

BEFORE THE HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Notice of Requirement to alter a designation for
the HCC Central City Reservoir – Ruakiwi Road

**SUPPLEMENTARY STATEMENT OF EVIDENCE OF CHRISTOPHER JOHN
DAWSON ON BEHALF OF HAMILTON CITY COUNCIL AS REQUIRING
AUTHORITY**

(Planning)

Dated 14 January 2026

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INTRODUCTION

1. My full name is Christopher John Dawson and I hold the position of Principal Planner at Bloxam Burnett and Olliver (**BBO**). My qualifications and experience are set out in my statement of evidence dated 19 December 2025 (**primary evidence**).
2. I reconfirm that I have read and am familiar with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and I agree to comply with it.
3. The purpose of my supplementary statement, which is provided on behalf of Hamilton City Council (**HCC**), is to provide an analysis of the National Policy Statement for Infrastructure 2025 (**NPS-I**) which was notified in the New Zealand Gazette on 18 December 2025 and comes into effect on 15 January 2026. Due to this timing, I was not in a position to address the NPS-I in my primary evidence dated 19 December 2025.
4. The NPS-I states at clause 3.1 that: “Decision-makers must give effect to this National Policy Statement on and from the commencement date.” The NPS-I is therefore highly relevant to the consideration of the proposed Ruakiwi Reservoir Notice of Requirement (**the project**).
5. The NPS-I applies to all infrastructure activities¹. Infrastructure is defined by the Resource Management Act 1991 (**RMA**) as (amongst other networks) “a water supply distribution system, including a system for irrigation”.² Given that the project comprises a designation for two new water reservoirs that will connect into an existing water supply distribution system, the NPS-I clearly applies to the proposed Ruakiwi Reservoir Notice of Requirement and will be a relevant consideration at the hearing in February 2026.

¹ NPS-I, clause 1.3(1).

² RMA, s 2(e) “infrastructure”.

NPS-I OBJECTIVES AND POLICIES ANALYSIS

Objective

6. The NPS-I states:

2.1 Objective

(1) The objective of this National Policy Statement is to:

- (a) Ensure the national; regional and local benefits of infrastructure are provided for;
- (b) Enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;
- (c) Enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;
- (d) Ensure infrastructure is well functioning, resilient and compatible, as far as practicable, with other activities; and
- (e) Ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.

7. The project will assist in implementing the outcomes of Plan Change 12 – Enabling Housing Supply (**PC12**), which is HCC’s response to the government direction on increasing housing intensification. PC12 was declared operative on 20 December 2024 and has now been incorporated into the Operative Hamilton District Plan. One of the outcomes of PC12 is to enable greater housing intensification (up to 6 stories or more) within the walkable catchment of central Hamilton. The project comprises part of HCC’s response to PC12 by supplying sufficient potable water to enable that intensification to take place.
8. The project is therefore consistent with Objective 2.1(1)(c) as it will support the intensification of central Hamilton to meet the changing needs of residents to live close to employment, education and transport, reducing the need for travel.
9. The project will also enable the development of a more resilient water supply due to the ability for the new reservoirs to service 70% of central Hamilton by gravity, even in a power outage, thereby reducing operational energy costs. This is consistent with Objective 2.1(1)(d).

Policy 1: Providing for the benefits of infrastructure:

- (1) Decision makers must ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for.
 - (2) Decision makers must recognise that the benefits of infrastructure include:
 - (a) Providing for the social, cultural and economic wellbeing of present and future generations;
 - (b) Creating, supporting and enhancing well-functioning urban and rural environments;
 - (c) Supporting sufficient development capacity to meet demand for housing and business land;
 - (d) Providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy;
 - (e) Helping to protect and restore the natural environment;
 - (f) Supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and
 - (g) Reducing the risks from, and improving resilience to, natural hazards and climate change.
- ...

10. The project will provide essential water supply infrastructure to support the outcomes of the adoption of PC12, which has amended the Operative Hamilton District Plan to enable the intensification of housing in central Hamilton. The project is therefore consistent with Policy 1(2)(a), (b) and (c).
11. The project incorporates a significant amount of native planting, ecological compensation planting, pest management, and habitat restoration, all of which will contribute to the visual quality, and ecological functioning of the site and the wider Hamilton Lake Domain. The project is therefore consistent with Policy 1(2)(e).
12. The proposed site is located at the highest point within the central Hamilton supply zone which means that the new reservoirs can be operated with approximately 10% lower costs than the next best available site from the options considered. The proposed site also minimises the area of central Hamilton that requires booster pumping to supply water at the necessary level of service and enables the deferral of capital cost due to the ability for the proposed site to use the existing

reservoir inlet filling pipeline³. This will improve the resilience and reduce the energy consumption needs of the new reservoirs. The project is therefore consistent with Policy 1(2)(f) and (g).

