight years.

The economic impacts on the area may be severe; tourists may well decide that the “Gateway to the Waitakeres” is a bridge too far. Rather than opting to play a destructive role in the community for the next decade, Watercare should consider actively listening to the voices of the communities they serve to represent.

Final comment

The proposed site for this water treatment plant lies in an area which is a classic example of what geographers and urban planners call a ‘resource frontier’. This is an area typically on the edge of a large urban centres which act as a resource to serve a large urban population and to act as a ‘safety valve’ for many of its problems. Thinking about this area, for example, we can see that the scenic amenity it offers allows an increasingly stressed urban population a chance to get some fresh air and access to nature (through everyday acts of bush-walks, dog-walking, cycle and running trails etc.); the lower population density and extensive land uses allow for large dam construction, reservoirs, water treatment plants, and landfill which would otherwise have to be done in the city; it also allows for incremental residential growth which alleviates the problem of land inflation and rising property prices in the central city area. Resource frontiers are therefore under great pressure, especially if urban planners (enamored by the booster visions of American urbanists) adopt a ‘growth mindset’. The irony is that such ‘edgelands’ have great cultural and ecological value in their own right – a fact increasingly recognized by geographers and planners.

Given the growing recognition that the next 30-50 years will be defined by how societies such as New Zealand respond to the ongoing warming condition and the shifts and shocks of sea-level rise, it is time to halt these faulty plans and engage in a much wider consultation about how to proceed.

Professor John Morgan
University of Auckland

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doi:10.1094/PDIS.2000.84.1.4.

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Hansen, E.M. 2008. Alien Forest Pathogens: *Phytophthora* Species are Changing World Forests. *Boreal Environmental Research*, 13: 33–41.

Hill, L. et al 2017 *Final Report on Kauri Dieback*
<https://www.kauridieback.co.nz/media/1516/7-auckland-council-waitakere-ranges-report-v2-final-aug17.pdf>

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Scott & Williams (2014) Phytophthora diseases in New Zealand forests. In *NZ Journal of Forestry*, August 2014, Vol. 59, No. 2
http://nzjf.org.nz/free_issues/NZJF59_2_2014/9433AEE4-C4D9-4002-870C-DB538C074075.pdf

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 1:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5232] Submission received on notified resource consent
Attachments: Watercare submission_20190902132417.755.docx

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: John Morgan

Organisation name: University of Auckland

Contact phone number: 027 2226920

Email address: john.morgan@auckland.ac.nz

Postal address:

31a Landing Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Ecology and diversity safe-guarding against soil transfer lack of care for the community's view and future

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

the Council should reject the proposal and require Watercare to find a solution that adheres to its stated principles of sustainability

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Watercare submission_20190902132417.755.docx

Huia Treatment Plant Submission

Watercare: committed to New Zealand's unique biodiversity in a Significant Ecological Area?

Three simple words should ensure that the current proposal is ruled 'out of court' - Significant Ecological Area. That this site is even being considered, at a time when Auckland Council is actively supporting a Rahui that aims to protect native Kauri, displays a lack of joined-up thinking.

Watercare is no doubt aware of this. As its own statement on Biodiversity states:

“New Zealand’s native biodiversity is unique. The high percentage of endemic species (those found nowhere else in the world) makes New Zealand’s native biodiversity both special and highly vulnerable”.

It is difficult to square this promissory statement with the facts, which are:

- That of the eight sites on Watercare’s list this was the only one which involves extensive damage to a SEA.
- The construction will damage the ecology of this area, with the removal of rare native trees (34 with diameters greater than 20cm and including 14 Kahikatea trees aged 80-120 years old; rerouting of three streams; spread of kauri dieback through removal of earth which is in the vicinity of kauri trees and therefore according to the protocols applying to the Waitakere ranges must be assumed to be contaminated with kauri dieback; destruction and disruption of the habitat for rare species including a newly discovered and as yet unnamed species of wasp, a very rare thread bug and a very rare slave ant.
- The site is part of a fragile ecological area rich in biodiversity. Independent ecologist Shona Myers has highlighted the area's high ecological value. Her report showed the area was home to regenerating kauri, broad-leaved forest, kahikatea-swamp maire forest, and that it forms wildlife corridors to adjoining forest (Myers, 2018).

Watercare: trustworthy operators?

The same statement on Biodiversity makes a promise:

“As many of Watercare’s operations are located in areas of cultural and ecological significance, we need to operate in a way that minimises harm and even protects and enhances these ecosystems”.

From the proposal it is hard to see how Watercare will keep its promise to minimise harm, protect and even enhance this Significant Ecological Area.

We know that Kauri dieback is spread by the activities of forestry contractors and the movement of trucks. It will be impossible to adequately ensure that trucks do not spread contaminated soil around the area of the site and Titirangi. Phytophthoras (the fungus responsible for dieback) are invading new areas where plants have no resistance to them, hitching a lift on new species of plants and on vehicles in particular (Hansen et al, 2000; Hansen, 2008; Scott & Williams, 2014). In the Watercare report this is compared to the protocols for building the Waterview motorway but the Waitakere ranges are different in being an area heavily infected with Kauri dieback (Hill et al 2017, Myers, 2018) and therefore posing risks that the motorway site did not.

No doubt Watercare will seek to downplay the impact of these activities and claim that these lie outside the Waitakere Regional Park. However:

In terms of scale, the Waitakere Ranges Regional Park (WRRP) represents the most heavily kauri dieback infected area currently recorded in New Zealand. This survey has reaffirmed that kauri dieback disease is a widespread biosecurity issue within the WRRP.

(Hill et al, 2017, p. 18)

And of course, natural systems and processes do not obey boundary lines on a map. As the discipline of ecology teaches us, ‘everything is connected to everything else’. The number of trucks and the need to move earth material make the recommended guidelines for vehicle hygiene impractical and unlikely in an area where kauri dieback has already been identified and where tracks have been closed to prevent further spread. As even one spore, that can live for years can infect a new area how can you guarantee that the disease will not be further spread by frequent truck movement in and out of a kauri forest and the deliberate removal and dumping of huge quantities of infected earth? The pathogen was identified in 4 out of 6 samples taken from trucks working in kauri dieback zones indicating the high level of risk (Ashcroft, 2017). The removal of vegetation will cause Significant Damage to the Ecology of the area rather than honoring the status of a significant ecological area.

Watercare in the community

“We care about Auckland’s future and are proud to play an active role in our community”.

The residents of Tititirangi, Waima, Huia and Parau will be excused if they do not have much faith in Watercare’s claim – although, it is the case that Watercare will be playing an active role in the community. An active role that involves around 100 trucks pounding up and down the already pressurized roads. This will have an impact of course on the two access roads to the Titirangi roundabout from Glen Eden and New Lynn. Six days a week. For eight years.

The economic impacts on the area may be severe; tourists may well decide that the “Gateway to the Waitakeres” is a bridge too far. Rather than opting to play a destructive role in the community for the next decade, Watercare should consider actively listening to the voices of the communities they serve to represent.

Final comment

The proposed site for this water treatment plant lies in an area which is a classic example of what geographers and urban planners call a ‘resource frontier’. This is an area typically on the edge of a large urban centres which act as a resource to serve a large urban population and to act as a ‘safety valve’ for many of its problems. Thinking about this area, for example, we can see that the scenic amenity it offers allows an increasingly stressed urban population a chance to get some fresh air and access to nature (through everyday acts of bush-walks, dog-walking, cycle and running trails etc.); the lower population density and extensive land uses allow for large dam construction, reservoirs, water treatment plants, and landfill which would otherwise have to be done in the city; it also allows for incremental residential growth which alleviates the problem of land inflation and rising property prices in the central city area. Resource frontiers are therefore under great pressure, especially if urban planners (enamored by the booster visions of American urbanists) adopt a ‘growth mindset’. The irony is that such ‘edgelands’ have great cultural and ecological value in their own right – a fact increasingly recognized by geographers and planners.

Given the growing recognition that the next 30-50 years will be defined by how societies such as New Zealand respond to the ongoing warming condition and the shifts and shocks of sea-level rise, it is time to halt these faulty plans and engage in a much wider consultation about how to proceed.

Professor John Morgan
University of Auckland

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doi:10.1094/PDIS.2000.84.1.4.

Hansen, E.M. 2008. Alien Forest Pathogens: *Phytophthora* Species are Changing World Forests. *Boreal Environmental Research*, 13: 33–41.

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<https://www.kauridieback.co.nz/media/1516/7-auckland-council-waitakere-ranges-report-v2-final-aug17.pdf>

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Hansen, E.M. 2008. Alien Forest Pathogens: *Phytophthora* Species are Changing World Forests. *Boreal Environmental Research*, 13: 33–41.

Hill, L. et al 2017 *Final Report on Kauri Dieback*
<https://www.kauridieback.co.nz/media/1516/7-auckland-council-waitakere-ranges-report-v2-final-aug17.pdf>

Myers, S. (2018). *Huia Treatment Upgrade Assessment and Review*. Accessed at <https://www.watercare.co.nz/.../GetAzureFile.aspx?...~\watercarepublicweb\...>

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http://nzjf.org.nz/free_issues/NZJF59_2_2014/9433AEE4-C4D9-4002-870C-DB538C074075.pdf

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5233] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:31:39 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Karl Saunders

Organisation name:

Contact phone number: 021505435

Email address: karl.flashlightfilm@gmail.com

Postal address:
56 Minnehaha Avenue Woodlands Park Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

This submission relates to the whole of the application. I oppose the application in its entirety.

What are the reasons for your submission?

As a resident of Woodlands Park for 34 years the application proposed by Watercare for the new Water Treatment Plant is of deep concern. I oppose the application in its entirety. My concerns include but are not limited to the following; The earthworks required to complete this project would destroy around 3.5ha of bush. It can not be replaced. Bush, with over 80 native species, that are crucial not only to Titirangi but to the greater Auckland region. There are 200+ year old Puriri trees and 3 of the oldest Kauri trees in the whole of the Auckland region that would be cut down. No private landowner has the right to cut down trees such as these, especially ones protected by S.E.A status. It's 2019, we need to be working harder and smarter towards protecting the environment, ecosystems and biodiversity. Of the 8 sites Watercare have considered Titirangi is the only one which involves extensive S.E.A land. Cost should not be the only consideration. There is not sufficient evidence to be sure that the earthworks will not increase the risk of Kauri Dieback, that is of national concern. I live in Woodlands park because of it's beautiful bush, wildlife and beaches. The fact that a large corporate business wants to chop down a huge area of bush in 2019 when everyone knows we need to be planting more trees is just wrong. This sets the wrong precedent for New Zealand's position on the environment. The safety of building a reservoir perched at the top of a valley above houses is very alarming. If this build goes ahead those responsible for giving it the green light will be crossing their fingers that there isn't an earthquake. You would think that there would be loss of life in such an event. Cost to the ratepayer would be significant to complete this project but it has been stated that the land is not appropriate for the intended use. The need to be able to expand or adapt the WTP in 20+ years should be critical. There are already Watercare buildings that sit abandoned and derelict, the new WTP needs to be able to adapt with future demands. The Titirangi site has no room for future expansion due to the size and terrain. This is not acceptable planning for New Zealand's largest company in the water and waste water industry, a council-controlled organisation. I am a class 4 truck driver myself and when ever possible I steer clear of driving trucks through Titirangi and the nearby areas. The proposed level of heavy vehicles on the roads is not only very dangerous to all the surrounding schools and people commuting to and from work it will also cause massive congestion. The roads are windy, narrow and difficult to negotiate. My children are at Woodlands Park Primary School, I would be very concerned with the number of trucks passing the school and the safety of the children walking to and from school. Woodlands Park is only one of at least 10 early childhood centres and schools that would be directly affected. The traffic congestion is a huge issue, especially for commuters. There are only two roads, Woodlands Park Road - Scenic Drive and Huia Road that we can travel to work. If Woodlands Park Road is closed or congested with trucks there will be a serious effect on our lives in terms of the amount of time required to commute and the flow on effect to our family life. Titirangi Primary School drop off and pick up times already causes major congestion at the roundabout without adding the trucks. 8 years is a long time for residents to live with the unavoidable building disruption. Ultimately I oppose this application because destroying 3.5ha of bush in a S.E.A for any development is unacceptable.

What decisions and amendments would you like the council to make?

I want the application to be declined

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5234] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:33:13 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Jennifer Dupen

Organisation name:

Contact phone number: 0212384780

Email address: jennifer.dupen@gmail.com

Postal address:
98 Atkinson Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I oppose the project going ahead in Titirangi. I have a huge concern at the potential effect of vibration and the effects this will have on my home. I live on Atkinson Rd and I am worried that the heavy vehicles negotiating the speed bumps might cause damage to my home. I have sometimes noticed my home shaking when truck go by, at present and I am worried that if this goes ahead and there are a large number of trucks on a daily basis this will have an even bigger impact.

What are the reasons for your submission?

I would like a mitigation package if the project gets resource consent to mitigate / compensate traffic disruption effects incl. providing me with an option of assessment and monitoring of my home along the route of construction traffic before, during and after construction for adverse impacts of noise and vibration caused by trucks with compensation to be made available, as well as regular assessment, monitoring and repair of all roads along route of construction traffic.

What decisions and amendments would you like the council to make?

For this not to proceed in the Titirangi area and rather in one of the other areas earmarked

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5235] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:46:59 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Jasmine Taylor

Organisation name:

Contact phone number: 0274051087

Email address: jasmine.taylor.email@gmail.com

Postal address:
83 Hillsborough Rd Hillsborough Auckland 1042

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I am against the removal of vegetation, including native trees, in a SEA. I do not support this application.

What are the reasons for your submission?

We have such a small proportion of Aotearoa and Auckland forested, including native forest. Removing any more should be a matter of last resort, both for our own environment and ecosystem, and given the climate emergency that the Auckland Council has declared their awareness of.

What decisions and amendments would you like the council to make?

I would like the council to oppose this submission on the basis of the impact it will have on the Special Ecological Area, including native bush.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5236] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:47:22 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Lisa Martell

Organisation name:

Contact phone number: 021816289

Email address: lisamartell789@hotmail.com

Postal address:
33 Concord Avenue Mount Maunganui Tauranga 3116

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

We oppose the Resource Consent for Watercare's proposed Huia Replacement Water Treatment Plant (WTP). We are residents of Shetland Street, Glen Eden who were notified by Watercare in early March 2018 about the proposed expansion of the WTP. Shetland Street will have consequential and significant adverse effects and risks to Health & Safety from the works associated with the WTP. Watercare obtained resource consents and a designation in late 2016. Watercare have not provided affected residents a comprehensive Geotech report, Risk Management Plan, Construction Management Plan nor timeline (start to finish) for tunnelling work (of a massive water pipe approx. 1.2m diameter) to take place on Shetland Street & Philips Ave as part of the expansion. From what we understand, contractors will tunnel under the ground to the end of Shetland Street where a large pit will be dug to extract the drilling equipment. The pipe will then be trenched along Shetland Street, up Philip Ave to Glengarry Road and onto Albany. Its total length is 33kms long. We require an independent comprehensive Geotechnical report, Risk Management Plan, Construction Management Plan & Timeline from Watercare to explain how they will manage land instability and ongoing consequential damage to the sensitive ridgeline, directly affecting residential properties. Potential risks which could generate more than minor/significant adverse effects are: - Movement and subsidence of land due to earthworks (tunnelling and drilling) causing footing instability of the large retaining wall that divides Shetland St upper & lower. - Potential cracking damage to properties due to drilling and fracturing movement over the course of the 'years' it will take to complete the tunnelling works. Our insurance companies have confirmed they will not cover for this type of consequential damage on our home building policies. - Disruption to existing underground waste water pipes that lead to our homes (ongoing repairs and replacements) - Land instability, land slips and flooding due to the removal of native Kauri and vegetation at the end of Shetland Street. Resulting in Health and Safety effects and biodiversity loss. - The immense daily noise disruption by machinery/trucks/construction workers to carry out the vegetation/soil removal, heavy trucks for earthworks on a very narrow sensitive ridge line

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

Do not tunnel and trench Shetland Street, Glen Eden. It's a sensitive ridge line that will not withstand these invasive earthworks. Select an alternative route!

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5237] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:46:52 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Shelley de Graaf

Organisation name:

Contact phone number: 0276962759

Email address: shelleydegraafnz@gmail.com

Postal address:
204 Woodlands Park Rd Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Traffic Impact

What are the reasons for your submission?

The opposition to this proposal is on the impact of traffic, specifically the risk to the safety of school children on Woodlands Park Rd. This proposal will put the safety of school children at risk. Literally hundreds of children along Woodlands Park Rd either walk to catch the bus, or walk to school, between 6:30am and 9:00am in the morning, and from 3pm to at least 5:30pm in the evenings. There is only one crossing along the entire length of Woodlands Park Rd. Children that catch the bus at various places along Woodlands Park Rd are required to cross the road either when catching the bus in the morning, or after getting off in the afternoon. They have no choice but to cross without a crossing. The proposed traffic plan means a phenomenal increase in the amount of traffic moving along Woodlands Park Rd, including hundreds of heavy truck movements every single school day. This will make it extremely dangerous for children to cross the road. This proposal does not address the danger to these kids' lives. I note with astonishment that the Traffic Assessment report makes mention of the expected impact of school traffic on the proposed project, but NOT of the expected impact of the project on the safety of school children! Risking the safety of 100s of children twice a day, every school day, is not an acceptable price to pay for a water treatment plant that could be built elsewhere.

What decisions and amendments would you like the council to make?

I would like the council to deny consent for this project to take place.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5238] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:47:18 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Katharine Jayne Brown

Organisation name:

Contact phone number: 0278173144

Email address: kjhuggard@gmail.com

Postal address:
555 South Titirangi Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Vegetation

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

On 11 June 2019 Auckland Council declared a 'climate emergency'. The Mayor states on the Auckland Council website that "By unanimously voting to declare a climate emergency we are signalling the councils intention to put climate change at the front of our decision making". The proposed site for the new water treatment plant would appear to strongly contradict this statement. I would like the council to view this decision based on its commitment to put climate change at the front of all decision making. This would involve looking back to previous site options - ones that do not seek to remove such a large volume of established forest.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Huia Replacement Water Treatment Plant (WTP) Project

Toni Reid

48c Sinclair Rd, Ararimu RD 3 Drury

Auckland 2579

toni@maxnet.co.nz

31/08/2019



Titirangi Kauri on death row. Photo by Brent Courtney

Submission

Whilst not currently living in the area affected by the application, I am concerned about the proposal to remove 3.5ha of protected native bush in a designated significant ecological area, which includes mature and regenerating kauri trees, kahikatea and rare native fauna. Conservation of mature native trees and stands of bush is an issue which is important to all residents of Auckland city.

Protection of threatened kauri

To the layperson, a SEA seems to be some sort of permanent protection for an area deemed by experts to be of importance. Within these areas, the average landowner is barely able to trim back vegetation without going through a consent process. In spite of this, the application for the WTP proposes to disregard expert opinion and develop a site within a SEA, containing the oldest remaining kauri in Auckland. The survival of the Bishop Kauri, two other large specimens of kauri and numerous smaller kauri could be compromised by the disturbance of clearing surrounding bush and carrying out earthworks. Apart from kauri, the loss of many mature kahikatea “.....and other fruit and nectar producing trees” is predicted to take place.

The Department of Conservation classified kauri as threatened in 2018 (1), which makes it bizarre to contemplate cutting down young trees that are thriving and risking the loss of the older trees, at a time when walking tracks around Auckland and other areas have been closed to protect kauri from dieback.

Surely these concerns alone would be enough to ensure the continuing protection of the area?

References

(1) <https://www.doc.govt.nz/news/media-releases/2018/new-plant-status-report-shows-increased-threats/> New plant status report shows increased threats

Indigenous fauna

Another concern is disruption or destruction of indigenous fauna. The Muddy Creeks Plan noted fauna in the area could include around fifty avian species, the rare Long-Tailed Bat, the Kauri snail, forest gecko, banded kōkopu, common bully, red-fin bully, the long-fin and short-fin eel and possibly Hochstetter’s frog. Unfortunately it was also noted that up to date information about fauna in the area is undocumented in places.

According to the Titirangi Protection Group on Facebook “....new species of pteromalid wasp was recently discovered near the project site and is currently at Auckland Museum to be named by the Curator of Entomology. This type of parasitic insect plays an important role as biological control agent within an ecosystem (ie: the control of pests such as insects, mites, weeds and plant diseases using other organisms.)”

Another find noted by the group was *Empicoris seorus* Bergroth, a thread bug of which we know very little, found in the Kahikatea wetland. It is very rare and the Waima specimen is the fourth ever recorded in New Zealand.

In Clark Bush a discovery is claimed of the first and only confirmed record of a slave ant, *Strumigenys xenos* in New Zealand. (1)

References

(1) *Titirangi Protection Group* <https://www.facebook.com/groups/TitirangiPG/>

Deforestation and climate change

Although a little over 8 acres may not seem to be a huge loss, in Auckland it is death by a thousand cuts. Across the city we have lost around a third of our trees since 2012 according to the non-profit Tree Council. This is based on reports from arborists, members, general public and local government information act requests about consents to remove protected trees. (1)

The report on tree loss in the Waitemata Local Board area found that between 2006 and 2016 a total of 61.23ha of tree canopy was lost, with a minimum of 12,879 trees removed. The removal of the SEA was the reason for clearance of 48% of high protection status trees. (2)

When the council declared a climate emergency in June of this year, Phil Goff said “By unanimously voting to declare a climate emergency we are signalling the council’s intention to put climate change at the front and centre of our decision making.” Councillor Penny Hulse said “Aucklanderswant to leave healthy, beautiful blue and green spaces for their kids and grandchildren.” (3)

We all understand that living with climate change means dealing with more extreme weather events like heatwaves and flooding. Trees and bush areas mitigate the effects of these occurrences by managing storm water, reducing flooding and also provide shade which lowers temperatures. However new plantings may take several decades before fulfilling the role of established bush; whether it is providing an environment for native fauna, erosion and flood control or carbon storage.

Yet Auckland’s fast disappearing tree cover is at odds with the council’s message about climate change being at the core of decision making. Planting a million new tiny trees cannot make up for the loss of mature specimens. This was noted by the authors of the

latest report from the Intergovernmental Panel on Climate Change (August 2019) who found that planting trees is not enough, we need to stop cutting them down as well. (4)

The visual effect of the proposed WTP is also worth considering, as the Waitakere Ranges are a popular tourist destination, destroying native bush at what is virtually the entrance to this area would reflect badly on Auckland city and New Zealand as a whole.

References

(1) http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=11932829

Wholesale slaughter' of Auckland's trees

(2) <http://www.knowledgeauckland.org.nz/publication/?mid=2661&DocumentType=1&>

Tree loss in the Waitemata Local Board over 10 years, 2006-2016

September 2018 Technical Report 2018/021

(3) <https://ourauckland.aucklandcouncil.govt.nz/articles/news/2019/06/auckland-council-declares-climate-emergency/> *Auckland Council declares climate emergency*

(4) https://www.ipcc.ch/site/assets/uploads/2019/08/2e.-Chapter-4_FINAL.pdf

IPCC report August 2019

Plans ignored

Members of the local communities, iwi, the Waitakere Ranges Local Board and Auckland Council units worked together to create The Muddy Creeks Plan (2014). This LAP identifies its first key action as – “Work to reduce the spread of kauri dieback and foster protection of healthy kauri” (1)

The Auckland Unitary Plan Biodiversity objectives which include “...to protect and restore in Waitakere ranges, maintain and enhance cover of trees and groups of trees, encourage legal protection of significant biodiversity” etc are also to be discarded if the Watercare project proceeds. (2)

It is puzzling why the council spends so much time and money on formulating plans to look after the environment, only to ignore these plans when they become inconvenient.

References

(1) *Muddy Creeks Plan* <https://www.aucklandcouncil.govt.nz/arts-culture-heritage/heritage-walks-places/docswaitakererangesheritagearea/waitakere-ranges-muddy-creeks-plan.pdf>

(2) <http://www.eds.org.nz/assets/Past%20events/Fuller%2C%20Biodiversity%2020%2004%2013.pdf>

Auckland Council need to walk the talk

Publications like 'Our Auckland' talk about the concept of environmental guardianship yet the council are failing to protect the foundation of Auckland's green ecosystem. Plans are put in place to safeguard trees - and then overridden when they become inconvenient.

Public trust in the council is eroded when it acts in opposition to its stated goals and plans.

The conservation of mature native trees and stands of bush is an issue which is important not only to the residents of the immediate area, but to the whole city. With climate change a reality, where are safeguards to protect Auckland's trees in perpetuity? New policies are needed that can't be overturned by a change in leadership, at the whim of developers or the needs of Council Controlled Organisations.

Auckland Council could lead the way for New Zealand in preventing deforestation, instead of consenting to the destruction of a beautiful piece of native bush. There has been plenty of rhetoric from the council about conservation but now is the time to walk the talk, as they say. If the council are sincere about protecting kauri, being sustainable, looking after the environment and addressing climate change, then this magnificent bush area should remain intact.

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5239] Submission received on notified resource consent
Date: Monday, 2 September 2019 1:47:50 PM
Attachments: [Huia WTP submission Toni Reid.pdf](#)

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Toni Reid

Organisation name: n/a

Contact phone number: 092924988

Email address: toni@maxnet.co.nz

Postal address:
48 C Sinclair Rd, Ararimu RD 3 Drury Auckland 2579

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The proposal to remove 3.5ha of protected native bush in a designated significant ecological area, which includes mature and regenerating kauri trees, kahikatea and rare native fauna.

What are the reasons for your submission?

Conservation of flora and fauna is an issue which is important to all residents of Auckland city.

What decisions and amendments would you like the council to make?

Decline the application and protect the area of native bush in perpetuity.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Huia WTP submission Toni Reid.pdf

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5240] Submission received on notified resource consent
Date: Monday, 2 September 2019 2:02:16 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Glenda Lock

Organisation name:

Contact phone number: 02108213976

Email address: glenda_lock@hotmail.co.nz

Postal address:
42 Rimutaka Place Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

(1) I oppose the application in whole. (2) I submit that there was inappropriate selection of this site based on sustained media coverage and political involvement. (3) The development of this site is inconsistent with the relevant objectives and policies of the Auckland Unitary Plan, causing adverse environmental effects. Removal of vegetation will impact wildlife corridors and increase sedimentation. This in an important ecological site - the ecology reports confirm this site forms linkages and corridors for wildlife with adjoining regional parkland including the North-West Link. The Yorke and Armstrong Gullies provide high quality freshwater habitats. Longfin eel and inanga are present in the catchment. (4) There is insufficient understanding of the underlying wildlife habitat eg, a single bird survey period of December-January is inadequate, and the bat survey was inconclusive and requires further investigations. Most recently a new species of native wasp was identified on the site. (5) Large parts of the Waitakere Ranges are closed to prevent the spread of kauri dieback yet 3.5ha of land are to be cleared within this protected area. The Ecological Report does not address the sensitive root systems of kauri and the impact of stress on vulnerable kauri. In addition, all soil from the project site must be considered as contaminated for the purpose of the potential spread of kauri dieback disease and treated in accordance with this assumption. (6) The proposed sediment controls are inadequate and the risk of failure could be catastrophic e.g. to populations of inanga at Little Muddy Creek. (7) The impact for local traffic that use these roads every day, school and public buses, pedestrians, cyclists. and tourist traffic will be huge. Pedestrian safety for school children and other users will be compromised – many students walk the route from Woodlands Park to Green Bay High or to catch school buses from Titirangi to more distant schools. This school traffic extends beyond the time period identified in the report. Scenic Drive is already narrow, with marginal footpaths. Vibration damage of homes along the truck routes will be an additional cost to the project not budgeted for. (8) I am concerned with the impact of traffic and vibration on the stability of land, there have already been significant slips on Scenic Drive in the past few years. (9) The proposed construction site is at the gateway to the Waitakere Ranges and would be a very visual scar and tarnish our international image. The site comprises almost completely native vegetation and has been identified as a Significant Ecological Area (SEA) in the Auckland Unitary Plan.

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

Not build on this site Investigate alternative sites Investigate required size/footprint of any further developments Implement water savings actions to reduce the amount of additional infrastructure required to service Auckland

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5241] Submission received on notified resource consent
Date: Monday, 2 September 2019 2:02:24 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Kim Bowkett-Moore

Organisation name:

Contact phone number: 098177873

Email address: kbowkettmoore@yahoo.co.nz

Postal address:

6 Karen Road Laingholm Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Environment and Traffic.

What are the reasons for your submission?

I oppose the resource consent in its entirety and also fully support the submission made by the Titirangi Protection Group. It is illogical to even consider that a resource consent could possibly be granted when on 11th June 2019 Auckland Council declared a climate emergency. The Mayor is quoted as saying on the Auckland Council website that "By unanimously voting to declare a climate emergency we are signalling the council's intention to put climate change at the front of our decision making"!! Councilor Hulse also is quoted as saying the following and relates it to scientific evidence "The scientific consensus and evidence of climate change is widespread, and research and reports have shifted primarily toward a better understanding of the pace and patterns of change and impacts". Councilor Hulse says the science is irrefutable that climate change is already impacting ecosystems and communities around the world. "We are experiencing increasingly frequent and severe storms, floods and droughts; we're seeing melting polar ice sheets, sea level rise, coastal inundation, erosion and impacts on biodiversity including species loss and extinction," said Councillor Hulse. Noting Councilor Hulse references impacts on biodiversity including species loss and extinction how is it even possible that healthy Kauri on the site in question can be destroyed to make way for an industrial sized water treatment plant at the gateway of the Waitakere Ranges? This also contradicts and is hypocritical of the Auckland Council statement of "Keep Kauri Standing" Also very ironic that walking tracks within the Waitakere Ranges have been closed on mass to mitigate the spread of the kauri dieback disease along with ratepayers having been asked to pay more in rates to fight the spread of the disease. The statement of intent from the Council with regards to the declaration of a climate emergency also contradicts the first principle of the RMA, to AVOID irreversible adverse environmental effects, which has clearly not been satisfactorily achieved with the project being proposed in this location. It is also inconsistent with the relevant objectives and policies of the Auckland Unitary Plan. The impact of a lot more heavy construction vehicles is also of major concern; especially on roads that are already in a poor state of repair. The roads in and around the proposed site are not designed for the proposed volume of heavier vehicle traffic. With the proposed volume of vehicular movements I also have concerns for the local children that both walk to and from school along with the designated bus stops. How will these children be kept safe; especially on Woodlands Park Road adjacent the reserve and play area; noting the fact that operations will be during a 6 day week including Saturdays? Having seen photographs of the truck survey that was completed it is interesting to note that there are none of two truck and trailer vehicles passing each other on Scenic Drive from Titirangi Roundabout to the Woodlands Park Road turn off. Have these photos been accidentally been omitted or is it the fact that there are not any taken due to fact its impossible for them to pass each other on this road. Given that is more to the truth how will buses that have to use Scenic Drive be kept safe; especially those with our children on as they both head and return home from schools? Given the amount of existing road works and blocked roads within the local area (especially Golf Road) it already places an impact on delaying people getting to and returning from work and puts added time constraints on a daily basis. With the proposed extra heavy vehicles using the roads this will only compound and already stressful commute.

What decisions and amendments would you like the council to make?

For the Council not to grant the Council Controlled Organisation the resource consent especially based on the environmental issues and the Councils declaration of a climate emergency.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:



Waima and Woodlands Park Residents & Ratepayers Association (Incorporated Society 2707631)

Submission to oppose the Huia Replacement Water Treatment Plant Project

Application numbers: BUN60339273

LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441

2 September 2019

From: Waima and Woodlands Park Residents & Ratepayers Association

Contact: Steven Westwood, Chair

B514/176 Broadway, Newmarket, Auckland 1023

027 425 6317

waimawoodlandspark@gmail.com

- The reasons for the submission are set out in the document below
- We wish the authority to **reject** the Consent Application in its entirety
- The Waima and Woodlands Park Residents & Ratepayers Association wishes to be heard to support this submission
- We do not wish to present a joint case.

The reasons for the submission:

1. Introduction

The Waima and Woodlands Park Residents & Ratepayers Association (WWPRRA) is an incorporated society whose primary objective is “Protecting the integrity and character of the Waima and Woodland’s Park area.” The evidence suggests that the granting of consent for the Huia Replacement Water Treatment Plant (WTP) would be in direct contradiction to this objective.

2. Rejection of mitigation

The applicant’s proposed site is in a Significant Ecological Area (SEA). A SEA is “an area of significant indigenous vegetation and/or significant habitat of indigenous fauna” (Sawyer and Forbes, 2013), the loss of which cannot be mitigated. This SEA meets all five criteria for qualifying as a SEA (representativeness; threat status and rarity; diversity; stepping stones, migration pathways and buffers; uniqueness or distinctiveness). This SEA is one of only 20 out of 3226 sites listed (SEA_T_5539) as per page 18 of Schedule 3 of the AUP that meet all five criteria. The SEA is recognized in the Auckland Council Unitary Plan and by the provisions of the Waitakere Ranges Heritage Act (2008).

It is the view of WWPRRA that the ecological and social impacts of the plant proposed in the consent applications are so significant they cannot be mitigated. Another site from the applicant's own list of sites should be utilised that does not have the impact that would be had if the Manuka Road site were to be used.

The applicant's suggested mitigation is to fund a trust to do works in the local area of an ecological nature. It is the view of WWPRRA that this concept is flawed. It has been suggested that this trust will be used partly to clean up weeds and undertake pest control on land leased by the applicant. The view of WWPRRA is that like any landowner, the applicant has a social responsibility to maintain its own land at its own cost and this does not constitute mitigation but should be undertaken regardless of the outcome of this application.

3. Ecological impact

It is accepted by the applicant that the ecological value of the project site is VERY HIGH. It is also accepted by the applicant that the level of effect of the proposal on the ecology is HIGH. Within the footprint of the proposed WTP the ecological losses will be total as the entire forest cover of this significant area will be removed.

The applicant is proposing significant unavoidable damage to the indigenous understory during the felling and processing stages if this proposal goes ahead. This will greatly decrease the current ecological values of the site. Rachel de Lambert ran through the final scoring for Landscape and Visual effects on the list of sites under initial consideration by the applicant. The Manuka Road site scores the worst with regards to landscape and visual of any sites on the list as development would involve clearing vegetation and modifying a site which is perceived to be unmodified i.e. HIGH IMPACT (Tonkin + Taylor Minutes HWTP Replacement - Final shortlist scores workshop 16 May 2017).

The applicant states that the most significant ecological impact is the loss of connectivity and fragmentation that will affect two catchments (Little Muddy Creek and Lower Nihotupu). It is accepted by the applicant that the project site connects these two catchments to the Manukau Harbour and the Waitakere Ranges Regional Park, which is an integral part of the Northwest Wildlink connecting the Ranges to the Hauraki Gulf islands and the rest of the Auckland Region.

The proposed replacement WTP site in its immediate surroundings bounds the forest which forms part of the link between exhibition drive to the north, the forest of Titirangi to the east, and the rest of the Waitakere Ranges to the west, and South through to Waituna Park and Tangiwhai Reserve. The site is a vital part of the Little Muddy Creek riparian corridors, which includes the Waituna Stream. It is one of several blocks of indigenous vegetation which form an important link between the Waitakere Ranges and the coastal ecosystems of the Little Muddy Creek area and the overall area forms an important part of the Waitakere Ranges.

The 2014 Local Area Plan described the area:

*"quality streams and healthy and diverse vegetative communities extend throughout Laingholm, up to Woodlands Park and Waima areas. Adjoining housing development in these areas, the surrounding bush is of good density and composition, and **provides an almost uninterrupted corridor of vegetation, allowing the facilitation of wildlife movement and the linkage of geographic areas.** This vegetation includes kauri, kowhai, kohekohe, puriri and kahikatea amongst others ... the area contains various avian species, and is likely to contain various reptile species such as the forest gecko, the Kauri Snail, and possibly the Hochstetters frog. The area boasts some of the highest sightings of kereru (wood pigeon) in the region in recent community-based counts."* (WRLB 2014:8)

The critically endangered kaihikatea-puketea forest (WF8) surrounds the Yorke-ephemeral stream headwaters and is within the proposed WTP footprint. This area is not specifically mentioned in the AAE.

The proposal disrupts the integrity of the catchment and its ecological corridors, as identified in the Local Area Plan. The plan highlights *“the importance of connected ecosystems that follow natural features within the catchment, particularly natural waterways.”* (p.13.) The damage to a major part of the integrity of this area would be devastating. Corridors are crucial in allowing sustainable populations, and are especially important to maintain the integrity of waterways. Protection of the integrity and extensive nature of the forested Ranges is, therefore, important for maintaining biological diversity at a regional and national scale.

The following is a quote from Mayor Phil Goff on May 28 2019 - *“Last month I raised with the Environment Minister, Council’s concern at the adequacy of protections under the Resource Management Act for our heritage native trees. The Minister is currently examining reform of New Zealand’s resource management system and is sympathetic to our concerns about the adequacy of existing protection.”*

“In my correspondence to him I said that resulting from changes to the RMA made by the previous government which lifted blanket tree protection; Auckland Council has fewer controls over urban trees on private land, leaving them at risk of felling. This is reflected in a significant loss of urban trees, for example in the Waitemata Local Board area.”
Below is part of my submission to the Minister, which spells out my view that we need stronger protection for our heritage native trees. What do you think?”

“I believe we need greater urban tree protection and agree with you that we need mechanisms to protect mature and ecologically significant trees while ensuring that protections do not create unnecessary compliance costs for routine pruning or the removal of smaller trees. In my views, councils should have the ability to create district plan rules to protect trees with certain attributes, and to selectively apply these rules in areas of the most need.”

The WWPRRA considers that these losses will not just affect these two local catchments but the whole of the Waitakere Ranges, the Northwest Wildlink and the ecology of the wider Auckland Region.

4. Impact of climate change on decision making

Plants create oxygen and absorb greenhouse gases. The destruction of trees may, therefore, encourage global warming. Changing temperatures can alter which organisms can survive in an ecosystem. Removing trees deprives the forest of portions of its canopy, which blocks the sun’s rays during the day and retains heat at night. That disruption leads to more extreme temperature swings that can be harmful to plants and animals.

On 11 June 2019 Auckland Council declared a climate emergency. The Mayor states on the Auckland Council website that *“By unanimously voting to declare a climate emergency we are signalling the council’s intention to put climate change at the front of our decision making.”* The granting of this consent would be against the stated goals of the Auckland Council.

The scientific consensus and evidence of climate change is widespread, and research and reports have shifted primarily toward a better understanding of the pace and patterns of change and impacts.

On the Auckland Council website Councillor Hulse states the science is irrefutable that climate change is already impacting ecosystems and communities around the world - *“We*

are experiencing increasingly frequent and severe storms, floods and droughts; we're seeing melting polar ice sheets, sea level rise, coastal inundation, erosion and impacts on biodiversity including species loss and extinction."

5. Kauri dieback

The Biosecurity Report states that the highest risk vector for phytophthora agathidicida (kauri dieback) movement into new distinct locations is soil disturbance associated with human activity. The applicant proposes to move 3.5 hectares of earth and this will almost certainly contain kauri dieback spores. There will almost certainly be a spread of kauri dieback due to these proposed earthworks.

The sites are sloped and high in rainfall and contain natural water flows all of which aid the spread of kauri dieback. The escaping of sediment laden water containing kauri dieback will be unpreventable, further spreading kauri dieback to areas, especially but not limited to, areas downhill from the site.

The risk of spread of kauri dieback disease from this proposal has been significantly underestimated and the precautions proposed are inadequate to prevent potential spread. The project site is immediately adjacent to two of the largest kauri trees in the Auckland Region, located in Clarks Bush, and adjacent to the Waitakere Ranges as well as being a part of the wider forest cover of Titirangi and the surrounding area. All these areas are well populated with regenerating kauri forest. Some stands are badly infected. For most private properties the disease status is unknown. Protection of healthy ecosystem and especially old growth trees is the top priority for preventing extinction of kauri.

The applicant accepts that kauri dieback is likely to be present on the site, but no soil testing has been done to establish disease presence. Ministry for Primary Industries advice requires sites with kauri to be treated as if they are infected, regardless of whether disease has been confirmed or not.

Not every kauri has been accounted for in the applicant's report, rather only those with greater than 20cm in diameter have been counted. The unaccounted for trees include rickers, saplings, seedlings and possibly infected root zones of the Kauri that are outside the proposed footprint.

Movement of soil is the primary risk activity in the spread of kauri dieback disease. This project proposes to move a total of 87,000 cubic metres of soil. The proposal includes strict hygiene precautions for kauri in excess of 20cm diameter. However kauri of all sizes from tiny seedlings to 1000+ year old trees can host kauri dieback disease. The size of the tree is not relevant in determining whether or not it is a risk for hosting the spores of the disease. All kauri need to be assumed to be infected on the site, regardless of size or age. While the applicant proposes to follow standard operating procedures for managing kauri dieback, the standard operating procedures were not designed for earthworks of this scale. Trigene is usually used for cleaning to limit the spread of kauri dieback but does not kill spores that are embedded in soil and is only effective against two of the three spores that spread kauri dieback.

The hygiene precautions, including the disposal of soil to a licenced contaminated landfill, must apply to the entire site. Not just the "kauri zones" as proposed. This will significantly affect the amount of soil that needs to be transported out of the local area and precludes the use of the Parau landfill for disposal of any soil from the project site. This will have a significant impact on cost and on the number of truck movements with the associated effects from that heavy vehicle traffic.

All vehicles, plant, machinery, equipment and footwear entering or leaving the site must be thoroughly decontaminated and the cleanings contained and disposed of as per contaminated material, not washed into the stormwater system, stormwater containment pond or onto the road. All vegetation that may be contaminated with soil, i.e. all vegetation from the site that has touched the soil, must be disposed of to a licenced contaminated landfill if it is not to be kept on site.

6. Earthworks

WWPRRA does not believe that the site itself is suitable for the earthworks proposed by the applicant and not enough has been done to determine whether the proposed works are feasible on the site. *“Unresolved differences of opinion mean that uncertainties remain with the geological modelling to date. This could cause difficulties for objective assessment of environmental effects in the resource consent application process. For e.g., if unfavourable geological conditions encountered either during design or construction might result in a larger earthworks footprint than proposed, with potentially greater adverse ecological consequences.”* (Riddolls Consultants Ltd - Geological Report - 20/11/17)

Traffic associated with earthworks will have a significant impact on the community. The intersection between Woodlands Park Road and Scenic Drive is the main route for the community to travel. As there aren't many commercial businesses in the community and there is no high school, the majority of the community have to commute every day. Having this intersection blocked off for construction would cause the whole community to have to drive through Huia Road instead which is already heavily used. This would cause significant delays notably in the Titirangi Roundabout area. As earthworks and subsequently construction would be ongoing for many years, the impact would be significant. Trucks for the construction would also have to go via Huia Road for a period of time which does not appear to have been covered in the applicant's submission.

Local residents often see even the small number of buses that travel along scenic drive today crossing the centre line. The large amount of much larger trucks will not be able to travel safely along this road without crossing the centre line on the tight turns and will not be able to pass each other on a number of stretches on the proposed routes. This will have significant impact on the current traffic in the area and is a safety concern.

The route trucks would have to take passes many schools and childcare centres which is of great concern to the community in terms of safety. The lack of footpaths on some sides of the roads in the area increases the impact of this even further. The volume of predicted truck movements by the applicant are on a scale not seen before in the area and the community is worried for the safety of children, many of whom walk to school.

The project heavy vehicle traffic, estimated to be up to 118 two-way truck movements per day, will directly impact all communities that use Scenic Drive, Huia Road and Atkinson Road all the way out to West Coast Road, Glen Eden and on to Great North Road in Kelston, plus Titirangi Road through Titirangi Village, New Lynn and the wider Auckland area. This estimate of 118 two-way truck movements per day for 11 months only relates to the earthworks phase. The assessment of truck movements associated with the construction phase of the plant have not been included with this application, nor assessed as impacts but the expectation is that this will also be significant. We consider the extended addition of heavy and other vehicles will extend and expand the direct impacts on these communities of noise, vibration, dust and congestion for a considerable length of time and should be included in the assessment.

The impact of vibration on houses especially on Atkinson Road and businesses in Titirangi Village as the B-train trucks navigate the speed bumps on this road has not been included or

assessed in the application. The impact of noise and diesel fumes on businesses in Titirangi Village as the B-train trucks navigate Titirangi Road has not been included or assessed. This will be especially significant for the cafes and restaurants that rely on on-street dining.

In terms of land stability, the area is well known for constant slips in times of rain. This includes the stretch of Scenic Drive it is proposed trucks will have to drive along to the proposed site. The slips will only be made worse by regular truck movements. There have been significant slips along Scenic drive including incidents that have blocked one or both carriageways for extended periods of time. In addition WWPRRA has concerns about the suitability of the site in terms of the actual stability of the land as has been highlighted by a number of experts.

The noise of the works will have a significant impact on the neighbouring properties, many of whom were not aware of the likelihood of a development of this scale when they moved into the neighbourhood. Their LIMs largely either make no mention of the designation or are interpreted as an area where work may need to be undertaken to support the existing WTP rather than a potential site for a new WTP. The impact will be much greater and was unexpected.

7. Culverting of streams including the reclamation and diversion of an intermittent stream as well as diversion and discharge of groundwater and stormwater.

The local streams have been painstakingly restored by local community groups over a number of years through volunteer days and the like. Testing has shown the water to be of high quality and as a result it is home to a number of insects and freshwater fish.

The Yorke and Armstrong Gullies provide high quality freshwater habitats. Longfin eel and inanga (designated as “at risk declining” by DOC) are present in the Yorke Gully catchment.

It is not possible to mitigate the substantial threat this proposed water treatment plant will have on our endangered native freshwater fish species and high quality stream macroinvertebrates as well as the effects on our special Inanga spawning area and habitats. Freshwater ecologists have expressed that the biology of the entire stream system will change as the ephemeral or intermittently flowing sections will be essentially be “bumped” down from the proposed water treatment plant site (*Effects on Freshwater Ecology referenced by Environmental Ecologists in the AEE 24 Aug 2018*).

The proposed footprint requires reclamation of a section of a headwater tributary of Yorke Stream, resulting in approx. 70m of intermittent stream loss and 38m of ephemeral stream loss. In addition to reclamation, earthworks and the associated discharge of sediment may adversely affect high quality freshwater habitats and associated aquatic organisms in the vicinity of the development.

There will be hydrological changes associated with diversion of stormwater away from watercourses. Hydrology is more significant these days because we plan ahead of time to deal with extremes (scarcity of water leading to droughts, and overflowing of water bodies leading to floods). Another significant area of research is looking into impacts of climate change in the hydrologic components in an area or watershed.

There will also be sediment laden runoff due to increase soil exposure, runoff from impervious surfaces and vegetation removal which will increase flood flows and could degrade freshwater systems downstream.

The works proposed by the applicant will lead to changes and modifications of waterways causing habitat loss as well as structures that can impede fish passages and even harm them.

The WWPRRA made a written submission to a Parliamentary Select Committee in November 2018 in relation to the (Conservation Indigenous Freshwater Fish) Amendment Bill on behalf of the community of Waima. The concerns raised were in the relation to the significant impacts on our Streams and Freshwater Fish with the proposed Water Treatment Plant, Reservoirs and Infrastructure. The submission was supported by Chris Penk MP who is the local MP. This was followed up by an oral submission on 11 April 2019. The written submission was published on the Parliament Website 14 November 2018.

