

From: [Keeley Faulkner](#)
To: [Official Information](#)
Subject: FW: SWWTP Presentation & Submission
Date: Tuesday, 4 November 2025 10:18:00 am
Attachments: [Southern WWTP - Letter to \[REDACTED\].Inc - 2025-10-31.pdf](#)

From: Jackie Colliar
Sent: Friday, 31 October 2025 5:54 pm
To: [REDACTED]
Cc: [REDACTED]@waipadc.govt.nz; SWWTP <swwtp@hcc.govt.nz>; Kevin Lavery <Kevin.Lavery@iawai.co.nz>; IAWAI <info@iawai.co.nz>; CEO <CEO@hcc.govt.nz>
Subject: RE: SWWTP Presentation & Submission

Teenaa koe Andrea, koutou katoa

Thank you again for meeting with us on 22 October and for your follow-up submission and questions dated 24 October. We appreciated the opportunity to koorero with you and hear your perspectives on the project.

Please find attached our written responses to the questions raised. We hope this provides clarity and supports ongoing engagement.

We look forward to continuing the conversation and hope to see you at one of the upcoming Community Information Sessions.

Ngaa mihi nui,

Jackie Colliar (she/her)

Director Strategic Investment Portfolio
IAWAI – Flowing Waters

From: [REDACTED]
Sent: Friday, 24 October 2025 9:17 pm
To: CEO <CEO@hcc.govt.nz>; [REDACTED]@waipadc.govt.nz; SWWTP@hcc.co.nz; IAWAI <info@iawai.co.nz>; Kevin Lavery <Kevin.Lavery@iawai.co.nz>; [REDACTED]
[REDACTED]
Subject: SWWTP Presentation & Submission

Thank you again for meeting with us on Thursday, 22 October 2025. We appreciated the opportunity to connect and discuss the important matters at hand.

Pursuant to that engagement, please find enclosed as promised, the following documentation for your review and consideration:

- IAWAI Presentation (provided in both electronic and PDF formats)

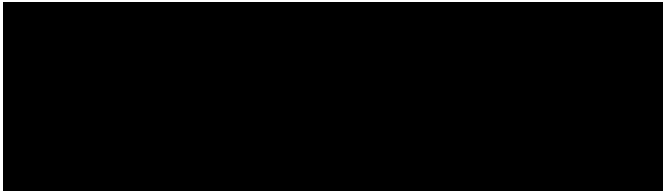
Nukuhau Residents Society Submission regarding the Southern Wastewater Treatment Plant (SWWTP), including:

- Site Selection Report
- Email correspondence from Jackie Colliar, which included responses from prior IAWAI meeting.

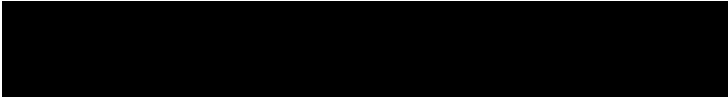
This submission is made in good faith and with the intent to request that Council reconsider the current site selection for the SWWTP. The enclosed materials outline substantive concerns and provide supporting evidence relevant to this request.

We respectfully seek a formal response within the agreed seven-day period, to enable presentation of Council's position at our scheduled community meeting on 1 November 2025.

Kind regards



31 October 2025



Teenaa koutou kaatoa,

Response to your submission dated 24 October 2025

Thank you sincerely for your presentation to the IAWAI, Hamilton City Council, and Waipā District Council Chief Executive Officers and members of the project team on the evening of Wednesday 22 October 2025 at the JetPark Airport Hotel. We also appreciate the follow-up submission and questions you sent through on Friday 24 October.

The CEOs and I would again like to acknowledge the time, care, and commitment shown by your representatives in preparing for and attending the meeting. It was a valuable opportunity to hear directly from you and to engage in koorero about the project.

As committed to during our discussion, we have prepared responses to the questions you've raised. You'll find this attached, and we'll also make it available on Council's website so that others in the community can access the same information.