Policy 2: Operational need or functional need of infrastructure to be in particular locations and environments

- (1) Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments.
- (2) Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to:
 - (a) Provide services to people and communities in a timely, effective and efficient manner;
 - (b) Operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries;
 - (c) Access or connect to particular natural or physical resources, including other infrastructure;
 - (d) Be accessible so infrastructure activities can be undertaken effectively and efficiently;
 - (e) Locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure has been spatially identified in advance; and
 - (f) Manage risk from natural hazards.

13. The options analysis carried out for the project⁴ set out the considerations made when the preferred site was selected. The preferred site has distinct advantages; primarily in terms of its elevation (highest point in central Hamilton) and the fact that it is already the site for the existing central Hamilton water reservoir with all of its associated ancillary infrastructure. This will enable the new reservoirs to make use of that elevation and existing infrastructure to “slot into” the existing network efficiently, minimising additional capital outlay such as new water supply pipes. In my opinion, the project will be consistent with Policy 2(2)(a), (b) and (c).

³ Primary evidence of Chris Hardy, paragraphs 37 – 38.

⁴ Primary evidence of Chris Hardy.

Policy 4: Enabling the efficient and timely operation and delivery of infrastructure activities

(1) Decision-makers must:

- (a) Enable the efficient and timely delivery of infrastructure activities;
- (b) Enable cross boundary infrastructure networks;
- (c) Provide flexibility for infrastructure providers to use new or innovative technologies and methods to improve the delivery of infrastructure services and/or improve environmental outcomes;
- (d) Enable opportunities to make more effective use of existing infrastructure;
- (e) Consider opportunities for continuous improvement in service delivery and environmental outcomes when renewing or replacing resource consents; and
- (f) Enable the upgrading of infrastructure where this will;
 - (i) Improve the resilience of infrastructure to the risks from natural hazards and effects of climate change;
 - (ii) Maintain or improve its level of infrastructure service, including to meet increasing demand; or
 - (iii) Improve environmental outcomes.

(2) Decision makers must:

- (a) Recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity:...

14. The adoption by HCC of PC12 means that the Operative Hamilton District Plan enables greater intensification and urban growth in central Hamilton. This intensification will support 4,140 additional dwellings to be located in central Hamilton between 2022 and 2035⁵. The project will enable the more efficient use of the existing water supply infrastructure already in place by increasing the storage capacity and improving the energy efficiency associated with the delivery of the water to central Hamilton. The new reservoirs will provide sufficient water pressure to 70% of central Hamilton via gravity meaning a more energy efficient water supply and also one that is more resilient in the event of power outages. In my opinion, the project will be consistent with Policy 4(1)(d) and (f).

⁵ Primary evidence of Jonathon Brooke, paragraph 16.

15. HCC as Requiring Authority (**RA**) has undertaken a comprehensive Multi Criteria Analysis (**MCA**) of 30 potential reservoir sites across Hamilton City and the Ruakiwi Road site was identified as the preferred site through that process. As noted in the evidence of Mr Chris Hardy, the Ruakiwi Road site remained as the preferred site even after a sensitivity analysis of the MCA weightings was carried out, reinforcing the Ruakiwi Road site as the preferred site⁶. In my opinion, the project will therefore be consistent with Policy 4(2)(a).

Policy 6: Recognising and providing for Maori interests

- (1) Decision-makers must recognise and provide for Maori interests in relation to infrastructure activities and infrastructure supporting activities, including by:
- (a) taking into account the outcome of any engagement with tangata whenua on any relevant resource consent, notice of requirement, or request for a private plan change;
 - (b) recognising the opportunities tangata whenua may have in developing and operating their own infrastructure at any scale or in partnership; and
 - (c) local authorities:
 - (i) providing opportunities for tangata whenua involvement where infrastructure and infrastructure supporting activities may affect a site of significance or issue of cultural significance to Maori; and
 - (ii) operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono a Rohe.
16. Mana whenua have been engaged proactively through the project including the commissioning of two Cultural Impact Assessments and the incorporation of cultural design elements into the project. These aspects along with the proffering of draft consent conditions to ensure an ongoing, meaningful partnership throughout the project lifecycle means that Maori interests have been recognised and provided for.
17. As set out in the evidence of Ms Jo Kukutai⁷ on behalf of Ngaati Mahanga, Ngaati Tamainupo, Ngaati Koroki Kahukura and Ngaati Hauaa

⁶ Primary evidence of Chris Hardy, paragraph 18.