8. Site selection process

The applicant's site selection process appears to have been done using flawed methodology from the start. Having reviewed the original long list of sites, the applicant was advised that their preferred site (the one chosen) did not meet their own shortlisting criteria. The applicant then changed the criteria to make sure the site could be considered.

When local groups (including WWPRRA) raised concerns about the site chosen the Waitakere Ranges Local Board (the local board) stepped in and suggested an alternative site that had less ecological impact and the response from the applicant was that they had considered all sites they wish to consider. The applicant mentioned the site suggested by the local board was inappropriate as a chlorine leak could contaminate one of the dams. When local community members raised concerns about the applicant's preferred site being above houses the applicant assured them that a chlorine leak was not possible with the technology used, contradicting the applicant's concerns about the other site. The impression given was that the applicant had a particular site in mind and the process followed after this decision was a box ticking exercise where all concerns raised were disregarded.

The WWPRRA as well as other local community groups raised several concerns through the Community Liaison Group (CLG) including:

- The potential spread of kauri dieback
- The culverting of a stream which had been restored by community volunteers
- The significant impact on native vegetation including a large number of native trees
- The impact on the local community including the immediate neighbours.

The response from the applicant to the concerns raised within the CLG was disappointing. Each concern was largely disregarded or the response was that this would be addressed through mitigation:

- The applicant stated that the spread of kauri dieback was being taken seriously then several weeks later mentioned their intention to transport the green waste from the site to the current sludge dump site which would risk spreading kauri dieback spores further into the Waitakere Ranges
- The concerns about the stream have been addressed by saying the applicant will artificially keep flows consistent without addressing the fact that this will likely lead to the destruction of a stream that was carefully and manually restored to health by the community
- The value of vegetation in the process undertaken by the applicant has been largely reduced to mature kauri and "everything else"
- The impact on the community was consistently managed by referring to the designation the community were largely unaware of
- The social impact reporting for Titirangi was inadequate due to the applicant's own time frame and plan to announce the decision on their preferred site. The social impact data gathering was rushed by the applicant's desire to keep to

- the already agreed timeframe and as a result no credible reporting on social impact was carried out for Titirangi before the site announcement was decided
- Only after the decision was made the applicant become involved in trying to mitigate the effects and talk to affected neighbours but this was not part of any site selection decision
 - The social impact report was allegedly completed by the applicant but when requested the members of the CLG we were told “not yet”. To date it has still not been released.

After working through the process of the CLG without having our concerns acknowledged or taken seriously, the WWPRRA directly approached the applicant’s board to raise concerns with the process. The applicant’s board formally responded to our address in writing standing behind their operational arm while quoting a number of inaccuracies such as “your statement “countless healthy native trees including kauri will be destroyed is not factually correct” and references to the community concerns being around the size of the plant and the location of the reservoirs. The process the applicant followed to both select the site and determine how works are to be undertaken on the site have been flawed. To date no costings have been done and it has not been determined that this is the cheapest site. The site is very challenging from an engineering perspective and is the site with the greatest ecological impact.

The RMA and the direction of the applicant’s board is to avoid wherever possible significant tree and ecological effects. Some minor ecological damage minimisation has been done within the confines of the proposed site but certainly has not been done in the consideration of all potential sites available to the applicant as many of the proposed list of sites from the applicant will have significantly lower ecological impact than the Manuka Road site.

9. Requirement to avoid

The applicant correctly states that the Resource Management Act requires applications to (in priority order) Avoid / Remedy / Mitigate / Compensate / Offset for losses caused. The applicant has stated that the ecological losses cannot be avoided, remedied or mitigated and therefore will be Compensated.

The WWPRRA does not consider that the application has gone far enough in seeking to avoid effects and impacts. Constructing the replacement WTP at a different site would avoid the significant ecological losses on this site, though we accept that losses of some kind will be incurred wherever the WTP is located.

The decision to select the Manuka Road site for the plant appears to have been made based on it having a water supply purposes designation rather than it being the site with the minimum impact of all the sites considered in terms of ecological impact. We believe that the applicant has failed to adequately avoid or even minimise the ecological effects of replacing the Huia WTP.

We accept that the applicant has moved Reservoir 2 in order to avoid effects on the high value ecosystem on the Manuka Road site. However we consider that insufficient investigation was undertaken to assess moving both reservoirs to a different location and even using a different site for the replacement plant to enable effects to be avoided completely in this area.

The remaining ecosystem will suffer significant edge effects as a result of the development of Reservoir 1 on this site and also encroaching on patches of kaihikatea-pukatea forest (WF8, a critically endangered ecosystem type, Singers et al 2013) principally along the toe of the escarpment and surrounding the small watercourse. Reservoir 1 has also had the

buffer reduced from 10m to 3m which will completely change the forest character of the neighbourhood.

The shaft of the NH2 (a new connection to a planned main trunk water line receiving bulk water from the reservoirs) is actually inside this area of high ecological value and also within riparian margins of Armstrong Gully. This “creep” of add-ons, is indicative of further encroachment over time.

Effects have therefore not been avoided in this high value ecosystem and have been underestimated.

10. Direct impacts to the community

The Waitakere Ranges are a key resource of the local area and a key destination on the list of most visitors both domestic and international. The route from Titirangi to the prestigious Arataki Visitor's Centre goes along Scenic Drive and past the proposed site. The western beaches of Piha, Karekare and Muriwai amongst others are a draw card for many with most visitors heading out along Scenic Drive past the proposed site. If the consent was to be granted, the first thing visitors would see as they enter the Waitakere Ranges on the way to these key visitor destinations would be a massive industrial plant the size of over 30 full size rugby pitches. The proposed WTP will have an impact on business right across the Waitakere ranges extending as far as Piha. We would expect the number of visitors going across the Waitakere Ranges to drop during the enablement and construction phases due to the traffic impact and there could be a long term effect on these often fragile local economies due to the drop in visitor numbers.

Many residents of the Waima and Woodlands Park area move there because of the peace, tranquillity and access to the great outdoors. During the construction phase there will be multiple impacts on this with some impacts having a longer term effect.

The Waima and Woodlands Park area is home to many families including those with young children. The huge traffic impact and upsurge of traffic during the lengthy construction process which has been estimated at eight years by the applicant is of particular concern for our residents. The area does not have footpaths on all street and those with footpaths often have them on only one side of the road. The roads in the area are not designed for the huge increase in volume of traffic and size of vehicles that is anticipated during the enablement and construction phases.

As mentioned above the noise from the enablement and construction will be significant.

Exhibition Drive is a walk that attracts many visitors from near and far throughout the year from early morning dog walkers through to night time runners with their head torches. During the lengthy earthworks, enablement and construction Exhibition Drive will be closed. With Exhibition Drive being one of only a handful of tracks in the Waitakere Ranges open under the kauri dieback prevention measures (which the WWPRRA support) there is a very real chance that people will either not be able to exercise in the time they have available. Other open tracks are some distance away so people will have to either travel a long way in a vehicle to get to another open track or breach the kauri dieback prevention measures and use tracks that have been closed.

During the enablement and construction phases with the junction of Woodlands Park road and Scenic drive closed, Waima and Woodlands Park residents will have to go on a huge detour to access the Waitakere Ranges. The route people will have to take is via Huia Road, Titirangi, Glen Eden and West Coast Road adding an additional 10km in either direction.

11. Waima Stone

There is currently a stone announcing the entrance to the suburb of Waima near the intersection of Woodlands Park Road and Scenic Drive which is known as the Waima Stone. This stone holds significance to the Waima community and the location of it is seen as many as the gateway to their community. Not only is there concern about the stone being damaged or removed by the applicant, but it is indicative of the importance to this gateway to the Waima community.

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5242] Submission received on notified resource consent
Date: Monday, 2 September 2019 2:19:34 PM
Attachments: [Waima and Woodlands Park Residents WTP submission.pdf](#)

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Steven Westwood

Organisation name: Waima and Woodlands Park Residents & Ratepayers Association

Contact phone number: 0274256317

Email address: waimawoodlandspark@gmail.com

Postal address:
B514/176 Broadway Newmarket Auckland 1023

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Vegetation removal and earthworks

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

We are asking the council to reject the applications for consent.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Waima and Woodlands Park Residents WTP submission.pdf

Woodlands Park School

BOARD OF TRUSTEES

Woodlands Park Road, Woodlands Park
PO Box 60 250, Titirangi, Auckland
Phone (09) 817 5150, fax (09) 817 5151
Email: admin@woodlandspark.school.nz
Website: www.woodlandspark.school.nz



Monday 2 September

Re application by Watercare Services Limited, application numbers BUN60339273, LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441

We wish the authority to reject the Consent Application in its entirety.

Woodlands Park School wishes to be heard to support this submission and would consider presenting with other schools making a similar submission at a hearing.

We are not a trade competitor of the applicant.

Woodlands Park School understands that the selected site and the entire 57 hectares which extends down Exhibition Drive is designated for Water Supply Purposes, a condition of the designation is that it complies with the aims of the district plan, Watercare have filed the application as non-complying (with the district plan). We understand that our submission is not for the construction phase of the proposed Water Treatment Plant.

Introduction

Woodlands Park School is a Co-Educational State school for Years 1-6 students, located at 202 Woodlands Park Road approximately 1.6km down from the proposed Water Treatment Plant site. We're a zoned school with a large range (see appendix 1). We have approximately 400 students, and is an important part of the Titirangi/Waima Community.

Woodlands Park School is proud to be a Travel Wise School and has put considerable, and ongoing, effort into encouraging safe behaviour, sustainable travel habits, and a commitment to road safety and active transport. These initiatives have been undertaken with the support of Auckland Transport's (AT's) Community Transport team and specialist TravelWise advisors.

We are an Enviro Green Gold School and have had a long history of education programs both on site and in the community. Embedded into the teaching at Woodlands Park is respect and guardianship (kaitiakitanga) for the environment. Our children undertake a lot of learning within the natural environment and we engage with local community groups by being active in planting projects and supporting these with native seedlings from our on site nursery.

What are the reasons for your submission?

Woodlands Park school considers itself to be a key affected party for the proposed WTP project and therefore submits on that basis. The prime reason for this submission is to ensure that the safety of Woodlands Park children, our staff and their families is given the high level of consideration that it deserves.

Many members of the school community use Woodlands Park Road for pedestrian and vehicle travel associated with school activities. This section of road, and our school zone, has been identified in the application documents as being a route for heavy vehicle movements during the period of site earthworks, vegetation removal and associated works (and subsequent development not covered by this application).

This application is a site within a larger 57hectare designation which extends on the ridgeline above the school, our pepeha (mural) is visible from Exhibition Drive. Should further development be deemed necessary over time, which is possible under the current designation, if granted this resource consent will create precedence for this to occur.

What decisions and amendments would you like the council to make?

Given our Travelwise status WPS requests that council (and/or AT) gives consideration to traffic and transport effects associated with the application on both people who walk and vehicle traffic - in particular, the safety of children and families travelling to and from WPS.

Pictured below are the kerbless footpaths enroute, there is narrowness in places, particularly on the bends of Huia Road as you approach the dairy. We have serious concerns regarding the safety of children walking. There would be an expected drop off in independent, family and Walking School Bus (WSB) walkers and cyclists and consequently more cars. Our WSB's are as follows:

1. Minnehaha Walking Bus - crosses Huia Road opposite the dairy
2. Tangiwai Reserve (Huia Rd)
3. Boylan Reserve (Woodlands Park Road)



WSL proposed mitigation measures include “preventing or limiting, where practicable, heavy truck movements on the adjacent road network during the busiest periods of construction in the weekday morning and afternoon peak periods around school pick up/ drop-off time”.

It is requested that council (or AT) seeks further clarification as to how “where practicable” will be assessed, and by whom. It is requested that this decision making will involve consultation with key stakeholders and/or regulators, rather than being solely at WSL’s (or their representatives’) discretion.

We will require the truck movement passing to be strictly enforced with no truck movements from 8.15-9.15am and 2.30-3.30pm. Note in the summer season our community has access to our school pool opening times mean there is high volumes of traffic at other times also.

Woodlands Park School endorse Councils’ comments on the proposed traffic mitigation measures, which state: “Advise why heavy vehicle movements should not be avoided at weekday school and commuter peaks and weekend midday peak, rather than just limited as suggested in Section 4.1.2.” WSL’s consultant’s response was that “heavy trucks will not be permitted (where practicable) at certain times of day on certain routes, such as during the periods around the start and end of the school day along the Atkinson/ Kaurilands/ Glendale Road and Parau site routes.”

Woodlands Park School concurs with council that vehicle movements should be avoided during these peak times, and is uncomfortable with the applicant's inclusion of the words "where practicable". Furthermore, WSL appears to give no regard or acknowledgement of Woodlands Park School and its associated Woodlands Park Road school traffic route (with 'school traffic' including both people who walk and vehicle traffic). Therefore Woodlands Park School requests that traffic mitigation measures be revisited to completely avoid construction traffic flows along Woodlands Park Road during school peak periods, and requests, if it is granted, that this be included as a condition of the Resource Consent. The traffic assessments focus on vehicles generated directly by the WTP upgrade activity (earthworks, vegetation removal etc.). However, disruption to Woodlands Park Road and Scenic Drive will also have marked effects on traffic flows for alternative routes, particularly Huia Road. This increased/diverted residential traffic will impact upon the Titirangi Village roundabout. It is unclear how / if these wider impacts have had any consideration given. It is requested that council (and/or AT) ensure appropriate consideration of these wider network effects.

We have identified the following hazards in the immediate school vicinity and would like to see the considerations given to these in the traffic assessments:

- Road patrol - responsibility too great for year 6 students and staff.
- Due to the car park style, cars reverse into the road.
- Blind corner on bend by hall car park exit, the school property is accessed from the west by a series of three car parks off Woodlands Park Road, with this being the largest car park and only off street car park for parents.
- Mostly ex WPS children use the bus stop from 8.10am for GEIS and GBHS buses.
- The Marist College/Lynfield/Mount Albert Grammar bus uses this bus stop earlier at approximately 7.15am.

Map shows the route to the Parau Landfill Site (end of Exhibition Drive).



Figure 1-3: Identified Heavy Truck Haul Routes – Parau Site



Huia WTP - 6503515, 4271-1560187-23.5.0 - 11 July 2016 - 3

"the predicted heavy rigid truck movements along Woodlands Park Road and Huia Road to the Parau site equates to approximately 13 movements per hour or around one heavy vehicle every five minutes."

The traffic assessment does not clarify if there will be a circular route of trucks accessing the site from the east via Huia Road to avoid two trucks passing on Scenic Drive i.e. down Huia Road, right into Woodlands Park Road and back towards the village along Scenic Drive. **This would significantly increase the truck numbers past the school.**

Also we note Figure 4-11, Page 55 of the M1 Traffic assessment. It shows the Huia WTP Sludge Dump (Parau Landfill) being located on Jay's road, across from Woodlands Park School. If this figure has been used for technical details (travel distances), then they will be incorrect.

NOISE & VIBRATIONS

The majority of our classrooms are either entirely or partly built using bricks. The closest classroom is approximately 15m from the road.

If consent is granted we require Watercare to fund a full detailed building assessment including photographs of cracks to be undertaken at regular intervals throughout the construction period.

While our insurers are yet to confirm if this is adequate, we require, at a minimum, Monitoring Pins to be installed

- On the hall
- On new 2 storey brick block rooms 1-8
- On room 20, closest to the road

In 2018 there was a significant slip near the major 375 dia culvert under Woodlands Park Road and adjacent to the school car park (Kopai Gully stream). The Ministry Of Education is funding the significant cost of remediation through Emergency Works Assistance and consent to carry out this remediation has just received. See the risk assessment excerpt below

[Geoconsult REVISED GEOTECHNICAL ASSESSMENT, June 2018, page 6]

9.1 Risk Assessment

The headscarp of the slip is at risk of continued retrogressive instability that could cause further loss to the land and damage to assets.

A brief qualitative risk assessment has been undertaken in accordance with the Australian Geomechanics Society Guidelines². Accordingly, an assessment of the likelihood and consequence of further instability has been made.

The likelihood of further failure occurring due to soil creep and shallow seated slope failure is assessed as "Likely", i.e. the slip headscarp will probably regress toward the adjacent assets and carpark in time. It is expected that under adverse conditions (e.g. high intensity rainfall event) the saturation of the soils will exacerbate the instability of the slope.

The consequences to further regression of the scarp is assessed as "Medium", as any further instability is likely to result in loss of land and damage to assets. This results in a **High Risk** category rating.

Woodlands Park School request that Watercare meet any costs of additional engineering and council reports and consents required to assess that the proposed works will be engineered for any extra stormwater or emergency discharges, plus be able to withstand the long period of truck movements. And meets any additional cost (if any) are found necessary.

See Appendix 3 - Auckland Council GeoMaps indicates that public sanitary sewer and stormwater pipes cross the school. The stormwater pipes discharge into the gully approximately 10m to the west of the aforementioned slip. ***We request that Watercare meet any costs to assess that this will be sufficient and not contribute to erosion in Kopai Gully.***

EMERGENCY RESPONSE

Chlorine gas is heavier than air and therefore sinks. The proposed WTP will have increased stockpiles. We accept they will be safer than current storage arrangements with automated dosing, however internationally there have been incidents and the truck deliveries of chlorine will increase.

We request that Watercare provide modelling using different wind patterns to predict the likely dispersal patterns if there were to be a chlorine leak. What safety measures does Watercare propose or plan to alert the school to a chlorine spill? We request that Watercare provide relevant expertise on helping the school develop this plan with the school?

STORMWATER AND DISCHARGE

The school runs a Water Testing program in the local stream as part of the fully embedded Education For Sustainability program. This involves pupils and staff visiting the local streams and taking water samples. Not having this would be detrimental to connectedness if it wasn't safe to continue. The water storage reservoirs will increase significantly in size, we are concerned as to how this may impact the water levels in the streams and consequently school property pupil and staff safety.

We request that modelling of planned and catastrophic discharge be undertaken, with particular reference to how this increase in water flow will impact the school property and pupil and staff safety.

We request that watercare provide suitable expertise to help develop safety plans.

We request that Watercare propose or plan a program so that Woodlands park school can continue it's active involvement in the Education for Sustainability?

COMMUNICATION EXPECTATIONS

Woodlands Park School requests being recognised as a relevant/key stakeholder, to be closely engaged with and included in any Community Liaison Group (or similar).

We require weekly works forecasting reports and phone calls should there be any deviation from the planned project plan for the upcoming weeks forecast.

We require an on call mobile numbers of key personnel.

We require quarterly meetings for the whole construction period, not just the scope of this application.

GENERAL STATEMENT REGARDING MITIGATION

Our school community is diverse with a range of strong views on the project, some families will be directly affected as neighbours and others are Watercare employees. Any discussions regarding mitigation can be commenced if resource consent is granted. There would be an expectation that this would reflect that we will have cohorts of children over a long period of time that will have these works affecting their ability to walk to school for their entire time at WPS missing a very integral part of kiwi life. Due to our geographical location walking to primary school is the only time possible for these children, as the local Intermediate and Secondary School are both accessed by bus.

The proposed Trust and any mitigation should also allow for educational and school wide environment enhancement outcomes rather than the narrow scope of Biosecurity.

In conclusion, The Lorax by Dr Seuss was published in 1971. Our WPS tamariki enjoy this book as much now as they did back then, it has strong environmental messages that they intrinsically understand. We need to look at the world we are in today, the issues we face and the choices we make for our future generations. We ask you to "speak for the trees", to protect our Waima forest.

Regards,



Megan Fitter
BoT Chairperson



Ngaria Stephenson
Principal

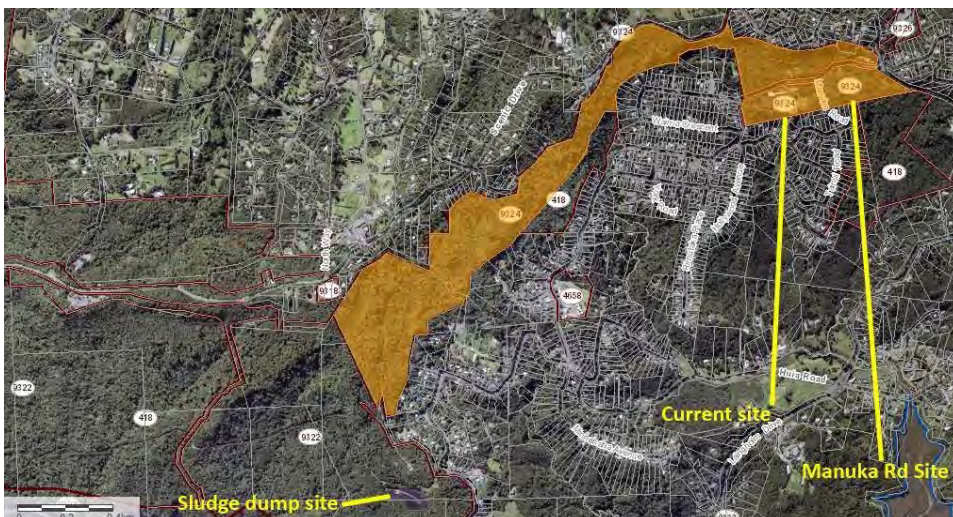
APPENDICES

1. School Zone Map
2. Designation showing school
3. Watercourse Map
4. Drainage Map
5. EFS photos

1. From the Beca Social Impact Assessment (DRAFT). Woodlands Park School and Titirangi School Zones, the portion in the middle is the portion of the zones which overlaps.



2. Woodlands Park School in relation to the 57ha designation.



3. Map from Auckland Council showing drains and culverts



4. Map from Auckland Council with stream and tributary paths



5. Our school EFS in action



From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5243] Submission received on notified resource consent
Date: Monday, 2 September 2019 2:21:56 PM
Attachments: [WPS SUBMISSION - Huia Water Treatment Plant.pdf](#)

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Ngaria Stephenson - Principal

Organisation name: Woodlands Park School

Contact phone number: 098175140

Email address: principal@woodlandspark.school.nz

Postal address:
202 Woodlands Park Road Woodlands Park, Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

We have outlined these in the attachment.

What are the reasons for your submission?

We have outlined these in the attachment.

What decisions and amendments would you like the council to make?

We have outlined these in the attachment.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

WPS SUBMISSION - Huia Water Treatment Plant.pdf

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5244] Submission received on notified resource consent
Date: Monday, 2 September 2019 2:19:30 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Sheila Roscoe

Organisation name:

Contact phone number: 357 8971

Email address: howard.roscoe1@gmail.com

Postal address:
PO Box 60627 Titirangi Auckland 0642

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The number of heavy vehicles

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

That the project does not go ahead

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5245] Submission received on notified resource consent
Date: Monday, 2 September 2019 2:36:04 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Tamara GEORGE

Organisation name:

Contact phone number: 021343503

Email address: tamara.george@avocamedia.nz

Postal address:
12 Manuka Road Titirangi AUCKLAND 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. BUN60360339273 / LUC60339274 / LUS60339442, WAT60339409, DIS60339275, DIS60339441

What are the reasons for your submission?

- The submitter opposes the Application.

What decisions and amendments would you like the council to make?

- The submitter seeks that the Application be declined in its entirety. • Alternatively, if the Application is granted the submitter seeks conditions that mitigate the adverse effects on Manuka Road residents.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5246] Submission received on notified resource consent
Date: Monday, 2 September 2019 2:36:06 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Victoria Scott

Organisation name:

Contact phone number: 02102611402

Email address: porkypoad@googlemail.com

Postal address:
96 Scenic Drive Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Traffic with regards to enabling earthworks. Noise with regards to enabling earthworks. Significant Ecological Area. Disturbance of potentially contaminated land. Diversion and discharge of groundwater and stormwater

What are the reasons for your submission?

The land proposed is not in a state of readiness to commence building a water treatment plant and requires more work than most sites, including alternatively proposed Watercare sites, to clear the site and redirect streams etc. Any enablement works needing completed will be majorly delayed, with increased costs, due to the necessary preventative measures taken to mitigate the risks of spreading Kauri Dieback. Enablement works needing completed will place a major strain on the local traffic routes. We live very close to the proposed site and the increase in traffic, as well as the different types of large vehicles required, will have a negative impact to the area as well as our property. Not only are the roads not suitable for such large vehicles, but neither are the footpaths taking our kids to and from local schools during the week and at weekends when work is also proposed to take place over the weekends. This enablement work will take many months (18+) to complete and will be made more time consuming due to the need to clear a Significant Ecological Area of native trees, plants and wildlife from the area. This is bad enough, in a time when Auckland Council has declared a climate emergency, but this will be further impacts and delayed by the need to also divert streams. All of the above will prolong the time that noise will be generated from this site during the enablement process. We live above the proposed site and this prolonged noise pollution will have a considerable impact on our family and neighbours, with little to no break.

What decisions and amendments would you like the council to make?

I'd like Auckland Council & Watercare to mitigate some of the risks as there are many. The best way to mitigate risk is to avoid the risk in the first place. Ideally choose another Watercare site, with less environmental impact, or locate less services in the one site. This also has the potential to increase the time to build a replacement treatment plant. The current site is a fraction of the size of the proposed site. Another option is for Watercare to work within the current, smaller site, and consider utilising another smaller site elsewhere for the storage of water tanks or other services. With Auckland Council declaring a climate emergency and with Kauri Dieback taking hold in the Waitakere Ranges, it is about time Auckland Council could action, rather than just using words, to ensure we are preserving green spaces and especially Significant Ecological Area's within Auckland whilst they still can.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
To: [Central RC Submissions](#)
Cc: Paul.Jones@water.co.nz
Subject: [ID:5247] Submission received on notified resource consent
Date: Monday, 2 September 2019 2:32:35 PM

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Jim Roskvist

Organisation name:

Contact phone number: 0275772763

Email address: jimroskvist@hotmail.com

Postal address:
87 Tainui Road Titirangi Auckland 0604

Submission details

This submission: supports the application in whole or in part

Specify the aspects of the application you are submitting on:

Entire application

What are the reasons for your submission?

Watercare has taken adequate steps to minimise the adverse effects on the environment to allow for the construction of the Water Treatment Plant (WTP), a critical piece of Auckland infrastructure. The relocation of the second reservoir to the existing WTP site and the changes to the proposed WTP footprint demonstrate this. Aucklands water supply being predominately gravity feed is unique and hugely beneficial. As stated in the application it provides resilience to the network. The application site allows this to continue and has been set aside for this purpose for many years. Therefore, I support the construction of the water treatment plant and reservoirs on the sites requested by Watercare.

What decisions and amendments would you like the council to make?

Approve the resource consent subject to consent conditions along the lines of those outlined in Appendix Q. Continued liaison with the community around construction effects and timing of works is important. All efforts to minimise construction traffic, especially during school hours, is also important and must be enforced through the consent conditions.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

2 September 2019

Dear Sir/Madam

RE RMA Application numbers BUN60339273, LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441, for the Watercare Huia Replacement Water Treatment Plant, Titirangi

Mandatory information:

1. Jake and Megan Fitter, hellojakeandmegan@hotmail.com, 09 8168528
2. 198a Huia Road, Titirangi, Auckland
4. We wish the authority to reject the Consent Application in its entirety
5. We wish to be heard to support this submission.
6. We do not wish to present a joint case.

Background

We moved here with our two children, Mischa and Eden, in 2013. We immediately got set to get rid of the gorse and be involved with riparian planting with support of The Weed Free Trust as it was then called. We'd undertaken similar work at our previous property on Konini Road and found it extremely rewarding.

Our house site is a result of 198 Huia Road subdividing and the space between our home and Waituna Stream to the South and West became council land. We've enjoyed very good Council support over the years and been really involved in mobilising our friends and neighbours to be involved in planting too. Megan is also on the Board of Trustees at our daughter's school so has facilitated having them come down to help with planting days over the past 3 years.

About two years ago we had a knock on the door from Ngaire Kingsbury who is a keen pest control volunteer with the South Titirangi Neighbourhood Network, she was so enthusiastic we got immediately on board with the new "discovery" of a potential inanga spawning ground (but we thought it was a bit funny because we knew they were there but of course for it to be official was important). Megan will cover what happened next in her separate submission on behalf of the Little Muddy Creek Rehabilitation Project, this takes up a lot of her time now days and there are always new people at the door or in the that she brings around to show them what's possible when neighbours coordinate.

OUR SUBMISSION BELOW

We are personally involved with many community groups in our catchment - Waituna Action Group, Waima 2 Laingholm Pest Free, South Titirangi Neighbourhood Network. We've previously been supporters of Waitakere Ranges Protection Society but their lack of involvement in the Muddy Creeks Local Area Plan affirmed our decision to focus on supporting those groups who have an appreciation of the value of the Waituna catchment and Little Muddy Creek as the amazing place we call home.

Flooding Risks

We are really concerned about flooding if the proposed WTP goes ahead. We've had 3 major events since we lived here, the last being the Tasman Tempest on 12th March 2017. The water level came up under our house and hit the bearers.

We are on a sharp bend of Waituna (it's where the Waituna comes past 200 Huia Road and does a right turn towards Landing Road). This corner is very eroded and despite planting we have concerns over the long term risk to our property falling away. This is the point where the creek completely skips the bend and flows across the area between our home at 198a and Alice Glen Creek which is on the other side of us. This is quite remarkable when you consider it's over 3m. We've included some pictures and maps to help illustrate this at the end.

Another previous event necessitated us having to evacuate chickens (8) and our goats (2) at speed when the water rose to waist height in 20 minutes. We rehomed them after that, if we weren't there (it was a Sunday afternoon), they would have drowned or been washed away.

We have had 2 insurance claims on our property due to these flooding events so we can look up all the dates if you need them. Our neighbours have pictures too and as they had to claim too unfortunately.

The application documents talk about climate change, so does lots of Auckland Council magazines (eg from Our Auckland below) and even in our rates bill it talks about planning for flooding. We are at almost the lowest point before the Manukau Harbour, and it also says of Flooding Risk to Lowest Point before Manukau Harbour and the project site is located approximately 1.5 km north of the closest reach of the Manukau Harbour. What is considered the closest reach? We think it might be our house.

Future challenges and opportunities

Risks to resilience are expected to change over time. This is in part because natural systems are dynamic and ever-changing, and in part because of climate change. Sea level rise, changes in rainfall intensity and patterns, and more storms will all intensify existing risks. For example, predictions for losses from coastal erosion in different parts of the region range from 6m to 55m in the next 100 years. With sea-level rise, these predictions extend to 200m in some areas. These kinds of changes will have significant effects on the future of coastal properties and activities.

What about the plans for a bigger settlement pond? It has a higher earth embankment than before and during earthworks and construction we'd like to know what happens if the sediment controls fail? How can you be so sure they won't? Our girls play in the stream, as do lots of the neighbourhood kids, what warning systems will be in place?

We don't think you can say it won't happen because it did happen. In 1931 and it reached the property then. It's in the old papers we've found - "Mr Louis Henry de Brabandere came out from Belgium with his family and farmed part of what was earlier the Brimmer property in the Valley of Little Muddy Creek. His house was right near the road bridge across the creek- it's still there today, across the road from Tangiwai Reserve at 200 Huia Rd". We are at 198A!!

Sustainable Development

We're not anti development, we live in a subdivision that was really controversial at the time. But it has to be done right and care about the future too. The hoops we go through as homeowners to be compliant are there for a good reason and we don't have a problem with our rain garden, not having outdoor lights so to minimise night sky pollution, grey water tank etc etc. But councils and their CCOs have to do the right thing too. Not just say the right thing. Some of the documents we saw during the Our Water Consultation sounded really good, we thought YES this is the city we want, so it's really and actually distressing to be facing the prospect of seeing the destruction so close to our home and to our stream which we have a very deep, almost spiritual connection, there have been sleepless nights and hours of worry. It's consumed our lives for the best part of two years, especially for Megan who goes to meetings, and reads endless reports about things I know she has no interest in. Things she loves doing have been sacrificed.

But the thought of the trucks rolling down the hill and taking away the kiwi kid opportunity to walk to the dairy for ice-blocks or take our dog across the road for a walk at Tangiwai Reserve won't be available to them if this goes ahead. Just when they're getting to an age when they could finally do that independently (10 and

12) they won't be allowed. Our road has no kerbs or rumble strips and it's just too dangerous once you factor in the volume that's been put in the reports.

And that's another thing. How do we know if the trucks will do a circular route down Huia Rd from the Titirangi round-a-bout. It just says "where practicable" everywhere it talks about the routes. That's a big get out of jail card if you ask us.

Watercare say they'll stick to the rules and blah blah blah, but we've not seen any evidence of integrity during the community consultations. There weren't even notices in our local papers, The Fringe or Round-a-bout, for example, or at the Library. In our opinion, and we know we can't submit on this, but the sooner the CCO model is reviewed and changed to an open and transparent governance structure, the better Auckland will be as a city.

We also think that it's unreasonable that the Trust structure excludes people from being Trustees who might have exercised their right to protest and been arrested and convicted without a prison term imposed e.g. Springbok Tour, Nuclear Free decades ago. It should be the same benchmark as a Member of Parliament or City Mayor/Elected Representative. (P17 Offences)

Please accept our submission and decline the application.

Regards,

Jake and Megan Fitter

References:

Water New Zealand's 2017 Stormwater Conference Stu Farrant & Reuben Ferguson, Morphum Environmental Limited: Taking the pain out of the treatment train: continuous simulation modelling for integrated water management.

AECOM, Titirangi-Laingholm- Catchment Modelling – Model Build and System Performance Report. Progress copy September 2018.

Big Blue Waitākere Coastal and Marine Information Report, 2018

Morphum Environmental report 2013 re sediment on Waituna

Other Referenced Pictures and Excerpts:

Auckland Council leads the way in erosion & sediment control, Our Auckland 2017
<https://ourauckland.aucklandcouncil.govt.nz/articles/news/2017/09/auckland-council-leads-the-way-in-erosion-and-sediment-control/>

“Protecting our natural heritage from the impacts of development is an underlying value in the Auckland Plan and an intrinsic component to building a resilient and environmentally sustainable city,” says Hulse.

Managing environmental impacts of development

Erosion is the process of soil being dislodged from surfaces, while sediment is the transport and deposition of these eroded soils into areas where it can negatively impact the environment.

The process of removing vegetation and exposing soils means a much higher potential for both erosion and sedimentation, with potentially negative impacts on nearby waterways, explains Sarah Sinclair, Chief Engineer.

“Auckland Council produces guidance to help our developers meet the requirements of the Unitary Plan in an environmentally sustainable way, and both this document and our guidance on water sensitive design are crucial to developing a world-class city,” she says.

About Our Water Future: Auckland's water discussion. The Our Water Consultation excerpt that made us think YES!
<https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/our-water-future/Pages/default.aspx>

An opportunity to improve

If our goal is to improve te mauri o te wai, we think we need to do our best to protect the places where water is relatively healthy, and use growth as an opportunity to improve the impacts on areas that are already degraded.

Redevelopment in our town centres is a good time to address some of our existing water problems, such as reducing flood hazards and improving stormwater capture and treatment. It also helps us manage our infrastructure investments, concentrating demand in a smaller area.

This approach aligns with the compact urban form promoted in the Auckland Plan 2050 and the Auckland Unitary Plan. It also lines up with our transport objectives of increasing public transport patronage. The less time we are stuck in congestion, the less pollution will come from our cars, onto our roads and into the sea.

Our proposed action

We would like to look further at the tools that are needed to manage and enable growth in ways that will protect and enhance te mauri o te wai.

Meeting future water needs

We need to ensure we continue to have enough water to meet our needs, for drinking, agriculture and industry, even as our population grows. We will also need to ensure we are fairly allocating the water we have, across the range of water demands. This includes making sure we leave enough water in streams and aquifers so they still have enough 'base flow' to be healthy.

LMC Survey Points. Envivo Feb 2018. Flood profiling is still underway.



This is the bank where the Waituna “skips” the bank, the inanga spawning ground is on the right of the picture.



Flooding pictures June 2013, note the wet on the baseboards is the true level





Left:

Flooding pictures Tasman Tempest March 2017

SEDIMENT ON NEAR LAND.

TEMPORARY REPAIRS DONE.

The bursting of a clay bank of the wash water pond at one of the Titirangi filtration plants of the City Council's waterworks released 250,000 gallons of water and slime on Saturday afternoon, and the flood swept over the property of Mr. T. A. Bishop. A patch of native bush became covered with a deposit of slime and decayed vegetable matter. The flow extended for a distance of about two miles, and the water found its way into a stream on the property of Mr. R. de Brabandere, on the Huia Road.

An emergency gang was rushed to the plant, and worked to 3 a.m. on Sunday. The breach was temporarily repaired with sandbags.



Auckland Star 7th September 1931

Auckland Star 9th September 1931

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 2:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5248] Submission received on notified resource consent
Attachments: Jake and Megan Fitter re WTP.pdf

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Jake and Megan Fitter

Organisation name:

Contact phone number: 021619854

Email address: hellojakeandmegan@hotmail.com

Postal address:

198a Huia Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

All of them

What are the reasons for your submission?

We've typed them up on the attachment.

What decisions and amendments would you like the council to make?

We've typed them up on the attachment.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Jake and Megan Fitter re WTP.pdf

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 2:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5249] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: TRACEY PARKER

Organisation name:

Contact phone number: 0212653893

Email address: titirangiteacher@gmail.com

Postal address:
8 WARWICK AVENUE AUCKLAND AUCKLAND 0640

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

With the on-going sensitivity and demise of Kauri in the Waitakeres, it would be criminal to decimate such a large area of natural bush

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

To halt the process and look for an alternative solution or site that doesn't impact on the environment

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 2:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5250] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Mischa Charlotte Dorothy Fitter

Organisation name:

Contact phone number: 098168528

Email address: hellojakeandmegan@hotmail.com

Postal address:
198a Huia Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The Vegetation Removal

What are the reasons for your submission?

I just wanted to share my poem Wednesday 28th August 2019 What shall we do without the tree? The sapling is planted in the hole and nurtured so it grows, With sunshine and rain it becomes tall and mighty, Leafs of green adorne the trees branches like bows, The tree stands strong even when storms come and are feisty. The birds nest in its branches, The weta slumbers in its bark, The tree used to flourish wild but now it withers; confined by fences, The cutting down of the majestic tree is leaving its mark. Men come down and cut its once divine body, They come and strip it of its once fine clothes, It calls for help and is answered by no body, Until they arrive to save its loaves. This cannot be allowed to on, Yet you go on.

What decisions and amendments would you like the council to make?

To not cut down the trees.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 2:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5251] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Stephanie Wickham

Organisation name:

Contact phone number: 0272763729

Email address: stephaniehw@hotmail.com

Postal address:
174 Scenic Drive Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The possibility of a third treatment site in Titirangi and the other two old sites cannot be removed due to their heritage status. The proposed number of trucks that will be used to undertake the earthworks, tree removal and building of the proposed new water treatment plant.

What are the reasons for your submission?

Several reasons:- - Surely Watercare could design an extension to the current site to avoid having a third treatment plant in the area? What will Watercare do in 100 years when this new plant is no longer useful - build a fourth plant? Then a fifth plant? I don't think they have explored this option well enough. - I'm also seriously concerned around the dangers to the community involving the number of trucks that are estimated to be travelling around the site during earthworks - Scenic Drive, Woodlands Park Rd, Huia Rd, Atkinson Rd and Titirangi Rd. These are small residential streets that carry high volumes of cars, bikes and pedestrians due to the number of schools, kindys and daycare centres in the area. There will be an accident as these trucks are too wide to be able to pass each on the same road, and usually take up both sides of the rides as the roads are too narrow.

What decisions and amendments would you like the council to make?

Currently, people building houses around us are not allowing to remove any earth from the site when building, the earth has to stay on site as part of their consent for building. This should also apply to Watercare - the earth being moved has to stay on site. Tree removal must be as minimal as possible and contained on site.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Huia Replacement Water Treatment Plant (WTP) Project Submission

Application number:

BUN60339273

LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441

Applicant:

Watercare Services Limited

Paul.Jones@water.co.nz

Paul Jones

Watercare Services Limited

Private Bag 92521

Wellesley Street

Auckland

1141

Submission by: Chantal Bayley of 45 Tainui Rd, Titirangi

This submission relates to the whole application. I oppose the application in its entirety.

I am a local resident of the area that will be most affected by the project. I am also concerned about environmental issues and involved with supporting environmental causes.

I am seeking that the application be declined in its entirety on the grounds of the following points. Alternatively, if the consent is granted then I request that the following points are given due consideration.

1.0 EARTHWORKS

1.1 Edge effects

The edge effects of earthworks affecting remaining vegetation has not to my knowledge been thoroughly investigated – especially with some of Auckland’s largest and oldest kauri some 20m and 100m away from the site, including Clark’s Kauri.

1.2 Traffic impacts

The proposed truck route from the village roundabout and along Scenic Drive to Woodlands Park Road is not practical or safe for other road users. The truck tests (which were requested by Auckland Council) and witness accounts of heavy vehicles using this road clearly demonstrate that the trucks need to cross the centre line of Scenic Drive when using it. There also doesn’t appear to have been testing of the scenario where two heavy trucks are passing each other in opposite directions.

Going in the other direction (so leaving Woodlands Park Road), there is also a bend at the top of Woodlands Park Rd that can have terrible sun strike in the mornings. If this is the site entrance, it will be very dangerous indeed.

I also don't agree that the assessment of current heavy vehicle usage of the roads in Waima is accurate or that the proposed truck movement timeframes allow sufficiently for commuter and school traffic peak times.

Sending trucks further down the hill to Parau to dispose of soil at the Sludge Dump Site means that rather than having one truck and trailer taking large amounts of the soil out of the area, there would be 2.5 rigid trucks moving the soil to Parau, further increasing the truck movements leaving Waima, and further adding to the level of disruption for Waima residents.

1.3 Kauri dieback

I don't believe that there has been sufficient testing for the presence of Kauri dieback in the soil in the project sites (it could well be present in the soil even if trees are not yet showing symptoms). As such, the soil needs to be treated as contaminated. How is it possible to transport 100,000m³ of potentially infected soil from the project site with 100% assurance that a Kauri dieback spore will not end up where it shouldn't? It simply isn't.

It's ridiculous that this development is even being considered at a time when there is a rahui still in place for all the bush tracks in the Waitakere ranges, and Auckland Council still has track closures in a bid to halt the spread of the disease.

As a ratepayer, I am now paying a targeted rate that goes towards dealing with Kauri dieback which I fully support, however, if this project is given consent by Auckland Council then I believe this is in complete contradiction to that, because of the risk it poses to kauri through the potential spread of Kauri dieback spores.

1.4 Sediment risks

With the frequent downpours in Titirangi (it is a rain forest after all), sediment from the earthworks flushing down into the valley below will put healthy kauri at risk of being infected with Kauri dieback.

Earthworks will undoubtedly also cause sedimentation in the streams that originate near the project sites and also have a negative on the native fresh water ecology down stream including the endangered Inanga population at Little Muddy Creek.

Auckland Council is well aware of the risk here. In relation to Auckland Council's erosion and sediment control standards, Sarah Sinclair, Chief Engineer states: *"The process of removing vegetation and exposing soils means a much higher potential for both erosion and sedimentation, with potentially negative impacts on nearby waterways."* Penny Hulse Continues: *"Protecting our natural heritage from the impacts of development is an underlying value in the Auckland Plan and an intrinsic component to building a resilient and environmentally sustainable city."*

1.5 Noise pollution

Waima is a peaceful community. Enduring noise from the earthworks 6 days per week including Saturdays is not acceptable for people who live and play in the vicinity of the project sites.

1.6 Archeological value

There is early Maori warfare history associated with the area where the project sites are located and Watercare have not to my knowledge contacted the Historic Places Trust to

inform them of the proposed earthworks in a possible archeological site, nor has there been any reporting on the heritage/ archeological values of the sites.

2.0 VEGETATION REMOVAL

2.1 S.E.A. status & designation

This site is protected by S.E.A. status and according to Schedule 3 of the Auckland Unitary Plan, the site (SEA_T_5539) is one of only 20 sites that meets all 5 of the criteria for an S.E.A including:

- (1) representativeness
- (2) threat status and rarity
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And the justification for creating S.E.A.s is set out in D9.1 of the Auckland Unitary Plan as follows:

"Auckland's indigenous biodiversity is unique with a diverse range of ecosystems reflecting the complex physical environment of the region. Natural ecosystems and indigenous biological diversity contribute to the character and identity of Auckland and distinguish it from other regions of New Zealand. Healthy and functioning ecosystems contribute to improved water quality, soil conservation and carbon sinks, as well as providing opportunities for our recreation, economic, and cultural use. However, development has resulted in the loss of habitats and a reduction of biodiversity. Urban expansion and development, changes in coastal and rural land uses, and the ongoing degradation from pest species continue threaten the maintenance of indigenous biodiversity. In order to protect and better provide for the management of areas that contribute significantly to Auckland's biodiversity it is important to spatially identify them as significant ecological areas, in accordance with B7.2 Indigenous biodiversity. Significant ecological areas have been identified for terrestrial areas, and parts of the coastal marine area."

With this in mind, the site is clearly an important feature of the Auckland landscape that deserves to be saved from Watercare's proposed development.

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I note that there is a history of engineering work on water infrastructure having to be abandoned due to soil stability in the area dating back to 1901:

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In fact, Council's 'Our Water Future' document discusses the need to acknowledge that the climate is changing:

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Surely this includes being more sensible about site selection for this piece of water infrastructure?

2.5 Social impacts

The proposed buffer zones are not big enough, especially around the reservoirs. And in fact the current 10m buffer zone to residential properties is much smaller than what was proposed for the Oratia sites (over 30m) – highlighting again how unsuitable this site is compared with other larger options. The complete removal of the vegetation in the buffer zone around reservoir 2 then temporary replanting until such a time that pipe work is required in the future, is not acceptable. The buffer should remain untouched and contain the original vegetation.

These sites lie at the entrance to the Waitakere Ranges and on popular tourist routes both towards the Arataki Centre/Piha and out to Huia. Travelling on a tour bus through an industrial scale construction site is not going to convince foreigners of our so called ‘clean green’ reputation, is it?

I don’t feel the social impacts of this project going ahead in Waima has been properly assessed either. The local social impact surveys executed by Watercare were hasty and last minute to say the least, and I can only assume it was a box ticking exercise due to the timeframe between the surveys being completed and the site decision being made (1 day).