Our invitation to visit the Raglan Wastewater Treatment Plant remains open. This project, delivered by Waikato District Council and commissioned earlier this year, offers a useful example of what a modern treatment plant of similar scale can look like. We'd be pleased to host you there, so don't hesitate to get in touch if you'd like to arrange a visit. As noted at the meeting, the best way to direct communication to us is through our project email address SWWTP@hcc.govt.nz

As mentioned at the meeting, IAWAI will be hosting two Community Information Sessions next week. We warmly invite you and other members of the Nukuhau community to attend, ask questions, and learn more about the project. These sessions will be held at the JetPark Airport Hotel on:

- **Wednesday 5 November 2025, 4pm – 7pm**
- **Thursday 6 November 2025, 4pm – 7pm**

Thank you again for your thoughtful presentation, questions and ongoing advocacy. We value your engagement and look forward to continuing the conversation with the Nukuhau community as the project progresses.

Ngaa mihi nui,

Jackie Colliar

Project Sponsor
Director Strategic Investment Portfolio
Iawai – Flowing Waters

IAWAI RESPONSES TO QUESTIONS FROM [REDACTED] INC- 31 OCTOBER 2025

ISSUES/COMMENTS/QUESTIONS RECEIVED FROM [REDACTED]			INC on 24th October 2025	IAWAI Response
Topic #	Issues	Comment	Key Questions	
1.Environmental:	Human and ecological health. Risks to bat habitat, eel/tuna migration and habitat, riparian and wetland values; odour and noise impacts; construction sedimentation and long-term discharge risks to receiving waters (surface and groundwaters).	<div><div>1. There are a significant number of bores used for stock and drinking water in the vicinity. Comprehensive baseline studies will be required to characterise the flow directions of groundwater and water quality in these bores.¹</div><div>2. Any discharge to land or to Nukuhau Stream represents a high risk for human health and ecology (see #6) for chemical risks.</div><div>3. Aerosols released affecting drinking water supply.</div><div>4. Nationally threatened long-tailed bats are resident at proposed site.² The cumulative Peacocks, Airport developments and proposed treatment plant place habitat under extreme pressure.</div></div>	<div><div>1. Is discharge to Nukuhau Stream considered a high priority to reach the Waikato River?</div><div>2. Nukuhau Stream would require very stringent limits (e.g., only 2-fold dilution). Are such consent limits practical for the treatment plant?</div><div>3. Mahinga kai in Nukuhau Stream need good water quality and will bioaccumulate contaminants. Will a risk assessment for ingestion of bioaccumulated contaminants in tuna and koura be undertaken?</div><div>4. Are cumulative developments being considered for total loss of bat habitat?</div></div>	<div><div>• The discharge optioneering workstream is ongoing. The preferred discharge method(s) and location(s) have not yet been determined. The currently identified short-listed options are (1) discharge to Waikato River (2) discharge to Nukuhau Stream and (3) discharge to land via rapid infiltration.</div><div>• For the Nukuhau Stream option, baseline water quality and ecology investigations have been undertaken to determine the sensitivity of the receiving environment.</div><div>• These investigations are ongoing and will continue into early-mid 2026, where the preferred discharge option(s) will be decided upon taking into account a wide range of factors.</div><div>• Should the Nukuhau Stream be selected as a preferred discharge option, further effects assessments will be required, which will include effects on water quality and aquatic ecology, including emerging contaminants.</div><div>• With respect to total loss of bat habitat, yes the cumulative effects of developments will be considered as part of the Masterplan, concept design and designation process.</div></div>
2.Technical/ Geotechnical:	Ground conditions (e.g., compressible/alluvial soils, liquefaction, bearing capacity) leading to higher foundation costs;	<div><div>1. Groundwater is high in the Raynes Road site.</div><div>2. Houses within 100 m of site boundary = 24; within 250 m = 58; within 500 m = 121; 1000</div></div>	<div><div>1. When is the designation application planned to allow treatment plant?</div><div>2. Are they intending to pursue the Fast Track for consenting?</div></div>	<div><div>• The current project programme is for the Notice of Requirement to be lodged for the Wastewater Treatment Plant (WWTP) site in June 2027.</div><div>• With respect to the Fast-Track Approvals Act (FTAA), no decision has been made on the</div></div>

