

5 November 2024

Hutt City Council
30 Laings Road
Private Bag 31912
Lower Hutt 5040

Attn: Dan Kellow
Dan.Kellow@huttcity.govt.nz

Request for further clarification – Eastern Hills Reservoir Notice of Requirement

Dear Dan,

Please find below our response to your email dated 29 October 2024 requesting additional information and assessment of the proposed reservoir and its location in relation to clause 3.11(1)(a), (b) and (c) of the National Policy Statement for Indigenous Biodiversity (NPS-IB). Though you have asked specifically for more information in relation to clause 3.11(1)(b) and (c), we have included analysis of 3.11(1)(a) as well for completeness.

3.11 Exceptions to clause 3.10(2)

- (1) Clause 3.10(2) does not apply, and any adverse effects on an SNA of a new subdivision, use or development must be managed in accordance with clause 3.10(3) and (4), if:**
 - (a) the new subdivision, use or development is required for the purposes of any of the following:**
 - (i) construction or upgrade (if the upgrade does not meet the requirements of clause 3.15(2)) of specified infrastructure that provides significant national or regional public benefit:...**

The Project meets the definition for specified infrastructure and will deliver a significant regional public as it will contribute towards the Hutt Valley's water resilience following a significant natural hazard event. A more fulsome assessment of the proposal against this clause has been provided in Section 12.3.2 of the AEE.

- (b) there is a functional need or operational need for the new subdivision, use or development to be in that particular location; and**

There is an operational and/or functional need for the reservoir to be at a top water level of 72.53 m¹ so that it may integrate with, and contribute to, the existing Hutt Valley reticulated water network. This means that there were limited suitable site options available within the Hutt Valley. Each of the seven longlisted suitable locations had its land parcels in an SNR area², including the reservoir site ultimately chosen.

¹ See sections 2.5 and 3.1 of the AEE, and Appendix C (Preliminary Design Report).

² See Site Selection Report (Appendix M to the AEE): page 30, and Appendix A (Longlisted Site Assessment). The relevant SNRs are SNR:12, 53, 36 and 21.

The reservoir outlet pipeline also dissects a portion of the SNR. There is an operational need for the pipeline to traverse the steep hill, towards Balgownie Grove following the proposed alignment as detailed previously in Section 12.3.2 of the AEE and in **Appendix P** (Pipe Alignment Report).

(c) there are no practicable alternative locations for the new subdivision, use or development.

Since the reservoir would need to have a top water level of 72.53m¹ so it may operate as a cohesive piece of the wider reticulated water network, there were limited site options available. Of the 28 potential locations identified, many were discounted due to their steep terrain that would make access and construction unfeasible³. This left fourteen sites, and these remaining sites were subsequently discounted due to a variety of factors including earthworks volumes, very high cut/fill heights, long/unfeasible access roads, and long pipeline routes which was considered to render construction at these alternative sites impracticable⁴. Each of the remaining seven longlisted suitable locations had its land parcels in an SNR area², including the reservoir site ultimately chosen. There are therefore no practicable alternative locations for the development of the new reservoir and associated delivery pipe that would avoid construction within an SNR.

It is therefore considered that the proposed reservoir development meets the requirements of clause 3.11 (1)(a), (b) and (c).

Yours sincerely



Cathy Crooks
Principal Planner
Connect Water/WSP

³ See section 3.7 (Site Identification) of Appendix M to the AEE (Site Selection Report).

⁴ See section 3.8 (Site Option Development) of Appendix M to the AEE (Site Selection Report).