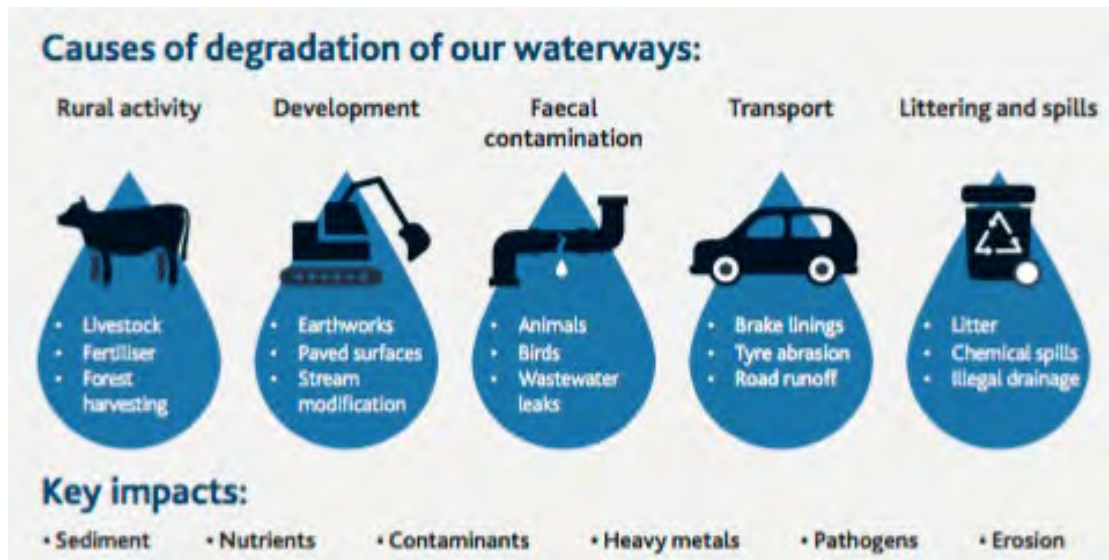
This project has personally caused me a great deal of stress and anxiety over the past two years since being made aware of it – I can’t bear the thought of losing so much of what makes our bush living community what it is, with the bush being the reason I chose to live here. It will completely change the identity of our neighbourhood which is heart breaking. And we already have two water treatment plants on the same road, is it fair to develop a third and abandon the other two?

3.0 STREAMS

I am concerned about the effects the proposed stream diversion will have on wildlife downstream and that draining ground water could affect remaining vegetation on the sites.

According to the Council’s ‘Our Water Future’ document, pollution is harming our waters. It states:

“Our waters are degraded, especially where they are close to urban areas. Contaminants (such as oil from cars, rubber from tyres, sediment from land, and human and animal waste) are washing into our waterways. This damages ecosystems and poses risks to human health. We need to clean up our rivers, lakes, streams and harbours.”



Watercare should not be allowed to risk the health of our local streams by proceeding with this 'Development'.

4.0 SITE SELECTION

The sites in Titirangi are a terrible choice for all the afore mentioned reasons but the site selected for the plant itself is extremely constrained and allows no room for expansion.

At the beginning of the site selection process, Beca's Site Principles Report of December 2015 concludes by saying that the Titirangi sites have failed the site principles test, and that the site principles would need to be relaxed to get them on to the long-list. See below excerpt. How is this at all appropriate?

Recommendations

The existing principles are very tight, and would discount the proposed Manuka Rd site and the existing Huia WTP. These should be relaxed to allow for these sites to be included.

The site principles are largely technical requirements; the environmental, social and cultural impacts of the site will need to be assessed during the multi-criteria analysis.

Then the scoring workshop of 7 April 2016 highlighted this problem of lack of future proofing with the Titirangi sites:

Close to Raw and Treated Water system. Complicated by raw water pumping. Reservoir site limited, does not readily allow for future development. This option means retaining the aqueduct. Will need to maintain or replace soon.

Watercare claim they won't need to expand the plant in the future because they are using the maximum water capacity from the outset. By this they mean that the total production

they can take from the existing dams is 140 Million Litres per day (MLD) and that is what the new plant would be able to produce. But how does Watercare know that water processes and water standards won't change over the next 100 years (the intended life of this plant)? What if people suddenly want the micro-plastics filtered out of their water? What if new processes make it much easier to eliminate chlorine from the water treatment process and they want to move to those new techniques? What if the water in the dams continues to degrade in quality as has been happening in recent years and therefore the water needs additional processing? The truth is that over their lifespan Water Treatment Plants change - just look at the continually evolving shape of the existing plant over its history if you want proof of that. As a ratepayer who wants the future of water well catered for I'm concerned about Watercare throwing what will end up being half a billion dollars at a project which doesn't allow for any expansion whatsoever.

5.0 MITIGATION

If this project is consented, the proposed mitigation package is insufficient – it is compensation, not mitigation. The trust timeframe is too short considering the effects on our community are permanent, and covers work already being planned for/funded by Council and rate payers.

6.0 ALTERNATIVES

Offering water treatment solutions for the future actually involves stepping beyond the reasoning of having to build on land just because Watercare already own it. What happens, as in the Titirangi case, where the land is simply not suitable for the intended use? They will need to look to buy or obtain new land – that's the price of offering a future-proofed water supply.

Watercare need to go back to their site principles test and ask what really is essential here, and what is just a question of cost? When calculated over the length of a 100 year lifespan, those additional costs could actually end up looking pretty negligible. What they need to do is use a bit of imagination and step away from the 'gravity-fed at all costs' model to see whether considering alternatives that use pumping might be viable. Watercare's reluctance on this are due to energy costs relating to the pumping. Eliminating the elevation criteria - or at least making it more flexible - would open up a whole range of new potential sites where social and environmental factors can be put more in the equation and where Watercare can still get the large site which they desire.

Why not diversify and build 2 smaller sites to spread the impact on any community and to also spread the risk of any operational issues (including threats of terrorism), or perhaps move the reservoirs closer to where the water will be used.

The cost of using this site from an environmental, social and budget blow-out perspective are way too high. Alternative sites have not been evaluated with climate change or kauri dieback included in the equation. This is 2019, and they need to go back to the drawing board and get this right.

Sources:

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<https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/ak-have-your-say/docssupporting/draft-cco-accountability-policy.pdf>

<https://titirangihistory.wordpress.com/2017/04/23/titirangi-reservoir/>

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 2:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5253] Submission received on notified resource consent
Attachments: Watercare WTP Submission - Chantal Bayley - Monday 2 September 2019.pdf

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Chantal Bayley

Organisation name:

Contact phone number: 021882434

Email address: chantalrbayley@gmail.com

Postal address:

Titirangi Auckland Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

This submission relates to the whole application. I oppose the application in its entirety.

What are the reasons for your submission?

I am a local resident of the area that will be most affected by the project. I am also concerned about environmental issues and involved with supporting environmental causes.

What decisions and amendments would you like the council to make?

I am seeking that the application be declined in its entirety on the grounds of the attached points. Alternatively, if the consent is granted then I request that the following points are given due consideration.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Watercare WTP Submission - Chantal Bayley - Monday 2 September 2019.pdf

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LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441

Applicant:

Watercare Services Limited

Paul.Jones@water.co.nz

Paul Jones

Watercare Services Limited

Private Bag 92521

Wellesley Street

Auckland

1141

Submission by: Chantal Bayley of 45 Tainui Rd, Titirangi

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I am a local resident of the area that will be most affected by the project. I am also concerned about environmental issues and involved with supporting environmental causes.

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1.0 EARTHWORKS

1.1 Edge effects

The edge effects of earthworks affecting remaining vegetation has not to my knowledge been thoroughly investigated – especially with some of Auckland’s largest and oldest kauri some 20m and 100m away from the site, including Clark’s Kauri.

1.2 Traffic impacts

The proposed truck route from the village roundabout and along Scenic Drive to Woodlands Park Road is not practical or safe for other road users. The truck tests (which were requested by Auckland Council) and witness accounts of heavy vehicles using this road clearly demonstrate that the trucks need to cross the centre line of Scenic Drive when using it. There also doesn’t appear to have been testing of the scenario where two heavy trucks are passing each other in opposite directions.

Going in the other direction (so leaving Woodlands Park Road), there is also a bend at the top of Woodlands Park Rd that can have terrible sun strike in the mornings. If this is the site entrance, it will be very dangerous indeed.

I also don't agree that the assessment of current heavy vehicle usage of the roads in Waima is accurate or that the proposed truck movement timeframes allow sufficiently for commuter and school traffic peak times.

Sending trucks further down the hill to Parau to dispose of soil at the Sludge Dump Site means that rather than having one truck and trailer taking large amounts of the soil out of the area, there would be 2.5 rigid trucks moving the soil to Parau, further increasing the truck movements leaving Waima, and further adding to the level of disruption for Waima residents.

1.3 Kauri dieback

I don't believe that there has been sufficient testing for the presence of Kauri dieback in the soil in the project sites (it could well be present in the soil even if trees are not yet showing symptoms). As such, the soil needs to be treated as contaminated. How is it possible to transport 100,000m³ of potentially infected soil from the project site with 100% assurance that a Kauri dieback spore will not end up where it shouldn't? It simply isn't.

It's ridiculous that this development is even being considered at a time when there is a rahui still in place for all the bush tracks in the Waitakere ranges, and Auckland Council still has track closures in a bid to halt the spread of the disease.

As a ratepayer, I am now paying a targeted rate that goes towards dealing with Kauri dieback which I fully support, however, if this project is given consent by Auckland Council then I believe this is in complete contradiction to that, because of the risk it poses to kauri through the potential spread of Kauri dieback spores.

1.4 Sediment risks

With the frequent downpours in Titirangi (it is a rain forest after all), sediment from the earthworks flushing down into the valley below will put healthy kauri at risk of being infected with Kauri dieback.

Earthworks will undoubtedly also cause sedimentation in the streams that originate near the project sites and also have a negative on the native fresh water ecology down stream including the endangered Inanga population at Little Muddy Creek.

Auckland Council is well aware of the risk here. In relation to Auckland Council's erosion and sediment control standards, Sarah Sinclair, Chief Engineer states: *"The process of removing vegetation and exposing soils means a much higher potential for both erosion and sedimentation, with potentially negative impacts on nearby waterways."* Penny Hulse Continues: *"Protecting our natural heritage from the impacts of development is an underlying value in the Auckland Plan and an intrinsic component to building a resilient and environmentally sustainable city."*

1.5 Noise pollution

Waima is a peaceful community. Enduring noise from the earthworks 6 days per week including Saturdays is not acceptable for people who live and play in the vicinity of the project sites.

1.6 Archeological value

There is early Maori warfare history associated with the area where the project sites are located and Watercare have not to my knowledge contacted the Historic Places Trust to

inform them of the proposed earthworks in a possible archeological site, nor has there been any reporting on the heritage/ archeological values of the sites.

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Surely this includes being more sensible about site selection for this piece of water infrastructure?

2.5 Social impacts

The proposed buffer zones are not big enough, especially around the reservoirs. And in fact the current 10m buffer zone to residential properties is much smaller than what was proposed for the Oratia sites (over 30m) – highlighting again how unsuitable this site is compared with other larger options. The complete removal of the vegetation in the buffer zone around reservoir 2 then temporary replanting until such a time that pipe work is required in the future, is not acceptable. The buffer should remain untouched and contain the original vegetation.

These sites lie at the entrance to the Waitakere Ranges and on popular tourist routes both towards the Arataki Centre/Piha and out to Huia. Travelling on a tour bus through an industrial scale construction site is not going to convince foreigners of our so called ‘clean green’ reputation, is it?

I don’t feel the social impacts of this project going ahead in Waima has been properly assessed either. The local social impact surveys executed by Watercare were hasty and last minute to say the least, and I can only assume it was a box ticking exercise due to the timeframe between the surveys being completed and the site decision being made (1 day).

This project has personally caused me a great deal of stress and anxiety over the past two years since being made aware of it – I can’t bear the thought of losing so much of what makes our bush living community what it is, with the bush being the reason I chose to live here. It will completely change the identity of our neighbourhood which is heart breaking. And we already have two water treatment plants on the same road, is it fair to develop a third and abandon the other two?

3.0 STREAMS

I am concerned about the effects the proposed stream diversion will have on wildlife downstream and that draining ground water could affect remaining vegetation on the sites.

According to the Council’s ‘Our Water Future’ document, pollution is harming our waters. It states:

“Our waters are degraded, especially where they are close to urban areas. Contaminants (such as oil from cars, rubber from tyres, sediment from land, and human and animal waste) are washing into our waterways. This damages ecosystems and poses risks to human health. We need to clean up our rivers, lakes, streams and harbours.”



Watercare should not be allowed to risk the health of our local streams by proceeding with this 'Development'.

4.0 SITE SELECTION

The sites in Titirangi are a terrible choice for all the afore mentioned reasons but the site selected for the plant itself is extremely constrained and allows no room for expansion.

At the beginning of the site selection process, Beca's Site Principles Report of December 2015 concludes by saying that the Titirangi sites have failed the site principles test, and that the site principles would need to be relaxed to get them on to the long-list. See below excerpt. How is this at all appropriate?

Recommendations

The existing principles are very tight, and would discount the proposed Manuka Rd site and the existing Huia WTP. These should be relaxed to allow for these sites to be included.

The site principles are largely technical requirements; the environmental, social and cultural impacts of the site will need to be assessed during the multi-criteria analysis.

Then the scoring workshop of 7 April 2016 highlighted this problem of lack of future proofing with the Titirangi sites:

Close to Raw and Treated Water system. Complicated by raw water pumping. Reservoir site limited, does not readily allow for future development. This option means retaining the aqueduct. Will need to maintain or replace soon.

Watercare claim they won't need to expand the plant in the future because they are using the maximum water capacity from the outset. By this they mean that the total production

they can take from the existing dams is 140 Million Litres per day (MLD) and that is what the new plant would be able to produce. But how does Watercare know that water processes and water standards won't change over the next 100 years (the intended life of this plant)? What if people suddenly want the micro-plastics filtered out of their water? What if new processes make it much easier to eliminate chlorine from the water treatment process and they want to move to those new techniques? What if the water in the dams continues to degrade in quality as has been happening in recent years and therefore the water needs additional processing? The truth is that over their lifespan Water Treatment Plants change - just look at the continually evolving shape of the existing plant over its history if you want proof of that. As a ratepayer who wants the future of water well catered for I'm concerned about Watercare throwing what will end up being half a billion dollars at a project which doesn't allow for any expansion whatsoever.

5.0 MITIGATION

If this project is consented, the proposed mitigation package is insufficient – it is compensation, not mitigation. The trust timeframe is too short considering the effects on our community are permanent, and covers work already being planned for/funded by Council and rate payers.

6.0 ALTERNATIVES

Offering water treatment solutions for the future actually involves stepping beyond the reasoning of having to build on land just because Watercare already own it. What happens, as in the Titirangi case, where the land is simply not suitable for the intended use? They will need to look to buy or obtain new land – that's the price of offering a future-proofed water supply.

Watercare need to go back to their site principles test and ask what really is essential here, and what is just a question of cost? When calculated over the length of a 100 year lifespan, those additional costs could actually end up looking pretty negligible. What they need to do is use a bit of imagination and step away from the 'gravity-fed at all costs' model to see whether considering alternatives that use pumping might be viable. Watercare's reluctance on this are due to energy costs relating to the pumping. Eliminating the elevation criteria - or at least making it more flexible - would open up a whole range of new potential sites where social and environmental factors can be put more in the equation and where Watercare can still get the large site which they desire.

Why not diversify and build 2 smaller sites to spread the impact on any community and to also spread the risk of any operational issues (including threats of terrorism), or perhaps move the reservoirs closer to where the water will be used.

The cost of using this site from an environmental, social and budget blow-out perspective are way too high. Alternative sites have not been evaluated with climate change or kauri dieback included in the equation. This is 2019, and they need to go back to the drawing board and get this right.

Sources:

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https://www.scionresearch.com/_data/assets/pdf_file/0019/17164/NZJFS40201033-59_STEWARD.pdf

<https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/our-water-future/Documents/our-water-future-summary.pdf>

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<https://unitaryplan.aucklandcouncil.govt.nz/Images/Auckland%20Council%20Decision/Chapter%20L%20Schedules/Schedule%203%20Significant%20Ecological%20Areas%20-%20Terrestrial%20Schedule.pdf?fbclid=IwAR1tdJpAdhW1M88YJGZRAsMozyzBgcYj6tKiExHnxll1rzruZZeCq95k7Lw>

https://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=12026846

<https://unitaryplan.aucklandcouncil.govt.nz/Images/Auckland%20Unitary%20Plan%20Operative/Chapter%20D%20Overlays/1.%20Natural%20Resources/D9%20Significant%20Ecological%20Areas%20Overlay.pdf>

<https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/ak-have-your-say/docssupporting/draft-cco-accountability-policy.pdf>

<https://titirangihistory.wordpress.com/2017/04/23/titirangi-reservoir/>

Submission on Resource Consent for Waima Water Treatment Plant

Vegetation Alteration in the Significant Ecological Area

Vegetation to be removed has overall classification as Very High quality. As the Highest quality of Vegetation its removal has an overall HIGH impact in terms of effects

There is also no mention in the report but local knowledge of the site notes that it is likely to contain Kauri Snails. Kauri snails have been located within the last year on other sites within Waima.

There is a duty to avoid, remedy and mitigate adverse effects. Off-setting and compensation are secondary measures when the aforementioned cannot be achieved.

The application documentation demonstrates there will be more than minor adverse effects as a result of the loss of Significant Ecological Area.

Firstly, there is the option of avoid, i.e. to locate the treatment plant on an alternative site.

- Any information on a peer review of the site selection process has not be undertaken or has not be made available. I would like to know if the findings in this report align with Engineering and Industry best practice.
- I find it concerning that effects on communities (unquantified), visual effects (not fully quantified) and risks to the construction programme in the form of land acquisition etc. have been placed above the significant effects on the environment.

Secondly, off-setting and compensation are secondary, when avoid remedy and mitigate are not possible.

- The development on this site can be avoided by locating it elsewhere.
- There is no guarantee that the Waima Biodiversity Management Plan can be implemented as it is reliant on third party approvals to carry out work on privately owned land. This cannot legally be relied upon to off-set the effects or as compensation.

Overall the effects of the proposal on the Significant ecological area are more than minor. The proposed Waima Biodiversity Management Plan does not go far enough in terms of compensating the environmental effects and cannot be fully relied upon as there is no guarantee this can be fully implemented. Regardless the WBP does not balance the values lost through clearance of such a large area of significant vegetation and will result in a net loss.

Based on the above the proposal is also inconsistent with the Objectives and Policies relating to the Significant Ecological Area Overlay of the Auckland Unitary Plan. Resource consent should not be granted.

Kauri Dieback

Further to the above we currently have the majority of the walking tracks in the Waitakere Ranges closed to prevent the spread of Kauri dieback disease, noting that there is still little know about this disease and currently no cure. The degree of earthworks required for this development is huge and the fact that the dirt will need to be carried from the site on the back of a truck. It only takes one tiny spore to spread this disease. It seems irresponsible at the very least for a Council Controlled Organisation to be proposing such works with this current risk, not to mention appears as double standards.

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5255] Submission received on notified resource consent
Attachments: Submission on Resource Consent for Waima Water Treatment Plant.docx

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Kate Lawson

Organisation name:

Contact phone number: +64221001260

Email address: Kaitlin.lawson@gmail.com

Postal address:

21 Karen Road Auckland Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Vegetation Removal Kauri Dieback

What are the reasons for your submission?

See attached

What decisions and amendments would you like the council to make?

To recommend the application be declined

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Submission on Resource Consent for Waima Water Treatment Plant.docx

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5256] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Yona Zhou

Organisation name:

Contact phone number: 021 024 27818

Email address: cloud_yona@hotmail.com

Postal address:
41 Waihoehoe Road Drury Auckland 2113

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Vegetation removal across up to 3.5 hectares.

What are the reasons for your submission?

This vegetation includes protected, mature native bush, including threatened kauri. This site is classed as a significant ecological area (SEA) in the Councils Unitary Plan as well as being in a regional park and under the protection of the Waitakere Ranges Heritage Act. Impacts on all the wildlife that rely on this native bush for their home or as a connection between their chosen habitats.

What decisions and amendments would you like the council to make?

Use smarter design thinking to utilise more of the footprint of the existing plant to avoid the destruction of 3.5 hectares of SEA native bush. Locate the two reservoirs closer to where the water will be used in north-west Auckland. Review the original long list of site options. With smarter design thinking to achieve a smaller footprint, more of these options will be feasible.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5257] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Janette Llewellyn

Organisation name:

Contact phone number: 021 368935

Email address: preslands@xtra.co.nz

Postal address:
512 South Titirangi Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Loss of trees /vegetation

What are the reasons for your submission?

The proposed site is almost completely covered in native vegetation and has been identified as a Significant Ecological Area (SEA) in the AUP. The site is only one of a small number of SEAs in Auckland that meet all 5 of the conditions required to be a SEA. At a time when the planet is in climate change crisis, it seems to me that that to proceed with this project at the Waima location is not logical. The loss of so many mature trees, so valuable in their ability to sequest carbon from the atmosphere is foolish. Another site should be found.

What decisions and amendments would you like the council to make?

Go back to the drawing board. find an alternative site.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5258] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Anneliese

Organisation name:

Contact phone number: 0276790075

Email address: juddes@xtra.co.nz

Postal address:
173 Godley Road Auckland Auckland 0604

Submission details

This submission: supports the application in whole or in part

Specify the aspects of the application you are submitting on:

Support the petition and in which I go against the proposition of the deforestation and water treatment plant

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

Think about our earth, climate change and how this plant is not going to benefit the area it is being put in and around.

Are you a trade competitor of the applicant? I am a trade competitor of the applicant.

I am directly affected by an effect of the proposed activity that adversely affects the environment, and that effect does not relate to trade competition or the effects of trade competition

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5259] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Ekta Kapadia

Organisation name:

Contact phone number: +64 210 830 2575

Email address: ektakapadiaa@gmail.com

Postal address:

1/3 Barron Drive Green Bay, Auckland, New Zealand Green bay Auckland 0600

Submission details

This submission: supports the application in whole or in part

Specify the aspects of the application you are submitting on:

to stop the cutting down of the rainforest in Titirangi

What are the reasons for your submission?

the water, first of all, is not going to us it is going to north shore. they are also native trees so we should not be able to cut them down

What decisions and amendments would you like the council to make?

no matter what it is for you should not be able to cut down native trees

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5260] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Isis Leilani Fynn

Organisation name: Green Bay High School

Contact phone number: +642041664118

Email address: Isis.fynn@gbhs.school.nz

Postal address:
242 Scenic Dr Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Watercress building a water treatment plant in Titirangi

What are the reasons for your submission?

*The water is for the North Shore but land in West Auckland is being used which isn't fair *Acres of native forest will be cut down *Native plants, trees, and animals will suffer *Sound and air pollution for eight years while it is being built *Increased traffic

What decisions and amendments would you like the council to make?

For this treatment plant to be built either on the north shore or in a more industrial area so less rainforest will be lost.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:



Little Muddy Creeks Estuary Rehabilitation Project



1 September 2019

Dear Sir/Madam

RE RMA Application numbers BUN60339273, LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441, for the Watercare Huia Replacement Water Treatment Plant, Titirangi

Mandatory information:

1. Megan Fitter meganfitter@xtra.co.nz 021 619854, 09 8168528
2. 198a Huia Road, Titirangi, Auckland
4. We wish the authority to reject the Consent Application in its entirety
5. We wish to be heard to support this submission.
6. We do not wish to present a joint case.

Background and Introduction

Riparian planting at Little Muddy Creek has been occurring informally, and with council help since 2000. A push under Sustainable Neighbourhoods increased the efforts and separate subdivisions of 198 Huia Road and 8 Landing Road relinquished significant riparian margins to council enabling this work to be extended, this later would transpire to be crucial in effectively “ring fencing” the spawning ground.

Inanga (whitebait) have been known to the immediate neighbours for many years, the local children have named some of the bigger long finned eels. However at the end of 2017 members of South Titirangi Neighbourhood Network - under the guidance of Mathew Bloxham and Malcolm Harrison (Auckland Biodiversity) - identified and documented the specific inanga spawning ground. This took considerable effort over a long period of suitable tides.

The above, together with support from EcoMatters, Waima 2 Laingholm Pest Free and residents a plan was put in place to enhance the habitat by an ambitious pest control program to encompass the entire riparian margins and estuarine area. Applications for a Quick Start Local Board and

Regional Environment and Natural Heritage (*RENH*) were successfully made to kick this plan into action.

This project is unique as it uses a paid contractor to do weekly trapline checking and this decision was carefully considered to make the plan sustainable while being established and gaining increased community capability and resourcing. It also encompasses community planting and weeding days. Two local schools participate as part of their Education For Sustainability (EFS) program.

All administration and coordination is done on a voluntary basis by Megan Fitter. EcoMatters acts as the funding umbrella. Holding true to the values of the Muddy Creeks Local Area Plan is key in the work we do.

Whitebait Connection has recently (in the last six months) visited our site to observe the bait and trap program to advise another local group (Laingholm). Ella Walmsley has supported our project by showing us how to identify and search for inanga eggs, also by supplying technical information when needed. We are grateful for all the support we receive and regard this project as a true collaboration, community led and free of agenda.

Our Goals are:

Threats to our native wildlife include possums, rats and sediment. Trapping these pests and further enhancement of the ecological corridor with extended riparian planting will improve erosion, provide habitat for birds and shade for the long finned eel population, Inanga and other endangered aquatic species.

- A fully functioning ecosystem free of pests and sediment, sustained by the community.
- To establish partnerships between groups active in the area, reactivate and engage friends and neighbours of Little Muddy Creek.
- Growing understanding of Little Muddy Creek and the value estuarine ecosystems.
- To see greater numbers of existing bird species and (re)establishment of Banded Rail and other species who dwell in mangrove and estuarine habitat.

OUR SUBMISSION:

ON SEDIMENT CONTROL

We agree with the comments of Waituna Action Group regarding the interests of Waima and the Waituna catchment not being represented well in the past. Holding true to the values of the Muddy Creeks Local Area Plan is key in the work we do.

We submit that the sediment controls proposed are inadequate to protect the inanga spawning ground at Little Muddy Creek. Though all Erosion and Sediment Control practices shall be in accordance with Auckland Councils GD05 guidance document. SEDIMENT CONTROL IS NOT ADEQUATE AT COUNCIL STANDARD. This is a risk not only to Little Muddy Creek but also the

Manukau Harbour which already has sedimentation input from Waituna. 2018 Big Blue Waitakere, p18, see appendix.

Flooding Risk to Lowest Point before Manukau Harbour

The project site is located approximately 1.5 km north of the closest reach of the Manukau Harbour. What is considered the closest reach?

Riparian planting for over 20 years with local groups such as Waituna Action Group and Sustainable Neighbourhoods plus Enviroschools in the area have been heading in the right direction for improvement in bank erosion and development at the headlands poses a significant risk to this.

As Cr Penny Hulse states “Protecting our natural heritage from the impacts of development is an underlying value in the Auckland Plan and an intrinsic component to building a resilient and environmentally sustainable city,” Our Auckland, September 2017

We have the following questions and points of note the following from the Cook Costello Stormwater And Erosion And Sediment Control Report, July 2019:

P21-22 Also Sediment Retention Ponds

“The difficulty in achieving 3% for SRP 1 is due to constraint of the landform and the retention volume cannot be practically increased.” **Then what? Where does it go?**

The Dry Pond has a 3.5m high embankment, in the instance of Failure Mode 1, **what are the evacuation or warning systems?** With volunteers checking traplines (see map appendix) who are at times crossing the stream and school children also work close to the stream during the winter planting season this is a real concern.

P30 on climate change, scope of consideration for flooding, rainfall adjustments. Auckland Council also makes the following observations in their Our Water Consultation (pic below). **What methodology has been used for these considerations?**

Future challenges and opportunities

Risks to resilience are expected to change over time. This is in part because natural systems are dynamic and ever-changing, and in part because of climate change. Sea level rise, changes in rainfall intensity and patterns, and more storms will all intensify existing risks. For example, predictions for losses from coastal erosion in different parts of the region range from 6m to 55m in the next 100 years. With sea-level rise, these predictions extend to 200m in some areas. These kinds of changes will have significant effects on the future of coastal properties and activities.

We note that if the WTP is built, some roof runoff will be captured for treatment in the WTP itself. But this isn't the case for some buildings nor any of the hard surfaces which form a

significant portion of the site surface. We would like any consent granted to include the directive to include that:

1. Permeable pavers are used throughout (discounted on p44)
2. Demolition of unused portions of the existing WTP be revegetated and protected in perpetuity (discounted on p44)
3. The length of the maintenance contract be extended to a minimum of 50 years (p52)
4. Increased building roof inclusions for discharge to WTP required to include Chlorine Contact Tanks, Filter Press, Electrical Compound, Admin (p75)

ON STREAM DIVERSION

The proposed footprint requires reclamation of a section of a headwater tributary of Yorke Stream, resulting in approx. 70m of intermittent stream loss and 38m of ephemeral stream loss. We reject the term “reclamation”, it was never belonged to the applicant in the first place so how can it be reclaimed? Indeed the the celebration around LaRosa being daylighted demonstrates how OUT OF STEP this application is WITH BEST PRACTICE IN 2019.

Re: Our Water Future: Auckland's Water Discussion. This has been crucially overlooked when considering the replacement of infrastructure on this scale and public spend involved. Reportedly there were more than *“7000 responses from the engagement process.....feedback showed that Aucklanders want to move quickly from words to implementation.”*

A further round of local board engagement is planned for the draft strategy in 2020 but it's unbelievable that the opinions of this discussion can be swept to one side.

THE PROPOSED TRUST

If it is put in place a new name should be established by the Trustees on formation. The name does not reflect the biosecurity focus.

As we have experienced and are aware there are many groups working on pest control around the Titirangi area and Little Muddy Creek catchment: What would the Trust Fund be doing that they are not?

In addition to direct delivery of pest control, under the umbrella of Pest Free Auckland and through the Regional Environment and Natural Heritage Grants programme, the council also facilitates pest control in Waitākere and elsewhere through support of community-led pest control. Support to community-led conservation is also set to increase in future years, as a result of the extra funding provided by the Natural Environment Targeted Rate.” In the appendix we’ve put an example of the resourcing available to us just in year one.

Trustee integrity will be key for the success of any Trust in the community. Therefore;

1. Trustees should be sitting on equal remuneration to one another in keeping with other comparable charities.

2. 16.3 - Why shouldn't proceedings by the Trust should be permitted if a Trustee acts dishonestly? It could bring the Trust into disrepute if, for example, someone does not declare a conflict or pecuniary conflict which results in them personally benefiting financially.
3. Appointment of Trustees. While we welcome the inclusion of at least one Trustee being from Auckland Biodiversity, the process of the Trustee appointments is not clear. Given quorum is 50% we feel the local community is not adequately represented by the composition of Trustees. Any community conservation representative should be demonstrably connected to the catchment which as we've outlined earlier has capability.
4. A benchmark for demonstrably should be long term involvement, for example those who have participated in the Local Area Plan process.
5. Meetings should be minuted, regular (with an annual minimum) and financial records should be publicly available.
6. Re clause 4.3 of the trust fund - this basically allowed to divert funds from Waima to elsewhere in New Zealand or the world. This is completely unacceptable.

Thank you for reading our submission, as previously mentioned we're volunteers and digesting over 2000 pages in 20 working days does not seem like a very equitable process considering the resourcing the applicant has.

Please reject the application in its entirety.

REFERENCES:

Water New Zealand's 2017 Stormwater Conference Stu Farrant & Reuben Ferguson, Morphem Environmental Limited: Taking the pain out of the treatment train: continuous simulation modelling for integrated water management.

AECOM, Titirangi-Laingholm- Catchment Modelling – Model Build and System Performance Report. Progress copy September 2018.

Our Water Future: Auckland's water discussion

<https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/our-water-future/Pages/default.aspx>

Big Blue Waitākere Coastal and Marine Information Report, 2018

Morphum Environmental report 2013 re sediment on Waituna

<http://www.boffamiskell.co.nz/project.php?v=la-rosa-stream-daylighting>

Auckland Council leads the way in erosion and sediment control, Our Auckland 2017

<https://ourauckland.aucklandcouncil.govt.nz/articles/news/2017/09/auckland-council-leads-the-way-in-erosion-and-sediment-control/>

About Our Water Future: Auckland's water discussion

<https://www.aucklandcouncil.govt.nz/have-your-say/topics-you-can-have-your-say-on/our-water-future/Pages/default.aspx>

A guide to restoring inanga habitat, J. Richardson and M. J. Taylor of NIWA, 2004 version

APPENDICES:

Left: Our Auckland re Sediment Control, Right: Big Blue Waitakere, p18

“Protecting our natural heritage from the impacts of development is an underlying value in the Auckland Plan and an intrinsic component to building a resilient and environmentally sustainable city,” says Hulse.

Managing environmental impacts of development

Erosion is the process of soil being dislodged from surfaces, while sediment is the transport and deposition of these eroded soils into areas where it can negatively impact the environment.

The process of removing vegetation and exposing soils means a much higher potential for both erosion and sedimentation, with potentially negative impacts on nearby waterways, explains Sarah Sinclair, Chief Engineer.

“Auckland Council produces guidance to help our developers meet the requirements of the Unitary Plan in an environmentally sustainable way, and both this document and our guidance on water sensitive design are crucial to developing a world-class city,” she says.

Focal stream assessments of Paturoa and Waituna Streams were conducted during September and October 2013 by Morphum Environmental. Significant erosion hot spots were identified on Paturoa Stream near Titirangi Beach Road and on Waituna Stream, which may be contributing to sediment inputs to Little Muddy Creek. Whilst Paturoa stream was primarily located within remnant native forest, the riparian margin of Waituna Stream is impacted by residential land use, resulting in reduced shading, stormwater filtration, and other habitat and channel stability functions.

To supplement this physical stream assessment, the data from each of the focal streams was summarised from the Water Quality Program (Management of Streams) carried out by EcoWater for Waitākere City Council (2004). Water

LMC Survey Points. Envivo Feb 2018.



Below: Some of the local kids taking a break from planting,

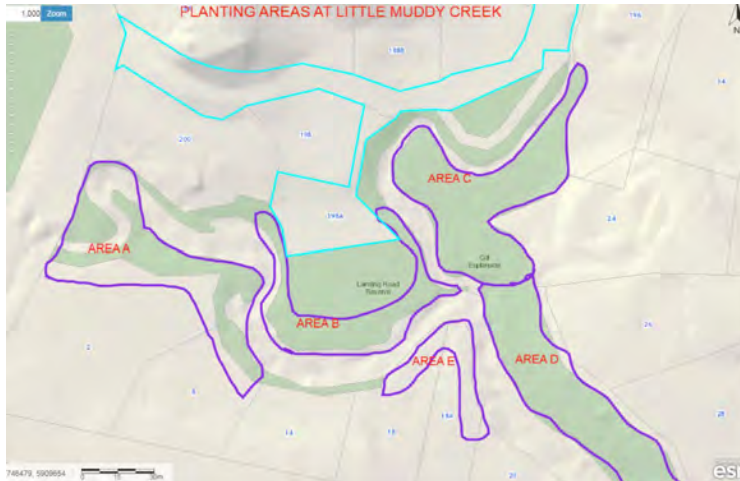
you can see the three years of planting by the “bands” of trees. This used to be all

grass to the stream edges. Searching for inanga eggs is one task necessitating being down in the stream.



Education days and signing up volunteers





Advice from
 Ella Walmsley
 Whitebait connection coordinator
 Mountains to Sea Conservation Trust

*“Little Muddy Creek is an important habitat for inanga *Galaxias maculatus* in the Auckland region. Inanga are known to spawn in natural habitat along the riparian margins, in the lower reaches of the stream. Unimpeded access to suitable adult habitat further inland ensures that this species can complete its full life-cycle in the stream.*

Inanga are listed as a declining species by the Department of Conservation. The main reasons for their decline include loss of adult and spawning habitat; degraded water quality and in-stream barriers, such as culverts, dams and weirs. Many surviving streams in Auckland provide little, if any, suitable habitat for this species (or other native freshwater fish) due to channel modification, poor water quality and/or in-stream barriers. This makes it all the more important to protect and conserve streams that still retain large areas of natural habitat.

Adult inanga have been shown to tolerate high levels of in-stream sediment in the short term however prolonged exposure can cause a decline in their condition and make them more susceptible to parasites and diseases. Heavy sediment loads are also known to decrease available in-stream habitat, by in-filling gaps between rocks and stones, and by covering woody debris. This in turn reduces the abundance of macroinvertebrates in a stream, which are the main food source for a lot of freshwater fish. Heavy sediment loads can also smother riparian vegetation during flood events, and suffocate any inanga eggs located in this vegetation. The young of some species of Galaxiidae will also avoid streams with high sediment loads when making their inward migration into freshwater.

It is imperative that any development consented in the headwaters of this stream has stringent sediment control measures in place, to ensure that sediment run-off does not adversely affect in-stream biota and habitat. At other freshwater sites in Auckland, even developments complying with current sediment control regulations release substantial quantities of sediment into surrounding water courses during heavy rainfall events, smothering in-stream and riparian habitat. In streams that are known to have high ecological value, sediment control measures should therefore go above and beyond what is currently required by Council.”

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5261] Submission received on notified resource consent
Attachments: Little Muddy Creek Rehabilitation Project Submission.pdf

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Megan Fitter

Organisation name: Little Muddy Creeks Estuary Rehabilitation Project

Contact phone number: 021619854

Email address: meganfitter@xtra.co.nz

Postal address:

198a Huia Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Vegetation removal including its effects and mitigation for the loss Earthworks (land stability during this period)
Stream diversion

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

Please reject the application in its entirety.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Little Muddy Creek Rehabilitation Project Submission.pdf

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Submitter contact details

Full name: Robin rawstorne

Organisation name:

Contact phone number: 098179667

Email address: robin@rawstornestudio.com

Postal address:
37 landing rd auckland auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I am a local resident who together with my family wholeheartedly oppose this proposed scheme, which feels ill conceived and will have a devastating effect on the valley in which we live. The environmental impact on the flora and Fauna will be devastating to the local ecosystem. We live downstream of the proposed expansion and we are greatly concerned of the impact that will be felt by the local community and the native species that are found in the proposed site. I submit that the first principle of the RMA to AVOID irreversible adverse environmental effects has not been satisfactorily achieved with the project being proposed in this location. It is also inconsistent with the relevant objectives and policies of the Auckland Unitary Plan.

What are the reasons for your submission?

I feel that due process has not been followed and as members of the community living downstream of this proposed waterworks expansion we submit that sediment controls are inadequate and the risk of failure could be catastrophic. Titirangi-Laingholm Catchment Modelling, including flood profiling is still underway giving insufficient information regarding the risk. Failure Mode 1 does not adequately address the evacuation or warning systems with downstream residents or the school which tests water in Kopai Gully. This cannot be allowed to go ahead!

What decisions and amendments would you like the council to make?

I propose that this application for watercare is rejected and the proposed scheme is not allowed to go ahead.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5263] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

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Applicant email: Paul.Jones@water.co.nz

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Submitter contact details

Full name: Vanessa Morris

Organisation name:

Contact phone number: 0275159534

Email address: vanessamarklew@gmail.com

Postal address:
24 Hollywood Avenue Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I am opposed to the application in whole because of the environmental impact as well as the traffic and construction impact on the local and surrounding communities and the safety risks this could have.

What are the reasons for your submission?

I have lived in Waima for over 10 years and chose to do so because of the beautiful native environment. The amazing flora and fauna that is unique to the area and that is fast becoming scares in Auckland. I believe the plan to develop a new water treatment plant, the size of Lynn Mall, will have substantial impact on this and as a result, recommend alternate locations be reinvestigated. My children are taught at the local school about the environment and the importance of protecting it for generations to come, yet they will be witness to three hectares of establish forest being demolished for more concrete development for little gain. This feels at odds with the national biodiversity strategy, the kauri protection efforts and due to the location proposed, would also impact the freshwater quality. I feel it's unfair to claim they 'give everyone a chance to have their say' as I don't think we have been 'heard'. In fact I think they have deliberately managed this in a way that will help get it through and reduce our ability as a community to stand up, have an opinion and oppose. They have split the Outline Plan of Works (OPW) from the regional Consent application in an attempt to remove the ability for the public to comment on any matters beyond a tightly controlled set of effects. These effects - while significant in their own right - in no way reflect the true impact of this proposal on our community. They also remove our ability to even comment on matters around landscape and amenity, or even see proposed details of landscape works, architecture, massing, or visualisations. It hardly feels like consultation. As pointed out by a friend, who knows the legislations more than I do, that this proposal appears to fly in the face of the rules the government have already put in place to try and ensure things like this do not happen; Part 2 (7c) of the Resource Management Act (1991) "In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to: • (c) the maintenance and enhancement of amenity values" Part 2 (Objectives) (8d) of the Waitakere Ranges Heritage Area Act (2008) "to recognise and avoid adverse potential, or adverse cumulative, effects of activities on the area's environment (including its amenity) or its heritage features" and (8f) "to ensure that any subdivision or development in the area, of itself or in respect of its cumulative effect,— • (i) is of an appropriate character, scale, and intensity" and (8g) "to maintain the quality and diversity of landscapes in the area by— • (i) protecting landscapes of local, regional, or national significance" and (8h) "to manage aquatic and terrestrial ecosystems in the area to protect and enhance indigenous habitat values, landscape values, and amenity values" Section D17 (Historic Heritage) of the Auckland Unitary Plan "Use and development, including adaptation: (3) Enable the use, development and adaptation of scheduled historic heritage places where: • (a) it will not result in adverse effects on the significance of the place; • (b) it will contribute to the ongoing maintenance and enhancement of the historic heritage values of the place; • (c) it is in accordance with good practice conservation principles and methods; • (d) it will not result in cumulative adverse effects on the historic heritage values of the place; • (e) it will support the long-term viability, retention or ongoing use of the place; and • (f) it will not lead to significant adverse effects on the surrounding area" I would also like to raise the risks around traffic and safety. There are constantly accidents on scenic drive and also on Woodlands Park road where cars are trying to get around cyclists or misjudge the bends and we have put in requests for improved crossings and footpaths. With the insane amount of trucks and construction workers coming in to the area if this proposal goes ahead I think the risk of more accidents will only increase. On a busy day the current Pipeline track carpark fills up and people start to park on the road creating a need for cars to overtake without good visibility. This is currently the exception, but with roadworks and construction I can understand this would be the norm. Or we are traffic managed to a point where the commute time is extended and untenable. For those walking, or taking the kids to school or up to the village, this will create even more hazards and safety risks. I really hope you will reconsider!

What decisions and amendments would you like the council to make?

I ask that the application be withdrawn and a full application lodged, which addresses landscape and visual impacts and outlines exactly how this proposal would actually appear via a series of 3D visualisations. The current approach undermines the intent of every piece of legislation designed to protect this area. By contrast, Landscape and Visual Assessments and visualisations are routinely produced for consents with much less significant impacts than this one, so this shouldn't be viewed as unusual at all.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5264] Submission received on notified resource consent

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Details of submission

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Submitter contact details

Full name: Nicholas Drake

Organisation name:

Contact phone number: 0212372194

Email address: ndrake@aut.ac.nz

Postal address:
21 Manuka Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

This submission relates to the whole of the application. This submitter opposes the application in its entirety.

What are the reasons for your submission?

I submit that the new Watercare development is not covered by an existing land use consent. The consent in question covers the two existing water pump stations and not a new development. Since that (ancient) consent was given we have had the Resource Management Act 1993 and the Waitakere Ranges Heritage Area Act 2008 which clearly take a very different approach to development in the Waitakeres from that which existed when that old (and now exhausted) consent was originally given. The council should not allow this development to go ahead (regardless of the consent as specified above) because of the severe harm it will cause. More particularly I am concerned about the severe ecological harm to the area around the development. This site (at the top of Woodlands Park road) has several hectares of native bush which is going to be destroyed in a massive development of what is supposed to be a protected area. This is within the Councils designated area of significant ecological area in the Councils Unitary Plan and is also within the area of the Waitakere Ranges Heritage Area Act which is supposed to stop further development in this area. I can't see how the Council can approve this application when all the recent Council policy and government legislation has been to protect the bush in this area rather than to allow development that will destroy it. A development of this magnitude will undermine the protections that have been put in place for the Waitakeres. It opens the door for future development and more destruction of bush. It is a bad precedent. The bush that will be destroyed is not isolated and its destruction will have negative consequences for the whole area of bush around it. I understand that it is proposed that toxic chemicals in massive amounts (as well as water) are to be brought onto the area concerned. I understand the area concerned is a difficult one to build on. It certainly has quite a slope to it. There is a large area of land that is down-slope from where these chemicals would be stored. This down-slope area includes large areas of bush, native trees, plants and animals, people, families, children, houses and infrastructure. A release of toxic chemicals (and/or water in large amounts) would cause severe harm. The new pumping station will be an eyesore. Scenic drive is the gate way to the Waitakeres for tourists and visitors and so they will go right past this on the way to Arataki or other destinations. The development is being built close to houses. As well as the risk of release of toxic chemicals (or large volumes of water) there will be the risk of noise pollution, noxious fumes and other harm for those houses concerned. The actual building of the water plant will have massive negative consequences for the wider area. I presume that the access route will be through Titirangi village and down Scenic Drive. This will cause severe congestion and disruption in Waima, Woodlands Park and Titirangi. These are narrow winding one lane roads. Scenic Drive is also meant to be a tourist route for tourists who are expecting to see protected New Zealand bush not a huge industrial development. This submission is made by Nicholas Drake and on behalf of Anne and Joshua Drake

What decisions and amendments would you like the council to make?

The Application should be declined in its entirety.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5265] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Seaton Meredith

Organisation name: Auckland Custom Shades and Screens

Contact phone number: 021 748 2000

Email address: seaton@sunshade.co.nz

Postal address:
397 Huia Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Transportation of waste materials from the excavation being dumped off Exhibition Drive in large vehicles or long trucks as the road is not suitable for continuous heavy movement.

What are the reasons for your submission?

We have 2 businesses and 4 staff working from these premises, the road noise when trucks go past is very loud, the house reverberates, the road is unstable, in the winter the potholes that appear from cars only is a hazard. The road surface is unstable and the roadside has no safe places to cross for bus stops. The corners are blind which means exiting driveways, especially 403 Huia Rd, is very dangerous with the cars so adding truck will be awful for my elderly neighbour. Truck cross the centre line because of the tight corners near Woodlands Park Store and this is an awful experience. The roadside has open drains so there is no way to escape or move away. Parking is very limited and we would not want any trucking waiting in our layby outside our property.

What decisions and amendments would you like the council to make?

Road strengthening, covered drains, suitable footpaths, sealed layby and the right to claim if damage to property results from truck movements on unstable land.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5266] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Victoria Warne

Organisation name:

Contact phone number: 0210309980

Email address: victoria@vevofoodstore.co.nz

Postal address:
VEVO FoodStore 402c Titirangi Rd Titirangi Auckland 0642

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

All of it in its entirety

What are the reasons for your submission?