¹ See Appendix A for examples of relevant local groundwater flow and risk assessment studies: Hadfield JC, Nicole DA, Thompson MA 1999. A summary of groundwater investigations at the Rukuhia pesticide research site. Environment Waikato, Hamilton. Internal Series Report 1999/3. 36 p.; Trebilco U, Fletcher B, Simonson T, Hadfield J 2012. Potential for effects from onsite wastewater in the Waikato region, with particular focus on development south and east of Hamilton. Waikato Regional Council, Hamilton. Waikato Regional Council Technical Report 2012/09. 47 p. Appendix D shows location of local wells.

² Bats: Records available from the Department of Conservation (DOC) database indicate the presence of numerous long-tailed bats (*Chalinolobus tuberculatus*) (Threatened – Nationally Critical) within the site, as well as in neighbouring areas (see Appendix C). These findings were recorded in 2019 for a NZTA project. The records of long-tailed bats appear to be concentrated along the riparian corridors of the watercourses on the site, as well as in denser vegetated areas in proximity to the site. Long-tailed bats are known to forage within riparian corridors with less-dense vegetation and more open space, which can both physically impede them (Southern-Wastewater-Treatment-Plant-Site-Selection-Report-Final-Oct-2024.pdf, Page 41).

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	flood and ponding susceptibility; constructability constraints and access issues.	m = 225.		preferred consenting pathway. Potential utilisation of the FTAA remains under consideration.
3.Cultural:	Potential effects on culturally significant streams and sites (mahinga kai, wāhi tapu/wāhi tūpuna, taonga species); limited weighting of mātauranga-informed values in the multi-criteria analysis (MCA).	<ol style="list-style-type: none"> 1. Significant local iwi site – Nukuhau Pa – adjacent to Nukuhau Stream on Lowe Road. 2. Significant populations of nationally endangered longfin eels (tuna, large specimens) and freshwater crayfish (koura) in Nukuhau Stream. 3. Farmer has found artefacts on site in past. Likely to be other artefacts. 	<ol style="list-style-type: none"> 1. What consultation was had with the tangata whenua associated with land at the end of Lowe Rd? 2. Has all tangata whenua feedback been included in the TWEA? 3. What feedback has there been from tangata whenua, both positive and negative, about the wastewater treatment plant and proposed installation of river discharge infrastructure on or near the Nukuhau Pa site? 	<ul style="list-style-type: none"> • HCC has established a Kaitiaki Roopuu with mandated mana whenua representatives to engage directly on this project. • The TWEAR is drafted on behalf of mana whenua who are represented on the Kaitiaki Roopuu. • The Kaitiaki Roopuu selected 131 Raynes Road as their preferred site for the SWWTP. Mana whenua are supportive of the three discharge options that have been shortlisted. These include a discharge to land (rapid infiltration), discharge to waterways (Nukuhau Stream) and discharge to the main stem of the Waikato River. Proximity to Nukuhau Paa is a matter mana whenua are considering across all of these options.
1. Other Material Factors:	Consenting risk profile; climate resilience and future growth staging; traffic and construction impacts; reverse sensitivity; safety and emergency access; visual and amenity impacts; lifecycle OPEX/energy and carbon considerations (pumping head and pipe lengths); CAPEX certainty and cost escalation risk.	<ol style="list-style-type: none"> 1. Communication with local residents has been either non-existent or very limited. 2. Valuation/depreciation of properties. 	<ol style="list-style-type: none"> 1. The Nukuhau Residents Society (NRS) wish to engage a valuer to establish how much property values, near the proposed new Site 1 WWTP, will depreciate as a consequence of the new WWTP. NRS request that IAWAI/HCC fund that investigation. 2. If the proposed Site 1 WWTP was to proceed, the WWTP project should compensate the owners who sustain financial losses to their property value because of the WWTP. 3. We understand HCC has previously stated there will be no compensation for nearby property owners whose property values may decline 	<ul style="list-style-type: none"> • As part of the next stages of work, the Masterplan and Concept Design for the site will be developed to determine the layout of the site and how any potential adverse effects of the WWTP can be avoided, remedied and mitigated as per the approach provided for in the RMA. • This work will be undertaken in an iterative fashion with inputs sought from mana whenua, stakeholders and the wider community to avoid, remedy and mitigate adverse effects beyond the boundary of the site. • This engagement is due to commence in early 2026 when we will have early draft designs available and we will seek your inputs at this time to work through your specific concerns regarding the future development of the site.

