

BEFORE THE KAIPARA DISTRICT COUNCIL'S HEARING PANEL

IN THE MATTER OF the Resource Management Act 1991 (**the Act**)

AND

IN THE MATTER An application for Private Plan Change 85 (**PC85**)
-**MANGAWHAI EAST** by Foundry Group Limited
(formerly Cabra Mangawhai Limited) and Pro
Land Matters Company to rezone approximately
94-hectares of land at Black Swamp and
Raymond Bull Roads, Mangawhai

**HEARING SUMMARY OF ROBERT JAMES HAMILTON WHITE ON BEHALF OF THE
APPLICANTS**

(Water and Wastewater Reticulation and Transmission)

17 February 2026

Jeremy Brabant

Barrister

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Summary

1. I outline my qualifications, experience and commitment to comply with the Environment Court Expert Witness Code of Conduct in my evidence in chief. I have continued to comply with the Code in the preparation of this summary.

WATER

2. I note Ms Parlane's statement that *"There is no water supply related reason to decline PPC85"*.
3. I also note Ms Parlane's concern with regards to the internal use of non-potable water due to the potential for cross-connection.
4. In a non-reticulated area, the use of non-potable water internally within a house has the advantage of reducing demand on rainwater collection and storage, allowing higher densities (for example, smaller roof area to collect rainwater) and generally providing resilience to households during periods of drought.
5. I agree that this may not be common practice within New Zealand, but is an accepted solution within the Building Code, with over 3,000 houses within the Hobsonville development in Auckland.
6. It is also noted that initial testing of the borehole water quality has indicated that the water meets potable water standards. The borehole yield has also been identified as having a good capacity.
7. I believe that this is not something that needs to be discussed further at this stage, noting Ms Parlane's comment as previously identified that *"[t]here is no water supply related reason to decline PPC85"*, with further discussion regarding the uses of non-potable water forming part of the Resource Consent process.

WASTEWATER

8. With regards to wastewater, I note the agreement between Mr Cantrell, Mr Fairgray and myself, as identified by Mr Cantrell:
 - a. *The proposed wastewater reticulation solution within PPC85 area itself is acceptable;*

- b. *The connection of the site to the Mangawhai WWTP will require existing public wastewater pump station and rising main upgrades/duplication;*
 - c. *The existing WWTP capacity and programmed upgrades and expected capacity [as outlined in Mr Cantrell's evidence in chief].*
9. I note that the key area of disagreement being the long-term effluent disposal solution, for a catchment greater than the identified 6,500 DUE.
10. The requirement to upgrade the existing wastewater pump stations and rising mains from Mangawhai (Longview WWPS, PS-VA) to the wastewater treatment plant, to service existing plan enabled areas, has already been identified (WSP report, Mangawhai Wastewater Modelling Model Build, Calibration and System Performance Report 18 March 2022). The recommendation is to replace existing pipework with larger diameter rising mains.
11. If this was considered as duplication rather than replacement, this would also allow the plan change area to be serviced when combined with increased pump station capacity. This results in a higher / better utilisation of this proposed infrastructure.
12. Details with regard to the treatment plant upgrade and effluent disposal are covered in more detail by Mr Fairgray. I concur with his statements.
13. With regards to effluent disposal, I have experience with both sea outfalls (having been involved with the Rosedale Wastewater Treatment Plant Sea outfall) and land disposal schemes (Taupo District Council land disposal scheme at View Road).

Conclusion

14. It is agreed that there is no water supply related reason to decline PPC85.
15. There is agreement that the plan change area can be serviced locally for wastewater, and that there is a technical solution to convey wastewater to the wastewater treatment plant.
16. There is agreement that wastewater treatment plant upgrades options are technically feasible, above 6,500 DUE, if required. There is no evidence that there would in fact be limitations to a feasible solution being provided.
17. I understand that Mr Thompson's evidence regarding feasible and reasonably expected to be realised development capacity results in a conclusion that sufficient capacity exists

to service PC85 within a 6,500 DUE cap. In any event, I concur with Mr Fairgray that additional disposal options have been identified that could be implemented within a reasonable timeframe.

18. On the evidence provided, in my opinion, wastewater servicing does not provide a basis to decline PPC85.

Robert James Hamilton White