My family is second generation to be living very close to the site in Titirangi, and raising my 3 young boys in the area. Not only did I grow up with a great appreciation of Titirangi as a very special unique bush living environment. My husband and I also own and operate VEVO Foodstore which we have done for the last 8 years. This is one of the main food eateries in Titirangi Village. We rely solely on this cafe for our livelihood, which is serviced entirely by the local community and tourist trades that come through the village. We are horrified to learn that: 1/ A large number of car parks will be removed from Titirangi Rd to make way for trucks. We have so little parking in Titirangi as it is that this is unacceptable and far too burdensome for the business community to bare. 2/ the proposed number of trucks intended to come through Titirangi Village up to 110 large trucks a day will kill the business community of the village and severely affect our business and livelihood. I feel strongly that this Native site should stay as is as is very significant to myself and a lot of the community. Before the recognition and knowledge about kauri dieback disease was made public I walked Clark Bush Track, it is now closed to protect kauri (parallel to the site). Across the road from the site is Exhibition Drive where over my life I have walked and ran the track more times than I could count. It is a place where I go to feel peace, exercise and to breathe in the fresh air of our native bush and home to many. Before the site was selected it was assumed by many locals including myself that it was part of the Waitakere Ranges Regional Parkland as it was mapped as this on Google maps and has an entry to Clark Bush Track on Manuka Road. There were no physical signs to suggest that it was designated as Watercare land. As Auckland Council declared a climate emergency on 11th June 2019, it should be taking all forms of deforestation into account including upgrading infrastructure. Watercare's Statement of Intent 2018-2021 clearly states "Watercare's challenge is to meet the demands of the growth occurring, and planned for, Auckland without compromising quality, efficiency nor the environment.", I do not feel this has been taken into consideration in Watercare's site selection process to select this site. I am opposed to the destruction of endangered native bush on this site, including regenerating kauri. The first principle of the RMA to avoid irreversible adverse environmental effects. This has not been achieved with the project being proposed in this location. It is also inconsistent with the relevant objectives and policies of the Auckland Unitary Plan. The site is almost completely covered in native vegetation and has been identified as a Significant Ecological Area (SEA) in the AUP. The site is only one of a small number of SEAs in Auckland that meet all 5 of the conditions required to be a SEA. I am not against the upgrading of infrastructure, I just do not agree it needs to come at the expense of high value SEA. There are many other sites on Watercare's long list that would avoid HIGH value SEA. It's important that infrastructure is built in a way that is sustainable, respects our ecosystems and protects them for future generations. The loss of this ecological corridor is irreversible and cannot be mitigated. It would be felt as a deep grievance to our community and as a national asset. If Watercare are able to go ahead with this site it would take away the identity of Titirangi as a bush living environment. I support the submissions of Titirangi Protection Group and Waituna Action Group. Kauri: The elevated status of kauri being now classified as threatened. Kauri <20cm have not been counted in the site surveys. It is illogical to undertake major earthworks in the Waitakere Ranges, parallel to a track which is closed for kauri protection. There currently are no Standard Operating Procedures for earthworks of this scale. Clarks kauri is only 100m downhill from the proposed development and is one of Auckland's oldest kauri. Ecology: The site contains habitat for nationally threatened plant species, is also home to a range of native invertebrates that help keep nutrients cycling and are our key pollinators. Recently a new species of native wasp was identified on the site. The edge effects go beyond the footprint of the site. Impacts downstream of the site: Sediment controls are inadequate and the risk of failure could be catastrophic. Titirangi-Laingholm Catchment Modelling, including flood profiling is still underway giving insufficient information regarding the risk. Given all soil is assumed to be contaminated such an event would risk healthy and genetically diverse kauri downstream. Risk to the population of inanga at Little Muddy Creek. What decisions and amendments would you like the council to make? Please do the right thing and move your site to somewhere less catastrophic!!

What decisions and amendments would you like the council to make?

I am requesting that the resource application is declined in its entirety

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5267] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Yiyi Li

Organisation name:

Contact phone number: 0220761188

Email address: mmhyzy@hotmail.com

Postal address:
15 Nelson Street Auckland CBD Auckland 1010

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Vegetation removal across up to 3.5 hectares

What are the reasons for your submission?

• This vegetation includes protected, mature native bush, including threatened kauri. This site is classed as a significant ecological area (SEA) in the Councils Unitary Plan as well as being in a regional park and under the protection of the Waitakere Ranges Heritage Act. • Impacts on all the wildlife that rely on this native bush for their home or as a connection between their chosen habitats. Plus, I'd say the government should spend more money and attention to prevent global warming !

What decisions and amendments would you like the council to make?

• Use smarter design thinking to utilise more of the footprint of the existing plant to avoid the destruction of 3.5 hectares of SEA native bush. • Locate the two reservoirs closer to where the water will be used in north-west Auckland. • Review the original long list of site options. With smarter design thinking to achieve a smaller footprint, more of these options will be feasible.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5268] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Kate Wemyss

Organisation name:

Contact phone number: 02102631204

Email address: kate@fibreplus.co.nz

Postal address:
104 Atkinson Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Oppose to traffic, earthworks, removal of vegetation

What are the reasons for your submission?

I believe the site is not suitable for the planned works

What decisions and amendments would you like the council to make?

Chose another site

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5269] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Ryan Barnes

Organisation name:

Contact phone number: 098177234

Email address: mandysewellmakin@hotmail.com

Postal address:
142 Woodlands Park Road Auckland Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Clearance in a Significant Ecological Area, Traffic caused by earthworks, Diversion of a river, stream

What are the reasons for your submission?

Clearing the trees and bush, I'm worried about the loss of homes of the animals. Earthworks with the trucks, I'm worried about the air pollution, and the amount of trucks going past my house and school. Losing the streams, I'm worried about the fish and aquatic life

What decisions and amendments would you like the council to make?

Choose a new site

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5270] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Nicola Drayton

Organisation name:

Contact phone number: 0212642568

Email address: nic.r.drayton@gmail.com

Postal address:
12 York Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

This submission relates to the whole application. I oppose the application in its entirety.

What are the reasons for your submission?

The roundabout at Titirangi is congested at key points during the day already - namely 7am to after 9am and again 3pm to 5pm which is unsafe in terms of risk to pedestrians, vehicles and drivers of said vehicles. To add heavy vehicles for earth movements would compound this and has consideration been made to the width of Scenic Drive in terms of how vehicles can proceed on both sides of the road? A considerable part of the traffic movements of heavy vehicles undertaking earthworks will pass schools putting students and staff who walk or cycle to school at risk. Again congestion during drop off and pick up periods will be compounded and increase risk of accidents. The noise that passes those schools throughout the day and potentially dust and debris created will also have negative impact on school communities. Titirangi and surrounding Waima, Woodlands Park and Parau are unique communities in Auckland. How can you even consider the destruction of this ecological corridor? We've spent so much time and resource preventing the spread of Kauri Dieback - what impact will the earth movements have and what consideration has been given to prevent further spread of this disease. This 6 days a week operation will also impact wider community of Auckland and tourists who visit the area - what impact will this have on the perception of Auckland as a liveable city if movements are restricted by heavy vehicles and our unique environments are seen to be destroyed.

What decisions and amendments would you like the council to make?

I would like the Application to be declined in its entirety.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5271] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Jade Barnes

Organisation name:

Contact phone number: 098177234

Email address: mandysewellmakin@hotmail.com

Postal address:
142 Woodlands Park Road Auckland Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Earthworks and traffic, Removal of the trees in the SEA, Removal of the rivers and streams

What are the reasons for your submission?

Earthworks and trucks, I don't like the vibration from the trucks and the smell. I will miss the trees. I don't want the insects and wildlife to get squashed and die.

What decisions and amendments would you like the council to make?

Decline the application from watercare and ask them to find a better site

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5272] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Megan Schussler

Organisation name:

Contact phone number: 0274114862

Email address: megan09@outlook.com

Postal address:
172 Woodlands Park Rd Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:
vegetation

What are the reasons for your submission?

The small trees weren't even counted. Only counting anything 20cm and above isn't good enough. The specialists should count all the trees to get a fair understanding of what is actually there. There are two kauri trees of huge significance near the site. They are healthy trees. Kauri dieback is causing lots of problems already, you must not cut healthy trees and affect our ancient kauri - 2 of the oldest left - Auckland Council has said that there is a climate emergency, so it's simple - they must not agree to this application. The discovery of a new type of living wasp that eats other bugs is massive and must not be overlooked. The sediment created by chopping the trees down will get into our waterways and kill all the downstream animals.

What decisions and amendments would you like the council to make?

Say no to the application and help homes to have their own water tanks. And fix the current WTP.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

**SUBMISSION IN RESPECT OF A
RESOURCE CONSENT APPLICATION**

To: Auckland Council
c/ - Resource Consent Project Administrator

For: An application by Watercare Services Limited (“the Application”) (“WSL”)

Submission on: Regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project

Application Numbers: BUN60360339273 / LUC60339274 / LUS60339442, WAT60339409, DIS60339275, DIS60339441

Name: Cyril Hamiaux (Scientist, PhD)
Pia Rheinländer (Scientist, PhD)
 (“the submitter”)

Address: 13 Manuka Road, Titirangi

Telephone: 0211034843

Email: cyril@cyrilhamiaux.net – pia.rheinlander@yahoo.com

Introduction

- A. The submitter is not a trade competitor of WSL for the purposes of [section 308B](#) of the Resource Management Act 1991 (the RMA).
- B. This submission relates to the whole of the Application.

Background

- C. The submitter lives on Manuka Road, Titirangi.
- D. The submitter opposes the Application in its entirety.

Reasons for submission

- E. The submitter opposes the Application.
- F. Reasons for opposition

1 Watercare’s decision to choose Woodlands Park Rd as their preferred site for the Huia WTP replacement is in irremediable conflict with policies of the Auckland AUP and of the RMA

- 1.1 The Resource Management Act (RMA) imposes a duty on all people to avoid, remedy, or mitigate adverse effects on the environment. In addition, works in the Auckland area fall under the legal framework of the Auckland Unitary Plan (AUP). In the present case, the proposed sites are 95% covered by a “Significant Ecological Area” (SEA) overlay in the AUP. Objective and policies of Chapter D9 (SEA Overlay) and Appendix 8 (Biodiversity offsetting) of the AUP therefore apply to this application. As the SEA is a regional overlay, it sits above designation 9324 held by Watercare over the proposed sites in Woodlands Park Rd.
- 1.2 Confirmation of the SEA status of the project sites is fully acknowledged by the Ecological Assessment Report (Appendix L p60): “Indigenous vegetation within the Project Site meets Unitary Plan SEA criteria of representativeness, rarity, diversity, buffering and connective linkages. We acknowledge the appropriateness of the site’s inclusion within both the WRHA and the wider Waitakere Ranges SEA_T_5539 and note that vegetation types are generally consistent with characteristic forest communities of the Waitakere Ranges.”
- 1.3 The AUP SEA objectives are described in D9.2. In particular, objective (1) says “*Areas of significant indigenous biodiversity value in terrestrial, freshwater, and coastal marine areas are protected from the adverse effects of subdivision, use and development.*”
From the beginning of the WTP replacement process, Watercare identified the SEA overlay on the proposed Woodlands Park Rd sites as an issue. This prompted them to commission a large study aiming at identifying alternative suitable locations fulfilling a set of initial principles required for the proper operation of the proposed WTP (it must be noted that following initial assessments, the set of principles had to be relaxed - notably in terms of size of available land - to include Woodlands Park road (Huia Water Treatment Plant Site Selection Principles – Beca - 2015)). Ultimately, this resulted in a short list of 4 sites (two in Woodlands Park Road – “Manuka Rd” and “existing site”) and two in Parker Rd (“North” and “South”). Following a detailed MCA analysis of these 4 sites, two sites (Manuka Rd and Parker Rd North) were identified as better than the two others but these two “winning” sites could not be distinguished based on the scores from MCA analysis (Manuka Rd scored 102.11 and Parker Rd North 102.05) and costs. As explained in the recommendation to the board report (May 2017): “The Parker Road North and Manuka Road sites are very similar on the balance of technical, environmental and costs”. In selecting the Manuka Rd site as their preferred site, Watercare justified: “Watercare can mitigate the ecological effects on the Manuka Road site through off-set mitigation, however it would be difficult to fully mitigate the social effects’ associated with developing the Parker Road North site.”
- 1.4 In pursuing the Woodlands Park Rd site, Watercare has developed an AEE which describes the following points:
 - 1.4.1 Watercare have reduced the footprint of the plant and reservoirs as far a practicable for the WTP to be operative.
 - 1.4.2 They have also “optimized the design” to avoid areas of highest ecological integrity. Nevertheless, the 3.5 ha of forest proposed to be felled have been acknowledged as being of very high ecological

- value, while the magnitude of the effects was described as moderate. As a result, the overall ecological effects of the proposal were assessed as high (Appendix L p 76).
- 1.4.3 Watercare have acknowledged that on-site mitigation is not possible or sufficient to compensate for the ecological effects of the current proposal.
 - 1.4.4 They therefore propose to offset these effects via the establishment of a fund, primarily targeted at pest and weed control in the wider Waima catchment.
 - 1.4.5 Watercare have acknowledged that the off-set will not replace like for like and therefore will result in a net loss of 3.5 ha of native forest, in contradiction with Appendix 8 (4) and (5) of the AUP. In addition, they have also identified significant risks of failure of the WBLP to deliver on its objectives (AEE p 94 and 95)
- 1.5 Chapter D9 and Appendix 8 (1) policies of the AUP, together with the Guidance of Good Practice Biodiversity Offsetting in New Zealand Principles it refers to, describe how to “*Manage the effects of activities on the indigenous biodiversity values of areas identified as significant ecological areas by (a) avoiding adverse effects as far as practicable, and where avoidance is not practicable, minimizing adverse effects; (b) remedying adverse effects that cannot be avoided; (c) mitigating adverse effects that cannot be avoided or remedied; and (d) considering the appropriateness of offsetting any residual effects that are significant and where they have not been able to be mitigated, through protection, restoration and enhancement measures, having regards to Appendix 8 Biodiversity offsetting*”. It is noted that in Chapter D9, the first step of the mitigation hierarchy (avoidance) is to be considered “*as far as practicable*”.
 - 1.6 During the site selection process, Watercare have failed to recognize the mitigation hierarchy imposed by the AUP, where the appropriateness of minimizing/mitigating/offsetting can only be considered after all practicable avoidance options have been considered. In the present case, the MCA analysis presented in the recommendation to the board report demonstrates that Parker Road North and Manuka Road sites are both equal on the balance of technical, environmental and costs. However, there is no SEA on the Parker Rd site, so all of the adverse biodiversity effects that Watercare acknowledge cannot be avoided, minimized or mitigated on the Woodlands Park Rd sites can be completely avoided by selecting the alternative location. This is in agreement with policy (6) (b) of Chapter D9: avoid as far as practical the removal of vegetation and loss of biodiversity in SEA from the construction of building platforms, access ways of infrastructure, through (b) assessing any practical alternative location and/or methods that would reduce the need for vegetation removal or land disturbance.
 - 1.7 Watercare have justified their decision by saying that “it would be difficult to fully mitigate the social effects’ associated with developing the Parker Road North site” (recommendation to the board report). However, a “Significant Community Area” overlay does not exist in the AUP to protect a community in a way the SEA overlay does to “areas of significant indigenous vegetation or significant habitats of indigenous fauna” (Chapter D9 of the AUP). Conversely, there are established legal processes defined in the Public Works Act that aim at fairly mitigating any home owners affected by infrastructure development. In this case, the decision was to be made between two similarly suitable sites, one almost fully covered by an SEA,

while the other is free of SEA. The Public Works Act makes it practicable to avoid all the adverse effects within the SEA by selecting the non-SEA site. By selecting Woodlands Park Rd (covered by the SEA overlay) as their preferred site for the new WTP, while identifying an equivalent alternative site not covered by the SEA overlay, Watercare has created an irremediable conflict with policies of the Auckland AUP and of the RMA. As a consequence, the resource consent application to fall 3.5 ha of native forest in Woodlands Park Rd must be declined.

2 Ecological issues

2.1 The proposed offset for the loss of 3.5 ha of forest (a temporary targeted pest and weed control program in Little Muddy Creek catchment) is completely inadequate and fails to compensate for the ecological damage.

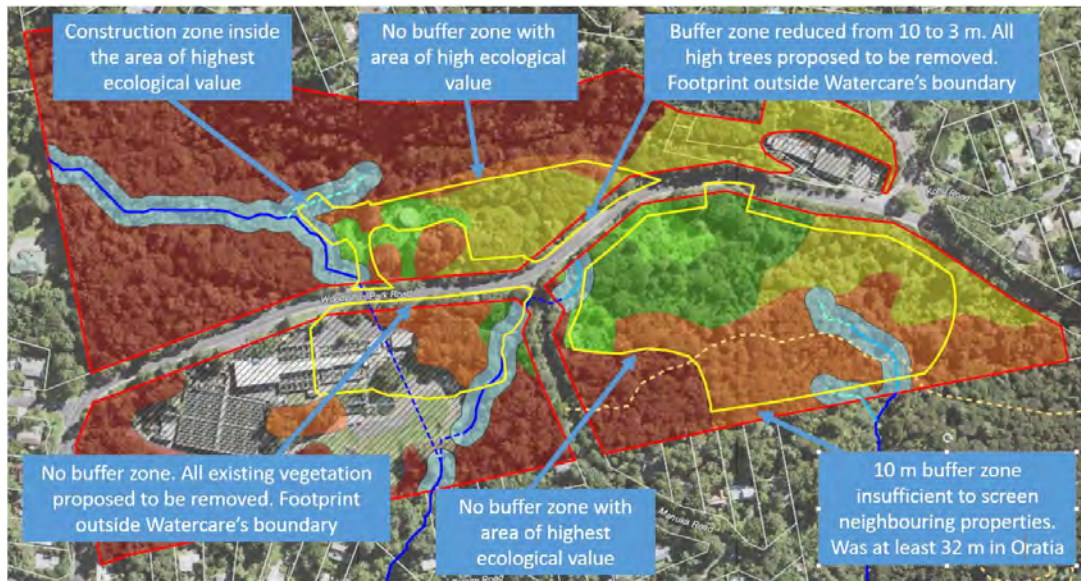
- 2.1.1 It will result in a net loss of 3.5 ha of native vegetation of very high ecological value classified as SEA, in conflict with the AUP (Appendix 8) and the DOC guidelines (Guidance on good practice biodiversity offsetting in NZ).
- 2.1.2 “The Project Site forms part of a largely intact forested corridor that extends around the head of the catchment (generally defined by Scenic Drive) which connects forest in the Lower Nihotupu Reservoir and Little Muddy Creek catchments” (Appendix L p33). The loss of this corridor will not be compensated by the proposed offset.
- 2.1.3 The AUP and the DOC guidance make it clear that a “like for like” solution should be the main aim of offsetting. The proposed trust completely fails to achieve this.
- 2.1.4 The proposed trust action lists are temporary measures (10 years), in contrast to a permanent loss of ecological values. Even if successful, pests and weeds will return once work is finished (10 years). Trees and ecosystems that are removed, however, are lost forever.
- 2.1.5 While it is acknowledged that pests and weeds are important threats to biodiversity, habitat destruction is equally important, if not more. Habitat loss leaves plants and animals homeless. To preserve (and hopefully enhance) biodiversity, these two major threats must be tackled together, not separately. In consequence, it is nonsense to claim, as Watercare do, that a pest and weed control program can compensate/offset for habitat destruction, corridor destruction and fragmentation. Biodiversity will only be given a chance if these major threats are addressed in a holistic approach and it is concerning that ecologists from Boffa Miskell seem to think otherwise.
- 2.1.6 The proposed offset program is already acknowledged by Watercare to have a high risk of failure (AEE p 94-95). More generally, it is now well documented that biodiversity offsetting has a >35% risk of failure (Brown *et al.*, (2013) Ecological compensation: an evaluation of regulator compliance in New Zealand). While a risk of failure may have been acceptable in the past, it is not anymore at a time where governing bodies (including Auckland Council recently) have declared a state of climate emergency. When advocating for the instauration of the Natural Environment targeted rate in 2018, Auckland Council was saying: “Around 70 per cent of our native ecosystems no longer exist”. Native forests are vital for Auckland, NZ and the world and cannot be destroyed anymore.

- 2.1.7 By being unable to appropriately mitigate and offset the effects of the Huia WTP proposal, Watercare will directly negatively contribute to three of the nine priority issues identified by the Ministry for the Environment as “those that matter most to the current state of our environment” (Environment Aotearoa 2019 report) <https://www.mfe.govt.nz/environment-aotearoa-2019-summary>) : Issue 1: Our native plants, animals, and ecosystems are under threat (Our unique native biodiversity is under significant pressure from introduced species, pollution, physical changes to our landscapes and coast, harvesting of wild species, and other factors. Almost 4,000 of our native species are currently threatened with or at risk of extinction.) ; Issue 2: Changes to the vegetation on our land are degrading the soil and water (Logging native forests, draining wetlands, and clearing land have degraded a range of benefits provided by native vegetation, accelerated our naturally high rates of soil loss, and affected our waterways.) ; Issue 3: Urban growth is reducing versatile land and native biodiversity (Growth of urban centres has led to land fragmentation and threatens the limited supply of versatile land near Auckland and other regional centres).
- 2.1.8 Given the recent “Natural Environment” targeted rate implemented by the Auckland Council and the existence of multiple local initiatives aiming at pest and weed control (Waituna Action Group, EcoMatters Environment Trust, Waima to Lainholm pest free, Kauri rescue, etc...), some of which do target private landowners, it is hard to believe that a large part of the offset package does not overlap with existing initiatives. In consequence, and in contradiction with the AUP, the proposed offset is not additive to existing initiatives.

2.2 The proposed buffer zones are inadequate

- 2.2.1 The overall 10 m buffer zone is totally insufficient to properly screen the plant from the surrounding forest and retain the character of the neighbourhood. Watercare provide no justification as to why they think 10 m is appropriate. Davies-Colley *et al.*, (Microclimate gradients across a forest edge, 2010) have demonstrated that the edge effects on microclimate extend at least 40 m into native New Zealand rainforest. A 40 m buffer zone is therefore considered a minimum to safeguard the surrounding native environment.
- 2.2.2 The buffer zone must remain 100% untouched, with no work at all to be performed within the buffer zone. Watercare are already proposing to locally breach the buffer zone with a 2 m “working zone” within the buffer zone (AEE p 69). This is unacceptable.
- 2.2.3 The proposal does not account for any buffer zones around areas of highest ecological value, which is unacceptable. It is acknowledged in the AEE (p89) that “clearance of vegetation within the works footprint has the potential to result in poor health or failure of adjacent trees that are retained, known as edge effects”. The delimitation by a straight line of areas of different ecological value is an ecological nonsense. However, Watercare have aligned their footprint right along these lines, with no buffer zone. Appropriate buffer zones must be put in place all around the proposed footprint, including where the boundary of the footprint is with adjacent forest. In priority this must be enforced when such forest is of the highest integrity value. Again this buffer zone must be strictly observed to prevent large ecological damage within areas of highest ecological value.

- 2.2.4 The 10 m buffer zone has been reduced to 3 m for reservoir 1. This is unacceptable as this implies that all of the high standing trees (mostly kanuka, but also including a grove of mature kahikatea) along that stretch of Woodlands Park Rd will go. The removal of these trees will completely change the forest character of the neighbourhood and have significant ecological consequences because these kanuka are at least 70 years old and, following the incursion of myrtle rust in NZ (and recently in Waitakere), are now classified as threatened species. Furthermore, in Figure 18 and 19 of Appendix L, the footprint of reservoir1 extends outside of Watercare's boundary and onto the public road.
- 2.2.5 The 10 m buffer zone of reservoir 2 is proposed to be felled in its entirety and then replanted once finished. This is again unacceptable. The buffer zone must remain untouched both to minimize ecological damage and to maintain the forest character of the neighbourhood. In addition, as explained in Appendix D (Reservoir Site Layout Report p7): "pipeworks will be installed below ground in this area. Mitigation planting will be provided. Any planting over pipework will consider maintaining the pipe integrity and allow removal for any required pipe maintenance over the life of the reservoir". This has therefore nothing to do with a buffer zone. High integrity bush (class 2) will be completely removed, and replaced by low value vegetation. And furthermore, Watercare already knows that that the new vegetation will need to be removed in the future for pipe maintenance. A proper untouched buffer zone must be enforced between the road and reservoir 2. And as for reservoir 1: the footprint of reservoir 2 extends beyond Watercare's boundary and onto the public road (maps 18 and 19 of Appendix L).
- 2.2.6 The footprint of reservoir 2 is at least 3 times the footprint of that same reservoir when it was located next to reservoir 1. By doing so 2000 m² of high integrity bush (class 2) will be unnecessarily destroyed (Appendix D – North Western water supply report p36). The footprint of this reservoir must be reduced to minimise adverse ecological effects.
- 2.2.7 The location chosen for the shaft of the NH2 pipeline is within an area of the highest ecological value, and over an ephemeral part of the Armstrong Gully stream. This is unacceptable.
- 2.2.8 A 10 m buffer zone is also insufficient to properly screen close neighbours from adverse effects from the enabling period (noise, dust, vibrations, land stability risks, etc...) and operations. In Oratia, the buffer zone had a minimal depth of 32 m (GHD Short list report), which, among others, allowed this site to consistently score best from a noise perspective.
- 2.2.9 Because of insufficient buffer zone, noise limits will go beyond the permitted 70 dB limit of the AUP at neighbouring properties during the enabling period (chain saw). This was reported by the Marshall Day noise expert at a meeting with the neighbours in February 2019, and confirmed in the AEE (p102).
- 2.2.10 A summary of the buffer zone issues is presented in the Figure below:



2.3 Stream reclamation and diversion issues

2.3.1 The crucial role of headwaters in stream hydrology, ecology and health is undisputed (Connectivity of stream and wetlands to downstream waters: a review and synthesis of the scientific evidence, EPA 2015) and supports that headwater streams should be given similar protection status to perennial reaches (Storey *et al.*, 2011). Yet, in many instances in the AEE, the importance of the ephemeral/intermittent Yorke stream is intentionally minimized:

- In the AEE, the Yorke intermittent stream is said to be assessed as having “moderate-low” ecological value. However, this assessment is not supported by appendix 9 of appendix L (Stream Ecological Valuation Plan) which concludes: “A predicted, current, SEV score for the Yorke_Project_Intermittent of 0.81 was calculated. This predicted score is high and is indicative of probable excellent ecological function”. The AEE (section 3.6.2) also explains that the existing intermittent Yorke stream (i) has the highest possible score (1.0) for hydraulic functions, (ii) forms a natural, stable stream channel with no external modification or inputs of stormwater, (iii) has full access to flood plain during storm events, (iv) has high biochemical functionality, and (v) has good riparian condition and conductivity. Most importantly, the ephemeral and intermittent part of the Yorke gully form the headwaters of the (permanent) Yorke gully, described as an excellent quality stream with an SEV of 0.845 and habitat for Longfin Eel and Inanga, species listed as At Risk-Declining.
- In section 8.7, the AEE emphasizes that “The reclamation and diversion of a small-section of intermittent stream in the Yorke Gully is a noncomplying activity”. And again in Section 6.2: “The reclamation and diversion of a small section of the Yorke Gully Stream to a new course is a noncomplying activity in an SEA.” Yet, as seen on Figure 19 of the Appendix L, the 53 m reclaimed actually consist of the entire length of the intermittent stream that forms the headwater of the very high quality Yorke gully downstream.
- In section 7.3.3 of the AEE, “Boffa Miskell considers that the reclamation and diversion of the intermittent stream will have minor

short term effects”. In section 4.3.7, it is however explained, that the final diverted stream will be constructed “following completion of bulk earthworks, once structures are being built”. So this will not happen before approximately 6 years into the project, which is not short term. In the meantime, a clear water diversion is proposed (staged over the construction period), the effect of which on the downstream sections of the Yorke gully has not been assessed and are unlikely to be minor.

- 2.3.2 The proposed on-site mitigation (70 m stream diversion) does not fully compensate for the effects of the removal of 53 m of the intermittent Yorke gully. As explained in appendix 9 of appendix L, the SEV of the diverted stream (0.77, good) is lower than that of the current stream (0.81, excellent), and it is estimated that a minimum of 85 m of diverted stream is required as mitigation. Offsetting is therefore also required for stream reclamation and diversion, which conflicts with the Avoid requirement of the RMA and AUP.
- 2.3.3 Flow modification. Section 7.3.2 of the AEE indicates that the contribution catchment area of the Yorke gully will be reduced once the construction of the WTP has been completed (this is because part of the water from the roof runoff will be diverted to the WTP), which has the potential to modify the flow of the stream. To mitigate this, treated stormwater from the WTP site will be discharged to the Yorke gully via a dry pond that will provide attenuation and detention of flows. The controlled delivery of this treated stormwater will “mimic the intermittent nature of the existing stream”. The AEE fails to explain how the controlled discharge will appropriately mimic the existing stream. In particular, there is no reference to multi-year, cross seasonal studies of the water flows actually entering the permanent section of the Yorke gully. Without such data, how will flow volumes be determined to “mimic the existing stream”? Modifications of the incoming flows to the permanent section of the Yorke gully are likely to have significant consequences for the high value stream ecology downstream.
- 2.3.4 Stormwater discharge. As mentioned in point 2.3.3, the AEE explains that treated stormwater coming from the whole WTP site (excluding roof runoffs) will be discharged in the York gully. This is an unacceptable contrast with the current situation of the intermittent part of the stream described as “Natural, stable stream channel with no external modification or inputs of stormwater” (AEE section 3.6.2).
- 2.3.5 Sediment runoff. Given the size of the earthwork directly next to the proposed diverted stream and the high amount of rain in the Ranges, it is difficult to believe that measures to prevent sediment runoff in the Yorke stream will be effective.
- 2.3.6 Riparian planting. Several drawings in Appendix A1 of Appendix G show the proposed path of the final diverted stream together with the elements of the proposed WTP. From these maps, it is obvious that the first 1/3 of the diverted stream will run directly alongside elements of the proposed plant (the electrical compound and chlorine facility and/or alongside the retaining wall) where planting will therefore only be possible on one side of the stream. Further down, it will be in the close vicinity of the retaining structure of the proposed dry pound where, again, only partial riparian planting can be accommodated. This is in crude contrast with the existing situation where the riparian condition and conductivity are described as “good”.

2.4 Kauri and kauri dieback issues

- 2.4.1 No kauri trees (regardless of size) should be removed because this is now a threatened species. All kauri (including those of diameter smaller than 20 cm) must be identified on all sites to i) inform the public of the real impact of this proposal and ii) ensure proper identification of potentially contaminated soil. In the AEE (section 7.5.4) Watercare highlights that “there are no mature kauri trees in the Project footprint”. Yet, on map 18 of appendix L, one mature kauri is clearly within the footprint of reservoir 1. Furthermore, some exceptional kauri are present inside the 10 m buffer zone around the WTP footprint, on the neighbouring properties (~12 m away from the footprint) and close by in the regional park (including the iconic Clark’s kauri). All of these are under significant risks from the proposed development.
- 2.4.2 Phytophthora is likely to present in forests other than kauri. Other plant species present in the project site have been described as hosts for phytophthora (MPI report 2013 Specialist Phytophthora Research: Biology, Pathology, Ecology and Detection of PTA). These species must be identified on the project site and soil movement around these species must also follow KD protocols.
- 2.4.3 Phytophthora has long latency periods, so is likely to be present in many areas where symptoms have not yet expressed (spreading was unnoticed for 50 years +). Furthermore, there is currently no simple, reliable test for KD in soil samples. Given KD has been found by Boffa Miskel within the wider project site (reservoir site), it cannot be unambiguously demonstrated that any soil is free of KD. Hence, either all soil from the project site must be considered as contaminated and treated in accordance, or Watercare must pay/commission for systematic rigorous testing of presence of KD in accordance with recommended identification procedures.
- 2.4.4 Sediment runoff from the project site to the regional park downhill is unavoidable and represents a significant risk of spreading of KD.
- 2.4.5 In a project of this scale, airborne spread of oospores is of major concern and practically unavoidable.

2.5 The Parau landfill site is not suitable to be used as landfill

- 2.5.1 Disposal of potentially contaminated soil with KD on the Parau landfill site is a breach of the biosecurity act.
- 2.5.2 The Parau landfill site is currently consented for disposal of 300 m³ of soil per year, in addition to the sludge material (consent number 37113, 2009). It is therefore not consented for the disposal of very large amounts of soil.
- 2.5.3 Prior to any soil disposal on the Parau landfill site, an independent assessment of the potential toxicity of the deposited sludge material must be undertaken. Indeed, there is a precedent in Waikato where the sludge from the Waikato WTP – and possibly Huia – was initially disposed locally as cleanfill, only to realize years later that the material was contaminated with high levels of arsenic, lithium and aluminium, and could potentially also leach other metals (copper, manganese nickel zinc) at concentrations exceeding ANZECC guidelines (Enforcement decision required - Duirs report, 2018).

2.6 Ridgeline Protection Overlay issue

- 2.6.1 On p75 of the AEE, Watercare mention that “The Ridgeline Protection Overlay applies to the part of the reservoir location (northern

boundary of the designated area). All works are contained outside of this overlay.”

- 2.6.2 It is agreed that the works are contained outside the Ridgeline Protection Overlay on the reservoir site. However, the Overlay continues along Scenic Drive and it is questionable (and unclear in the AEE) whether this holds true on the northern boundary of the WTP site where part of the retaining wall, roughly half of the laydown area and possibly even the corner of the chlorine contact tank seem to sit inside the Ridgeline Protection Overlay. The beautiful forest landscape including sea views over Little Muddy Creek in the background that is enjoyable when standing on the footpath of Woodlands Park Rd / Scenic drive on that particular section of the ridge will, beyond any doubt, be affected by the development.

2.7 Cost considerations

- 2.7.1 Originally estimated at \$317-396M (recommendation to the board), the overall cost of the project in Woodlands Park Rd is likely to skyrocket. In the AEE, it is many times mentioned that strict size constraints on the sites will result in technical difficulties, or require non-conventional methodologies, etc... Compounded with potential associated delays in the project, these will significantly increase costs. Furthermore, compared to the original proposal costed in 2016, the following (more expensive) modifications have been implemented: i) the shape of both reservoirs has been modified from a standard cylinder to more complex designs, ii) reservoir 1 has been shifted east as far as possible and as a result is now fully buried, iii) reservoir 2 is proposed to be built on the site of the existing plant, independently from reservoir 1, iv) reservoir 1 and 2 are now at different elevations, thus requiring more complex design. An LGOIMA request (13 August 2019) to obtain the latest cost estimates of the project has so far been unanswered by Watercare.
- 2.7.2 Altogether, the additional costs for this project will make it much more expensive than alternative options on other sites. It is suggested here that rather than spending these additional costs on a site that requires large deforestation, it would be better to avoid deforestation here, and use the additional costs at an alternative site (for example to include pumping costs of a site at lower elevation, or to provide large financial compensation on an alternative site affecting a community).

2.8 Impact on Waima community and local neighbours

- 2.8.1 As direct neighbour, the proposed development is of inhuman scale. It will permanently destroy our direct environment and create very long term (8 years during construction) and permanent (once in operation) nuisances directly affecting our everyday life. Living in a forest environment is what brought us here. The proposed felling of “our” forest on three sites literally surrounding our property will be particularly distressful, and will have very strong psychological implications for all members of our family. We have been for the past two years, and will continue being (throughout the whole length of the construction period and possibly during operations) complete hostages of the situation. Altogether this creates a constant level of high emotional stress that is getting harder and harder to live with. It is unreasonable for Watercare to put our lives on hold for so long.
- 2.8.2 Direct risks for neighbours associated with the development have systematically been dismissed by Watercare. In contrast, Watercare

have acknowledged to the Local Board that there are risks associated with the construction and operation of the plant: in response to the Local Board request to consider the Parau Landfill site as alternative location for the WTP, Watercare explained this was not possible due to “operational risks to the water storage in an emergency”. Yet the Lower Nihotupu reservoir is located more than 700 m from the Parau Landfill site while the neighbouring properties (including ours) are directly below, within meters of the proposed WTP.

- 2.8.3 Watercare have met the “Manuka Rd neighbours” (including ourselves) on 3 or 4 occasions to present updates of the proposal. At no time during these meetings have Watercare ever acknowledge the significant adverse effects the proposed development will have on the direct neighbours. They also never made any proposition or suggestion to compensate the neighbours for any of the significant adverse effects.
- 2.8.4 The ecological destruction will completely and irreversibly change the nature of the neighbourhood and transform Waima into a large industrial zone with elements on all side of the road, along at least 500m. This obviously has important financial implication on property values for immediate neighbours.
- 2.8.5 Social impacts on the Waima/Titirangi community have been largely neglected in Watercare’s assessment and site selection; in fact no proper assessment of social impact of the Waima community has been conducted.
- 2.8.6 Cumulated traffic impacts of the enabling works and construction works (which will overlap over the whole length of the project) will severely impact the everyday life of whole local community and businesses, from Huia to Laingholm, Waima, Titirangi, Glen Eden and beyond.

2.9 Nothing, in this proposal, is minor or less than minor. The effects are major on multiple aspects of the proposal and simply cannot be addressed. We therefore believe that the proposed development is not in accordance with Part 2 of the RMA and the promotion of the sustainable management of natural and physical resources, including the social, economic, health and safety and wellbeing of people and communities.

3 Gaps in the application

3.1 The new plant is not connected to the raw water sources

- 3.1.1 As per the proposal described in the AEE, there is no connection between the plant and the raw water. Currently, the raw water from the dams arrives at the existing plant at the bottom of Woodlands Park Rd via a 100 years old aqueduct that must be replaced. Watercare have made clear that they do not plan to connect the old aqueduct to the new plant. To bring raw water to the plant, Watercare have signalled to the Community Liaison Group that they are planning to replace the aqueduct by a new tunnel between Mackies rest and the new plant. Of note, this implies that 100% of the raw water will need significant pumping (~15 m vertical lift) to enter the plant.
- 3.1.2 The current proposal does not include planning and/or consenting of such raw water tunnel between Mackies Rest and the plant. Should this consent be problematic, then no water would reach the new plant

and the plant would be useless. All planning and consenting of the raw water tunnel must be obtained before the clearance of any vegetation can be consented.

3.2 Due to space constraints, the new plant is not future proof

- 3.2.1 From the very initial steps of the project (Huia Water Treatment Plant Site Selection Principles – Beca - 2015) significant space constraints were identified for the Woodlands Park Rd sites. In fact, the initial set of principles required for the establishment of the 140 MLD WTP had to be relaxed in order for the Woodlands Park Rd scheme to be included. Based on these criteria, this site should have been rejected from day one.
- 3.2.2 Because of over tight space constraints, the new plant can not be expanded in the future, and is therefore not future proof. This is clearly mentioned in various Watercare internal documents (Minutes of the Challenge Workshop May 2017, comments on the draft recommendation to the board).
- 3.2.3 This infrastructure is supposed to last for 100 years, during which climate change and changes in the quality of the raw water are unavoidable. Therefore the plant will need to be upgraded/modified at some stage in the future. It is not reasonable to consent for clearance of native forest (which are vital to tackle climate change) for an infrastructure that can not be upgraded/expanded to cater for future need, or that will only be able to expand at the cost of more and more ecological damage in surrounding areas of highest ecological value over the lifespan of the plant.

3.3 Watercare have never attempted to look at alternative models to their proposal.

- 3.3.1 One obvious way to minimize ecological damage would be to build two smaller ~70 MLD plants on different sites, where such plants would have half the footprint of the proposed one and could be located on smaller sites not covered with trees. In that scenario, one plant could be located on another of the long list sites (or elsewhere) and be build first, with one reservoir. Once that first plant is operational, the current plant could be decommissioned and rebuild at 70 MLD capacity on the existing footprint, together with the second reservoir. Such alternative solution (two plants) has actually been identified (but ignored by Watercare) in the Huia WTP Replacement Justification Gap Analysis report (GHD, 2015) which says:” What is the 50 year risk-adjusted cost of utilising the existing asset base to maintain a capacity of say 65 MLD at the existing site in conjunction with a new 75 MLD plant at another site?”

4 Watercare failed to inform the community (and neighbouring home owners) that a new water treatment plant could be erected on the Manuka Rd site.

- 4.1 Watercare started planning the replacement of the current facility in 2008 (recommendation to the board report), but has never informed the community that the old plant was getting towards the end of its economic life and would need to be replaced/upgraded.
- 4.2 Watercare have also investigated the implementation of large water storage reservoirs on the Manuka Rd site in 2011 (SKM Manuka Rd Reservoir Concept design) and also in Woodlands Park Rd (site opposite to current

plant) in 2013 (Opus report). But again, they have never informed the community about the need for these new massive structures.

4.3 The long list and short list selection processes were confidential to a bunch of “happy few” stakeholders that did not appropriately represent the communities.

4.4 When the Watercare board took the decision to select Manuka Rd as the site for the Water Treatment Plant replacement (30 May 2017), the “recommendation to the board report” said: “Watercare has long held a designation over the Manuka Road site and this has signalled to the community the potential for the construction and operation of a water treatment plant on the site at some stage”. Further, it adds: “the designation has signalled to the communities that such a plant may be established on the sites at any time”. In practice, however Watercare totally failed to inform the community at any stage:

4.4.1 As said above, they never informed anybody, especially neighbours, of any possible new development or necessity for upgrades.

4.4.2 There were no physical signs or indications anywhere that the Manuka Rd site belongs to Watercare.

4.4.3 There is a public walking track (Clark Bush Track) going through the Manuka Rd site, administrated by the Regional Park rangers (there are kauri dieback cleaning stations for instance – there are no kauri dieback cleaning station in the tracks administrated by Watercare in the Waitakere ranges). So the impression was that this parcel was part of the Regional Park. This is even acknowledge by Paul Jones (the project manager for Watercare) in an email conversation obtained under LGOIMA:

From: Paul Jones

Sent: Monday 10 April 2017

To: Amelia Linzey

Subject: Huia Water Treatment Plant Tours- 8 and 9 April 2017 (staff briefing)

Hi Amelia,

It was good that you weren't there as there were several people that were there that you would not have wanted to talk to.

But there were landowners that back on to Manuka Road that said you haven't approached them.

They were very upset about the proposal as they were led to believe that the land was a reserve- which in a way is understandable in that the walkway (sign) that enters Watercare property off Manuka Road has Clark's Bush on it.

Will call.

Paul.

4.4.4 The very first information about any development provided to the community was way down in the process (in February 2017) when Watercare started public consultations on the two short listed sites (Woodlands Park Rd and Oratia). However, the Woodlands Park Rd consultation was hardly advertised locally and even directly affected neighbours were not contacted.

4.4.5 The Manuka Rd site is covered by a Significant Ecological Area Overlay, which prevents Watercare to use the designation without specific consents for land use. In 2016, Watercare have not submitted against the SEA overlay on that parcel of land, even though they were in advance planning to use it to build the new proposed WTP. Such submission would have signalled the community that they were planning to use that land for large infrastructure.

4.4.6 Until recently, the designation over the Manuka Rd site (lot 6DP 156565) was wrongly labelled in the Plan and on the Council GIS site and on other documents.

Decision sought

- G. The submitter seeks that the Application be declined in its entirety.
- H. Alternatively, if despite the adverse effects the Application is granted the submitter seeks conditions that remedy or mitigate the adverse effects on the environment and on the directly affected residents of Manuka Road.

The submitter wishes to be heard in support of this submission.

If others make a similar submission consideration will be given to presenting a joint case with them at the hearing.

Signature:



Cyril Hamiaux & Pia Rheinländer

Date: 02 September 2019

References

Guidance on Good Practice Biodiversity Offsetting in New Zealand ([DOC, 2014](#))

Huia Water Treatment Plant Site Selection Principles (Beca, 2015). Report prepared for Watercare

Site Selection for Replacement of Huia Water Treatment Plant - Report to the Board of Watercare Services Limited (Watercare, May 2017)

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Davies-Colley RJ, Payne GW, van Elswijk M (2000) Microclimate gradients across a forest edge New Zealand. *Journal of Ecology* **24(2)**, 111-121, DOI: [10.1.1.376.4102](#)

Huia WTP Site Selection Study Shortlist Site Development Report ([GHD, 2016](#))

Huia WTP Replacement Report on Longlist Options ([Tonkin & Taylor, 2016](#))

Specialist Phytophthora Research: Biology, Pathology, Ecology and Detection of PTA ([MPI, 2013](#))

Duirs R (2018). Cleanfill discharges at EnviroFert, Tuakau. Report – Enforcement decision required.

Huia WTP Replacement Justification Gap Analysis (GHD, 2015) Report prepared for Watercare

Connectivity of stream and wetlands to downstream waters: a review and synthesis of the scientific evidence ([USA Environmental Protection Agency, 2015](#))

Storey RG, Parkyn S, Neale MW, Wilding T, Croker G (2011) Biodiversity values of small headwater streams in contrasting land uses in the Auckland region, New Zealand *Journal of Marine and Freshwater Research*, **45(2)**, 231-248, DOI: [10.1080/00288330.2011.555410](#)

Woodlands Park Road reservoirs. Geotechnical interpretive report (Opus 2013). Report prepared for Watercare

Manuka Rd reservoir concept design (SKM 2011). Report prepared for Watercare

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5273] Submission received on notified resource consent
Attachments: Huia Residents short form submitters_13 Manuka Rd_FINAL_20190902153610.985.pdf

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Cyril Hamiaux

Organisation name:

Contact phone number: 0211034843

Email address: cyril@cyrilhamiaux.net

Postal address:

13 Manuka Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

See attached

What are the reasons for your submission?

See attached. I have lodged this submission by email (premiumsubmissions@aucklandcouncil.govt.nz ; Paul.Jones@water.co.nz) but did not received any acknowledgement that it has been received. Hence I'm sending it again via the Council website.

What decisions and amendments would you like the council to make?

See attached

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Huia Residents short form submitters_13 Manuka Rd_FINAL_20190902153610.985.pdf

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5274] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Helmi Thompson

Organisation name:

Contact phone number: 0224299052

Email address: info@woodlandsenchanted.co.nz

Postal address:
272 Huia Road, Titirangi Auckland Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Destruction of native forest with high ecological value Vegetation and soil removal which carries the risks of erosion and the spread of kauri dieback disease and loss of habitat for known and unknown species of wildlife. The high increase in traffic on windy roads not built for this.

What are the reasons for your submission?

Very concerned about the loss of natural habitat and the effects this upgrade will have on the community and Traffic is already causing major traffic jams up Huia road towards the roundabout. Excess for emergency services could be crucially jeopardised.

What decisions and amendments would you like the council to make?

I would like the council to deny Watercare the consent application. Developing the currently proposed site will need to be looked at in view of future value and I would like Watercare to look into more sustainable solutions considering global warming and a looming water crisis.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 3:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5275] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Lee Taylor

Organisation name:

Contact phone number: 0274136732

Email address: lee.taylor@outlook.co.nz

Postal address:
32 Tainui Rd Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Destruction of kauri forest in an area where there are trees which are non-symptomatic of kauri dieback.

What are the reasons for your submission?

Clark's bush track has been closed as part of the council's efforts to restrict the spread of kauri dieback. Currently there are no signs of dieback along the track or in that area that has been designated for use by Watercare. The wildlife and other flora and fauna in the area needs to remain protected and the redirecting of streams will impact significantly on those species reliant upon it. The destruction of kauri trees, taonga to the local iwi, goes against the council's and government's promise to protect one of New Zealand's oldest species; at a time when healthy specimens need as much protection as they can have.

What decisions and amendments would you like the council to make?