IAWAI RESPONSES TO QUESTIONS FROM [REDACTED] INC- 31 OCTOBER 2025

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			<p>because of the new WWTP. We would appreciate insight into how this position is justified.</p> <p>4. It has been communicated that the plant will be significant in scale and of national importance, benefitting a large number of people. If this is the case, why wouldn't all associated costs, including the negative impact on surrounding property values, be shared more evenly, rather than disproportionately borne by nearby property owners?</p>	
2. Probity/ Site-selection criteria:	Potential bias from council-owned land affecting decision-making; need for sensitivity testing that fixes land price/availability across sites to isolate environmental, cultural, technical, and community risk drivers.	<ol style="list-style-type: none"> 1. The RMA states that the site selection investigations must not be carried out in an arbitrary or cursory way. It is mentioned in the site selection report that the sites considered in the investigation were not chosen based on preferred options, they were just chosen to get a cost estimate. 2. Also, there may be other sites that are better suited than those properties owned by NZTA or Council. Other sites need to be considered. 3. HCC decided to remove the Airport and Penniket Rd options because they were not "willing sellers". What doesn't make sense is that local councils own the airport i.e., HCC, Waipa DC, Waikato DC, MPDC and Otorohanga DC. 	<ul style="list-style-type: none"> • One of the other NZTA sites that were not included in the investigation may have scored better. Were there any other sites that should be revisited, if these ones were just for costing purposes? • Can we also go out to the market to see if there are any properties available in the recommended areas identified in the Metro Wastewater Business case? • We need to see how the potential airport site would score in terms of MCA. Can this scoring schedule be provided? 	<ul style="list-style-type: none"> • IAWAI/HCC position is the site selection process was not carried out in an arbitrary or cursory manner, but followed a robust assessment process. • IAWAI/HCC has completed a site selection process and is comfortable with the site it has identified for the WWTP. • IAWAI/HCC will continue with its investigations in relation to this site, and is not intending to pause and go to the market for an alternative site.