⁷ Primary evidence of Jo Kukutai, paragraph 3.2.

and Ms Carol Henry⁸ on behalf of Ngati Wairere, the proposed conditions will uphold Te Ture Whaimana o te Awa o Waikato and support the exercise of kaitiakitanga for the project. In my opinion, the project will be consistent with Policy 6(1)(a) and (c)(i).

Policy 7: Assessing and managing the effects of proposed infrastructure activities

- (1) When assessing and managing the effects of infrastructure activities, decision-makers must:
- (a) Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work;
 - (b) Consider the technical and operational requirements and constraints of infrastructure activities;
 - (c) Take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure;
 - (d) Take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and
 - (e) Ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.

18. As set out above in paragraph 13 of my supplementary evidence, a comprehensive MCA was completed to select the Ruakiwi site as the preferred option. The Ruakiwi site is able to deliver the most energy efficient and cost effective water storage solution that utilises the existing network infrastructure already in place in a manner that will enable the intensification of central Hamilton. The architectural and landscape design approach achieves a considered balance between infrastructure requirements and the Domain's open space character and function⁹.

19. The proposed draft conditions¹⁰ are both comprehensive and proportionate to the scale of the adverse effects generated by the

⁸ Primary evidence of Carol Henry, paragraph 3.2.

⁹ Primary evidence of Adrian Morton, paragraph 122.

¹⁰ Primary evidence of Chris Dawson, Attachment A.

project. In my opinion, the project will be consistent with Policy 7(1)(a), (b), (d) and (e).

Policy 9: Managing the effects of new infrastructure and major upgrades

- (1) Decision-makers must enable new infrastructure or major upgrades of existing infrastructure in all environments.
- (2) Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans.
- (3) Where (2) does not apply, the adverse effects of new infrastructure and major upgrades must be, where practicable, avoided, remedied or mitigated.

20. I have provided an analysis of the project in relation to s 6(a), (c), (d) and (f) of the RMA in paragraphs 112 to 117 of my primary evidence. In my opinion, the project will not have adverse effects on the environments and values provided for in section 6. I have also considered the adverse effects associated with the project in paragraphs 41 to 71 of my primary evidence and consider that all of the potential adverse effects can be appropriately addressed through the draft conditions and will be appropriately managed. I therefore consider that the project will be consistent with Policy 9(2) and (3).

Policy 11: Assessing and managing the interface between infrastructure and other activities

- (1) When assessing and managing the interface between existing and planned infrastructure with other activities, including new or intensified sensitive activities, through planning instruments, decision-makers must:
 - (a) Recognise that noise, vibration, dust and visual effects are all typical effects associated with infrastructure activities that can be managed where practicable but not completely avoided;
 - (b) Recognise that:
 - (i) amenity values change due to a range of factors;
 - (ii) changes in amenity values from infrastructure activities can be necessary to achieve well-functioning urban and rural environments: and
 - (c) apply the general principle that the primary responsibility for managing adverse effects is on the new activity

(including infrastructure) while allowing flexibility for site and project specific circumstances.

21. I have assessed the potential adverse noise, vibration and visual effects in my primary evidence¹¹ and concluded that while they cannot be completely avoided, they will be appropriately addressed through designation conditions. While there will be a change in the amenity values of the immediate surroundings of the project¹², the adverse landscape and visual effects have been appropriately addressed through the architectural and landscape treatments proposed as part of the project and captured in the draft designation conditions¹³. In my opinion, the project will be consistent with Policy 11(1)(a) and (b)(ii).
22. In my opinion, the project will support the economic, social and cultural wellbeing of the Hamilton community, enable the intensification of central Hamilton and deliver that infrastructure in a manner that will be resilient, cost effective and energy efficient. In my opinion, the project is highly consistent with, and gives effect to, the policy direction provided by the NPS-I.

Christopher John Dawson

14 January 2026

¹¹ Primary evidence of Chris Dawson, paragraphs 54 to 57 (visual), 58-62 (noise and vibration).

¹² Primary evidence of Adrian Morton, paragraph 122.

¹³ Primary evidence of Chris Dawson, paragraph 57.