It would be hypocritical of the council to provide consent to build on land that contains established kauri tree given the importance to local iwi and the council's image of the Waitakere Ranges being the lungs of Auckland - at a time when there already exists a rāhui on the land. It would also be hypocritical of the council to provide consent for the go ahead of the development given the great number of native species that would certainly not be able to continue to survive when their habitat is being decimated by land removal - this also increase the risk of spreading dieback disease if any were to be found in the area. There is no way the population of Auckland, as it stands currently, would be alive to see the mitigation Watercare proposes to plant more trees in the Hunua Ranges if this were to go ahead. The council need to make Watercare reconsider its options of land to develop as Titirangi was not the preferred option: this is more expensive. Back to the drawing board and prevent the increase traffic noise, dangers on surrounding roads, pedestrian dangers and of wildlife in general. Had Watercare invested in the upkeep of its existing site they may not have found themselves in this position now. Watercare have already let one building become a ruined eyesore in the community: Titirangi does not need another.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5276] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Rylen Schussler

Organisation name:

Contact phone number: 0274114862

Email address: rylen@outlook.co.nz

Postal address:
172 Woodlands Park Rd Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:
vegetation & stream diversion

What are the reasons for your submission?

The reason for my submission is to protect native, endangered and threatened species that are found in the mentioned site. These are important to New Zealand and we need to protect them, not harm them.

What decisions and amendments would you like the council to make?

Decline the application for resource consent and send Watercare back to the drawing board on site selection.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5277] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Scott McKerrow

Organisation name:

Contact phone number: 0211006211

Email address: scottmckerrow@gmail.com

Postal address:
10 rimutaka place Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Destruction of the natural environment

What are the reasons for your submission?

It is the wrong location due to ecological damage

What decisions and amendments would you like the council to make?

Build it elsewhere

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5278] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Amanda Barnes

Organisation name:

Contact phone number: 0210359048

Email address: mandysewellmakin@hotmail.com

Postal address:
142 Woodlands Park Road Auckland Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Earthworks in a SEA Overlay Earthworks for construction of infrastructure Vegetation removal in a SEA Diversion of a river or stream Dewatering and groundwater Waitakere Ranges Heritage Area Overlay Development of new Impervious Areas & diversion and discharge of stormwater

What are the reasons for your submission?

I am making this submission as I live and work near the proposed site. I have lived in this area for 41 years, and have never seen such a scale of proposed destruction of bush such as what is proposed. This area is peaceful, we live here because it is green, it is covered in special dense bush, the trees mean a lot to us, the native bird life is all around us, we see lizards, and bugs. I work from home, I hear only a few buses a day go past, not many trucks, the predominant sound is birds. I could never have envisaged what is proposed at the site up the road. When I was young there were a couple of houses on the proposed replacement site, since they were demolished the bush has started to reclaim that land, I walk past it often, it is significant in that it marks the start of where we turn off towards home, the start of our road, Woodlands Park Road. I believe that if Auckland Council grants this application, that it could set a precedent for adverse cumulative effects. The proposed site allows for no future expansion, so will we be going through applications such as this in the future? If Watercare are allowed to remove significant areas of bush in the SEA, will others be able to? I am concerned that the proposal is inconsistent with the Objectives of the Waitakere Ranges Heritage Area Act. In particular the following items which are talked about in the Act: Is it of appropriate character, scale and intensity? Is the natural character of the site lost? Does the proposal detract from the landscape and is it typical of the existing area or type of built development within significant vegetation? Design size and scale is out of character with the surrounding landscape. Is the proposal sympathetically sited & designed? Does the development fit with the existing local neighbourhood character? The impact of the footprint in terms of impervious areas. Effects of development on ecological, landscape, natural character values & features – slope & stability. Scale, form, colour & appearance, retaining. How building relates to topography of the site. Visually integrated & sympathetic to surrounding landscape. The desired outcome is for the built development to remain subservient to the natural landscape for which the area is so highly valued. Character of the entry to the foothills. Earthworks: substantial & cumulative effects on the environment including look & feel of the landscape. Significantly altering topography and resulting in a loss of vegetation which would otherwise enhance the area's character and identity. Earthworks in sensitive areas that are easily eroded (such as steep slopes) are of particular concern. Part 8 State of the Waitakere Ranges Heritage Area 2018. Says it already manages weeds on both leased and owned land. So how can the proposed mitigation package be new mitigation? Council already imposes conditions on owners in SEA to control weeds as part of their conditions of resource consent, yet Watercare proposes to use this as their mitigation. Shouldn't this be something that Watercare already undertakes as part of owning land in an area such as this? EARTHWORKS Where is the proof that the existing ground is suitable for such a development? Shouldn't Watercare be undertaking extensive onsite geotechnical investigations to prove that the site is suitable. How can comments be made such as "the effects of the proposal on land stability are assessed as being no more than minor" when thorough geotechnical investigations are yet to be carried out? Size of the overall site, particularly the proposed Huia WTP site Lot 6 DP 156565, the scale and size of earthworks and vegetation removal, and then new impervious areas on this particular lot are out of scale with the surrounding areas. The loss of vegetation together with the new impervious areas will greatly alter the existing surrounding properties. Sediment going into streams and loss of natural streams. RULE E3.4.1(A19) Diversion of a stream, loss of the ecosystem due to this activity. Exhibition drive which has experienced many slips over the years, yet the reservoir is to be constructed, with a lot of excavation right below it, altering water tables. By allowing such a large amount of earthworks to go ahead, this in turn requires large amounts of retaining. The retaining will likely need a lot of concrete, it has already been stated in the "Indicative Construction Methodology" report by Alta that when there is concrete needed on site, they won't be able to limit the heavy vehicles at peak times. The adverse effects of this on the surrounding roads will be high. VEGETATION REMOVAL Is it the best site from an ecological viewpoint? In this time where climate change is so big on everyone's mind, what does this proposal say about Auckland Council's alignment with climate objectives? It goes against Auckland Council's objective of combating climate change, and their obligation under clause 1.1.8 of the Auckland Council CCO Accountability Policy. Vegetation removal, such a huge amount removed from one site, does this increase the risk of land slip? The ground has been described as "landslide slope deposits" in the reports. Risk of spread of Kauri dieback, particularly with the scale of work to be carried out, and in such close proximity to significant kauri. Notable trees schedule Auckland Unitary Plan Schedule 10 1836 Kauri. And 3 of the oldest kauri trees in the whole of the Auckland Region. Loss of vegetation and integrity of ecological corridors. "Very High" Ecological value. The site is very constrained, and therefore the large scale removal of vegetation would be required for the project, leaving little buffer zone to neighbouring properties. Effects of vegetation removal on wildlife. The proposal to remove wildlife and trees at particular seasons only, I can imagine that this adds a lot of extra time and money pressure to the project which could be avoided by choosing a site that is suitable, one that isn't covered in significant vegetation. Auckland Unitary Plan Chapter D9 removal of vegetation in an SEA. Avoid. This application ignores this. I believe that the proposed ecological mitigation and compensation package doesn't compensate for the irreversible damage to such a heritage feature. TRAFFIC I am concerned that our roads are not designed for industrial scale earthworks (and

construction) such as is proposed. The effects of the traffic on a community with a project such as is proposed should not be ignored. Becca Report states that by “preventing heavy trucks at these peak times will in any event address that effect” and that it will be “appropriate to limit heavy vehicle movements at peak times to assist in managing these effects”. It also says that where practicable that the peak times will be avoided. I can imagine that during the process that there are going to be many times when it won't be 'practicable' to avoid these times, the methodology of works addresses one of these: The methodology of works states that during concrete pours it will be “not possible to stop concrete truck movements during the AM peak”. We are not talking about a standard say year construction project which may usually be seen in this area, this project is to take place over many years, how can it be assessed as being of minor effects to residents, schools etc when we are going to have years and years of disruption. 1 truck every 5 minutes at some stages. Scenic drive has been closed, or one way traffic many times over the years due to slips, the same with areas of exhibition drive. The topography of this area is steep, it is prone to landslides, I am concerned that the chance of these may be increased by the vibrations and increase in heavy truck movements. Scenic drive may have been widened slightly in recent times, however there are still many corners, which needs to be taken into account, safety of school buses, and pedestrians walking along that road. Two heavy vehicles passing each other, a truck passing a bus. New road widening proposed will add even more inconvenience to traffic on top of the construction time. Concerned at the loss of carparks around the village, particularly if these are taken away for the to allow for the heavy vehicles. Already the approach into Titirangi from Green Bay and out is too narrow for a bus and truck to pass each other. Atkinson Road is also too narrow at all times of the day for two trucks to pass. If a bus is currently coming along there, anytime of the day, it is one way. I'm concerned about the increase in trucks going past my house in terms of vibration effects, and noise, I also work from home and am concerned about the increased disruptions from this application, not mention the increased risk of heavy trucks around my children walking to and from school, and also catching school buses in the near future. I'm very concerned for their safety on the school bus.

What decisions and amendments would you like the council to make?

Decline the application

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5279] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: MP Mears

Organisation name: -

Contact phone number: 098174223

Email address: idlechat@gmail.com

Postal address:

12 WaimaCres Titirangi auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I oppose all aspects of the application

What are the reasons for your submission?

concern for WIDER ENVIRONMENTAL IMPACT beyond the 'footprint 'of the actual plant. eg . to the WATER TABLE to any or every thing re the FLOOR of the near pristine VALLEY that the plant build is above and adjacent to .

What decisions and amendments would you like the council to make?

1]compensate those worst effected - manuka rd. 2] continue community 'watchdogs ' [such as LIASON groups TPG RATEPAYERS grps etc]for the life of the existing,new and future plant[s] 2] DISGUISE the plant as much as possible using EXCESS PLANTING around perimeter roading ,subtle colours for built structures etc 3] remove excess built structures [ie older ones near existing plant at top end WAIMA CRES] 4] 'have a mind to' the ONGOING SAFETY of all dangerous CHEMICALS stored possibly at the plant .

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5280] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: tara GEORGE

Organisation name:

Contact phone number: 0210541728

Email address: tarageorge95@gmail.com

Postal address:
12 Manuka Road AUCKLAND AUCKLAND 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

- The submitter opposes the Application.

What are the reasons for your submission?

I have lived in Titirangi with my daughter for over 14 years. Titirangi is a beautiful quiet village and can no longer cope with the proposed massive construction. it must be left alone so it can retain it's history and stunning forests and birds that make it so special. Watercare will ruin all this! Please please keep them from going ahead with this destruction. Dont damage titirangi please

What decisions and amendments would you like the council to make?

- The submitter seeks that the Application be declined in its entirety.
- Alternatively, if the Application is granted the submitter seeks conditions that mitigate the adverse effects on Manuka Road and Waima residents.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5281] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Douglas Austin Cowan

Organisation name:

Contact phone number: 021414693

Email address: doug@cowan.net.nz

Postal address:
486 New North Road Auckland Auckland 1021

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

All of it. I oppose the application in full. My submission relates to the whole of the application.

What are the reasons for your submission?

Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunneling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. My Submission: 1. I support and adopt the submission/petition to be filed by Titirangi Protection Group Incorporated. That submission forms part of this submission and a copy will be provided on request. 2. I support and adopt the submission of Natasha and Mark Carter and Keith Berman 3. The application should not be approved having regard to: (a) RMA Part 2; (b) The actual and potential effects on the natural environment of the proposed works; (c) The adverse effects on the environment which will be far more than minor and the policies and objectives of the Auckland Unitary Plan; (d) The inadequacy of the proposed mitigation measures. No mitigation can adequately compensate for the adverse effects of the works at these sites; (e) The inadequacy and ineffectiveness of the proposed conditions of approval. (f) The other statutory provisions relevant to this application. 4. The information provided with the application is inadequate and too rushed to enable a proper assessment of the effects of the proposed works, and to enable the submitters and Commissioners to ascertain whether adequate conditions can be formulated to address the adverse effects. This is, in part, because an inaccurately narrow view has been taken by the Applicant of the effects of the proposed works. Traffic effects, noise effects, landscape effects, ecology and heritage effects, and a wide range of other effects, including some construction effects, are directly effects of the proposed works. Those effects must be addressed and considered as part of this application. They must not be deferred to the OPW or left to numerous ex post facto "Plans" (as proposed in the Draft Conditions). 5. The proposed works will have and is already having a devastating effect on the social fabric of the Waima/Woodlands Park community including their safety, well-being, and health. Their neighbourhood will be part of a construction site for at least 8 years (not counting the inevitable cost and time overruns/delay). 6. The ecological discovery of a new species of native wasp is still 'in train' and the destruction of the land of the sites could lead to an unusual situation where a species gets discovered and wiped out in the first 1-2 years of that discovery. 7. The kanuka stands at the sites provide areas of fertile pollination for the bees in Waima and the beekeepers (in which there are a number) will be adversely effected. I ask that the Application be declined. I wish to be heard in support of my submission It is important to me that the functions, powers, and duties to hear and decide the application be delegated to at least 2 commissioners who are not members of Council (independent nature of the appointments being paramount). However I would like to be consulted as to who are the proposed Commissioners prior to their appointment.

What decisions and amendments would you like the council to make?

Decline the application in its totality. Direct that Watercare looks for far better alternative sites that do not mean the removal of possibly contaminated soil, destruction of precious native flora and tie up a whole community with its primary egress point from and to the community at large with over 100 truck movements a day and workman and work woman's vehicles (i.e go back to the 'long list' of sites).

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5282] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Rita Steel

Organisation name:

Contact phone number: 0212424543

Email address: Ritasteel.nz@gmail.com

Postal address:
771 West Coast Rd Oratia Waitakere 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

- Removal of mature native forest vegetation - Disturbance and movement of soil - Disturbance of a stream - There are no associated costs and CBA with which such public decisions should be made - The proposed interruption to residents and wildlife in the area

What are the reasons for your submission?

- removing healthy Kauri of any size in this current Kauri Die Back epidemic is counter intuitive - especially as the public have put their money where their mouths are (via targeted rate) in order to save them. - Combined with the loosening of tree felling rules the Waitakere Area is seeing huge amounts of forest loss. This trend should not be encouraged by council in any way shape or form. And this sort of mass destruction is exactly what we want to avoid. - Movement of soil is likely to affect downstream overland flows, impacting other trees who will either get less or too much water with the new changes - threatening their health. - Movement of soil is also likely to increase the risk of Kauri Die Back for trees that remain in the area nearby. - Although this area has been zoned for Watercare - like the rest of the residents in the area, when the Waitakere Heritage Area Act came in - we lost a lot of land right privileges in order to benefit wider Auckland with the ecological services the ranges bring. I do not know why Watercare would be any different in losing that old status. - The development is not in line many (if any) of our guiding policies, conventions or laws: The development itself is VERY much so outside the WHA Act principles, not only in design but in concept. It is outside our obligations under the UN Sustainability conventions we have signed up to as this is not a sustainable (large areas of established forests being bulldozed for a small 12% increases on existing plant capacity). The council have recently declared a climate emergency - felling healthy, established trees is again working against that policy. This is not an integrated Water Management Strategy and will leave us more vulnerable to climate change, - There does not appear to be a Cost Benefit Analysis done - this document should be weighing up the public cost of this and the willingness to pay for the intact forests - of which Aucklanders have already showed a WTP for healthy forests in the recent voting on a targeted rate for ecosystem health. - Although mitigation of lost forests has been offered there is no detail on the ecological value of this area as it stands; ecological services that it provides including but not limited to: mitigation of soil erosion, Carbon sequestering, pollution filtration (both air and water), wind control, pollination (for non self fertilising trees), gene diversity, habitat for native and endemic species. Therefore how has the "mitigation" been calculated? Large established stands of trees such as this have a much higher value than seedlings - but without this analysis - you cannot know what it will take to mitigate. This is not best practise development at all. - This is not a sustainable model. When the dams run low - than what; more dams? more treatment plants? This linear model has been proven to be unsustainable and if we, a wealthy city with obligation to be sustainable, cannot prove our sustainability - than who can and what is our future??

What decisions and amendments would you like the council to make?

To reject this plan in its entirety and request that Watercare looks for alternative solutions that meet existing policies and conventions that we have signed up for. In particular please look at Water Recycling Plants in the vicinity of new growth in Auckland (North west in particular where there is land to do so). This is how large, fast growing wealthy cities with water scarcity (which Auckland will eventually get to) are dealing with it. Water recycling plants can treat water to a level that can be used for Looking at Rouse Hill in North West Sydney - which services 32,000 homes treating 20 ML per day (more than this plants increased capacity) supplying tertiary treated water to homes for non drinking purposes eg. flushing toilets, irrigation etc.,. Only 1-3% of water is actually used for drinking in the home. new homes are built with Dual plumbing. The additional cost to each home build is around \$4,000-5,000 but it has been shown that the homes value increases by at least that due to the dual reticulation system making the developments more resilient to climate change. This gives Watercare an opportunity to work with developers to create a more resilient integrated water management strategy.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5283] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Kati Chapman

Organisation name:

Contact phone number: 0220310699

Email address: kati_chapman@hotmail.com

Postal address:
69 Shetland st, Auckland Glen Eden Auckland 0602

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The location of the new plant

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

Think about relocating somewhere else

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5284] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Eden Sofia Fitter

Organisation name:

Contact phone number: 098168528

Email address: hellojakeandmegan@hotmail.com

Postal address:
198a Huia Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Vegetation removal, earthworks, stream diversion

What are the reasons for your submission?

Personally, I think all the kids walking home from school, will stop because of this water treatment plant. Which is bad for pollution coming from cars. Another risk is child safety, if they carry on walking home, will it be safe? Noise is a huge factor too. People in homes near the new water treatment will not be able to sleep, including their children, which will make them tired at school, and not be able to learn. Kids that walk to the dairy after school (because they either meet their parents there, or want a snack) will have trouble going to the Woodlands Park Dairy and add a little bit more to the pollution problem!

What decisions and amendments would you like the council to make?

say NO

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5285] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Jim Aikman

Organisation name:

Contact phone number: 09 817 5672

Email address: jakaikman@xtra.co.nz

Postal address:
35 Waima Crescent Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The new planned Watercare ais The new Watercare area is in the S.E.A. (sensitive environment area) Also in Heritage area Involves clearing of large area of forest

What are the reasons for your submission?

Felling of Kauri, Kahikatea, Kanuka & Rimu etc

What decisions and amendments would you like the council to make?

Consider other options eg Waste Dump (off Huia Road)

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5286] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: mark Stephen

Organisation name:

Contact phone number: 021859385

Email address: design@markstephen.co.nz

Postal address:

23 Landing Road titirangi auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Our submission relates to the whole of the application.

What are the reasons for your submission?

We support and adopt the submission/petition to be filed by Titirangi Protection Group Incorporated. That submission forms part of this submission and a copy will be provided on request. The application should not be approved having regard to: RMA Part 2; The actual and potential effects on the environment of the proposed works; The adverse effects on the environment which will be more than minor and the policies and objectives of the Auckland Unitary Plan; The inadequacy of the proposed mitigation measures. No mitigation can adequately compensate for the adverse effects of the works; The inadequacy and ineffectiveness of the proposed conditions of approval. The other statutory provisions relevant to this application. The information provided with the application is inadequate to enable a proper assessment of the effects of the proposed works, and to enable the submitters and Commissioners to ascertain whether adequate conditions can be formulated to address the adverse effects. This is, in part, because an inaccurately narrow view has been taken by the Applicant of the effects of the proposed works. Traffic effects, noise effects, landscape effects, ecology and heritage effects, and a wide range of other effects, including some construction effects, are directly effects of the proposed works. Those effects must addressed and considered as part of this application. They must not be deferred to the OPW or left to numerous ex post facto "Plans" (as proposed in the Draft Conditions). The proposed works will have and is already having a devastating effect on the social fabric of the Waima/Woodlands Park community including their safety, well-being, and health. Their neighbourhood will be part of a construction site for at least 8 years (and recently what project has been finished on schedule?). We ask that the Application be declined.

What decisions and amendments would you like the council to make?

I seek that the application be declined in its entirety

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

2 September 2019

Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1142

Watercare Services Limited
Private Bag 92521
Wellesley Street
Auckland 1141

Kei te rangatira, tēnā koe,

**Huia Replacement Water Treatment Plant Project – Application for resource consents –
Submission of the Director-General of Conservation**

Please find enclosed a submission by the Director-General of Conservation on Watercare Services Limited's notified application for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project.

The Director-General's submission identifies concerns about potential adverse effects on threatened indigenous species and other terrestrial and freshwater biodiversity. Proposed mitigation is inadequate to ensure potential effects are avoided, remedied or mitigated, offset or compensated for.

The Director-General is not opposed to the proposal in principle and is willing to work collaboratively with the applicant and other parties to better understand and manage potential adverse effects associated with the proposal.

Please contact Maggie Burns (RMA Planner) in the first instance if you wish to discuss any of the matters raised in this submission (email mburns@doc.govt.nz or phone 027 632 2961).

Nāku noa, nā



Kirsty Prior
Operations Manager
Tāmaki Makaurau / Auckland Mainland

Submission on publicly notified application for the Huia Replacement Water Treatment Plant project

Resource Management Act 1991

To: Auckland Council

Name of submitter: Lou Sanson, Director-General of Conservation/ Te Papa Atawhai

Applicant: Watercare Services Limited

Submission on: Application for resource consents for earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project.

Application number: BUN60339273

Trade competition: I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

My submission relates to: The whole application, but in particular the parts relating to potential adverse effects on long-tailed bats, herpetofauna (lizards and frogs), freshwater ecosystems, kauri (including kauri die-back) and ecological mitigation and compensation and offset proposals.

My submission is: I oppose the application

Director-General's interest in the application

1. The Director-General of Conservation ('the Director-General') has all the powers reasonably necessary to enable the Department of Conservation ('the Department') to perform its functions.¹ A function of the Department is to advocate for the conservation of natural and historic resources generally.² Section 2 of the Conservation Act 1987 defines 'conservation' to mean *'the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations'*.

Reasons for Director-General's submission

2. The applicant has not provided sufficient information to satisfy the Council or persons interested in the proposal that the proposal promotes sustainable management, adequately avoids, remedies or mitigates adverse effects, and appropriately provides for the other matters in Part 2 of the Resource Management Act 1991 (the Act), including in particular the matters of national importance listed in Section 6 of the Act, specifically:

c) The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:

3. I am concerned that the proposal does not adequately address:
 - a. Potential effects on indigenous biodiversity, particularly,
 - i. Vegetation loss
 - ii. Long-tailed bats
 - iii. Herpetofauna
 - iv. Freshwater
 - v. Kauri, with regard to the spread of kauri dieback disease
 - b. How the proposal will avoid, remedy or mitigate potential adverse effects
 - c. How the proposal will offset or compensate for residual adverse effects.

¹ Refer section 53 Conservation Act 1987

² Refer section 6(b) Conservation Act 1987

4. The proposed site has a high level of ecological value. The site is within a Significant Ecological Area (SEA) overlay in the Auckland Unitary Plan and an assessment of indigenous vegetation within the project site concluded that it meets the Auckland Unitary Plan SNA criteria.
5. The proposal will result in the loss of 3.5 hectares of significant indigenous forest and scrub vegetation assessed by the applicant as having very high ecological value. There are therefore a number of faunal associations between soil, vegetation, invertebrates and other fauna which indicate that the site is a high quality ecosystem. The area is also a significant ecological corridor which forms linkages for wildlife with the adjoining parkland. Potential adverse effects on indigenous habitat and species must therefore be appropriately understood to ensure there are appropriately managed.
6. The site is home to nationally threatened taxa including kauri, pohutakawa, kanuka, and manuka. It contains a diversity of forest types, including threatened ecosystem types (regenerating kauri forest, broadleaved forest and kahikatea-swamp maire forest) and nationally and regionally threatened species.
7. There are currently a number of information gaps and inconsistencies associated with the proposal and its methodology of assessment. The current mitigation and offsetting package is also considered insufficient to appropriately remedy or mitigate and, where there are residual effects, offset and compensate adverse effects on significant indigenous flora and significant habitats of indigenous fauna. My main areas of concern are potential effects on long-tailed bats, herpetofauna, kauri (including through the spread of kauri dieback) and freshwater ecosystems.

Long-tailed bats

8. Long-tailed bats are absolutely protected under the Wildlife Act 1953 which is administered by the Department. It is an offence to disturb, capture or kill bats under the Wildlife Act, and approvals can only be granted for activities which are consistent with the purpose of the Wildlife Act, i.e. the protection of wildlife.
9. The applicant's long-tailed bat survey and assessment is considered inadequate as it lacks key information on the potential adverse effects on long-tailed bats as a result of the proposed activity.

10. The interpretation of bat survey results is also considered inadequate and potentially underestimates the presence of maternity roosts for bats.
11. The applicant has concluded from the results of the ABM surveys, that there is a “*very small risk of direct mortality via removal of occupied solitary day roosts during vegetation clearance.*” It is not clear how that conclusion was reached, as an assessment of the number of potential bat roost trees within the construction footprint has not been provided to allow a full assessment of the potential adverse effects of potential roost tree removal on long-tailed bats.
12. Other adverse effects of the proposed vegetation clearance on long-tailed bats have not been considered, including:
 - Habitat loss of roosts, foraging areas and commuting routes
 - Potential effects of noise
 - Potential effects of artificial light
 - Potential effects as a result of the creation of habitat edges
 - Changes in behaviour as a result of all of the above.
13. Connectivity across the landscape is a particular concern due to the ecological significance of the site as an ecological corridor and part of a network of habitats.
14. Functional loss may occur where a feature such as a roost, is present but is no longer used due to changes associated with the development. In the case of this project, roosts in large trees adjacent to the project footprint may be abandoned due to proposed works, or potential roosts to the south and east of the project site may be abandoned due to reduction in connectivity caused by vegetation clearance.

Herpetofauna

15. Indigenous herpetofauna are also protected under the Wildlife Act. The assessment of herpetofauna habitat values undertaken by the applicant also contains an inadequate level of information and is considered insufficient to quantify potential adverse effects on lizard and frog species.

16. The desktop assessment in the Ecological report does not provide a full herpetofaunal context for the site. The report focusses on lizards and omits to note the presence of a population of the indigenous Hochstetter's frog (*Leiopelma hochstetteri*; At Risk-Declining) within five kilometres of the site. More detail should be provided regarding how habitats were assessed and deemed unsuitable for this species. If they are present, any potential adverse effects on frogs will need to be appropriately managed
17. There are a number of key errors identified in the applicant's Ecological assessment report, including inconsistencies with use of scales. In addition, some species found within 5, 10, or 20 kilometres of the Project Site have been excluded from the herpetofauna assessment.
18. Additionally, multiple records of Pacific gecko (*Dactylochnemis pacificus*; At Risk-Relict) within five kilometres of the project area have been omitted from the assessment.
19. Table 9 (p.35) of the Ecological assessment report lists lizard records for five species "within a 10km radius of the proposed Huia WTP site". An independent review of the Department of Conservation Bioweb Database and Auckland Council's lizard record database revealed that 45 records of six species are present within a five kilometre radius of the project site, and at least 160 records of six species are present within 10 kilometres.
20. The lizard and frog survey undertaken does not provide adequate certainty associated with the actual species diversity and abundance within the project area. The adverse effects of the project on herpetofauna therefore appear to have been underestimated in respect of a number of species, and is not able to be relied on as a true reflection of potential adverse effects on herpetofauna. As a consequence, it is not possible to determine whether the measures proposed by the applicant adequately or appropriately address effects on herpetofauna.

Freshwater

21. Insufficient information is provided about proposed works within the riparian margins of the permanent section of the Armstrong Stream. The lack of detail regarding how far works will extend into the riparian margin is concerning. With the current information gaps, it is not possible to fully understand the potential ecological effects of works within the riparian margin of Armstrong Stream. There is inadequate information included in the Section 92 response to assess the appropriateness of the diversion channel or ensure the effects are appropriately managed.

22. Little information has been provided for clearance of vegetation and construction works within the riparian margin of the permanent watercourses. The applicant's section 92 further information on this issue (page 3 of the Tonkin & Taylor 9 August 2019 letter) is inadequate, and in the absence of an appropriate assessment of effects it is not possible to quantify potential effects on freshwater values. It is not appropriate to leave this issue to management plans that are to be prepared by the applicant following the grant of resource consents.

Catchment scale effects

23. The applicant considers that the proposed vegetation clearance "constitutes a small peripheral part of a much larger natural area, the integrity of which will not be undermined as a result of the proposed development" (Ecological Assessment report, Section 6.3, p71). This statement is then moderated in the following paragraph where it is acknowledged that works will result in localised fragmentation of a relatively intact vegetated corridor in the upper Little Muddy Creek catchment. This will reduce connectivity through an already fragmented landscape.

24. The ecological effects of reduced connectivity across the landscape have not been adequately discussed. A key area of concern is potential effects on long-tailed bats, as discussed above.

Kauri Dieback

25. Vegetation survey results undertaken by the applicant show that Kauri are present within the project footprint of the proposed water treatment plant. Kauri also occurs in adjacent forest.

26. Kauri dieback, (*Phytophthora agathidicida*) is thought to be present in the surrounding landscape and, consequently likely to be present within the project footprint, including within current vegetation within the proposed water treatment plant and Reservoir 1 sites.

27. The plan contains two Kauri Dieback protocols one which applies to Kauri greater than 20cm diameter, (KCZ, Section 4.10.2,) and a general kauri dieback protocol for site. However, as the applicant's assessment has been prepared on the basis that no kauri have been found within the development site with diameter greater than 20cm, only general kauri dieback protocols are proposed to apply.

28. The applicant's Ecological Assessment report however notes that there is a mature kauri within the project footprint (page 97) and that emergent large kauri are present in the Armstrong Gully area.
29. Given that Kauri seedlings and larger kauri occur within the site, and that Kauri dieback has potentially other hosts, Kauri control zone controls protocols should be used across the entire site. In addition, the National Kauri Dieback Programme has developed several protocols particularly the guidelines such as Working around Kauri, Tree removal and pruning, Land disturbance activities (including earthworks) around kauri, Vehicle and Heavy Machinery Hygiene guidelines. The guidelines developed by the Kauri Dieback programmes should apply to the entire site and mitigation, and referenced in Section 4.10.2 and controls.

Ecological Mitigation, Offset and Compensation

30. The application as it stands contains inadequate information and insufficient measures to effectively avoid, remedy or mitigate, where there are residual effects, offset and compensate adverse effects on terrestrial and freshwater biodiversity.
31. Ecological impacts have been considered in the site selection process, and the mitigation hierarchy has been attempted, however, the current mitigation package is considered to be insufficient and is more aspirational than practical in nature. The applicant's current proposed management measures do not provide confidence that adverse effects are adequately understood and can therefore be addressed.
32. There are a number of outstanding issues with the proposed mitigation package, which are discussed in more detail below.
33. The whole project site is within the Parkland Buffer, where control of various pest plant species is to be undertaken by Auckland Council. Control of these species is therefore not additional to currently planned work, and should not be included in the applicant's mitigation package.
34. The assessment of adverse effects on long-tailed bats is incomplete and further measures may be required. Current proposed mitigation, in the form of pre-clearance surveys are likely to be inadequate following a more thorough assessment of effects. All reasonably possible measures need to be taken to ensure adverse effects on long-tailed bats are avoided.

35. Explanation of the proposed mitigation measures for lizards is cursory, and it is unclear whether and how effects on lizards will be effectively managed.

Planning assessment

36. The proposal in its current form is inconsistent with objectives and policies in the Auckland Unitary Plan and does not adequately recognise and provide for matters of national importance in the Act, specifically section 6(c).

37. Policy D9.3 (1) of the Auckland unitary plan requires the management of effects of activities on indigenous biodiversity values of areas identified as significant ecological areas (SEAs) by adopting a mitigation hierarchy of avoidance then remediation, mitigation and consideration of the appropriateness of offsetting any residual effects.

38. As discussed above, the applications use of the mitigation hierarchy is flawed and further work is required to ensure the application is consistent with offsetting principles in its approach (as detailed in Appendix 8 of the Auckland Unitary Plan). The application is therefore currently inconsistent with this policy.

39. Policy D9.3 (2) identifies adverse effects on indigenous biodiversity values in SEAs that are required to be avoided, remedied, mitigated or offset. Given the ecological significance of the site, the following values identified in the policy are relevant.

- a) fragmentation of, or a reduction in the size and extent of, indigenous ecosystems and the habitats of indigenous species;*
- b) fragmentation or disruption of connections between ecosystems or habitats;*
- c) changes which result in increased threats from pests on indigenous biodiversity and ecosystems;*
- d) loss of a rare or threatened individual, species population or habitat; and*
- e) a reduction in the abundance of individuals within a population, or natural diversity of indigenous vegetation and habitats of indigenous fauna;*

It is therefore imperative that the proposal adequately avoids, remedies, mitigates or offset the above adverse effects.

The Director-General seeks the following decisions from the consent authority:

I seek the following:

- a) That the consent authority **declines the application**, given the shortcomings identified above; or
- b) If the consent authority is minded to grant the application, that it imposes the following requirements:
 - i) Additional information is provided by the applicant to enable the consent authority and interested persons to understand and quantify potential adverse effects on indigenous biodiversity as discussed above.
 - ii) Suitable conditions to ensure the above concerns are adequately and appropriately addressed.
 - iii) Suitable conditions to ensure best practice kauri dieback protocols are used to avoid further spread of the disease, and the Department is consulted in the preparation of the conditions.
 - iv) A comprehensive approach to managing effects, prioritising measures to avoid, remedy then mitigate adverse effects, and, where there are residual effects, offsetting or (when offsetting cannot be achieved) environmental compensation. Conditions should require the applicant to consult with the Department, including on the preparation of ecological management plans (which should not be left for the applicant to prepare post-grant of consents and without the opportunity for interested persons to provide input), and any fish passage issues.
- c) Such alternative and/or additional relief as may be necessary and appropriate to address my concerns.

I wish to be heard in support of my submission.

If others make a similar submission, I will consider presenting a joint case at hearing.

A copy of this submission has been served on the applicant.



.....
Kirsty Prior
Operations Manager
Auckland
Pursuant to a delegation by the Director-General
of Conservation

Address for service:
RMA Shared Services
Department of Conservation
Private Bag 3072
Hamilton 3240
Attn: Maggie Burns
Ph: 027 632 2961
email: mburns@doc.govt.nz

Date: 2 September 2019

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011.

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:16 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5287] Submission received on notified resource consent
Attachments: Submission by Director-General of Conservation on Huia Water Treatment Plant - BUN60339273 - DOC-6056883.pdf

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Maggie Burns

Organisation name: Department of Conservation

Contact phone number: 027 632 2961

Email address: mburns@doc.govt.nz

Postal address:

RMA Shared Services, Department of Conservation, Private Bag 3072, Hamilton Central, 3240, Hamilton 3240

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Please refer to the attached submission.

What are the reasons for your submission?

Please refer to the attached submission.

What decisions and amendments would you like the council to make?

Please refer to the attached submission.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Submission by Director-General of Conservation on Huia Water Treatment Plant - BUN60339273 - DOC-6056883.pdf

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5288] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Arie Hinton

Organisation name:

Contact phone number: 02102351166

Email address: belynda_g@yahoo.com

Postal address:
16 Waima Crescent Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I oppose the application in whole

What are the reasons for your submission?

There should be a law that you can't cut down trees. Because it's really bad. And it's bad for the planet. And they're homes for birds and other high place animals like bats. And it's stupid. Arie is 4 years old and this proposal would have a huge negative impact on his life until he's a teenager. It would mean that he'd be unable to walk to school, that his favourite local track, Exhibition Drive would no longer be available for bike rides and walks and that he'd have to witness the horror of his beloved forest slowly being destroyed. Arie has learnt at kindergarten and at home about kaitiakitanga. He has helped at local planting days, knows he needs to scrub his boots before going anywhere near the kauri in our backyard and helped to inform people about the rāhui and keep them off the tracks before council closed them. He doesn't understand why adults are even considering 'removing vegetation' and has asked if there is somewhere without native trees that Watercare could build instead. We've told him that there is. He thinks they should go there or come up with a better plan.

What decisions and amendments would you like the council to make?

I'd like them to tell Watercare that it's stupid. They have to go away. And not cut down the forest. Basically he'd like them to decline the application and tell Watercare to find somewhere smarter.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5289] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Barrie-John Partridge

Organisation name:

Contact phone number: 0212941078

Email address: bjpartridgelaw@gmail.com

Postal address:
15A Cajero Place Green Bay Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

This submission relates to the whole of the application. I oppose the application in its entirety.

What are the reasons for your submission?

The impact of the construction on our community are far beyond any benefit received. There are better locations that the applied for activity could take place. There are significant environmental impacts applied for that will negatively impact the area.

What decisions and amendments would you like the council to make?

I seek that the application be rejected in its entirety.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5290] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Divya Simone Karippail

Organisation name:

Contact phone number: 0273187053

Email address: divya.karippail@gbhs.school.nz

Postal address:
11 Terracotta Drive, Blockhouse Bay Blockhouse Bay Auckland 0600

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I disagree with the process of cutting down over 3 hectares of native bush and tree, which is home to many animals as well as sustains our ecosystem in order to build a water plant, to give water to the citizens of North Shore.

What are the reasons for your submission?

I have friends and family living in Titirangi, who will be greatly affected by the development of this water plant. Not only will the building of it negatively affect them, they do not receive any benefits as the water is going to the North Shore. Additionally, I care greatly about the environment and believe that there has to be a better and more ecological way to solve this issue, besides destroying hectares of habitat and native trees. The Earth's ecosystem is suffering enough, without this adding to it.

What decisions and amendments would you like the council to make?

To find a better place to build this water treatment plant, one closer to the North Shore seeing as they will be the ones receiving the benefits. We need to protect our native plants, as well as our native species and our environment as a whole. Find somewhere else to build this plant, somewhere that will not disrupt the lives of Titirangi citizens as well as destroy the environment.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5291] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: sarah johnson

Organisation name: Rawstorne Limited

Contact phone number: +64211429452

Email address: sarah@rawstornestudio.com

Postal address:
37 Landing Road Titirangi Auckland Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Im local resident and business owner who will be affected by new 'SHORT TERM' solution development on many levels Such as : Traffic increase (Huia Rd will become even more jammed - therefore ability to get to meetings and have clients reach us for meetings weill be seriously impacted) Short term and long term environmental impact - specifically culverting the streams. We are just metres away from this stream where years of community initiatives have been looking to restore these streams the removal of 3.5h - in an area thats already seriously compromised with kauri dieback would seem completely insane We live below the proposed site - and are deeply proposed to the onsite chemicals being stored

What are the reasons for your submission?

see above

What decisions and amendments would you like the council to make?

cancel it - and using the amazing innovative capabilities - find a more long term and sustainable solution

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5292] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Matthew Phang

Organisation name:

Contact phone number: 0211330506

Email address: mpha64@gmail.com

Postal address:
16 Piko Lane Hobsonville Auckland 0618

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Vegetation removal across up to 3.5 hectares

What are the reasons for your submission?

This vegetation includes protected, mature native bush, including threatened kauri. This site is classed as a significant ecological area (SEA) in the Councils Unitary Plan as well as being in a regional park and under the protection of the Waitakere Ranges Heritage Act. Impacts on all the wildlife that rely on this native bush for their home or as a connection between their chosen habitats.

What decisions and amendments would you like the council to make?

Use smarter design thinking to utilise more of the footprint of the existing plant to avoid the destruction of 3.5 hectares of SEA native bush. Locate the two reservoirs closer to where the water will be used in north-west Auckland. Review the original long list of site options. With smarter design thinking to achieve a smaller footprint, more of these options will be feasible.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5293] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: John Bradley

Organisation name:

Contact phone number: 021994886

Email address: whynoti@hotmail.com

Postal address:
P O Box 60601 Titirangi Waitakere 0642

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The location of the Water Treatment Plant and the destruction of native bush.

What are the reasons for your submission?

Concerned Aucklander.

What decisions and amendments would you like the council to make?

To whom it may concern: It is of great concern to me, that in 2019, an organisation would apply to destroy native bush and construct an industrial plant in a nature reserve. This is regardless of the organisation. I understand that the land is watercare owned and was apparently always intended for such use. A location with an intention of use is not left for decades for plant and animal life to become well established. The management of such site, for potential future use, would be to discourage plants and animals to minimise future environmental impact. Whilst I realise the management of Watercare does not feature in this submission, it should be noted that as no consideration for the environment is being given, it begs one to question how other sites within the Waitakere Ranges and within Watercares grasp are being mismanaged from an environmental perspective. Why do I live and work in Titirangi? Because of the stunning natural beauty and the community. To live in this location is a gift which I am eternally grateful for. The subdivision which is taking place elsewhere in Auckland, does not appear here, one reason being the protected status of the ranges and the love the locals have for the environment. You won't find the hillside littered with minute sections, that's not why people come here. New Zealand presents a clean green and pure image for tourism. If the infestation of rats into Titirangi made global news, then we can be assured that the destruction of native bush in a protected zone will too. As the construction of this project is stretching towards the decade mark, that is a decade long scar on the New Zealands Pure Image. Unfortunately, once an image is destroyed, it is exceptionally hard to rebuild. Has the potential damage to New Zealand's reputation been factored in? Lastly, a climate emergency has been declared, both here and abroad. How does this destruction tie in with that? I am absolutely against all aspects of the intended destruction.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:31 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5294] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Donna Schussler

Organisation name:

Contact phone number: 0274114862

Email address: glennsdemise@hotmail.com

Postal address:
172 Woodlands Park Rd Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

vegetation, earthworks, stream, contamination, site selection process

What are the reasons for your submission?

I oppose the resource consent application to replace the water treatment plant. This is a significant ecological area 'SEA' in the Auckland Unitary Plan 'AUP'. Considering the meaning of SEA and the fact there are a small number of sites that meet all 5 criterium, this application should never had made it as far as the Council. It defies belief that a company can even suggest felling 3.5ha of healthy forest and irreversibly destroy a Kahikatea Wetlands along with cutting all trees and releasing all the stored carbon. Auckland Council must not agree to this resource consent. They declared a climate emergency, are advertising planting a million trees and under the AUP (D9 – SEA Overlay) it clearly says this exact thing should be avoided. Watercare left the site to regenerate and that is what it has done, it is not the right site. Bush has been Customarily closed to protect healthy trees due to Kauri dieback issues and the applicant is applying to fell healthy trees. Years of investment of time and money have been spent on the downstream water quality, weed and pest control measures and all will be destroyed by this intervention if Council grants the Resource consent. There are rare eels, wasps, frogs, snails, fish, and other sensitive species that won't survive. Watercare can not re-home them. Watercare can offer no mitigation sufficient or acceptable for the proposed loss of a high quality SEA and its inhabitants. In fact, did you know, Watercare originally offered the locals who attended a meeting (which was not well-advertised) mitigation in the form of a pine forest already in their possession in Hunua! The pine forest is an investment, not mitigation. The community was shocked at finding the Clark's Bush track area was not council-owned and Watercare had intentions of using it for water supply purposes. No LIMS showed this information and it was not publicly available. No one could have forecast this turn of events. The closest residents on Manuka Road have not been offered a buffer zone, the same as which other short-listed sites were offered and the new plant will end up infringing on their lives in ways that are not as they would ever have expected when they moved into bush-clad Waima. Council and government officials interferred with the site selection process, unethically. The applicant's own evaluations showed this site didn't make the initial short-lists and criteria were altered to allow it back in. They admit to not believing the site is the best option. The difficulty of the site will blow costs and timeframes out beyond anything currently accounted for. The traffic on our narrow local roads will be every day, 6 days a week for 8 years – probably longer when it runs over and past budget. The roads are very obviously not designed for carrying huge trucks and the trucks driving to the site will pass up to 11 schools and childcare centres. Scenic Drive is a popluar route for cyclists, who will be at risk with the increased truck movements, as will the buses and pedestrians on the narrow road. It is also an access point for tourism companies out to the West Coast Beaches. Tourists come for the Waitakeres, not for the WTP and construction zones. Insurance companies have advised local residents that damage to homes and buildings caused by truck vibrations will have to be paid by Watercare or Council, blowing out estimated project costs even further. We are being asked to pay all this money to replace a plant that can only increase the capacity from 126mld to 140mld and the site has no potential for expansion, as the site simply is not large enough to offer anything more. Statements made by the applicant indicate they are already aware of this, as well as their need to further expand their systems further. It makes more sense to do this right the first time and put it somewhere where they can have an easier – and therefore more cost effective- site from the start, that allows future-proofing and doesn't go against everything the Council has been stating over recent years. Please decline the application.

What decisions and amendments would you like the council to make?

Decline the application in full and advise the applicant to find a site with less effects to community and environment

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5295] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Jennifer Joy Gibson

Organisation name:

Contact phone number: 021814995

Email address: jengbsn@hotmail.co.nz

Postal address:
51 Paturoa Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

VEGETATION REMOVAL AND EARTHWORKS The proposed environmental destruction is thoroughly irresponsible at a time of growing worldwide concern about loss of forest cover, degradation of the environment, and decreasing biodiversity (all as a result of human activity). It also appears to be inconsistent with the Auckland Unitary Plan and the climate emergency declared by Auckland Council earlier this year. The proposed vegetation removal will destroy an area that has been recognised as a Significant Ecological Area with rich biodiversity, including native bush, and a number of rare and endangered species, including some that have not been found elsewhere. Our local bush and streams and the species that live in both of them are irreplaceable. Watercare's weak mitigation programme seems to offer little more than local neighbourhood networks are already doing with pest control on private properties, weed removal and replanting programmes, etc, and can in no way make up for what will be lost. In addition to the permanent loss of the diverse ecosystem in the affected area, the removal of thousands of trees (including countless kauri) and tens of thousands of truckloads of earth pose a significant threat for spreading kauri dieback, through run off downhill from the site, and further afield on vehicle tyres, equipment, dumped vegetation and soil, etc. It is hard to rationalise this with the Council's attitudes towards protecting our precious kauri which includes locking individuals out of much of the Waitakere Ranges and even closing short access paths between streets in residential areas adjacent to the Waitakere Ranges. Closer to home, many of the residents of Waima, Titirangi and surrounding suburbs have like myself chosen to live in this area to be close to nature, and enjoy peace, quiet and birdsong. Being in and around nature has enormous benefits for both physical and mental health. Many like to enjoy the Village amenities, walking children or dogs in the neighbourhood, or having a cup of coffee or a bite to eat outside a local café. The loss of local forest, and the noise and heavy traffic generated during the earthworks and vegetation removal process for six days per week for years on end will totally destroy residents' quiet enjoyment of their homes and surroundings. It will also negatively impact the unique character of Titirangi Village that is the gateway to the Waitakere Ranges and the west coast beaches for tourists and other Aucklanders, which may have a negative impact on local businesses. The proposed site may be convenient but there are so many reasons why it is a bad idea. I've touched on just a few of those that matter most to me.

What are the reasons for your submission?

I am a concerned resident and global citizen.

What decisions and amendments would you like the council to make?

I would like the council to decline consent for the earthworks and vegetation removal on the proposed site and instruct Watercare to locate an alternative site that will not have such significant ecological impact.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5296] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Sarah Fearnside

Organisation name:

Contact phone number: 021394999

Email address: salfearnside@gmail.com

Postal address:
1 Boylan Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I oppose the application in its entirety

What are the reasons for your submission?

The impact on the environment, including the kauri, flora and fauna in the area to be cleared will be catastrophic. The biodiversity of this area, and the fact that Auckland Council have declared a climate emergency as of June 11 2019 is further support that we don't need to be cutting down more trees in today's current world. I am concerned by the hypocrisy of local government who have closed Clark's Bush to protect the kauri yet are going to chop down the same kauri to make way for the water treatment plant. Do we care about these native trees or not? I, as a resident and native of this country, care about these trees and their continued protection. The negative impact on the native bird population will be irreversible. Tui, Kereru, Piwakawaka and Morepork are among the well-known birds in this area who will be affected if this project goes ahead. The impact on local residents in terms of traffic disruption, the noise and tremors from the construction, for the next eight years will be highly stressful and ruin our quality of life. Any heavy truck that passes through Woodlands Park Road emits shudders that rattle our house and disturb sleep. The danger to pedestrians and the proximity to the local school are both concerning.