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		<p>4. The site selection report does not consider the practicality or feasibility of a discharge structure at the river. The river discharge is a major consideration and needs to be included in the assessment. The discharge is an integral part of a WWTP system, without it there is no WWTP. The practicality and feasibility of the river discharge should have been one of the MCA criteria in the site selection assessment. These issues need to be included in both the MCA and the TWEA.</p>		
6. Additional Risks:	Discharge upstream of Hamilton's drinking water intake, including potential PFAS, pharmaceutical, and other emerging contaminant concerns.	<ol style="list-style-type: none"> 1. Discharge to Nukuhau Stream represents a very high risk for bioaccumulation of chemical contaminants and human uptake through mahinga kai. These include contraceptive hormones which are discharged. 2. Discharge of chemical contaminants directly to surface waters approximately 4 km upstream of the Hamilton Drinking Water intake risks undesirable chemical contaminant exposure and microbial exposure with a plant failure. 3. Membrane bioreactor (MBR) systems have a poor removal 	<ol style="list-style-type: none"> 1. Has Taumata Arowai provided risk comment on the nature of contaminant risk for the Hamilton Water Treatment Plant for wastewater discharge from site 1? 2. Will additional treatment systems be installed to completely remove pharmaceuticals and emerging contaminants prior to receiving water discharge – either surface or groundwater? 3. Will a comprehensive baseline survey and robust compliance monitoring be in place for bioaccumulation of key mahinga kai species? 	<ul style="list-style-type: none"> • Taumata Arowai is responsible for regulating and monitoring the environmental performance of public wastewater networks, establishing national standards for infrastructure and operation, and providing public information and transparency. Waikato Regional Council (WRC) remains the regulator for processing any applications to discharge treated wastewater within the Waikato Region. • The scope of environmental investigations will include an assessment of effects on the human drinking water supply at the Hamilton Water Treatment Plant in line with requirements of the National Environmental Standard (NES) for the Protection of Sources of Human Drinking Water (2007). • For the chosen preferred discharge options, further effects assessment will be required, which will include effects on water quality and aquatic

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		<p>efficiency for many pharmaceuticals³ and illicit drugs known to be present in Hamilton wastewater (specifically MDMA and cocaine).</p> <p>4. Emerging contaminants are known to be present in groundwater⁴ and will present a risk for human consumption.</p> <p>5. Significant environmental accumulation of pharmaceuticals has been measured in harbour sediments adjacent to Auckland's Mangere WWTP.⁵</p>		ecology, including emerging contaminants.
7. Alternative sites:	Other local sites offer better potential from a range of assessment criteria.	<p>1. We understand that there may be land available around the Penniket Rd area.</p> <p>2. We consider that the HCC MCA assessment process has significant flaws, and we have conducted an independent evaluation attached.⁶</p>	<p>1. Can IAWAI/HCC enquire about land which might be available in this area?</p> <p>2. Comment/feedback on issues raised in report requested?</p>	<ul style="list-style-type: none"> IAWAI/HCC have considered your submission regarding the identified preferred site. We have confidence in the site selection assessment undertaken, and do not intend making new enquiries of other unspecified sites not already considered as part of the assessment. If you wish to formulate a proposition regarding an alternative preferred site, IAWAI/HCC are open to reviewing the information provided.

³ See Appendix B for a review of New Zealand MBR studies: Coxon, S. 2024a. Assessment of the presence of pharmaceuticals in, and removal from, municipal wastewater in Aotearoa New Zealand, p. 99, ESR report for Health New Zealand. Also: Park, J., Kim, C., Hong, Y., Lee, W., Chung, H., Jeong, D.-H. and Kim, H. 2020. Distribution and Removal of Pharmaceuticals in Liquid and Solid Phases in the Unit Processes of Sewage Treatment Plants. Int. J. Env. Res. Public Health 17(3), 687.; Radjenovic, J., Petrovic, M. and Barcelo, D. 2007. Analysis of pharmaceuticals in wastewater and removal using a membrane bioreactor. Anal. Bioanal. Chem. 387, 1365-1377.

⁴ Moreau, M., Hadfield, J., Hughey, J., Sanders, F., Lapworth, D.J., White, D. and Civil, W. 2019. A baseline assessment of emerging organic contaminants in New Zealand groundwater. Science of the Total Environment 686, 425-439.

⁵ Stewart, M., Olsen, G., Hickey, C.W., Ferreira, B., Jelić, A., Petrović, M. and Barcelo, D. 2014. A survey of emerging contaminants in the estuarine receiving environment around Auckland, New Zealand. Science of The Total Environment 468-469(0), 202-210.

⁶ NRS (2025). [REDACTED] – Submission on Preferred Site (Site 1: Sharpe Farm) for the Southern Wastewater Treatment Plant. 18p.