What decisions and amendments would you like the council to make?

I would like the council to investigate another site with less environmental, emotional and social impact than the current site.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5297] Submission received on notified resource consent
Attachments: Waitakere Ranges Local Board -Feedback Huia Water Treatment Plant resource consent.pdf

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Greg Presland

Organisation name: Waitakere Ranges Local Board

Contact phone number: 09 813 9150

Email address: Sharon.Davies@aucklandcouncil.govt.nz

Postal address:

Private Bag 92300 Auckland Auckland 1142

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

See attached

What are the reasons for your submission?

See attached

What decisions and amendments would you like the council to make?

See attached

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Waitakere Ranges Local Board -Feedback Huia Water Treatment Plant resource consent.pdf

2 September 2019

Feedback on:

**Replacement Huia Water Treatment Plant and Reservoirs consent application -
BUN60339273**

LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441

The Waitakere Ranges Local Board is responsible for identifying and communicating the interests and preferences of the people in its local board area.

Following is our input to the consent application by Watercare. This relates to the environmental, heritage and social impacts of the proposal.

We would like to be heard at the hearing.

Summary

- a) We oppose the application in its current form.
- b) We note the proposed development is in the Waitakere Ranges Heritage Area and is adjacent to regional parkland and our view is that it is inconsistent with the objectives of the Waitakere Ranges Heritage Area Act 2008 as well as the Muddy Creek Local Area Plan.
- c) We invite Watercare to renew consultation with the Waima community to locate a site and a plant design that will satisfy local expectations.
- d) We invite Watercare to investigate repositioning of the plant to the sludge site close to the Nihotupu lake as identified in the Local Board's letter to Watercare dated October 9, 2018 a copy of which is attached.

- e) Alternatively, we invite Watercare to consider repositioning the site in an urban industrial area such as Spam Farm in Glendene which is more suitable for the location of a large industrial complex of this sort.
- f) We are concerned
 - a. the plant design requires the destruction of 3.5 hectares of regenerating sub tropical rainforest that is home to many indigenous species including a previously unidentified wasp.
 - b. The project will require up to 118 heavy vehicle movements a day on Titirangi's narrow and fragile roads.
- g) We support the restoration and repurposing of the Nihotupu Filter Station which is a scheduled heritage building at the entrance to Exhibition Drive
- h) We support a significant restoration fund being established should the new plant be constructed in the Waima area.

Comment

Waitakere Ranges Heritage Area Act considerations

We acknowledge that Watercare holds a special designation on the site and the terms of this designation have been considered by the High Court in *TPG v Watercare* [CIV-2017-404-2762]. We note however that the significant ecological area overlay of the Unitary Plan poses some restrictions on what can occur specifically in relation to vegetation clearance and earthworks and stream diversion and therefore overrides the designation.

The subject site is within the Waitakere Ranges Heritage Area (WRHA), established by the WRHA Act 2008. Section 7 of the Act recognises that:

“(1) The heritage area is of national significance and the heritage features described in subsection (2), individually or collectively, contribute to its significance.

(2) The heritage features of the heritage area are—

(a) its terrestrial and aquatic ecosystems of prominent indigenous character that—

(i) include large continuous areas of primary and regenerating lowland and coastal rainforest, wetland, and dune systems with intact ecological sequences:

(ii) have intrinsic value:

(iii) provide a diversity of habitats for indigenous flora and fauna:

(iv) collect, store, and produce high quality water:

(v) provide opportunities for ecological restoration:

(vi) are of cultural, scientific, or educational interest:

(vii) have landscape qualities of regional and national significance:

(viii) have natural scenic beauty:

(b) the different classes of natural landforms and landscapes within the area that contrast and connect with each other, and which collectively give the area its distinctive character: ...

(e) the quietness and darkness of the Waitakere Ranges and the coastal parts of the area: ...

(g) the opportunities that the area provides for wilderness experiences, recreation, and relaxation in close proximity to metropolitan Auckland:

(i) the subservience of the built environment to the area's natural and rural landscape, which is reflected in—...

(ii) the distinctive harmony, pleasantness, and coherence of the low-density residential and urban areas that are located in regenerating (and increasingly dominant) forest settings; ...

(l) its distinctive local communities:

(m) the Waitakere Ranges Regional Park and its importance as an accessible public place with significant natural, historical, cultural, and recreational resources:

(n) the public water catchment and supply system, the operation, maintenance, and development of which serves the people of Auckland.”

Section 8 sets out the objectives of the Legislation. It says:

“The objectives of establishing and maintaining the heritage area are—

(a) to protect, restore, and enhance the area and its heritage features:

(b) to ensure that impacts on the area as a whole are considered when decisions are made affecting any part of it:

(c) to adopt the following approach when considering decisions that threaten serious or irreversible damage to a heritage feature:

(i) carefully consider the risks and uncertainties associated with any particular course of action; and

(ii) take into account the best information available; and

(iii) endeavour to protect the heritage feature:

(d) to recognise and avoid adverse potential, or adverse cumulative, effects of activities on the area’s environment (including its amenity) or its heritage features:

(e) to recognise that, in protecting the heritage features, the area has little capacity to absorb further subdivision:

(f) to ensure that any subdivision or development in the area, of itself or in respect of its cumulative effect,—

(i) is of an appropriate character, scale, and intensity; and

(ii) does not adversely affect the heritage features; and

(iii) does not contribute to urban sprawl:

(g) to maintain the quality and diversity of landscapes in the area by—

(i) protecting landscapes of local, regional, or national significance; and

(ii) restoring and enhancing degraded landscapes; and

(iii) managing change within a landscape in an integrated way, including managing change in a rural landscape to retain a rural character:

(h) to manage aquatic and terrestrial ecosystems in the area to protect and enhance indigenous habitat values, landscape values, and amenity values:

(i) to recognise that people live and work in the area in distinct communities, and to enable those people to provide for their social, economic, environmental, and cultural well-being:

(j) to provide for future uses of rural land in order to retain a rural character in the area:

(k) to protect those features of the area that relate to its water catchment and supply functions ...

As can be seen most of these objectives are protective. Only objective (k) is supportive of the construction of the treatment plant and it talks about protecting features rather than changing features.

Section 13 of the Act requires a decision making body when considering a resource consent for a discretionary or non-complying application to give particular regard to the purpose and objectives of the Act. If the application involves a controlled or restricted discretionary activity then consent authority must consider the purpose of this Act and the relevant objectives as if they were matters specified in the plan or proposed plan.

Clearly special care needs to be taken in the assessment of this application.

The currently bush covered part of the Watercare site is on a highly prominent location at the intersection of Scenic Drive and Woodlands Park Road.

Exhibition Drive is an entry point to Waitakere Ranges Regional Park so we believe the protecting the values of the park should be a major consideration, along with the impacts on the character of Waima and Titirangi.

The proposed changes to the site will have significant impact on the heritage and ecological values with the removal of vegetation, the earthworks, the construction impacts and the eventual built form.

We acknowledge the importance of the area's water supply function and the need for a growing Auckland. A good outcome would be to balance this with the other heritage features, particularly subservience of the built environment to the natural landscape, protection, enhancement and restoration of ecosystems, and the area's distinctive local communities.

Muddy Creeks Local Area Plan

The Waitakere Ranges Heritage Area Act 2008 allows for the creation of local area plans. The purpose of these plans is set out in section 25(2) of the Act as follows:

“The purpose of a LAP is to—

- (a) promote the purpose of this Act and the objectives; and
- (b) provide objectives (particularly long-term objectives) in relation to—
 - (i) the future amenity, character, and environment of the local area to which the LAP applies; and
 - (ii) the well-being of the local community within that area (including its economic and social wellbeing); and
- (c) inform decision-making processes that relate to the heritage area.”

The effects of a LAP are set out in sections 27 and 28 of the Act. The provisions are somewhat complex but the board believes that the terms of any existing plan are a relevant consideration in assessing what heritage features to give effect to and how much weight should be given.

The Muddy Creeks Plan, a local area plan for Waima, Woodlands Park, Laingholm and Parau, was adopted in 2014. It contains the following passage:

Statement of existing character and amenity

Woodlands Park and Waima are visually contained on their northern and western sides within the steep forested slopes of the Regional Park and Watercare land that includes Exhibition Drive. Houses are nestled within the regenerating forest. Large trees, many of them kauri, are a prominent feature. Dissected valleys and gullies give each road a sense of intimacy and isolation while offering elevated glimpses of the Manukau Harbour. At the top of Woodlands Park Road, the Huia filter station is a prominent feature which reminds us of the history and current water supply function of the area.

Statement of future character and amenity

In Laingholm, Woodlands Park and Waima the delicate balance between houses and vegetation along the slopes will be maintained. Footpaths designed in sympathy with the area will line the main roads, and a network of walkways will join pockets of settlements, schools, halls and shops, Laingholm Beach and South Titirangi. Ecological corridors within the area will provide safe, healthy and connected ecosystems and terrestrial habitats.

Site selection process and requirement to look at alternatives

The replacement of the Huia Water Treatment Plant has been a contentious subject in the area. There was strong opposition to locating the plant in Oratia, and there is strong local opposition to the current proposal.

The following aspects of the proposal are, in no particular order, the matters of most concern:

- a) Environment destruction including the clearing of over 3 hectares of forest close to significant stands of Kauri.
- b) Amenity destruction, particularly for Manuka Road residents who would especially be affected by the proposal.
- c) Disruption to the local community caused by construction and truck movements.

The local board has always taken a keen interest in issues relating to tree protection. In a world where forests in Alaska, Siberia, Brazil and Africa are burning and where the planting of sufficient trees may be the world's best chance to prevent runaway global warming the thought of 3.5 hectares of Waitakere forest and bush being cleared fills us with dread.

The plant is a large industrial style plant and is totally out of place in Waima, in a sensitive ecological area.

The board had previously proposed to Watercare that it should construct the plant on another site. A copy of our letter is attached. Watercare has rejected this proposal.

We note the proposal would have these benefits:

- Low quality vegetation would be cleared
- Watercare would have to remediate a site which is currently a dumping area for treated carbon which is a by-product of the treatment process
- The affect on amenity would be limited as the site is on the far site of a ridge away from houses.

We accept however that the proposal would increase the disruption caused by truck trips to a greater area.

This sort of activity should take place in an industrial area, not in an area of environmental sensitivity. We would urge Watercare to go back to the drawing board on this application and reconsider placing the treatment plant in a suitably designated industrial area.

Design

The size of the plant is of concern. The technology being used, settlement tanks, requires this size plant. We would urge Watercare to consider alternatives such as filtration so that if a treatment plant is located in Waima then much smaller bush clearance is required.

In relation to the current proposal we are pleased to see that the final revised proposal decreased the amount of vegetation to be cleared by having two separate reservoirs. Also the intensity of the construction was reduced by having the second reservoir constructed after the first one was finished.

With regards to design, we consider that the proposed design is sprawling and that there has been no opportunity taken to reduce footprints of actual infrastructure. Is there not a more effective process that could require smaller more dispersed responses? Were other sites explored for partial filtration? With a distributed filtration system (including smaller plants at different parts of the network) raw water could be piped to different parts of the network and then filtered and cleaned.

Construction

The effects on the local community will be considerable. Amongst other things there will be a number of daily truck movements and it has been estimated there could be up to 118 per day.

Roads in the area are steep and narrow and windy. There are realistically only two roads that trucks could take into the area. One is through Titirangi village using Titirangi Road and the other is on Atkinson Road. The first will cause considerable disruption to the village. The second will take trucks past two primary and one intermediate school in a one kilometre stretch of road.

Mitigation proposals

We support the proposed mitigation package however have concerns that the construction will put pressure on the catchment which is wider than the Waima catchment and the mitigation package should address this.

We recommend the catchment be extended to include Parau to the west, and parts of South Titirangi to the east.

Heritage

We note that Sandra Coney and Bob Harvey have submitted on the future of the Nihotupu Filter Station. We support the restoration and repurposing of the Station that is proposed.

We do question if works affecting the Nihotupu and Huia Filter Stations, which have heritage status, can be achieved by use of the Outline Plan of Works process. We believe that consideration of the treatment of these buildings should be part of the public hearing process.

Restoration

We consider that the effects are that significant that an increase in the proposed funding to support sustainable on-going ecological change is appropriate.

We also consider there should also be investment in social mitigation similar to that provided to the Waterview community following the NZTA tunnel project that occurred there.

We recommend that the Waima Biodiversity Trust include a representative of the Waitakere Ranges Local Board along with an Auckland Council staff representative in its make up. We ask that the Trust Deed be changed accordingly. While the trust will be operating independently there is a need for it to be aware of what council is doing and for council to be aware of what the trust is doing. Having a technical representative from Auckland Council along with an elected representative would help with this. The local board oversees council's local environmental activities, including the support of volunteer groups doing ecological restoration.

We also consider there should be an emphasis on supporting the efforts of locally based environmental groups.

Waima Biodiversity Management Plan

We recommend that the **Management Plan** include support of the full range of community led actions in the Muddy Creeks Local Area Plan to deliver on the objectives for “Ecology and Ecosystems” as outlined in Appendix 1 of the plan. The biodiversity plan should support environmental education programmes to foster environmental stewardship in the area beyond the proposed 10 year life of the trust and its funding.

For service, please contact:

Sharon Davies, PA / Liaison Officer

Local Board Services – Waitakere Ranges

Local Board Services (West), Governance, Auckland Council

Sharon.Davies@aucklandcouncil.govt.nz

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
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Details of submission

Notified resource consent application details

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Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: James William Aikman

Organisation name:

Contact phone number: 817 5672

Email address: jakaikman@xtra.co.nz

Postal address:
35 Waima Crescent Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The new planned Watercare site which is in S.E.A (sensitive environment area) which is also in a Heritage area. The felling of a large area of forest which includes Kauri, Kahikatea, Rimu & Kanuka The spreading of die back due to soil disturbance/removal.

What are the reasons for your submission?

The loss of Clarks Track. The clearing of a large area of forest. Impact of this proposal on NZ's rare plants, insects and frogs and natural flora & fauna. The huge disruption to the local community due to increased traffic especially large trucks. The implications on the Kahikatea swamp forest opposite (new discoveries have recently been made of a very rare thread bug)

What decisions and amendments would you like the council to make?

The consideration of a completely different location te eg The Watercare Waste dump (off Huia road) or the grass areas at Parau Dam which can be used as overspill

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5299] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Donna Schussler

Organisation name:

Contact phone number: 0274114862

Email address: donna@syntechnz.co.nz

Postal address:
172 Woodlands Park Rd Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Timeframe for submission

What are the reasons for your submission?

There are over 2000 pages of information in the application to read and understand. 20 days is not long enough to go through it all thoroughly and make a thoughtful and informed submission for the average person. Then for the applicant to still be submitting information after the 20 days has started and not have the 20-day period begin again is unfair to the public.

What decisions and amendments would you like the council to make?

Increase time available. Decline the application

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

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Subject: [ID:5300] Submission received on notified resource consent

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Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

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Submitter contact details

Full name: Tanya Ludvigson

Organisation name:

Contact phone number: 022 0283945

Email address: tludvigson@slingshot.co.nz

Postal address:
53 Phillip Ave Glen Eden Auckland 0602

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I am opposing the destruction of Native forest.

What are the reasons for your submission?

The area is well known for its rich biodiversity in flora and fauna and the site has nationally threatened plant species. We need to protect it not demolish it!

What decisions and amendments would you like the council to make?

Find an alternative solution

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5301] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Damien Kearney

Organisation name:

Contact phone number: 021634256

Email address: damien_kearney@yahoo.co.nz

Postal address:
1 Boylan Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I oppose the application in its entirety

What are the reasons for your submission?

The impact on the environment, including the kauri, flora and fauna in the area to be cleared will be catastrophic. The biodiversity of this area, and the fact that Auckland Council have declared a climate emergency as of June 11 2019 is further support that we don't need to be cutting down more trees in today's current world. The site is almost completely covered in native vegetation and has been identified as a Significant Ecological Area (SEA) in the Auckland Unitary Plan and should be protected as such. Local government have closed Clark's Bush to protect the kauri yet are going to chop down the same kauri to make way for the water treatment plant. I, as a resident and native of this country, care about these trees and their continued protection. The negative impact on the native bird population will be irreversible. Tui, Kereru, Piwakawaka and Morepork are among the well-known birds in this area who will be affected if this project goes ahead. The impact on local residents in terms of traffic disruption, the noise and tremors from the construction, for the next eight years will be highly stressful and ruin our quality of life. Any heavy truck that passes through Woodlands Park Road emits shudders that rattle our house and disturb sleep. The danger to pedestrians and the proximity to the local school are both concerning.

What decisions and amendments would you like the council to make?

I would like the council to abandon the current plan to use this site and investigate other sites with significantly less environmental and social impacts.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:



Submission on the Huia Replacement Water Treatment Plant Consent Application

30 August 2019

To: Auckland Council
Private Bag 92300
Auckland 1142

From: Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)
PO Box 108 055
Auckland 1150
Attention: Nicholas Beveridge

Email: n.beveridge@forestandbird.org.nz
Telephone: 09 302 3901

Introduction

The Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest & Bird) is New Zealand's largest independent nature conservation organisation, with many members and supporters. Our mission is to be a voice for nature on land, in fresh water and at sea.

We have 47 branches throughout the country, seven of which, including the Waitakere Branch, are in the Auckland region and involved in a wide range of conservation and advocacy activities.

Forest & Bird has for many years had a strong interest and involvement in the greater Auckland area. These include instigating and implementing the Ark in the Park and Habitat Te Henga projects in the Waitakere Ranges and the North-West Wildlink, a wildlife linkage connecting the Hauraki Gulf Islands with the Waitakere Ranges. This has included advocating for greater protection of indigenous biodiversity on land, in freshwater and in the coastal environment, and in protecting and enhancing the healthy functioning and integrity of indigenous ecosystems across the region.

Forest & Bird could not gain an advantage in trade competition through this submission.

Forest & Bird wishes to be heard in support of this submission, and would consider presenting this submission jointly with others making a similar submission at a hearing.

Forest & Bird welcomes the opportunity to submit on the consent application.

1. Submission

1.1. Forest & Bird opposes the application for the following reasons:

- (a) loss of significant indigenous vegetation and habitat
- (b) adverse effects on the ecosystem of threatened kauri trees
- (c) adverse effects on indigenous biodiversity, such as birds, reptiles and invertebrates
- (d) the edge effects and cumulative effects of habitat loss and fragmentation
- (e) adverse effects on a significant ecological connection to the Waitakere Ranges
- (f) lack of justification for the size of the proposed footprint
- (g) limited opportunity for on-site mitigation and remediation
- (h) potential for sediment run-off via streams into Little Muddy Creek
- (i) potential to spread kauri dieback disease and Argentine ants
- (j) the site is covered by rāhui that has been placed on the Waitakere forest by Te Kawerau a Maki
- (k) uncertainty and inadequacy of consent conditions including the biodiversity offset/compensation proposal
- (l) deficiencies in the Draft Deed for the Trust proposed as part of the biodiversity offset/compensation proposal

2. Indigenous vegetation, habitat and biodiversity

- 2.1. The proposal is in a Significant Ecological Area (SEA), as identified in the Auckland Unitary Plan (AUP). The Regional Policy Statement provisions of the AUP provide for the protection of SEAs. It is our understanding that the proposal, if granted, will not protect this area of the SEA, and will result in adverse effects on the remaining SEA.
- 2.2. The site of the proposal is connected to and forms a linkage with regional parkland to the south and west and to a network of forest patches in the Titirangi-Waima area, most of which is SEA. These areas are largely dominated by the now threatened kauri and its associated ecosystem. Connectivity is an important aspect of ecosystem health and for the protection of significant habitats of indigenous species.
- 2.3. These areas connect with the rest of the Waitakere Ranges and via the North-West Wildlink to the Hauraki Gulf islands and beyond. Any loss and reduction in connectivity can have significant local effects and wider cumulative effects on significant vegetation and habitats and the ability to sustain indigenous biodiversity values in Auckland.
- 2.4. A number of rare and threatened fauna are likely to be present on or use the site, such as geckos and invertebrates, including a new species of flightless parasitic wasp (*Pseudoceraphron* n.sp.), a rare slave ant (*Strimigenys xenos*) and a species of peripatus (*Peripatoides* sp.) that have been found in the immediate area. Without a thorough ecological assessment the potential effects on this fauna cannot be determined.

- 2.5. The loss of up to 3.5 ha of indigenous vegetation within the proposal footprint areas (reservoir site and the treatment plant) will result in reduced connectivity with the rest of the Waitakere forest and will increase access to animal pests such as rats, stoats and possums, and enable pest plants to establish. While adequate mitigation could address some of these effects it will be difficult to avoid them entirely. Without an adequate assessment of these effects it will not be possible to provide an appropriate mitigation package or assess the remaining effects were the proposal to proceed.
- 2.6. The effects of this proposal must be considered in respect of cumulative adverse effects on the Waitakere forest, including ongoing pressure from urbanisation, on the habitat of significant indigenous fauna and flora which is already under threat from habitat loss and fragmentation.

3. Freshwater streams including Little Muddy Creek

- 3.1. The proposal is likely to result in sediment runoff into adjacent streams and eventually to Little Muddy Creek. This risk is especially problematic during the rain events which can occur any time of the year and are most prevalent during spring and summer when construction is likely to occur. There are likely to be adverse effects of sediment on the habitat of catadromus fish including the threatened longfin eel and galaxiids such as banded kokopu.

4. Kauri dieback disease (PA)

- 4.1. Kauri is a keystone species upon which a number of other species depend for their existence. Kauri throughout the upper North Island is under threat from kauri dieback disease (known as PA). It is expected that the loss of kauri to PA will result in the collapse of the kauri ecosystem. Preventing the spread of the disease is critical to the survival of kauri and the ecosystems which they support.
- 4.2. The proposal has identified that there are kauri present within and adjacent to the proposal footprint. However the proposal only sets out to retain and protect kauri trees over 20cm diameter. Not only will this result in the loss of regenerating kauri within the footprint, it also increases potential for the spread of PA. PA can be present in young trees as well as within soil on the site. Moving these young trees and soil offsite poses a risk to spreading the disease.
- 4.3. Having been involved with the development of regional and national pest plans for kauri dieback, we understand that the presence of the PA can be very localised and hard to confirm. For example it may be present in a very small area of soil. This carries a risk that machinery, plant, vehicles and peoples' footwear and clothing could bring PA to the site. It could also be spread across the site and from the site.
- 4.4. The proposed area of native vegetation removal and substantial amount of earthworks and earth moving equipment not only risks the introduction (or spread) of PA it also exposes the neighbouring kauri areas (including the iconic Bishops Kauri Tree) to the potential environmental stress of edge effect, root damage and increased risk of exposure to PA.

- 4.5. PA primarily spreads through soil, and this can be carried by water. This means there is also a risk of spreading PA through sediment loss and via any sediment collection devices.
- 4.6. The application has not identified potential vectors, risks at the site, or measures to manage these risks. In our view the application is inadequate to provide any certainty for the prevention of PA spread.
- 4.7. A fit for purpose risk assessment and accompanying biosecurity plan (which includes audit and compliance measures) to manage all biosecurity issues, including PA, needs to be developed with an external/independent expert review.

5. Argentine ant

- 5.1. Argentine ants pose a threat to our indigenous biodiversity, particularly ground-living invertebrates. Argentine ants have been found nearby and are spreading. Vehicles, machinery, soil, plant material and supplies such as wood, provide common vectors for the spread of ants. The application fails to consider this risk or propose an adequate management plan.

6. Onsite mitigation and remediation

- 6.1. The extent of any onsite mitigation and remediation depends on the size of the footprint but there is insufficient justification for the footprint proposed.
- 6.2. Some on-site mitigation and remediation is proposed by the applicant, including the realignment of a stream. However, because the detailed design will not occur until after the granting of consent the extent of vegetation removal is uncertain. Potentially everything within the footprint of the proposed WTP could be removed. Even if the proposal does not require the whole footprint the opportunity to carry out on-site mitigation and remediation is limited by the scale of the activity if the proposal goes ahead.

7. Off-site offset and compensation package

- 7.1. The applicant compensation package is uncertain in terms of the requirements in the AUP.
- 7.2. The policies of D9 Significant Ecological Areas overlay in the AUP set out direction on the management of adverse effects and biodiversity values that are required to be avoided, remedied, mitigated or offset.
- 7.3. The applicant has not clearly identified the adverse effects which cannot be avoided, remedied or mitigated, to establish the residual adverse effects for which offsetting may be considered under the AUP. Understanding the extent and detail of any residual effects is important so that ecological advice can be provided:
 - (a) on the extent of adverse effects which cannot be avoided, remedied or mitigated on site
 - (b) on the opportunities for biodiversity offsetting on a like for like basis (as in NZ Best practice offsetting guidelines) and the extent of offset required to make up for onsite loss of biodiversity values. This includes identifying any values for which an offset cannot be achieved.

- (c) The extent to which any proposal by the applicant for biodiversity compensation under s104 is of an appropriate scale to compensate for the onsite loss of biodiversity values. (Recognising that D9 policies do not specifically consider compensation as an option for addressing adverse effects on SEAs).
 - (d) Whether the potential loss of biodiversity values is such that an offset and/or compensation proposal is not appropriate.
- 7.4. In addition the proposed financial compensation is not consistent with the considerations under s104 of the RMA for offset and compensation. This section states that:
- (ab) any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity;*
- 7.5. The applicant's financial offset/compensation is grossly inadequate and inappropriate. In our view any offset or compensation should be set out in terms of positive effects on the environment in the context of the adverse effects that will or may occur if the proposal goes ahead. Given the extent of ecological adverse effects we would expect that offset/compensating measures would be determined on an ecological basis, not a dollar amount.
- 7.6. In our view this requires the identification of specific locations and quantifiable environmental outcomes/benefits to be achieved.

8. Proposed conditions

- 8.1. Forest & Bird has a number of concerns with the consent conditions which have been proposed. These are set out in Attachment 1 to this submission.

9. Relief sought

- 9.1. Forest & Bird seeks that the application be declined.
- 9.2. However, should the Council decide to grant this consent, we seek that the conditions of consent are amended such that Forest & Bird's concerns are resolved.
- 9.3. Forest & Bird wishes to be notified for comment on the development of the updated optimised site layout report should the proposal progress that far.

Thank you for the opportunity to make this submission.

Nick Beveridge

Regional Manager, Auckland & Northland

Attachment 1 – Concerns with the applicants proposed conditions

Condition	Concern
2	The condition for general accordance of development does not provide certainty that the project footprint area of the proposal will remain within the area set out on the maps.
5	It is uncertain under b. whether reducing adverse effects on individual trees ensures that those trees are retained.
6	It is unclear what the certification process is and what requirements must be met for certification to be given.
7	It is uncertain how “representatives of the local community” will be selected. In our view this must include community groups with an ecological focus. Forest & Bird seeks that provision is made in the conditions for Forest & Bird to provide a representative on the CLG.
10-21	The erosion and sediment control conditions lack any clear objective or measurable limits to protect specific values at the site, such as on Little Muddy Creek.
24 – 28	The conditions need to include objectives and measurable targets established by ecological advice to address the values which will be lost as appropriate for an offset/compensation package which meets the requirements in Appendix 8 of the AUP.
29 -32	<p>The conditions need to be clarified in terms of achieving on site mitigation and offsite offsets.</p> <p>The conditions need to include objectives and measurable targets established by ecological advice to address the values which will be lost as appropriate for an offset/compensation package which meets the requirements in Appendix 8 of the AUP.</p> <p>29 the existing SEV values need to be set out as part of the consent (i.e. within the Stream Ecological Valuation Plan) in a way that they can be measured to ensure they are maintained and improved.</p> <p>30 It is uncertain whether such erosion protecting works, including structures, will provide environmental benefits as per s104.</p>
26	The management measures to be included in the EMP are uncertain. This should be worded to ensure that the matters listed in i to iv are included, not merely “such as”

39	The condition lacks certainty for requirements for additional stormwater treatment measures and onsite retention. Additional requirements which achieve stormwater quality benefits for the Project Site should be set out as an enforceable condition of consent.
40	The approval approach under this condition is uncertain as discretion must not be retained by the Council. It is not clear that other conditions of consent must still be met.
42	The objectives of the CTMP need to include “avoid the spread of Kauri dieback disease, including introduction from off site to the project area.”
43	Needs to include measures to achieve the kauri dieback objective for the CTMP
45	This condition lacks involvement of the CLG prior to the 20 days before submitting the CTMP to the Council for each stage.
47 - 53	The condition lacks any consideration of effects on birds and bats.
Proposed Offsite Management of Ecological Effects	<p>1.2 of the Draft consent condition reference to “residual adverse ecological effects from the construction” should also include “effects from the enabling works”.</p> <p>1.3 the objectives and measurable targets need to be reviewed against the values which will be lost to establish an appropriate offset/compensation package which meets the requirements in Appendix 8 of the AUP.</p> <p>1.3 (d)(iii) “kauri rescue procedures, needs further direction in the conditions of consent to ensure the disease is not spread. Provisions for kauri on private land should not duplicate the services currently provided to ratepayers by the Council.</p> <p>1.4 the compensation proposed needs to be quantified in terms of ecological outcomes to be achieved.</p> <p>1.5 (c)(ii) the minimum operative period of the trust needs to be based on ecological advice for the period to establish and achieve the ecological offsets package. For example may require vegetation to reach a certain age and density.</p>
Management Plans	A draft of all management plans needs to be available for submitters and decision makers to consider and provide sufficient detail that they can be captured by condition 2 requiring they are completed in general accordance with the drafts.

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 4:46 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5302] Submission received on notified resource consent

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Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

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Submitter contact details

Full name: Glenn Schussler

Organisation name: 1974

Contact phone number: 0212438251

Email address: glenn.schussler@unilever.com

Postal address:
172 Woodlands Park Road, Titirangi Auckland Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The traffic impact on the community and dwellings, the removal of native vegetation and the disturbance of streams with in the effected area and the site selection process.

What are the reasons for your submission?

I oppose the resource consent application to build a "new" the water treatment plant. This is a significant ecological area 'SEA' in the Auckland Unitary Plan 'AUP'. Considering the meaning of SEA and the fact there are a small number of sites that meet all 5 criterium, this application should never had made it as far as the Council. It defies belief that a company can even suggest felling 3.5ha of healthy forest and irreversibly destroy a Kahikatea Wetlands along with cutting all trees and releasing all the stored carbon. Auckland Council must not agree to this resource consent. They declared a climate emergency, are advertising planting a million trees and under the AUP (D9 – SEA Overlay) it clearly says this exact thing should be avoided. Watercare left the site to regenerate and that is what it has done, it is not the right site. Bush has been Customarily closed to protect healthy trees due to Kauri dieback issues and the applicant is applying to fell healthy trees. Years of investment of time and money have been spent on the downstream water quality, weed and pest control measures and all will be destroyed by this intervention if Council grants the Resource consent. There are rare eels, wasps, frogs, snails, fish, and other sensitive species that won't survive. Watercare can not re-home them. Watercare can offer no mitigation sufficient or acceptable for the proposed loss of a high quality SEA and its inhabitants. In fact, did you know, Watercare originally offered the locals who attended a meeting (which was not well-advertised) mitigation in the form of a pine forest already in their possession in Hunua! The pine forest is an investment, not mitigation. The community was shocked at finding the Clark's Bush track area was not council-owned and Watercare had intentions of using it for water supply purposes. No LIMS showed this information and it was not publicly available. No one could have forecast this turn of events. The closest residents on Manuka Road have not been offered a buffer zone, the same as which other short-listed sites were offered and the new plant will end up infringing on their lives in ways that are not as they would ever have expected when they moved into bush-clad Waima. Council and government officials interferred with the site selection process, unethically. The applicant's own evaluations showed this site didn't make the initial short-lists and criteria were altered to allow it back in. They admit to not believing the site is the best option. The difficulty of the site will blow costs and timeframes out beyond anything currently accounted for. The traffic on our narrow local roads will be every day, 6 days a week for 8 years – probably longer when it runs over and past budget. The roads are very obviously not designed for carrying huge trucks and the trucks driving to the site will pass up to 11 schools and childcare centres. Scenic Drive is a popluar route for cyclists, who will be at risk with the increased truck movements, as will the buses and pedestrians on the narrow road. It is also an access point for tourism companies out to the West Coast Beaches. Tourists come for the Waitakeres, not for the WTP and construction zones. Insurance companies have advised local residents that damage to homes and buildings caused by truck vibrations will have to be paid by Watercare or Council, blowing out estimated project costs even further. We are being asked to pay all this money to replace a plant that can only increase the capacity from 126mld to 140mld and the site has no potential for expansion, as the site simply is not large enough to offer anything more. Statements made by the applicant indicate they are already aware of this, as well as their need to further expand their systems further. It makes more sense to do this right the first time and put it somewhere where they can have an easier – and therefore more cost effective- site from the start, that allows future-proofing and doesn't go against everything the Council has been stating over recent years. Please decline the application.

What decisions and amendments would you like the council to make?

Decline the application in full and advise the applicant to find a site with less effects to community and environment. Make Watercare pay compensation to the community for the time, expenses, unnecessary stress and effort that has been put in to opposing this ridiculous proposal. Watercare own land elsewhere that is of low ecological value such as a pine plantation at Riverhead. This land which is 1000ha could be used instead.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5303] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Mark

Organisation name: Greaves

Contact phone number: 0211542436

Email address: mark.greaves@police.govt.nz

Postal address:
36 Boylan road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The water treatment plant destroying native bush and wildlife

What are the reasons for your submission?

To help save the trees

What decisions and amendments would you like the council to make?

To take more caution in destroying the bush. Putting the treatment station somewhere that won't affect wildlife and forest as much

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5304] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Nicola Paton

Organisation name:

Contact phone number: 099235873

Email address: n.paton@auckland.ac.nz

Postal address:
26 Paturoa Rd Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

All aspects

What are the reasons for your submission?

I do not support Watercare's application to build a water treatment plant at Waima. In the 21st century, I believe it is completely inappropriate to clear an area of native bush larger than LynnMall shopping centre. I live in Titirangi. I commute 40-90 minutes to work every day because coming home to the forest so supports my wellbeing. I am horrified at the proposed destruction of this huge area of native bush. I never would have thought this was possible in Titirangi. More and more research is confirming the immense value of trees for physical and mental health - see for example <https://bigthink.com/mind-brain/trees-mental-health?rebellitem=1#rebellitem1> As well as residents of Titirangi and West Auckland, I note this would impact on the thousands of Auckland-based and other visitors to the Waitākere Ranges, being a shameful, very visible scar and loss of habitat and wildlife corridors at the gateway to the Ranges. I believe it is simply nonsensical that this would be allowed: • In the Waitākere Ranges Heritage Area • In a Significant Ecological Area (SEA) overlay • In an area with rich biodiversity, including rare species of flora and fauna, and requiring the culverting of streams • In a regenerating kauri forest, when kauri dieback has already closed most forested trails throughout the Waitākere Ranges Humans have already reduced New Zealand's native forest cover from approximately 85 percent of the land area (23 million hectares) to about 23 percent (6.2 million hectares). [Ministry for the Environment – Pressures on the land, <https://www.mfe.govt.nz/publications/environmental-reporting/state-new-zealand%E2%80%99s-environment-1997-chapter-eight-state-our-2>] This moment in history is the time for smart, sustainable planning, design and infrastructure development. Auckland Council's declaration of a climate emergency reflects this, as does the Government's commitment to plant a billion trees. However plans to clear a large area of significant native forest make a mockery of these policy positions. This city can do better. Watercare and Auckland Council, go back to the drawing board and find another option: think outside the forest.

What decisions and amendments would you like the council to make?

I would like the council to refuse the resource and land consents related to the proposed Huia Replacement Water Treatment Plant (WTP) project, and find an alternative site for a new water treatment plant that does not require the clearing of native forest.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Save Our Kauri Trust Registered Charitable Trust

RE: Submission to oppose the Huia Replacement Water Treatment Plant Resource Consent Application BUN60339273 by Save Our Kauri Trust.

We wish the authority to reject the Consent Application in its entirety.

We wish to be heard to support this submission.

We support the Titirangi Protection Group Submission, we want however to specifically represent the issues faced by Kauri and therefore are presenting a separate submission.

Introduction:

Save Our Kauri Trust was formed after the 2015 protests against the proposed felling of the mature Titirangi Kauri Awhi Awhi.

Kauri are amongst the largest and long lived trees in the world, an individual tree can store vast amounts of carbon.

Kauri are the 4th most threatened tree globally.

Kauri are now classified as a threatened species due to the effects of Kauri Dieback.

The site

The site has a works footprint of 4.3 hectares of indigenous forest and scrub, all part of a 24,000 hectares Significant Ecological Area owned by Watercare.

The site except for the areas already cleared for buildings is identified and mapped as being a Significant Ecological Area (SEA) applicable to all of the sites in the Auckland Unitary Plan (Operative in Part).

The site meets all 5 criteria of a SEA.

The site is also within the Waitakere Ranges Heritage Area protected by the Waitakere Ranges Heritage Area Act 2008.

The purpose of the Act is to recognize the national regional and local significance of the heritage area and to promote the protection and enhancement of its heritage features for present and future generations.

On December 2, 2017 Te Kawerau A Maki placed a Rahui over Te Waonui to try to protect the forest while efforts continue to fight the spread of Kauri Dieback.

This site is covered by the Rahui.

Kauri are now listed as a threatened species.

Much of the area is a regenerating Kauri Forest.

Soil in this area is known to be contaminated with Kauri Dieback.

Site selection

The first principle of the RMA is to avoid irreversible adverse environmental effects. Inadequate attempts were made by Watercare to avoid irreversible adverse environmental effects in the site selection process.

The long list project of site selection started back in 2015. The short list was published in September 2016 and determined 4 short listed sites including both the Oratia and the Woodlands Park sites.

It had been well documented that Parker Road North Oratia was regarded highly in the site selection process but was removed after huge public and Political objections due to the Social Effects of removing people from their homes in a housing crisis.

Watercare announced the preferred location for the new Water Treatment Plant on 30 May 2017 as being the Woodlands Park, Manuka Road site.

The failure of process occurred when Watercare simply reverted to the “next option on the list” once it decided against Oratia.

The process of site selection involved the assessment of adverse environmental effects which related especially to the large Significant Ecological Area on the Woodlands Park/Manuka Road site. Watercare relied on information that had been gathered some 2yrs prior or even earlier, in relation to Kauri and Kauri Dieback and failed to take account of updated and relevant information in relation to Biosecurity and the emerging threat to Kauri from Kauri Dieback.

In December 2016 the first draft of Auckland Council’s Kauri Dieback Report was submitted for internal and external peer review, Version 1 incorporating feedback from external peer review was available from 26 May 2017.

There is no evidence to show that Watercare sought this updated information from the Biosecurity Department of Auckland Council before they selected the Woodlands Park Road site, hence they did not rely on the best available information in making their site selection and in avoiding a known Biosecurity threat.

In June 2017 Dr Nick Waipara completed Version 2 of the Kauri Dieback Report.

The key findings in the report stated that “The Waitakere Ranges Regional Park now represents the most heavily kauri dieback infected area currently recorded in New Zealand.”

“The recorded distribution of kauri dieback relative to kauri area within the WRRP has risen from 7.9% infected and a further 2.7% possibly infected in 2011 to 18.95% infected and a further 4.65% possibly infected in 2016.”

The Boffa Miskell 26 July 2019 Assessment of Ecological Effects prepared for Watercare for this Application references Bellgard 2013, in relation to Kauri Dieback.

The science in regard to the pathogen that causes Kauri Dieback disease, *Phytophthora agathidicida* is evolving at a rapid rate as well as discoveries around the spread of the disease, hence the importance on relying on the most recent, published Scientific information.

Despite the staggering increase to 18.95% of trees infected in the Waitakere Ranges, Watercare made no attempt to revisit their decision or to rely on the latest scientific information regarding Kauri Dieback, when they confirmed their site selection, instead they attempted to mitigate effects of Kauri Dieback in this Resource Consent Application when avoidance due to the Biosecurity threat is clearly described in the RMA as being the best practice.

Kauri Dieback Zones

In line with the Auckland Unitary Plan, Areas within 3 times the drip lines of the canopy radius of any Kauri will be defined as Kauri Contaminated Zones (KCZ).

The Kauri Dieback Report describes Kauri Dieback as having a potential spread rate of 3m per year, the Report used a 30m buffer zone spatially representing the area of a kauri root zone that is either potentially or highly likely to be infected and applied it to each trees location and then added a precautionary 15m buffer zone to each 30m buffer zone adding up to a 45m buffer zone.

This 45m buffer Zone far exceeds the “3 times the drip line canopy radius” applied in the AUP.

The issue is that one is a RMA “workable” contamination zone and the other is potential contaminated zone. What has resulted is the substituting of what was considered to be an actual buffer zone for Kauri Dieback with a “workable” buffer zone that may bear very little resemblance to the actual spread of disease, in contradiction to the Biosecurity Regulations.

Biosecurity Risk

The Report states that the highest risk vector for *Phytophthora agathidicida* movement into new distinct locations is soil disturbance associate with human activity.

Watercare will move 3.5 hectares of earth and this will contain Kauri Dieback spores.

There will be an undeniable spread of Kauri Dieback due to these earth works.

The topographical maps show these sites are steep, they are also high in rainfall and contain natural water flows all of which aid the spread of Kauri Dieback.

The escaping of sediment laden water containing Kauri Dieback will be unpreventable, further spreading Kauri Dieback to areas, especially but not limited to, areas downhill from the site.

There is clear evidence from other sites in Auckland of sediment escaping from sites complying with Consent Conditions due to the inability of the Consent Conditions to account for periods of excessively high rainfall.

This site will be no different except the escaping sediment will contain a known pathogen.

Some of Auckland’s oldest Kauri are downstream from these sites.

The Clarks Kauri is approximately 100m away.

Phytophthora agathidicida is also likely to be present in forests other than Kauri. A recent study released by Dr Monica Gerth and Dr Amanda Black describe the anti *Phytophthora* agencies of Kanuka. This new information is relevant to the Consent Authority’s decision making in considering Save Our Kauris claim for the Resource Consent to be declined due to the extent of Kanuka that will be removed from this site.

The Boffa Miskell Report 3.7.2 Vegetation / Kauri Dieback :

“Phytophthora taxon Agathis (PTA) infection(Kauri Dieback) has emerged as a major and significant threat to the future of the Waitakere Ranges Heritage Area’s forest ecosystem. Symptoms of Kauri Dieback were observed on a single large kauri tree within the mature kauri forest stand in the north western quarter of the Project Site.”

Boffa Miskells Report clearly acknowledges that Kauri Dieback has emerged as a major and significant threat to the future of the Waitakere Ranges Heritage Area forest ecosystem.

It also confirms that symptoms of Kauri Dieback were observed in a single large kauri tree, within the mature kauri forest stand.

What the report fails to consider is that forests can be infected but asymptomatic and that the latency period before symptoms show can even be up to 20yrs.

It is reasonable then, to question whether the fact that symptoms were observed in just a single large kauri mean that the kauri forest is simply asymptomatic and in a latency period the adverse effects of which cannot be realistically measured or determined.

The movement of 3.5h of earth could have an unmeasurable adverse effect in years to come with the death of hundreds more Kauri in this area and downstream.

Not every Kauri has been accounted for in this Report.

This leaves open the unaccounted for and possibly infected root zones of Kauri that have been missed out.

This Report also fails to acknowledge the “edge effect” of Kauri in close proximity to the site.

The large scheduled Kauri on the corner of Manuka Road and Woodlands Park Road will likely suffer edge effects.

The numerous mature Kauri on the neighboring sites in Manuka Road have not been considered.

The report has failed to account for the effects of all Kauri on this site as well as those in close proximity.

Standard Operating Procedures for Kauri Dieback

These SOPs are not designed for earthworks of this scale.

Trigene will not kill Kauri Dieback spores imbedded in soil and is only effective against 2 of the 3 spores that spread Kauri Dieback.

Adaptive Management

Adaptive Management , a practice of essentially “trying it out” and seeing what happens and adapting the conditions accordingly.

The knowledge about where exactly the disease currently exists is not settled in science.

Little is known about the latency period between disease presence and expression on the host.

Phytophthora agathidicida is likely to be present in many areas where symptoms simply have not yet been detected.

The movement of hectares of earthworks thought to be disease free but which could in all likelihood actually be the disease in a latency period, as this knowledge is still unknown, could have adverse effects that could be catastrophic to Kauri in the future in this area.

No RMA condition can address this Biosecurity and Biodiversity risk.

Conclusion

The Boffa Miskell Report states *“The Waitākere Ranges ecosystem as a whole is nationally significant as one of the largest areas of coastal and lowland forest with intact sequences remaining in the Auckland Region.”*

Save Our Kauri Trust submits that the site selection process was deeply flawed with regard to the Biosecurity threat that will be unleashed by Watercares proposal.

There will likely be loss of an entire Kauri ecosystem from this area, at a time when Kauri are classified as a threatened species.

Kauri forests store large amounts of carbon and are ranked as one of the most carbon dense ecosystems in the world, to lose these ecosystems at a time of a Climate emergency is simply negligent on the part of a CCO like Watercare.

The Biodiversity loss and the Biosecurity threat in the Waitakere Ranges Heritage Area is unacceptable and the Application must be declined.

References:

Dr Nick Waipara and Lee Hill 2017 Kauri Dieback Report Auckland Council

Myers S. Huia Water Treatment Upgrade – Assessment and Review of Ecological Values July 2018

Macinnis-Ng C. Kauri and Carbon Research and Seminar Series October 2012

Gerth M. Black A and others... Maturanga- guided screening of New Zealand native plants reveal flavonoids from kanuka (*Kunzea robusta*) with anti-Phytophthora activity. 19 August 2019

Waitakere Ranges Heritage Area Act

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5305] Submission received on notified resource consent
Attachments: Microsoft Word - Save Our Kauri Trust Submission.pdf

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Winnie Charlesworth

Organisation name: Save our Kauri Trust

Contact phone number: 021 540 980

Email address: saveourkauritrust@gmail.com

Postal address:

38 paturoa rd Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Ecological grounds

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

Decline the application

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Microsoft Word - Save Our Kauri Trust Submission.pdf

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5306] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Tallulah Kearney

Organisation name:

Contact phone number: 021394999

Email address: talkea@richmondroad.school.nz

Postal address:
1 Boylan Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

I oppose the application in its entirety

What are the reasons for your submission?

I am against this because trees will be cut down to make way for the water plant. The site is almost completely covered in native vegetation and has been identified as a Significant Ecological Area (SEA) in the AUP. This plan involves cutting down native trees, including kauri trees which are endangered through disease and have been for the past two years. Auckland Council have also declared a climate emergency as of June 11 2019. Cutting down trees goes against such a declaration, is irresponsible and against best practice. I am worried about the number of trucks that will pass through my neighbourhood, making it unsafe for me, my neighbours and my family. The noise and disruption to the neighbourhood will cause stress to everyone. If this project is to take the next 8 years to complete, then the rest of my childhood, from the age of 8 through to 16, will be lived through noise, disruption and stress.

What decisions and amendments would you like the council to make?

The council needs to find a better alternative site for the expansion of the water treatment plant that will not involve cutting down trees and endangering local species.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5307] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Sarah

Organisation name: Knowles

Contact phone number: 0211542436

Email address: sarahknowles@slingshot.com

Postal address:
36 Boylan road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

The removal of native bush

What are the reasons for your submission?

Watercare are destroying native forest and damaging fragile ecosystems

What decisions and amendments would you like the council to make?

Call off the new treatment plant or find some where with less native wildlife and trees

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5309] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Clem White

Organisation name:

Contact phone number: 021633318

Email address: clemw@hotmail.com

Postal address:
26 Waima Crescent Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Destruction of established native ecosystems. Practicality of site. Impact on local community.

What are the reasons for your submission?

The proposed development would destroy a large area of native bush, containing many mature trees as well as protected birds and other species. Its destruction will break up a nature corridor, the importance of which is documented in Auckland Council's own environmental recommendations. It is impractical to relocate most of these. Huge amounts of earth will need to be moved, so it is inevitable that it will affect large areas of protected bush outside of the site. We are supposed to be doing everything we can to fight kauri die back disease, and this project would be the biggest threat to kauri in the area in decades - not just the numerous ones on the site, but those in the large tracts of native bush downstream from the site. I believe that mitigation can not come close to the value of protecting already established eco systems. The site has been designated a Significant Ecological Area and anyone who understood the value of what is there would agree that this designation should be honoured. The location is on the doorstep of the Waitakere Ranges, one of Aucklands most popular areas for tourists seeking to explore NZ's unique selling points. NZ has had its clean / green image diminished recently in highly publicised international reports, and finding an area of forest being ripped out right as they enter the ranges will only help solidify those findings in the eyes of the world. I believe the site is impractical and poorly thought out because there is very little room for future expansion. Also the area is prone to landslides which have been occurring periodically over the past few years. The location is also inappropriate because it is in a suburban location with only light road infrastructure. The traffic generated by the 7 year construction process will have a disproportionate effect on local communities, and make life more difficult and dangerous for the children attending the various schools and kindergartens in the affected area.

What decisions and amendments would you like the council to make?

I would like the Watercare to find a more appropriate site.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5310] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Ant Vile

Organisation name:

Contact phone number: 021989079

Email address: antvile12@gmail.com

Postal address:
275 Konini Road Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Poorly considered investment of public money with out full consideration of the effect on the community where proposal is located nor consideration of the protection of native flora and fauna in Special ecological area. Fails to recognize the national, regional, and local significance of the Waitakere Heritage Area, and to promote the protection and enhancement of its heritage features for present and future generations as demanded under the Waitakere Ranges Heritage Area Act 2008 . Disproportionately loads the costs of infra-structure development on one community including the disruption of construction traffic on roads already at capacity not designed for large trucks. Noise and pollution from trucks focused on all main school routes and through neighborhood and town centers with no existing cycling or pedestrian infra-structure creates a dangerous situation and contributes further to existing traffic issues. Fails to align with the Auckland plan 2050 : preserve, protect and care for the natural environment as our shared cultural heritage, for its intrinsic value and for the benefit of present and future generations. Nor acheives objective of future proofing infrastructure.

What are the reasons for your submission?

What decisions and amendments would you like the council to make?

I would like to see the current proposal rejected. I would like to see a reconsideration of infrastructure as a co design process where the community is given a voice in the design process. I would like to see design professionals including architects, urban designers, landscape architects included in the design process in order to acheive innovative and future proofed design solution. An engineers solution does not acheive an appropriate outcome in this situation. I would like to see a full urban design panel review of the project incorporated into the process. I would like to see te aranga design principles and consultation with local iwi incorporated into the design process. I would like the council to consider infrastructure other than hard engineering but take a holisitic approach to design and implementation.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? Yes

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5311] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Pamela Gill

Organisation name:

Contact phone number: 021308257

Email address: pamela.gillnz1@gmail.com

Postal address:
3 Ngaio Road Waima Auckland 0604

Submission details

This submission: is neutral regarding the application in whole or in part

Specify the aspects of the application you are submitting on:

Tree removal, stream diversion, biodiversity and environmental loss. Waima Biodiversity Trust

What are the reasons for your submission?

I live locally and this will have a significant impact on the community of people, floral, fauna, and waterways in our area.

What decisions and amendments would you like the council to make?

I am concerned at the impact of cutting down such an extensive tract of bush as well as the flow-on environmental impacts this will have. I want to ensure that mitigation for this loss will be substantial. I do support \$5,000,000 being ring-fenced for the Waima-Laingholm catchment. I would like to see a higher level of community engagement incorporated into the Waima Biodiversity Management Plan. Building community capacity and capability must be a high level objective incorporated into this plan. I would be disappointed to see most of the work done by contractors without community involvement where possible. I would not want the work to lose momentum after the 10 year period of operation of the Trust. I do not think this money should be used for Watercare land as this is mitigation to the community for the loss of bush. It should also be noted that Watercare will be required to control certain weeds within the soon to be adopted Regional Pest Management Plan, funding for this work, should not come out of this mitigation funding. I question whether \$5,000,000 is enough and believe this figure could be doubled to \$10,000,000 to include a slighter broader focus of area such as Scenic Drive, wider Titirangi, and Parau. I do think it is important to include 2 members from local conservation groups on the Waima such as Laingholm Wai Ora, Pest Free Laingholm, Little Muddy Creek Rehabilitation Project and Waima to Laingholm. I do not support the 3.8 million required to restore the Filter Station. I think this is a costly outlay and I'm unclear what benefit this will be to the local community. It is dark and damp. Finally, I would like Watercare to carry out Pest Control on all Watercare land. Watercare manages extensive catchment area that is not being looked after in terms of weed management and predator control. This attitude needs to change.

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: No

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5313] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Andrew Battley

Organisation name:

Contact phone number: 0210795489

Email address: andbatt@gmail.com

Postal address:
52 Daffodil Street Titirangi Auckland 0604

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

Predominantly the location. Supporting these concerns are those over the proposal of mass soil movement in an area adjacent to a Kauri Dieback Controlled Area (Described in Section 131 of the Biosecurity Act, 1993), the proposed traffic density and use of heavy vehicles on ill-suited roading infrastructure, and

What are the reasons for your submission?

I have a range of concerns: Firstly, the removal of Kauri and other native flora on-site runs directly counter to Auckland Council's stated drive to protect these trees from harm. The council has elected to leave tracks in the Waitakeres that are entirely outside of regions of Kauri and pose no danger to Kauri closed (E.G. Ridge Road) purely because "Opening a track through the middle of the park would send the wrong message", so to allow the felling of Kauri, no matter how young, would ruin the point entirely. Further, the movement of soil from an area directly adjacent to the controlled area, (An area where removal or movement of soil or vegetation is illegal) when these borders have been set somewhat arbitrarily, destroys any hope of containing Kauri Dieback to the area. We currently have no way to kill the fungus, and no cure, so it seems entirely irresponsible to remove tonnes of soil from the area, as there are no approaches to make this soil safe, other than the extremely expensive option of combusting it all. This brings me to another point: Transporting the materials and soil. Moving this much material through busy, school surrounded areas, over degrading roading infrastructure is just asking for an accident. I have never seen the Titirangi roundabout NOT busy, this much traffic will cause havoc at any time of the day. Scenic drive and Huia Rd are also already falling down the hill, so this will cause immense amounts of damage.

What decisions and amendments would you like the council to make?

Insist that Watercare go back and look at other areas, including the Huia Site they have disregarded, and potentially the existing water storage and treatment site on Konini rd

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

Ushla Maea-Brown

From: NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz
Sent: Monday, 2 September 2019 5:01 PM
To: Central RC Submissions
Cc: Paul.Jones@water.co.nz
Subject: [ID:5314] Submission received on notified resource consent

We have received a submission on the notified resource consent for Huia Replacement Water Treatment Plant (WTP) Project.

Details of submission

Notified resource consent application details

Property address: Huia Replacement Water Treatment Plant (WTP) Project

Application number: BUN60339273

Applicant name: Watercare Services Limited

Applicant email: Paul.Jones@water.co.nz

Application description: Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site. The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity. The land on which the WTP and reservoirs are located is designated under the Auckland Unitary Plan for 'Water supply purposes – water treatment plants and associated structures' (designation reference 9324 – Huia and Nihotupu Water Treatment Plants). Works undertaken in accordance with this designation do not require a land use consent (other than in respect of the NES Soil). Therefore land use activities, including the construction of the replacement WTP and reservoirs and associated traffic and noise effects do not form part of this application, and instead will be addressed through an outline plan of works (OPW) that Watercare will submit to Auckland Council as required under section 176A of the RMA in relation to its designation.

Submitter contact details

Full name: Lydia Tyrrell

Organisation name:

Contact phone number: 02102783791

Email address: lydiatyrrell@yahoo.co.nz

Postal address:
67 Orchard Street Auckland Auckland 1026

Submission details

This submission: opposes the application in whole or in part

Specify the aspects of the application you are submitting on:

vegetation removal; earthworks; and site selection

What are the reasons for your submission?

vegetation removal; earthworks; and site selection Under What are the reasons for your submission? Copy and paste: I oppose Watercare's application for resource consent for vegetation removal; for earthworks; and based on their site selection process. Watercare propose to remove 3.5 hectares of native bush. Auckland Council have affirmed a commitment to combat climate change; to promote biodiversity; to fight kauri dieback. The proposed development would fell native forest, releasing sequestered carbon back into the atmosphere, in direct contradiction of the Climate Emergency Auckland Council declared on 11 June 2019. The loss of the affected area would be a blow to biodiversity, given the 80+ native species residing within the site, including 11 on the endangered or critically-endangered lists. A satisfactory understanding of the wildlife habitat that will be destroyed and/or disturbed has not been established. The affected area is defined as a Significant Ecological Area in the Unitary Plan; the affected critically-endangered flora and fauna is also protected under: · The Auckland Unitary Plan – SEA, Environmental protection, Mana Whenua · The Waitakere Ranges Heritage Area Act 2008 · The Little Muddy Creeks Plan 2014 · Auckland Council 2050 Pest Free Plan · Auckland Council's list of protected trees · Native Plants Protection Act 1934 · Wildlife Act 1953 · The Conservation Act 1987 · DoC National Biodiversity Strategy 2019 D9.3 of the Auckland Unitary Plan requires those wishing to remove vegetation in a SEA to: · first try to avoid removal; · if this is not practicable, to remedy the removal; · failing that, to mitigate or offset the removal. The Waima site is the only site on Watercare's "long list" where it is impossible to avoid removing vegetation in a SEA. Kauri Dieback is a huge concern in the Waitakeres, and to Auckland Council. Watercare are proposing to move 100,000 cubic metres of dirt in and around the Kauri Protection Zones. How will the threat of spreading Kauri Dieback through movement of contaminated soil be addressed? Waima and Titirangi do not have a roading infrastructure conducive to the volume of heavy truck traffic that the project anticipates. A heavy truck cannot fit in a single lane along much of the proposed routes, rendering the roads unsafe for both traffic and pedestrians. Scenic Drive has already experienced numerous slips in the past – has research been undertaken as to the likely exacerbation of such events by constant heavy truck movements and vibration? The Waima site is a poor choice for the development, based on Watercare's own site principles and selection criteria. According to their Site Principles report of December 2015, the Waima site failed the Site Principles test, and Watercare needed to relax their criteria in order to allow the site onto their long list. It is the only site on the long list that makes encroachment into a Significant Ecological Area unavoidable. It is very small for its intended purpose, with no room for future expansion should additional facilities be required. I submit that the site was selected based on altered scores due almost entirely to inappropriate political pressure on the CCO as a result of sustained media coverage, preventing the most optimal site being selected. I further submit that the first principle of the RMA – to avoid irreversible adverse environmental effects – has not been satisfactorily achieved with the project being proposed in this location. It is also inconsistent with the relevant objectives and policies of the Auckland Unitary Plan.

What decisions and amendments would you like the council to make?

Go back to the long list of site options which will less impact our environment

Are you a trade competitor of the applicant? I am not a trade competitor of the applicant.

Do you want to attend a hearing and speak in support of your submission? No

If other people make a similar submission I will consider making a joint case with them at the hearing: Yes

Supporting information:

2 September 2019

Re: Submission to Oppose Huia Replacement Water Treatment Plant (WTP) Project resource consent application

Application number: BUN60339273, LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441

Applicant:

Watercare Services Limited
Paul.Jones@water.co.nz

Paul Jones
Watercare Services Limited
Private Bag 92521
Wellesley Street
Auckland 1141

Submission by: Belinda Groot, 16 Waima Road, Titirangi

This submission relates to the whole application. I **oppose** the application in its entirety and ask the Commissioners to decline it.

I wish to be heard at any hearing.

I am making this submission as a resident of Waima and as an advocate for our natural environment.

I am not a trade competitor of the applicant.

If other people make a similar submission I will consider making a joint case with them at the hearing: No

I support the submissions of Titirangi Protection Group Inc and Waima & Woodlands Park Residents and Ratepayers Association and Save Our Kauri Trust.

I am seeking that the application be **declined** in its entirety on the grounds of the following points.

Introduction

I moved to Waima with my family 3 years ago. The unique setting within an area of incredible natural beauty and having the Waitakere Ranges and west coast beaches right on our doorstep were a huge part of our decision to move here. Waima is exactly what we were looking for as a place to raise our son. We are blessed to own a property that essentially has a forest for a back yard. When we bought we carefully read through the relevant sections of the Waitakere Ranges Heritage Area Act to ensure we were aware of the responsibilities and constraints associated with living in the area. It was only a short time later that we discovered that not all landowners in the WRHA were bound by those same constraints and that Watercare were proposing to fell several hectares of native bush to make way for a new water treatment plant.

Vegetation Removal

The area is well known for its rich biodiversity in flora and fauna, including rare species of ferns, epiphytes, butterflies, and snails; forest tree giants including the iconic kauri, rimu, totara and tawa; and significant fragments of kaihikatea wetlands. It is also home to a range of native invertebrates that help keep nutrients cycling and are our key pollinators. This includes several very rare and one completely novel species of insect. These are fully functioning and healthy ecosystems at risk. Edge effects on flora and fauna from the movement of heavy machinery and impacts on groundwater are likely to have major impacts well beyond the site itself. With droughts and extreme weather events increasingly common as a result of climate change our forests don't need any additional obstacles to contend with.

Deforestation, catastrophic loss of biodiversity are major problems globally. Recent reports show that Waitemata Local Board Area alone has lost 620.000m² of tree canopy. With that in mind it is even more outrageous that Watercare are proposing to fell a native forest. From a report recently published by the UN's Intergovernmental Panel on Climate Change it is clear that saving the trees we have is even more vital than planting new ones. Council has recently declared a climate crisis. They must act accordingly and ensure that all decision making puts our environment first.

According to the ecological report by Shona Myers: "The site itself is representative of regenerating forest types including kauri, present in this part of the foothills. It contains threatened ecosystem types (regenerating kauri forest, broadleaved forest and kahikatea-swamp maire forest) and nationally and regionally threatened species. The site forms linkages and corridors for wildlife with adjoining regional parkland forest." All of this would be destroyed meaning massive loss of native ecosystems and fragmentation of the forest. The development also requires the culverting/ diversion of several streams and is likely to have a negative impact on the planting and waterway clean-up activities carried out by the local community over the past 25 years.

Earthworks

Scenic Drive and Titirangi generally are notorious for slips and that's with very minimal heavy vehicles travelling through. There have been numerous closures for slip clean ups and bank stabilisation over the last few years. We're all very concerned about the impact of such a huge increase in heavy vehicle traffic in that respect. <https://www.stuff.co.nz/auckland/local-news/western-leader/97458895/new-slip-on-scenic-drive-closes-the-west-auckland-road>

The geotechnical issues Watercare will experience trying to build on a site on a massive gradient in an area that is very well known for major slips will be huge. This engineering costs alone on this are likely to spiral out of control and they'll just keep throwing money at it.

Kauri dieback was not considered at all in the site selection process. That is totally negligent and yet another reason for them to go back to the drawing board.

100,000m³ of potentially infected soil passing hundreds of healthy kauri when a single spore can devastate a whole stand? It's not just the 3.5ha that's at stake. The edge effects, noise, pollution and vibrations will have a terrible impact on flora, fauna and people a lot further afield. That will include numerous mature trees. Earthworks of this scale in an area that has tested positive for kauri dieback is just madness. Testing of the site for the pathogen has been completely neglected so it is not clear where the pathogen is present.

Watercare's current plan involves dumping the soil from the site down at the sludge dump in contravention of biosecurity rules which mean you are supposed to assume that the soil is infected.

There are no kauri dieback protocols in existence for work on this scale. We don't even know if the shoe washing efforts currently in place are sufficient so how can anyone ensure that the thousands of truck movements through Titirangi won't spread the disease further?

Social Impact

The social impact reporting done on the site was token and rushed and not given any consideration as part of the decision making process. For a project of this scale that is both reckless and totally disrespectful.

Waima residents choose to live in the forest because we love it. It's definitely not the weather, public transport links or easy commute to the city that draws people to making their home in Titirangi.

There will be huge negative impacts on the mental health and wellbeing of the community if the forest is felled. Many of us walk, run and cycle in the area and will no longer be able to do so. The quiet and calm of the area will be completely destroyed during the enabling period and form many years afterwards. The noise, pollution from trucks and massive disruption to traffic will add insult to injury.

Those who live closest to the proposed plant will bear the brunt of the pain should it go ahead. We are still at a loss to understand why the 20 metre buffer mooted for the Oratia proposal was reduced to nothing for Waima.

The psychological trauma and grief for residents that would result from this project being allowed to go ahead has not been thought through.

Summary

This proposal should never have reached the point where resource consent applications were submitted. Watercare have wasted millions of ratepayer dollars paying consultants to try to shoe horn this plant onto a site totally unfit for purpose. They themselves know that it's not big enough and leaves absolutely no room for expansion.

It often seems to that in this country that the word 'infrastructure' unlocks any door. That may have made sense 47 years ago when the designation was approved for this SEA but is no longer acceptable. We have to make better decisions. Infrastructure will be no use when our air is unbreathable, when rainfall becomes more unpredictable, when the seas flood the land. This is not scaremongering. It is science. In NZ at least most politicians agree that climate change is a serious issue. It's time to start giving due consideration to the importance of our environment.

The costs of using this site from an environmental and social perspective are way too high. Alternative sites have not been evaluated with climate change or kauri dieback included in the equation. Watercare need to go back to the drawing board and get this right. They relaxed their site principles to get this site on to the longlist so there is a lot of scope for this to be re-examined.

The impact of consent to this proposal extends far beyond Titirangi. New Zealand markets itself internationally as a tourist destination under the "100% Pure NZ" banner. It's well past time that we start living up to our own marketing. Watercare needs to think outside the forest and be the innovative company that they claim to be. Clean water shouldn't cost the earth.

**SUBMISSION IN RESPECT OF A
RESOURCE CONSENT APPLICATION**

To: Auckland Council
c/ - Resource Consent Project Administrator

For: An application by Watercare Services Limited ("the Application") ("WSL")

Submission on: Regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project.

Application Numbers: BUN60360339273 / LUC60339274 / LUS60339442, WAT60339409, DIS60339275, DIS60339441

Name: **Dave and Jolie Hutchings**

Address: **18 Manuka Road, Titirangi**

Telephone: **027 2220078 (Dave)**
021 0640717 (Jolie)

Email: dhutchingsnz@gmail.com

Introduction

- The submitter is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (the RMA).
- This submission relates to the whole of the Application.

Background

- The submitter lives on Manuka Road, Titirangi.
- The submitter opposes the Application in its entirety.

Reasons for submission

- The submitter opposes the Application.
- The clearing of this site will cause us to lose the sense of bush living which attracted us to the property. The parcel of land directly behind our land was designated 418 Regional park land 'Clarke Bush Track' when we purchased, it has been distressing to discover that the designation was removed without notification allowing Watercare to build up our boundary.

There were no physical signs or indications that the Manuka Rd site belonged to Watercare.

- The proposed mitigation, a \$5 million-dollar fund to target pest and weed control for a 10-year period is not adequate compensation for the large-scale ecological damage.
- The proposed footprint is significant and will require a huge volume of native bush and trees to be cleared. It's disappointing considering the SEA status on the Manuka Road land that Watercare are not seeking to minimise the footprint by utilising buildings or already developed land on their 2 existing Woodlands Park Road sites to accommodate infrastructure i.e. administration offices could be on the old Nihotupu site across the road.
- The buffer allowance to the immediate neighbouring properties is only 10 metres. Initial planning in Oratia allowed a minimum 32 metre buffer to the closest neighbours. A 10-metre buffer should not be permitted and re-visiting the footprint or smarter placement of the plant should be recommended.
- The 10 m buffer zone must remain 100% untouched. Watercare is proposing a 2 m "working zone" within the buffer zone. Vegetation clearing along the buffer zone will place mature vegetation within the buffer at risk of edge effects/poor health. Large trees that would provide a screen if they don't survive the plant construction could be visible from neighbouring properties.
- Reducing the footprint thus reducing the volume of vegetation destroyed would align with Auckland Council's climate change, environment and Kauri Die back policies.
- Hours of work - the consent allows for work to occur 6 days per week. In multiple meetings with Watercare representatives' neighbours were repeatedly advised that work would be conducted Monday - Friday only. This would significantly impact the quiet enjoyment of neighbouring properties.
- Noise - Neighbouring properties will be exposed to significant amounts of noise, vibration, airborne dust and debris. Due to the insufficient buffer zone, noise limits will go beyond the permitted 70 dB limit for neighbouring properties. A representative from Marshall Day confirmed this at a Watercare/neighbours meeting in February 2019.
- Ground stability could be compromised during the site clearing and earthworks stage. Heavy rains will place neighbouring properties at risk of flooding and landslides due to the site being raised 1 to 5 metres above them.
- The volume of heavy vehicle traffic (82,000 truck movements estimated) to remove vegetation and during the construction period will be catastrophic to the residents of Waima and Woodlands Park. Local roads are so narrow and winding that 2 trucks will not be able to pass each other at any one time thus causing a hazard to other road users, cyclists and pedestrians.

- There is not adequate parking to cater the volume of vehicles anticipated during the construction stage of this project. Manuka Road and other side roads that are narrow, with no footpaths should not be utilised for parking as this would cause a hazard for road users and pedestrians.
- Watercare are attempting to publicly minimise the effects on the environment by not identifying the healthy Kauri to be felled measuring less than 20cm in diameter. The total volume of kauri lost in the vegetation clearance must be accurately reported so the public understands the real impact of this proposal.
- Kauri Die back - Sediment runoff from the project site downhill to the neighbouring homes is unavoidable and there is a significant risk of the spread of Kauri Die back. Our property at 18 Manuka Road is home to 17 significant, healthy and mature Kauri trees that could be at risk of disease.

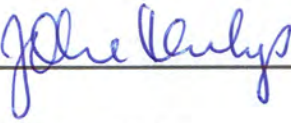

Decision sought

- The submitter seeks that the Application be declined in its entirety.
- Alternatively, if the Application is granted the submitter seeks conditions that mitigate the adverse effects on Manuka Road residents.

The submitter wishes to be heard in support of this submission.

If others make a similar submission consideration will be given to presenting a joint case with them at the hearing.

Signature:

Date: 1 September 2019



Waima to Laingholm Pest Free

PO Box 60580,
Titirangi, Auckland
0642

Ph: 816 9559
Email: admin@W2L.nz
Web: www.W2L.nz



1 September 2019

RE: Application BUN60339273, LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441 from Watercare Services Limited

We are a non-profit community group aimed at the eradication of introduced pests in our local area. As part of this initiative we offer equipment for pest control at low cost. At each "pulse" we ask all our members to put their traps out and report back to us on catches. By taking a coordinated approach we can have more impact than operating individually. By collecting catch data we can grow our understanding of the challenge we face and the impact we are having.

We aim to cover approximately 900 hectares and have goals in place [see appendix 1, and our website]

Mandatory Information

PO Box 60580 Titirangi, Auckland 0604, 816 9559, admin@W2L.nz

We wish the authority to reject the Consent Application in its entirety.

Waima to Laingholm Pest Free wishes to be heard and would consider presenting with others making a similar submission at a hearing.

We are not a trade competitor of the applicant.

OUR SUBMISSION POINTS ARE BELOW

Biodiversity

In February 2018 we were involved in the largest eradication of Argentine ants on the mainland, however they have been found nearby in Waima Crescent, very close to the proposed site and are spreading. Vehicles, machinery, soil, plant material and supplies such as wood, provide common vectors for the spread of ants. The application fails to consider this risk or propose an adequate management plan. In Dr Peter Maddison's report he says "The lack of invasive ant species and particularly of Argentine ant, (*Linepithema humile*) is notable". Peter actually confirmed with W2L there were none, he also goes on to say "A large ground beetle, *Mecodema*, is indicative of a low presence of rodents. This is probably associated with pest control activities in the area."

Earthworks and Vegetation Removal

Construction activity could severely impact on our ability to carry out pest control. Along with practical and safety considerations our volunteers are less likely to be amiable to carrying out their duties with the background noise of chippers and chainsaws.



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Large amount of earthworks in an area known to have Kauri dieback will compromise tracks which have been closed to protect them. We hold rahui warrants with Te Kawerau a Maki and protecting the areas immediately downhill from the site, and indeed our entire coverage area, is a priority.

The Proposed Trust

The goals outlined are not not biodiversity, it's biosecurity. We also make the following points:

- 1) We are not clear of the methodology or basis on which the \$5m figure was derived - what was the ecological basis and methodology of derivation?
- 2) Watercare has a poor history region wide on weed and pest control and we spend many volunteer hours assisting improve this locally on traplines along Exhibition Drive. Any pest control efforts should extend for the life of the plant, not just for the period whilst the WTP is being built and commissioned.
- 3) We seek further information regarding the goal of 400 homes, are these in ADDITION to those currently trapping? How has this been quantified?
- 4) The data and text surrounding the applicant's example in the s92 response are misleading and do not reflect reasonable estimates for the potential benefits of a pest control program over 720 Ha in the Waima Catchment. See appendix 2.
- 5) How the Trust will achieve a positive net gain to the biodiversity of the area when it's not clear what the starting point is?
- 6) We note there are other groups we are in partnership with in the proposed zone who have support to increase biodiversity in the area via Auckland Biodiversity expertise and Auckland Council Grants. The Natural Environment Targeted Rate has increased this help, many of these groups, as documented in the Local Area Plan has been in place for many many years and continued even after the Sustainable Neighbourhoods Funding finished up.
- 7) There is an assumption that the Trust will create high levels of engagement in the catchment, we are fortunate to already have a lot of support which is growing all the time. More resourcing is welcomed, indeed we have received supplies from Watercare, and trap on their land. However the application and proposal does not take into account the resistance of many in the catchment who oppose the project and want no part in



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perceived “hush or cash for trees money”. We are concerned of any unintended consequential damage to our reputation should we engage with the Trust.

- 8) The Trust proposed has a Trustee structure that favours the applicant rather than the community in which it will operate. We have skilled and experienced people in the catchment who have capability to fulfil these functions and respectfully suggest that local people know the area and it's needs best. Far from being parochial it will ensure longevity that kept Sustainable Neighbourhoods running (informally) even after funding expired. A paternalistic approach will be detrimental to community engagement.
- 9) Re Stakeholders. The Community Conservation and CLG representative should be connected to the Catchment in a meaningful way.
- 10) All Trustees should receive the same remuneration, to be equitable. This should be a fixed amount per Trustee per meeting but this shouldn't be excessive.
- 11) There should be a minimum number of meetings per year. It is not clear if they are public? General Administrative Matters Minutes and Financial Records should be publicly available.
- 12) Re 16.3 - If a Trustee acts dishonestly by, for example, not declaring a conflict or pecuniary conflict which results in them personally benefiting financially, proceedings should be permitted. This maintains the integrity of all the Trustees.

“Proceedings Against Trustees: Neither the Board nor any Trustee will be bound to take, or liable for failure to take, any proceedings against any other Trustee (including any former Trustee) for any breach or alleged breach of trust committed by that other Trustee.” 16.3

Waima to Laingholm Pest Free requests being recognised as a relevant/key stakeholder, to be closely engaged with and included in a trustee appointment process that should be open and transparent. And also on any Community Liaison Group (or similar).

Finally, we are appreciative of you allowing us an extension. The navigation of over 2,000 pages of documentation by a small volunteer group has been a challenge.

Regards,

Mark Harvey
On behalf Waima to Laingholm Pest Free



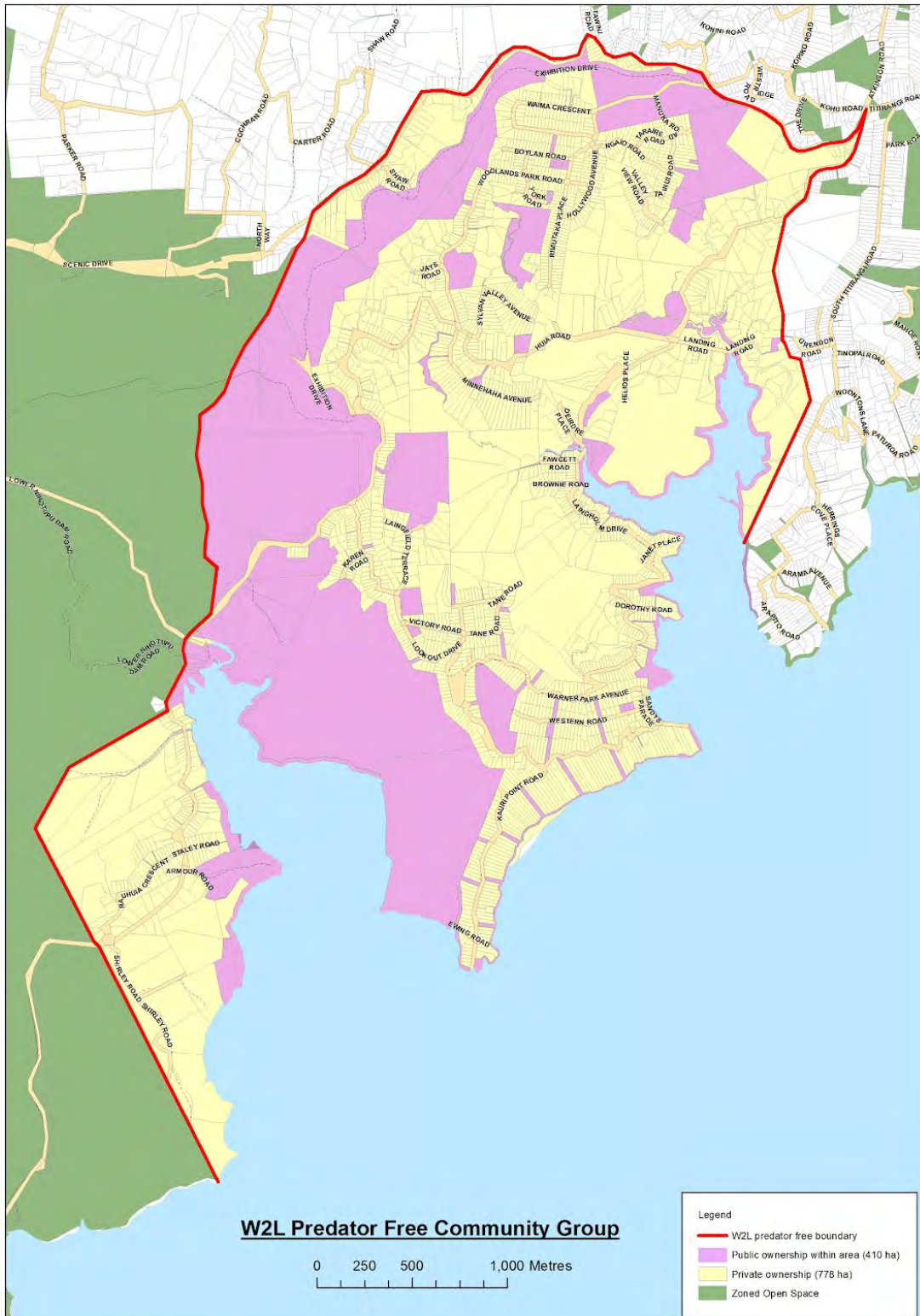
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Map of W2L Area



FILE: Q:\GIS_Analysts\Staff\Neil_Dingle\W2L_Predator_Free_Base_Map.mxd

(dingle), 20/07/2019



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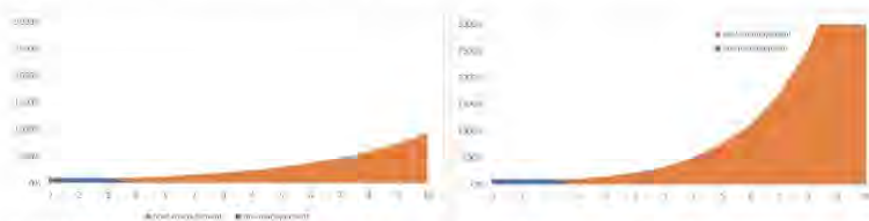
Appendix C, A16055C BML S92 response, p9, Figure 1 and text.

In response to:

"The loss of 3.5 ha of native forest and shrubland within the project development area is assumed to be permanent, or for at least as long as the design life of the infrastructure proposed. Please explain whether and how the proposed compensation programme as administered by the Trust Deed will provide for enhancements to biodiversity that last at least as long as the residual impacts of the development."

Watercare state:

"Figure 1 illustrates simple cumulative growth models for a given species over 10 years assuming a) a 20% annual population increase, and b) 50% annual population increase. In either scenario, the population increase exceeds 1000% after 10 years. Even at an increase of 10% per annum, the population would double after approximately 7 years."



1 (a) 25% annual growth

1 (b) 50% annual growth.

Figure 1. Illustrative models of cumulative population increase.

The data and text surrounding this figure are grossly misleading and do not reflect a reasonable estimate for the potential benefits of a pest control program over 720 Ha in the Waima Catchment. Note first, that the growth rates cited from the references provided on page 10 are 'best case' scenarios in several cases (for example, the Mohua growth rate in O'Donnell et al. NZ Journal of Ecology 2012, 36(2):131 is the highest by far of 13 species, 2 showed no change and 4 decreased in population after pest control). The data cited on page 10 show population increases over ten years of 24-fold, 6-fold, over 7 years of 4-5 fold, and there is no study showing anything near the 1000 fold claimed here. I cannot see anywhere in the cited references an indication of a 50% annual growth rate, or even a 25% annual growth rate, 10% or at a push 17% seems more reasonable, but more likely less than that on average. I have a PhD in Applied Mathematics, focusing on Mathematical Biology and while I do not research population dynamics, this is the kind of thing that is studied as an undergraduate. One of the first things you learn in in these undergraduate courses is that uncontrolled population growth like these curves show only happens in unrealistic scenarios (infinite food sources, space to spread out, no competition for space or food) and the 1000-fold projected increases are clearly unrealistic, and I would say unheard of in the literature on population growth after an intervention. This can be seen by considering an example:

Thinking about the 720 Ha that Watercare propose to do pest control in, let's say that there are 100 Tuis living there right now. With their projected population increases, 10 years after construction of the treatment plant there will be 100,000 Tuis living there. This is great because that means we have 100,000 Tuis /720 Ha = 139 Tuis per hectare. Thinking about this in terms of property sizes we can understand, let's think about how many Tuis will be in a classic Kiwi quarter acre section (0.1Ha) – around 14! Even if there were only 10 Tui originally in the area, we'd have 1-2 per quarter acre of land in the area, and when you add in all the other species that will be saved, the land will be packed with native species. While it sounds awesome that the pest control programme will be so successful it is clear that this is a mis-representation of the data.

From my interpretation of the data presented by Watercare, it seems more likely that the worst-case scenario presented in the response document is actually closer to a best-case scenario than any other numbers touted, and the graphs presented are a severe mis-representation of the data available.

Submission on application for resource consent

To: Auckland Council

Submitter: Natasha and Mark Carter and Keith Berman

The Submitters are owners and/or occupiers of 5 Boylan Road, Woodlands Park, Titirangi

Email: kberman@ninehigh.co.nz

The submitters are not trade competitors and are affected by the proposal as it adversely affects the environment including their property at 5 Boylan Road.

Site address:

Huia Replacement Water Treatment Plant (WTP) Project

Application number:

BUN60339273

Name of applicant:

Watercare Services Limited

Applicant's email address:

Paul.Jones@water.co.nz

Summary of application (as provided by Watercare):

Watercare Services Limited has applied for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) for enabling earthworks, vegetation removal and associated activities related to the Huia Replacement Water Treatment Plant (WTP) project. The application relates to three sites owned by Watercare as follows: the Replacement WTP site on the corner of Manuka Road and Woodlands Park Road; a new reservoir located on the northern side of Woodlands Park Road (Reservoir 1); and the existing Huia WTP site (where a second 25 ML reservoir is to be located once the existing Huia WTP has been decommissioned). The application also includes enabling earthworks to provide for the North Harbour 2 watermain valve chamber and tunnelling reception shaft within the Reservoir 1 site.

The proposal involves earthworks and vegetation removal, including in a Significant Ecological Area (SEA) overlay, and stream works including the reclamation and

diversion of a small length of intermittent stream. Resource consents are also sought for the diversion and discharge of groundwater and stormwater, and the disturbance of potentially contaminated land. The application will be assessed overall as a non-complying activity.

Our Submission:

Our submission relates to the whole of the application.

1. We support and adopt the submission/petition to be filed by Titirangi Protection Group Incorporated. That submission forms part of this submission. A copy will be provided on request.
2. The application should not be approved having regard to:
 - (a) RMA Part 2;
 - (b) The actual and potential effects on the environment of the proposed works;
 - (c) The adverse effects on the environment which will be more than minor and having regard to the policies and objectives of the Auckland Unitary Plan;
 - (d) The inadequacy of the proposed mitigation measures. No mitigation can adequately compensate for the adverse effects of the works;
 - (e) The inadequacy and ineffectiveness of the proposed conditions of approval.
 - (f) The other statutory provisions relevant to this application.
3. The information provided with the application is inadequate to enable a proper assessment of the effects of the proposed works, and to enable the submitters and Commissioners to ascertain whether adequate conditions can be formulated to address the adverse effects. This is, in part, because an inaccurately narrow view has been taken by the Applicant of the effects of the proposed works. Traffic effects, noise effects, landscape effects, ecology and heritage effects, and a wide range of other effects, including some construction effects, are directly effects of the proposed works. Those effects must be addressed and considered as part of this application. They must not be deferred to the OPW or left to numerous ex post facto "Plans" (as proposed in the Draft Conditions).
4. The proposed works will have and is already having a devastating effect on the social fabric of the Waima/Woodlands Park community including their safety, well-being, and health. Their neighbourhood will be part of a construction site for at least 8 years (and recently what project has been finished on schedule?).

We ask that the Application be declined.

We wish to be heard in support of our submission.

We request the functions, powers, and duties to hear and decide the application be delegated to at least 2 commissioners who are not members of Council. However we would like to be consulted as to who are the proposed Commissioners prior to their appointment.

Signed on behalf of the

Submitters by Keith Berman

A handwritten signature in black ink, appearing to read 'Keith Berman', is written over a horizontal dashed line.

Dated 28 August 2019

Electronic address for service: kberman@ninehigh.co.nz

Telephone: 021 763032

Postal Address: 16 Mahoe Avenue

Remuera 1050

Contact person: Keith Berman

From: [PJones \(Paul\)](#)
To: [Tracey Grant](#)
Subject: FW: Submissions to Huia Replacement Water Treatment Plant (WTP) Project
Date: Tuesday, 26 November 2019 2:25:24 PM

Is this another one?

Paul Jones | Principal Planner

Watercare Services Limited

Customer service line: +64 09 442 2222

Postal address: Private Bag 92 521, Wellesley Street, Auckland 1141, New Zealand

Physical address: 73 Remuera Road, Remuera, Auckland 1050, New Zealand

Website: www.watercare.co.nz

From: Tom Ang [<mailto:tomangphoto@gmail.com>]
Sent: Monday, 2 September 2019 4:10 a.m.
To: PJones (Paul)
Subject: Submissions to Huia Replacement Water Treatment Plant (WTP) Project

Huia Replacement Water Treatment Plant (WTP) Project

Public notice date: 4 August 2019

Closing date and time: 2 September 2019, 7am

Section 95A of the Resource Management Act 1991

Auckland Council Application for resource consent.

Location: Huia Replacement Water Treatment Plant (WTP) Project

Applicant :Watercare Services Limited

Submission in response to application numbers:

BUN60339273

LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441

Address for service: Email: Paul.Jones@water.co.nz

Paul Jones

Watercare Services Limited

Private Bag 92521

Auckland , 1141

Submissions of Tom Ang

I oppose this application and ask the Commissioners to reject it. I wish to be heard at any hearing.

I am making these submissions in my capacity as a resident of Auckland and as a tree advocate.

I support the submissions of Cyril Hamiaux and Megan Fitter, both of Titirangi Protection Society, and Shona Myers.

The 'ecology' report is woefully inadequate in its cursory examination of the damage that the development of the site will entail. In particular, it fails to give due regard to the protected trees in the site. Indeed, the report goes out of its way to avoid mentioning key species such as Kauri (BM Ecological at WTP Footprint p.69).

As a result, it is impossible to evaluate fully the damage that will be done to the protected trees of this highly Significant Ecological Area. In particular, the report

fails abysmally to value the trees. A basic, and conservative valuation following internationally accepted, peer-reviewed standards should have been undertaken. The failure to do so renders any grant of consent profoundly unsafe.

A CAVAT calculation using the Quick Method (all that is possible given the paucity of data and absence of baseline studies) <https://www.ltoa.org.uk/resources/cavat> based on the ecological report's own figures at pp. 69-70 taking in account only Kahikatea and Kanuka arrives at a conservative valuation of NZD 14,444,805. This does not include the twenty-four substantial specimen examples of Kauri, Totara, Rewarewa, etc.

In respect of p.69, we note that the report refers to 'at least' 34 canopy trees but is specific only in reference to Kahikatea. According to the ecology report at Illustration 18 there are 31 Kauri, 5 Totara and 39 Kahikatea, 13 Kanuka as well as 11 Macrocarpa on the site. The unexplained inconsistencies in figures, as well as reluctance to refer to Kauri indicates a dishonest, unprofessional attempt to minimise mention of protected trees. Furthermore, it is not standard practice to refer to forest density by 100 sq metres, but by the hectare. 4-10 trees per 100 sq metres may sound like not much, but in fact represents a high density of trees of significant diameter. This represents a disappointing lack of objectivity in the presentation of the ecological report, that must bring into question the objectivity of its conclusions.

In Maori understanding, trees are part of the human family tree: they are our elder siblings. Tane, they say, made trees before making humans, a story not dissimilar to the first chapter of Genesis, or to the unravelling of the human genome, which shows we share a third of our genes with oak trees.

Kentucky farmer and essayist Wendell Berry wrote: "Until we understand what the land is, we are at odds with everything we touch. And to come to that understanding...we have to re-enter the woods."

The Project Site

The "Project Site" has a works footprint of 4.3 hectares of indigenous forest and scrub dominated 'vegetation'. This vegetation is ngahere. All part of a 24,000 hectare Significant Ecological Area (SEA_T_5539) AUP that encompasses the Waitakere Ranges.

The Waitakere Ranges ecosystem as a whole is nationally significant as one of the largest areas of coastal and lowland forest with intact sequences remaining in the Auckland Region.

This Project Site is Watercare's "preferred site".

We know that Watercare had a number of other sites it could have used for the treatment plant yet it claims that none were suitable. The Titirangi Protection Society takes issue with this claim and I support their submissions on this point.

What about the sludge dump which Waitakere Ranges Local Board asked Watercare to consider as the project site instead? Why has Watercare not considered this site? It needs cleaning up, is already cleared and should be considered.

I submit that all alternative options have not been thoroughly investigated. Boffa Miskell's assessment of the terrestrial (and freshwater) ecological values of the proposed replacement WTP site and the reservoir site assigns the site a 'Moderate' rating for representativeness, and a 'High' rating for rarity/distinctiveness, diversity and pattern, and ecological context. In accordance with the EIANZ criteria, the Project Site is therefore deemed to be of 'Very High' value.

It also has Auckland Council's highest level of protection with the SEA overlay

under the AUP.

Watercare and its advisers variously claim, in the application and supporting documents, that : “Ecological constraints in particular have been the primary determinant,” (p.ix Executive Summary T&T); The reservoir site considered the sustainability principles to: minimise environmental, ecological and social effects in alignment with Watercare’s sustainability principles to the wider community and environment; Carbon required throughout the lifecycle of a reservoir site shall be considered; The effects of climate change need to be considered in selecting a site for a reservoir. (Beca p25)

In fact at the end of the day these noble claims have become the secondary determination because Watercare’s primary determinate turns out to be “Watercare’s desire to ensure that the proposed upgrade was considered strategically in terms of the operation and future development of the overall water treatment and drinking water supply network” (T&T p54)

Watercare also “own” the project site and it is already designated “water supply purposes”

It is my submission that, in reality, these facts were the determining factors in Watercare’s decision. T&T and Beca are merely paying lip service to claims that “ecological constraints.. have been..primary determinant” for locating the project at this site, for the purposes of this Resource Consent Application and attempting to show that they are complying with their obligations under the RMA.

The nice words regarding the Board’s concerns, about preserving notable/scheduled trees and the SEA environment, gloss over the fact of Watercare’s destruction of the highest level of threatened and nationally critical (kauri, pohutukawa, climbing ratas, maire tawake, kanuka, manuka, and Elaeocarpus hookerianus. p27 T&T) and “at risk” endangered and declining (koura, long fin eel, Inanga) “endemic” New Zealand biodiversity, rare newly discovered endemic species of wasp and species yet to be discovered. The highest level of SEA under the AUP.

I submit that the documentation does not demonstrate a robust assessment of alternative options in relation to the siting of this project, the new WTP and the 2 Reservoirs.

In the circumstances this application fails to fulfil the Applicant’s RMA obligations required by Part 2 Purpose and Principles and particularly section 171(1)(b) and also Clauses 6 and 7 of Schedule 4 (particularly clause 7 (b) (c) and (d)).

This project is de-minimus

It is implicit in this application and the reports that In theory 4.3 hectares of 24,000 hectares of SEA is an insignificant part of the whole area.

By definition it is not de-minimus or there would not be the necessity to offer compensatory schemes or other mitigation. This is pure and simple logic.

The Application tells us that “Since it was commissioned, (in 1929), the Huia WTP has been expanded and upgraded a number of times with its capacity increased and new treatment processes added.” (p5 T&T Application)

What is to stop further development on this de-minimus basis in the future?

Future proofing

Watercare says that this project is needed to future-proof its operations in the north west.

Past experience tells us that the proposed rather small 27% increase in maximum production capacity from 110/126 (max)MLD to 140MLD, is not in fact “future proofing” it is a foot in the door to future increases in maximum production and treatment processes.

It is my submission that on past history it is fair to assume that Watercare will want to increase the capacity of this site in a few years time and will use the same argument that it is a small loss taking the whole of the 24,000 hectares of the SEA into account.

On past history and experience this application represents a slippery slope.

It also needs to be highlighted that the long run processing capacity of the proposed replacement Huia WTP will be similar to the existing plant as the sustainable draw from the four supply dams has not changed. (See note 18 at p14 of the T&T Application)

This means that increasing the maximum production capacity of the plant does not enable Watercare to make use of that capacity because they cannot get enough water from their dams.

So does this mean they are going to dig another dam? Do they have some plans to create another dam to enable them to use this capacity? Otherwise what is the extra capacity for?

Simple fact is this plant is not 'future proofing' Auckland's water.

It is a proposal to develop into one of the most significant and 'high value' SEAs in Auckland which it intends to continue to develop into for the purposes of "future proofing" Auckland's water.

It is a proposal to develop into Auckland's water catchment area of the Waitakeres. How is this future proofing our water catchment when in future we will need more water not less? Clearing trees we know reduces our water catchment. The Commissioners do not have all the information they need to properly evaluate this proposal taking into consideration the future water catchment needs of Auckland.

Valuation

It is not about the small area of the whole SEA to be destroyed but exactly what is to be destroyed. It is about the true "value" and quality of what is to be destroyed and the long term consequences to the whole.

Watercare has failed to properly survey and value this indigenous forest SEA that it is proposing to destroy with this project. The value of this priceless ngahere and the notable trees which are New Zealand's taonga, these costs should be factored into the information provided to enable Commissioners to make their decision.

They are not. Not to provide this information is to fail to comply with Watercare's obligations under Schedule 4 of the RMA.

"Hence, while the proposed forest clearance amounts to a small proportion of the indigenous forest present in the Little Muddy Creek catchment, the gap created will further reduce connectivity across the (already somewhat fragmented) local landscape, and between mature and regenerating forest patches in the immediate environs of the Project Site (Figure 20). " BM p71

s issue is one of lack of value - see valuations to work on with Tom.

VALUATION

The Kauri and other Notable Trees, less significant native trees and ngahere to be destroyed by this project

Where is the tree by tree assessment arboricultural report?

We do not actually know how many native trees are being destroyed and exactly what types of tree / plants they are.

Under the CAVAT system of assessment and valuation population densities of more than 119 trees per hectare are considered 'high density'.

In expressing the density of trees and ngahere, to be destroyed as, trees per

100m², as BM does in its report, is a dishonest attempt to make the numbers to be destroyed look smaller than they really are.

10 trees per 100 m² is a lot of trees.

BM's report is not detailed about the trees to be destroyed. We have 34 trees mentioned, some of the varieties that are endangered, and some specimen trees are mentioned. That is all.

The BM report seems to go to great lengths not mention exactly what mature podocarps will be destroyed.

The true scale of the loss and the variety, which includes diverse mature ngahere of Nikau, and ferns, amongst many other native varieties as well, has not been surveyed and the information is not available.

This means that the Commissioners do not have all of the information that they need to ensure that this application is compliant with the requirements of the RMA and the AUP, particularly in relation to the SEA and the waterway overlays, nor in relation to Auckland Council's other policies and strategies.

The Kauri Community

Maori lore tells us that the Kauri live in community not only with each other but also with those companion plants that Kauri like the company of and which generally grow where Kauri do.

BM refer at page 64 of their report to the "Kauri-podocarp forest community". "Of particular concern is the likely change to the kauri-podocarp forest community adjacent to the south-western corner of the WTP footprint, which is close to a group of large, old-growth podocarps."

The AUT University work on a Kauri Stump is relevant here. (July 25 2019 by MKF Bader & S Leuzinger - [https://www.cell.com/iscience/fulltext/S2589-0042\(19\)30146-4](https://www.cell.com/iscience/fulltext/S2589-0042(19)30146-4))

This is new research, published on July 25 in iScience, which details how surrounding trees keep tree stumps alive, possibly in exchange for access to larger root systems.

The findings suggest a shift from the perception of trees as individuals towards understanding forest ecosystems as "superorganisms."

Such intimate hydrological coupling suggests a "communal physiology" among (conspecific) trees with far-reaching implications for our understanding of forest functioning, particularly under water shortage.

This work builds on the work of Dr Susanne Simard professor of forest ecology who teaches at the University of British Columbia.

Simard helped identify something called a hub tree, or "mother tree". Mother trees are the largest trees in forests that act as central hubs for vast below-ground mycorrhizal networks. A mother tree supports seedlings by infecting them with fungi and supplying them the nutrients they need to grow.[1]

In this way, individual plants are joined to one another by an underground hyphal network: a dazzlingly complex and collaborative structure that has become known as the Wood Wide Web.

It was also found the mother trees change their root structure to make room for baby trees.

Simard also found that tree species can loan one another sugars as deficits occur within seasonal changes.

The benefit "of this cooperative underground economy appears to be better overall health, more total photosynthesis, and greater resilience in the face of disturbance".[2]

This network is a key factor in the mauri of the Forest "superorganism".

The kind of land disturbance proposed in this project will destroy parts of the “wood wide web” and negatively impact the whole forest superorganism ecosystem.

BM themselves highlight at p64, “Of particular concern is the likely change to the kauri-podocarp forest community adjacent to the south-western corner of the WTP footprint, which is close to a group of large, old-growth podocarps.”

They also go on to highlight the main issue with this forest clearance “..., while the proposed forest clearance amounts to a small proportion of the indigenous forest present in the Little Muddy Creek catchment, the gap created will further reduce connectivity across the (already somewhat fragmented) local landscape, and between mature and regenerating forest patches in the immediate environs of the Project Site.” (BM p71)

I submit that we just don't know what negative impact this project will have on our threatened Kauri-podocarp forest community.

What we do know is that it will be negatively impacted as will the whole forest superorganism ecosystem.

Vibration

We know that this Forest has a connectivity through the woodwideweb.

We also know that the kind of earth movers and heavy machinery to be used in this project, plus the excavations, all will cause vibration through the ground.

This will negatively affect the trees and this Forest.

Such a major development on the edge of this forest will have vibration consequences to trees well outside the site footprint.

It is time that Applicants were made to consider this issue.

The Assessment of Environmental Effect

The Boffa Miskell Report gives an idea of the environmental qualities of the project site but by no means is it an exhaustive survey.

There are no base line studies which means that the proposed mitigation biodiversity monitoring methodology, in relation to the Trust to be set up, is flawed. Furthermore much of the BM report is opinion and assumption.

It completely fails to assess the actual environmental effects and as such this application fails to include all the information it is required to provide by Schedule 4 Clause 7 (1) to enable the Commissioner's decision-making to be fully informed..

Chipping the destroyed trees and ngahere

“Due to the density and size of the vegetation required to be removed, mechanical plant such as 20 tonne (T) diggers and large chippers will be required on site to undertake the clearance works.” (p27 T&T)

Chippers ensure that the biodiversity loss will be greater than if the destroyed native trees were left to decay where they lie.

I refer to the case of Ngai Tahu's Eyrewell Ground Beetle which was finally destroyed when Ngai Tahu cleared and chipped, the pine plantation which was their last known habitat.

The earthmovers destroy the soil structure, the mycorrhizal and fungal network that maintains the balance and harmony in the Forest and enables our native plants to function as an integrated superorganism.

This means that the landscaped “mitigation” solution will take 10s if not 100s of years to return the soil structure to what it is now. It is possible it will never return, ever.

Destroying the soil structure and overstorey vegetation destroys the stormwater runoff and groundwater system. The many reports on this issue make that clear

enough.

This leads to soil erosion and runoff problems because of the loss of the overstorey and possible pollution and disease contamination of water courses flowing towards the Manakau Harbour.

Also possible contamination of the Manukau Harbour in the event of an unexpected heavy weather event.

The severity of the effect of soil structure destruction on the trees and forest that are left is difficult to know as BM themselves not at p64. Especially if the rainfall is less than usually expected.

The unequal undemocratic and unsafe Auckland Council Resource Consent process

The Government's Environment Aotearoa 2019 Stocktake Report informed us that New Zealand's environment and biodiversity is in a precarious state. "Things are very bad" said Forest and Bird's Kevin Hague.

The 'Man of Trees' Richard St Barbe Baker writing in his book "The Land of Tane" in the 1940s and 50s noted that New Zealanders viewed "trees as being in competition with settlement".

This cultural condition is as prevalent today as it ever was, especially espoused by the culture of Auckland Council and its CCOs, which is to prefer development over protection and enhancement of the environment, and especially our forests and trees,.

Auckland Council and the Applicant espouse the current New Zealand culture which sees 'development' as being in competition with our environment.

Auckland Council culture has not modified its plans, processes and planing policies to take the Government Stocktake outcomes into account in its decision making.

Development is still be preferred over protection and enhancement of the environment because Auckland Council does not actually 'value' Auckland's environment, urban tree canopy and biodiversity enough to compromise and modify its most often unnecessary "dust world' plans.

This application, like many Resource Consent applications, for destruction of trees, ngahere, biodiversity and its habitat, particularly in Auckland's SEAs demonstrates a clear lack of consideration of the true value of our environment and biodiversity.

To allow the destruction of this most valuable and vulnerable part of this SEA once is to potentially open the floodgates to the destruction of this priceless taonga altogether.

This application represents the sharp edge of the sorites paradox.

This 24,000 acre 'high value' SEA is currently being chipped away at daily like a balding man losing one hair at time until he becomes bald.

The "mitigation" or "compensation" - theTrust

The Trust will only operate for a minimum of 10 years.

10 years is nothing compared with the century or more that the trees, biodiversity and soil structure have already given us and will continue to generously give if it is left alone.

The Focus and key actions of the Trust's biodiversity management will be solely on Little Muddy Creek not on the whole area. So the Trust will do nothing to address the damage it will do to this patch of nationally significant native forest. It may not be able to do anything beyond its mandate.

The Trust is totally limited to this project and this project alone.

The focus and key actions are on pest and weed management this is not a

primary focus on biodiversity protection and enhancement.

Where there is a mention of biodiversity it is methodologically flawed because there is no mention of base line studies. It only talks about monitoring and as there have been no base line studies to date, even for this application, then it is a sham. Pest and weed management is only being caused by this project because Watercare will open up the forest canopy of the area and will cause an explosion in weed growth on the Forest margins which are currently contained within a shaded closed canopy.

Engagement with community is all very well but it does not replace, encourage or enhance the biodiversity and its habitat loss.

The proposal is that \$5million will be paid from Watercare only after the trust is set up as a charitable entity. This \$5 million payment will then be tax deductible for Watercare. Some would say this is prudent management. I submit it is not really mitigation or compensation at all.

The Board is required (Para 5.5) to do what Watercare tell them whether they ask for any input from Watercare or not. The Board "must" have an "ongoing and co-operative relationship with" Watercare. Watercare will have full control (para 6) of the Trust.

It is clear that Watercare will actually be in control of this Trust.

The Trust Board is in fact merely a puppet of the Watercare Board which does raise concerns about Watercare obtaining tax advantages by their promotion of this scheme.

I submit that this mitigation is not what it appears to be. It is a lot of smoke and mirrors.

Far from being focussed on achieving an overall net benefit in biodiversity (p31 T&T) this mitigation and biodiversity compensation package does not have the base line data to be able to measure these grand claims

This Trust is a sham.

I submit the Trust is specifically designed to prevent the Trust from objecting to Watercare's future plans for development of the project area.

I further submit that this proposed mitigation/compensation fails to comply with RMA Schedule 4 clause 6 (e) and s 171 (1B).

Water Catchment Area

This area of the Waitakere Ranges is an important part of Auckland's water catchment area.

A study published in the Science of the Total Environment journal, led by Professor of Ecology and Conservation Science Dr David Lindenmayer. concerned logging reducing water catchment in the Melbourne Thomson Catchment.

Dr Lindenmayer argues timber harvesting, climate change and bushfires are interconnected drivers of water loss.

He points out that it has long been known that logging can significantly reduce the amount of water produced from forests.

Dr Lindenmayer argues his work indicates the Victorian government needs to cease logging and prioritise the supply of water to the people of Melbourne.

The same issues are relevant in respect of Watercare's application.

This WTP is to be built in Auckland's water catchment area. Any future development will involve further destroying an SEA and destabilising Auckland's Waitakere Water Catchment area.

Has it done the studies to resolve the loss of water to the catchment? I have not seen them.

BM themselves recognise that the forest is connected and this forest clearance "..., while the proposed forest clearance amounts to a small proportion of the indigenous forest present in the Little Muddy Creek catchment, the gap created will further reduce connectivity across the (already somewhat fragmented) local landscape, and between mature and regenerating forest patches in the immediate environs of the Project Site." (BM p71)

Death by a thousand cuts.

I submit that instead, of developing this WTP in this fragile location where there is no space for future development of this plant, Auckland Council and Watercare should instead close the Waitakere Ranges from development and prioritise the supply of water from this area to the people of Auckland.

Weed management

One hopes that chemicals like glyphosate which is an antibiotic will not be used because of their very toxic effect on soil mycorrhiza and fungi which is so important to the proper functioning of this Forest ecosystem as a superorganism. Glyphosate is an antibiotic which is toxic to soil mycorrhiza and fungi. Given the problems with Kauri Dieback disease and myrtle rust this chemical should never be used.

It is possible that it is implicated as one of the multiply of factors that are contributors of the depletion of the immune systems of our trees that are enabling these diseases to take hold in our trees.

Carbon

We are told in the Beca report p.25 that "Carbon required throughout the lifecycle of a reservoir site shall be considered; "

What about the carbon release consequences of destroying unknown numbers of mature and scheduled trees and native ngahere?

No assessment has been done as far as I can find nor does it appear is one planned.

This failure of methodology and to address this sustainability principle means that any grant of Consent would be unsafe.

Alignment with Council's plans and Strategic Objectives

Strategy for Auckland's Urban Ngahere

This application is not align with Council's plans and strategic objectives.

No mention is made of the Strategy for Auckland's Urban Ngahere.

"Protecting trees " is part of the implementation framework actions.

The strategy is supposed to provide an important tool to ensure we are all working towards the same common goal.

I submit that this application is not consistent with this strategic objective.

The Auckland Plan 2050

This application may comply with Directive 4 of this plan regarding provision of future infrastructure but it totally fails to comply with Directive 1 and the Focus areas.

I submit that this application fails in its compliance with balancing the competing interests of environment and development.

Another way of interpreting the RMA is - Tiwaiwaka - <http://treeadvocates.com/wp-content/uploads/2019/08/Tiwaiwaka-ebook.pdf>

Auckland Council is currently failing to safely apply the RMA and is, in fact, preferring development over Auckland's environment and biodiversity which is, overall, having a devastating overall effect on Auckland's environment, biodiversity and habitat.

Nowhere does Auckland Council keep a tally of the overall impact on Auckland's urban forest canopy and fragile biodiversity. of each resource consent. Particularly the very unsafe non-notified resource consents, some to destroy habitat in SEAs, which it is rubber stamping.

This is well demonstrated by the failure to factor in the dollar cost of the loss of this Forest SEA its notable trees and the damage to the Kauri community of trees located in the Waitakeres and native taonga.

The 'ecology' report is woefully inadequate in its cursory examination of the damage that the development of the site will entail. In particular, it fails to give due regard to the protected trees in the site. Indeed, the report goes out of its way to avoid mentioning key species such as Kauri (BM Ecological at WTP Footprint p.69).

As a result, it is impossible to evaluate fully the damage that will be done to the protected trees of this highly Significant Ecological Area. In particular, the report fails abysmally to value the trees. A basic, and conservative valuation following internationally accepted, peer-reviewed standards should have been undertaken. The failure to do so renders any grant of consent profoundly unsafe.

A CAVAT calculation using the Quick Method (all that is possible given the paucity of data and absence of baseline studies) <https://www.ltoa.org.uk/resources/cavat> based on the ecological report's own figures at pp. 69-70 taking in account only Kahikatea and Kanuka arrives at a conservative valuation of NZD 14,444,805. This does not include the twenty-four substantial specimen examples of Kauri, Totara, Rewarewa, etc.

In respect of p.69, we note that the report refers to 'at least' 34 canopy trees but is specific only in reference to Kahikatea. According to the ecology report at Illustration 18 there are 31 Kauri, 5 Totara and 39 Kahikatea, 13 Kanuka as well as 11 Macrocarpa on the site. The unexplained inconsistencies in figures, as well as reluctance to refer to Kauri indicates a dishonest, unprofessional attempt to minimise mention of protected trees. Furthermore, it is not standard practice to refer to forest density by 100 sq metres, but by the hectare. 4-10 trees per 100 sq metres may sound like not much, but in fact represents a high density of trees of significant diameter. This represents a disappointing lack of objectivity in the presentation of the ecological report, that must bring into question the objectivity of its conclusions.

Not only are Auckland Council Commissioners failing to interpret the RMA to protect our most vulnerable environment and endemic biodiversity this is happening at a time of huge public concern about changes to Earth's climate. The first question in the Resource Management Act should be something like this: "Does this proposed action help the earth more that it hurts it. If the answer is yes, it can be approved. If that is uncertain, the proposal needs to be looked at again and revised.If the answer is no, it hurts the whenua more than it helps, it is rejected". There is no room for "ifs" and "buts".

If that was how we managed our environment our future would be more certain. In actual fact such an approach is in keeping with Part II of the Resource Management Act Purpose and Principles Sections 5,6, & 7:

RMA Section 5. Purpose - (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.

(2) In this Act, "sustainable management" means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enable people and communities to provide for their social, economic, and cultural well being and for their health and safety while –

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.

For the sake of our future and those future generations who follow us the RM Act needs to be administered in a more literal way. We need to try to follow the spirit of the law, rather than looking for the absolute minimum we can justify to ourselves.

What has happened in fact is the Act has been administered in a way that ensures that economic development continues to progress in such a way that its effects on the environment are acceptable to those who administer the Act and those to whom they are answerable.

Also to expert advisers who support the current paradigm of destruction.

The result has been the continuing gradual deterioration of the environment that we are all witness to and are increasingly alarmed about.

The time has come to stop postponing the inevitable and work to ensure that the Act does achieve the protection of the environment and the life that belongs there. Currently the whole approach is to try to find ways around the statutory duties to protect nationally significant ecological areas by putting the fox in charge of the hen coup.

Tikanga

I am talking about 'tikanga' acting with the right intention in the correct way.

"We stand now where two roads diverge". Rachael Carson Silent Spring 1962 .

The risks of not taking the correct road are too grave to contemplate.

Climate change issues from submissions to the Environment Committee

The Masterplan proposal does not align with Council's plans and strategic objectives. No mention is made of the Strategy for Auckland's Urban Ngahere. "Protecting trees " is part of the implementation framework actions. The strategy is supposed to provide an important tool to ensure we are all working towards the same common goal.

Nowhere is it mentioned.

What about Council's Climate Crisis Declaration in June 19? Surely Council and Local Boards are reviewing and auditing all proposals and plans? We are being told almost daily that it is planting trees, preserving and replenishing our mature forests that will help solve the carbon and climate crises.

These assessments have focused on avoiding, as far as practicable, effects on the values of the SEA and the streams and otherwise minimising and mitigating adverse effects. Section 5.5 of this report provides further details on the layout optimisation exercise which was undertaken in accordance with Schedule 4 of the RMA and also to reflect the Watercare Board's direction to avoid, as far as practicable, significant trees and significant ecological effects on the preferred site.

Loss of threatened at risk species BM p67 - there *are* no "large and widespread populations." of natives in New Zealand any more. When one considers how New Zealand was once covered in native ngahere that was "large and widespread" . Now our land is covered Now, in Auckland region, it is fair to say with the many

separate resource consent applications, just like this one, many non-notified, are systematically destroying biodiversity habitat in Auckland's most valuable SEAs

-

Min of Environment Stats - Indigenous Forest cover of New Zealand 2012 25.9%
1000AD 80% cover by 2000 24% cover = settlement of New Zealand has destroyed approximately 60% of the Indigenous Forest cover of New Zealand - this does contradict the claim of large and widespread populations.

We are down to survival populations and every one of these Resource Consents facilitated by accommodating ecologists like BM who make a business of assessing the biodiversity as though the resource consent were a one off application instead of one of many which enabling Auckland Council to steadily undermine and destroy Auckland's biodiversity habitat and green environment The overall affect of each one of these Resource consents (notified and non-notified) is not quantified nor do Commissioners consider the overall affect of each one on Auckland's biodiversity and green environment for future generations.

I submit this is a serious problem with this process and flaw in this process which is leading to the collapse of Auckland's biodiversity.

Auckland Council in allowing this resource consent as it is rubber-stamping other non notified resource consents to destroy trees in Waitakeres is destroying the integrity and connectivity across the Waitakeres ranges Forest landscape, between mature and regenerating forest patches one resource consent application at a time. It is creeping development dressed up as expert advice.

Watercare must be required to develop other sites already surveyed that show a far reduced ecological impact.

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Huia Replacement Water Treatment Plant (WTP) Project

Public notice date: 4 August 2019

Closing date and time: 2 September 2019, 7am

Section 95A of the Resource Management Act 1991

Auckland Council Application for resource consent.

Location: Huia Replacement Water Treatment Plant (WTP) Project

Applicant :Watercare Services Limited

Submission in response to application numbers:

BUN60339273

LUC60339274, LUS60339442, WAT60339409, DIS60339275, DIS60339441

Address for service: Email: Paul.Jones@water.co.nz

Paul Jones

Watercare Services Limited

Private Bag 92521

Auckland , 1141

Submissions of Wendy Gray

1. I oppose this application and ask the Commissioners to reject it.
2. I wish to be heard at any hearing.
3. I am making these submissions in my capacity as a resident of Auckland and as a tree advocate.
4. I support the submissions of Cyril Hamiaux and Megan Fitter, both of Titirangi Protection Society, and Shona Myers.
5. In Maori understanding, trees are part of the human family tree: they are our elder siblings. Tane, they say, made trees before making humans, a story not dissimilar to the first chapter of Genesis, or to the unravelling of the human genome, which shows we share a third of our genes with oak trees.
6. Kentucky farmer and essayist Wendell Berry wrote: "Until we understand what the land is, we are at odds with everything we touch. And to come to that understanding...we have to re-enter the woods."

The Project Site

7. The "Project Site" has a works footprint of 4.3 hectares of indigenous forest and scrub dominated 'vegetation'. This vegetation is ngahere. All part of a 24,000 hectare Significant Ecological Area (SEA_T_5539) AUP that encompasses the Waitakere Ranges.
8. The Waitakere Ranges ecosystem as a whole is nationally significant as one of the largest areas of coastal and lowland forest with intact sequences remaining in the Auckland Region.
9. This Project Site is Watercare's "preferred site".
10. We know that Watercare had a number of other sites it could have used for the treatment plant yet it claims that none were suitable. The Titirangi Protection Society takes issue with this claim and I support their submissions on this point.
11. What about the sludge dump which Waitakere Ranges Local Board asked Watercare to consider as the project site instead? Why has Watercare not considered this site? It needs cleaning up, is already cleared and should be considered.
12. I submit that all alternative options have not been thoroughly investigated.
13. Boffa Miskell's assessment of the terrestrial (and freshwater) ecological values of the proposed replacement WTP site and the reservoir site assigns the site a 'Moderate' rating for representativeness, and a 'High' rating for rarity/distinctiveness, diversity and pattern, and ecological context. In accordance with the EIANZ criteria, the Project Site is therefore deemed to be of 'Very High' value.
14. It also has Auckland Council's highest level of protection with the SEA overlay under the AUP.

15. Watercare and its advisers variously claim, in the application and supporting documents, that : “Ecological constraints in particular have been the primary determinant,” (p.ix Executive Summary T&T); The reservoir site considered the sustainability principles to: minimise environmental, ecological and social effects in alignment with Watercare’s sustainability principles to the wider community and environment; Carbon required throughout the lifecycle of a reservoir site shall be considered; The effects of climate change need to be considered in selecting a site for a reservoir. (Beca p25)
16. In fact at the end of the day these noble claims have become the secondary determination because Watercare’s primary determinate turns out to be “Watercare’s desire to ensure that the proposed upgrade was considered strategically in terms of the operation and future development of the overall water treatment and drinking water supply network” (T&T p54)
17. Watercare also “own” the project site and it is already designated “water supply purposes”
18. It is my submission that, in reality, these facts were the determining factors in Watercare’s decision. T&T and Beca are merely paying lip service to claims that “ecological constraints.. have been..primary determinant” for locating the project at this site, for the purposes of this Resource Consent Application and attempting to show that they are complying with their obligations under the RMA.
19. The nice words regarding the Board’s concerns, about preserving notable/scheduled trees and the SEA environment, gloss over the fact of Watercare’s destruction of the highest level of threatened and nationally critical (kauri, pōhutukawa, climbing ratas, maire tawake, kanuka, manuka, and Elaeocarpus hookerianus. p27 T&T) and “at risk” endangered and declining (koura, long fin eel, Inanga) “endemic” New Zealand biodiversity, rare newly discovered endemic species of wasp and species yet to be discovered. The highest level of SEA under the AUP.
20. I submit that the documentation does not demonstrate a robust assessment of alternative options in relation to the siting of this project, the new WTP and the 2 Reservoirs.
21. In the circumstances this application fails to fulfil the Applicant’s RMA obligations required by Part 2 Purpose and Principles and particularly section 171(1)(b) and also Clauses 6 and 7 of Schedule 4 (particularly clause 7 (b) (c) and (d)).

This project is de-minimus

22. It is implicit in this application and the reports that In theory 4.3 hectares of 24,000 hectares of SEA is an insignificant part of the whole area.
23. By definition it is not de-minimus or there would not be the necessity to offer compensatory schemes or other mitigation. This is pure and simple logic.
24. The Application tells us that “Since it was commissioned, (in 1929), the Huia WTP has been expanded and upgraded a number of times with its capacity increased and new treatment processes added.” (p5 T&T Application)
25. What is to stop further development on this de-minimus basis in the future?

Future proofing

26. Watercare says that this project is needed to future-proof its operations in the north west.
27. Past experience tells us that the proposed rather small 27% increase in maximum production capacity from 110/126 (max)MLD to 140MLD, is not in fact “future proofing” it is a foot in the door to future increases in maximum production and treatment processes.
28. It is my submission that on past history it is fair to assume that Watercare will want to increase the capacity of this site in a few years time and will use the same argument that it is a small loss taking the whole of the 24,000 hectares of the SEA into account.
29. On past history and experience this application represents a slippery slope.
30. It also needs to be highlighted that the long run processing capacity of the proposed replacement Huia WTP will be similar to the existing plant as the sustainable draw from the four supply dams has not changed. (See note 18 at p14 of the T&T Application)
31. This means that increasing the maximum production capacity of the plant does **not** enable Watercare to make use of that capacity because they cannot get enough water from their dams.
32. So does this mean they are going to dig another dam? Do they have some plans to create another dam to enable them to use this capacity? Otherwise what is the extra capacity for?
33. Simple fact is this plant is not ‘future proofing’ Auckland’s water.

34. It is a proposal to develop into one of the most significant and 'high value' SEAs in Auckland which it intends to continue to develop into for the purposes of "future proofing" Auckland's water.
35. It is a proposal to develop into Auckland's water catchment area of the Waitakeres. How is this future proofing our water catchment when in future we will need more water not less? Clearing trees we know reduces our water catchment.
36. The Commissioners do not have all the information they need to properly evaluate this proposal taking into consideration the future water catchment needs of Auckland.

Valuation

37. It is not about the small area of the whole SEA to be destroyed but exactly what is to be destroyed. It is about the true "value" and quality of what is to be destroyed and the long term consequences to the whole.
38. Watercare has failed to properly survey and value this indigenous forest SEA that it is proposing to destroy with this project. The value of this priceless ngahere and the notable trees which are New Zealand's taonga, these costs should be factored into the information provided to enable Commissioners to make their decision. They are not. Not to provide this information is to fail to comply with Watercare's obligations under Schedule 4 of the RMA.
39. The 'ecology' report is woefully inadequate in its cursory examination of the damage that the development of the site will entail. In particular, it fails to give due regard to the protected trees in the site. Indeed, the report goes out of its way to avoid mentioning key species such as Kauri (BM Ecological at WTP Footprint p.69).
40. As a result, it is impossible to evaluate fully the damage that will be done to the protected trees of this highly Significant Ecological Area. In particular, the report fails abysmally to value the trees. A basic, and conservative valuation following internationally accepted, peer-reviewed standards should have been undertaken. The failure to do so renders any grant of consent profoundly unsafe.
41. A CAVAT calculation using the Quick Method (all that is possible given the paucity of data and absence of baseline studies <https://www.ltoa.org.uk/resources/cavat>) based on the ecological report's own figures at pp. 69-70 taking in account only Kahikatea and Kanuka arrives at a conservative valuation of NZD 14,444,805. This does not include the twenty-four substantial specimen examples of Kauri, Totara, Rewarewa, etc.
42. Once you start to provide for these substantial specimen trees the valuation increases hugely.
43. In respect of p.69, we note that the report refers to 'at least' 34 canopy trees but is specific only in reference to Kahikatea. According to the ecology report at Illustration 18 there are 31 Kauri, 5 Totara and 39 Kahikatea, 13 Kanuka as well as 11 Macrocarpa on the site. The unexplained inconsistencies in figures, as well as reluctance to refer to Kauri indicates a dishonest, unprofessional attempt to minimise mention of protected trees.
44. Furthermore, it is not standard practice to refer to forest density by 100 sq metres, but by the hectare. 4-10 trees per 100 sq metres may sound like not much, but in fact represents a high density of trees of significant diameter. This represents a disappointing lack of objectivity in the presentation of the ecological report, that must bring into question the soundness and objectivity of its conclusions.

The Kauri and other Notable Trees, less significant native trees and ngahere to be destroyed by this project

45. Where is the tree by tree assessment arboricultural report?
46. We do not actually know how many native trees are being destroyed and exactly what types of tree / plants they are.
47. Under the CAVAT system of assessment and valuation population densities of more than 119 trees per hectare are considered 'high density'.
48. In expressing the density of trees and ngahere, to be destroyed as, trees per 100m², as BM does in its report, is a dishonest attempt to make the numbers to be destroyed look smaller than they really are.
49. 10 trees per 100 m² is a lot of trees.
50. BM's report is not detailed about the trees to be destroyed. We have 34 trees mentioned, some of the varieties that are endangered, and some specimen trees are mention. That is all.

51. The BM report seems to go to great lengths not mention exactly what mature podocarps will be destroyed.
52. The true scale of the loss and the variety, which includes diverse mature ngahere of Nikau, and ferns, amongst many other native varieties as well, has not been surveyed and the information is not available.
53. This means that the Commissioners do not have all of the information that they need to ensure that this application is compliant with the requirements of the RMA and the AUP, particularly in relation to the SEA and the waterway overlays, nor in relation to Auckland Council's other policies and strategies.

The Kauri Community

54. Maori lore tells us that the Kauri live in community not only with each other but also with those companion plants that Kauri like the company of and which generally grow where Kauri do.
55. BM refer at page 64 of their report to the "Kauri-podocarp forest community". "Of particular concern is the likely change to the kauri-podocarp forest community adjacent to the south-western corner of the WTP footprint, which is close to a group of large, old-growth podocarps."
56. The AUT University work on a Kauri Stump is relevant here. (July 25 2019 by MKF Bader & S Leuzinger - [https://www.cell.com/iscience/fulltext/S2589-0042\(19\)30146-4](https://www.cell.com/iscience/fulltext/S2589-0042(19)30146-4))
57. This is new research, published on July 25 in iScience, which details how surrounding trees keep tree stumps alive, possibly in exchange for access to larger root systems.
58. The findings suggest a shift from the perception of trees as individuals towards understanding forest ecosystems as "superorganisms."
59. Such intimate hydrological coupling suggests a "communal physiology" among (conspecific) trees with far-reaching implications for our understanding of forest functioning, particularly under water shortage.
60. This work builds on the work of Dr Susanne Simard professor of forest ecology who teaches at the University of British Columbia.
61. Simard helped identify something called a hub tree, or "mother tree". Mother trees are the largest trees in forests that act as central hubs for vast below-ground mycorrhizal networks. A mother tree supports seedlings by infecting them with fungi and supplying them the nutrients they need to grow.[1] .
62. In this way, individual plants are joined to one another by an underground hyphal network: a dazzlingly complex and collaborative structure that has become known as the Wood Wide Web.
63. It was also found the mother trees change their root structure to make room for baby trees.
64. Simard also found that tree species can loan one another sugars as deficits occur within seasonal changes.
65. The benefit "of this cooperative underground economy appears to be better over-all health, more total photosynthesis, and greater resilience in the face of disturbance".[2]
66. This network is a key factor in the mauri of the Forest "superorganism".
67. The kind of land disturbance proposed in this project will destroy parts of the "wood wide web" and negatively impact the whole forest superorganism ecosystem.
68. BM themselves highlight at p64, "Of particular concern is the likely change to the kauri-podocarp forest community adjacent to the south-western corner of the WTP footprint, which is close to a group of large, old-growth podocarps."
69. They also go on to highlight the main issue with this forest clearance "..., while the proposed forest clearance amounts to a small proportion of the indigenous forest present in the Little Muddy Creek catchment, the gap created will further reduce connectivity across the (already somewhat fragmented) local landscape, and between mature and regenerating forest patches in the immediate environs of the Project Site." (BM p71)
70. I submit that we just don't know what negative impact this project will have on our threatened Kauri-podocarp forest community.

71. What we do know is that it will be negatively impacted as will the whole forest superorganism ecosystem.

Vibration

72. We know that this Forest has a connectivity through the woodwideweb.

73. We also know that the kind of earth movers and heavy machinery to be used in this project, plus the excavations, all will cause vibration through the ground.

74. This will negatively affect the trees and this Forest.

75. Such a major development on the edge of this forest will have vibration consequences to trees well outside the site footprint.

76. It is time that Applicants were made to consider this issue.

The Assessment of Environmental Effect

77. The Boffa Miskell Report gives an idea of the environmental qualities of the project site but by no means is it an exhaustive survey.

78. There are no base line studies which means that the proposed mitigation biodiversity monitoring methodology, in relation to the Trust to be set up, is flawed.

79. Furthermore much of the BM report is opinion and assumption.

80. It completely fails to assess the actual environmental effects and as such this application fails to include all the information it is required to provide by Schedule 4 Clause 7 (1) to enable the Commissioner's decision-making to be fully informed..

81. Loss of threatened at risk species (BM p67)

82. BM claim that the loss is not significant because of "large and widespread populations". I submit that this is a very subjective statement of opinion and actually there are no "large and widespread populations." of natives in New Zealand any more.

83. When one considers how New Zealand was once covered in native ngahere that was "large and widespread" . The Ministry of Environment Stats - Indigenous Forest cover of New Zealand 2012 was 25.9%

84. Settlement of New Zealand has destroyed approximately 60% of the Indigenous Forest cover of New Zealand.

85. I submit that this contradicts the claim of large and widespread populations.

86. We are down to survival populations and every one of these Resource Consents facilitated by accommodating ecologists like BM who make a business of assessing the biodiversity as though the resource consent were a one off application.

87. Instead this Application is one of many which is enabling Auckland Council to steadily undermine and destroy Auckland's biodiversity habitat and green environment. The overall affect of each one of these Resource consents (notified and non-notified) is not quantified nor do Commissioners consider the overall affect of each one on Auckland's biodiversity and green environment for future generations. Death by a thousand cuts.

88. I submit there is a serious problem with this process which is undermining the intended protections of the RMA and the AUP and which is leading to the collapse of Auckland's biodiversity.

89. I submit that the loss of these threatened species is significant because we do not have all the information to enable us to decide otherwise.

90. It is also significant that the loss of these species also reduces the resilience of the species and diversity of the species.

Chipping the destroyed trees and ngahere

91. "Due to the density and size of the vegetation required to be removed, mechanical plant such as 20 tonne (T) diggers and large chippers will be required on site to undertake the clearance works." (p27 T&T)

92. Chippers ensure that the biodiversity loss will be greater than if the destroyed native trees were left to decay where they lie.

93. I refer to the case of Ngai Tahu's Eyrewell Ground Beetle which was finally destroyed when Ngai Tahu cleared *and chipped*, the pine plantation which was their last known habitat.

94. The earthmovers destroy the soil structure, the mycorrhizal and fungal network that maintains the balance and harmony in the Forest and enables our native plants to function as an integrated superorganism.

95. This means that the landscaped “mitigation” solution will take 10s if not 100s of years to return the soil structure to what it is now. It is possible it will never return, ever.
96. Destroying the soil structure and overstorey vegetation destroys the stormwater runoff and groundwater system. The many reports on this issue make that clear enough.
97. This leads to soil erosion and runoff problems because of the loss of the overstorey and possible pollution and disease contamination of water courses flowing towards the Manakau Harbour.
98. Also possible contamination of the Manukau Harbour in the event of an unexpected heavy weather event.
99. The severity of the effect of soil structure destruction on the trees and forest that are left is difficult to know as BM themselves not at p64. Especially if the rainfall is less than usually expected.

The unequal undemocratic and unsafe Auckland Council Resource Consent process

100. The Government’s Environment Aotearoa 2019 Stocktake Report informed us that New Zealand’s environment and biodiversity is in a precarious state. “Things are very bad” said Forest and Bird’s Kevin Hague.
101. The ‘Man of Trees’ Richard St Barbe Baker writing in his book “The Land of Tane” in the 1940s and 50s noted that New Zealanders viewed “trees as being in competition with settlement”.
102. This cultural condition is as prevalent today as it ever was, especially espoused by the culture of Auckland Council and its CCOs, which is to prefer development over protection and enhancement of the environment, and especially our forests and trees,.
103. Auckland Council and the Applicant espouse the current New Zealand culture which sees ‘development’ as being in competition with our environment.
104. Auckland Council culture has not modified its plans, processes and planing policies to take the Government Stocktake outcomes into account in its decision making.
105. Development is still be preferred over protection and enhancement of the environment because Auckland Council does not actually ‘value’ Auckland’s environment , urban tree canopy and biodiversity enough to compromise and modify its most often unnecessary “dust world’ plans.
106. This application, like many Resource Consent applications, for destruction of trees, ngahere, biodiversity and its habitat, particularly in Auckland’s SEAs demonstrates a clear lack of consideration of the true value of our environment and biodiversity.
107. To allow the destruction of this most valuable and vulnerable part of this SEA once is to potentially open the floodgates to the destruction of this priceless taonga altogether.
108. This application represents the sharp edge of the *sorites paradox*.
109. This 24,000 acre ‘high value’ SEA is currently being chipped away at daily like a balding man loosing one hair at time until he becomes bald.

The “mitigation” or “compensation” - theTrust

110. The Trust will only operate for a minimum of 10 years.
111. 10 years is nothing compared with the century or more that the trees, biodiversity and soil structure have already given us and will continue to generously give if it is left alone.
112. The Focus and key actions of the Trust’s biodiversity management will be solely on Little Muddy Creek not on the whole area. So the Trust will do nothing to address the damage it will do to this patch of nationally significant native forest. It may not be able to do anything beyond its mandate.
113. The Trust is totally limited to this project and this project alone.
114. The focus and key actions are on pest and weed management this is not a primary focus on biodiversity protection and enhancement.
115. Where there is a mention of biodiversity it is methodologically flawed because there is no mention of base line studies. It only talks about monitoring and as there have been no base line studies to date, even for this application, then it is a sham.
116. Pest and weed management is only being caused by this project because Watercare will open up the forest canopy of the area and will cause an explosion in weed growth on the Forest margins which are currently contained within a shaded closed canopy.
117. Engagement with community is all very well but it does not replace, encourage or enhance the biodiversity and its habitat loss.

118. The proposal is that \$5 million will be paid from Watercare only after the trust is set up as a charitable entity. This \$5 million payment will then be tax deductible for Watercare. Some would say this is prudent management. I submit it is not really mitigation or compensation at all.
119. The Board is required (Para 5.5) to do what Watercare tell them whether they ask for any input from Watercare or not. The Board “must” have an “ongoing and co-operative relationship with” Watercare. Watercare will have full control (para 6) of the Trust.
120. It is clear that Watercare will actually be in control of this Trust.
121. The Trust Board is in fact merely a puppet of the Watercare Board which does raise concerns about Watercare obtaining tax advantages by their promotion of this scheme.
122. I submit that this mitigation is not what it appears to be. It is a lot of smoke and mirrors.
123. Far from being focussed on achieving an overall net benefit in biodiversity (p31 T&T) this mitigation and biodiversity compensation package does not have the base line data to be able to measure these grand claims
124. This Trust is a sham.
125. I submit the Trust is specifically designed to prevent the Trust from objecting to Watercare’s future plans for development of the project area.
126. I further submit that this proposed mitigation/compensation fails to comply with RMA Schedule 4 clause 6 (e) and s 171 (1B).

Water Catchment Area

127. This area of the Waitakere Ranges is an important part of Auckland’s water catchment area.
128. A study published in the Science of the Total Environment journal, led by Professor of Ecology and Conservation Science Dr David Lindenmayer. concerned logging reducing water catchment in the Melbourne Thomson Catchment.
129. Dr Lindenmayer argues timber harvesting, climate change and bushfires are interconnected drivers of water loss.
130. He points out that it has long been known that logging can significantly reduce the amount of water produced from forests.
131. Dr Lindenmayer argues his work indicates the Victorian government needs to cease logging and prioritise the supply of water to the people of Melbourne.
132. The same issues are relevant in respect of Watercare’s application.
133. This WTP is to be built in Auckland’s water catchment area. Any future development will involve further destroying an SEA and destabilising Auckland’s Waitakere Water Catchment area.
134. Has it done the studies to resolve the loss of water to the catchment? I have not seen them.
135. BM themselves recognise that the forest is connected and this forest clearance “..., while the proposed forest clearance amounts to a small proportion of the indigenous forest present in the Little Muddy Creek catchment, the gap created will further reduce connectivity across the (already somewhat fragmented) local landscape, and between mature and regenerating forest patches in the immediate environs of the Project Site.” (BM p71)
136. Death by a thousand cuts.
137. I submit that instead, of developing this WTP in this fragile location where there is no space for future development of this plant, Auckland Council and Watercare should instead close the Waitakere Ranges from development and prioritise the supply of water from this area to the people of Auckland.

Weed management

138. One hopes that chemicals like glyphosate which is an antibiotic will not be used because of their very toxic effect on soil mycorrhiza and fungi which is so important to the proper functioning of this Forest ecosystem as a superorganism.
139. Glyphosate is an antibiotic which is toxic to soil mycorrhiza and fungi. Given the problems with Kauri Dieback disease and myrtle rust this chemical should never be used.
140. It is possible that it is implicated as one of the multiply of factors that are contributors of the depletion of the immune systems of our trees that are enabling these diseases to take hold in our trees.

Carbon

141. We are told in the Beca report p.25 that “Carbon required throughout the lifecycle of a reservoir site shall be considered; “
142. What about the carbon release consequences of destroying unknown numbers of mature and scheduled trees and native ngahere?
143. No assessment has been done as far as I can find nor does it appear is one planned.
144. This failure of methodology and to address this sustainability principle means that any grant of Consent would be unsafe.

**Alignment with Council’s plans and Strategic Objectives
Strategy for Auckland’s Urban Ngahere**

145. This application is not align with Council’s plans and strategic objectives.
146. No mention is made of the Strategy for Auckland’s Urban Ngahere.
147. “Protecting trees “ is part of the implementation framework actions.
148. The strategy is supposed to provide an important tool to ensure we are all working towards the same common goal.
149. I submit that this application is not consistent with this strategic objective.

150. The Auckland Plan 2050

151. This application may comply with Directive 4 of this plan regarding provision of future infrastructure but it totally fails to comply with Directive 1 and the Focus areas.
152. I submit that this application fails in its compliance with balancing the competing interests of environment and development.
153. I submit that the obligation must be to prioritise this ‘high value’ SEA over this development which could and should be located on a more appropriate site where the new WTP can be expanded in the future. This site is not suitable for ‘future proofing’ this WTP.

154. Auckland Council Climate Change Declaration June 2019

155. We are being told almost daily that it is planting trees, preserving and replenishing our mature forests that will help solve the carbon and climate crises.
156. The destruction of this forest represents a further reduction in the ecosystem services that these trees and this forest are providing to the people of Auckland and negatively impacts the climate for future generations.
157. We know that these mature trees contribute to the management of Auckland’s climate. We don’t know how many trees and how much ngahere is to be destroyed because there are no baseline studies have been done.
158. I submit that before Commissioners make their decision on this application they need to know how extensive is the loss of this part of the Waitakere Ranges Forest taken together with the loss of urban forest canopy (and consequent biodiversity habitat loss) across Auckland through Auckland Council’s other resource consents. Taken together they are having a significant negative effect on Auckland’s climate.

Another way of interpreting the RMA - Tiwaiwaka - <http://treeadvocates.com/wp-content/uploads/2019/08/Tiwaiwaka-ebook.pdf>

159. Auckland Council is currently failing to safely apply the RMA and is, in fact, preferring development over Auckland’s environment and biodiversity which is, overall, having a devastating overall effect on Auckland’s environment, biodiversity and habitat.

160. Nowhere does Auckland Council keep a tally of the overall impact on Auckland's urban forest canopy and fragile biodiversity. of each resource consent. Particularly the very unsafe non-notified resource consents, some to destroy habitat in SEAs, which it is rubber stamping.
161. This is well demonstrated by the failure to factor in the dollar cost of the loss of this Forest SEA its notable trees and the damage to the Kauri community of trees located in the Waitakeres and native taonga.
162. Not only are Auckland Council Commissioners failing to interpret the RMA to protect our most vulnerable environment and endemic biodiversity this is happening at a time of huge public concern about changes to Earth's climate.
163. The first question in the Resource Management Act should be something like this:
164. *"Does this proposed action help the earth more than it hurts it. If the answer is yes, it can be approved. If that is uncertain, the proposal needs to be looked at again and revised. If the answer is no, it hurts the whenua more than it helps, it is rejected". There is no room for "ifs" and "buts".*
165. If that was how we managed our environment our future would be more certain.
166. In actual fact such an approach is in keeping with Part II of the Resource Management Act Purpose and Principles Sections 5,6, & 7:
- RMA Section 5. *Purpose - (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) In this Act, "sustainable management" means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enable people and communities to provide for their social, economic, and cultural well being and for their health and safety while -*
- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and*
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*
167. For the sake of our future and those future generations who follow us the RM Act needs to be administered in a more literal way. We need to try to follow the spirit of the law, rather than looking for the absolute minimum we can justify to ourselves.
168. What has happened in fact is the Act has been administered in a way that ensures that economic development continues to progress in such a way that its effects on the environment are acceptable to those who administer the Act and those to whom they are answerable.
169. Also to expert advisers who support the current paradigm of destruction.
170. The result has been the continuing gradual deterioration of the environment that we are all witness to and are increasingly alarmed about.
171. The time has come to stop postponing the inevitable and work to ensure that the Act does achieve the protection of the environment and the life that belongs there.
172. Currently the whole approach is to try to find ways around the statutory duties to protect nationally significant ecological areas by putting the fox in charge of the hen coup.

Tikanga

173. I am talking about 'tikanga' acting with the right intention in the correct way.
174. "We stand now where two roads diverge". Rachael Carson Silent Spring 1962 . The risks of not taking the correct road are too grave to contemplate.

This application should be declined and Watercare must be required to develop other sites already surveyed that show a far reduced its ecological impact.
1 September 2019
Tuscany