

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

Of the Auckland Unitary Plan (Operative in Part)

AND

IN THE MATTER

Of an application by Watercare Services Limited ("WSL") 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 Proposed Development").

STATEMENT OF EVIDENCE OF DR OLEG MEDVEDEV

DATE APRIL 14,2021

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1. INTRODUCTION

- 1.1 My name is Dr Oleg Medvedev. I reside at 16 Manuka Road, Waima (Titirangi) with my family. We have lived at 16 Manuka Road since 2012. We are members of the Manuka Road Residents Society.
- 1.2 The purpose of my evidence is to outline the significant concerns regarding the proposed water treatment plant and its harmful impact on the environment with a special focus on **Kauri dieback**.
- 1.3 Significant concerns about possibility to mitigate harmful effects of the project on **Kauri forest**
- 1.4 Significant concerns that the proposed by Watercare mitigation plan is realistic.
- 1.5 Significant concerns regarding meaningfulness of the project in the current situation when the second year in a row there is no sufficient water in the catchment reservoirs even for an existing water treatment plant to process.

2. CONCERNS

- 2.1 Watercare proposes to move large amounts of potentially contaminated soil, threatening genetically diverse kauri forest located below the site containing historically significant kauri trees (e.g. Clark Kauri is 1000+ years old).
- 2.2 Kauri trees growing at our property and our neighbours' properties were not tested for dieback. To our knowledge they are healthy. Any movement of soil contaminated with dieback in such close proximity will put them in jeopardy.
- 2.3 It is practically impossible to mitigate the negative effects on local ecology by the measures proposed by Watercare.
- 2.4 The removal of 3.5 ha of the protected native forest classed as Significant Ecological Area will have disastrous effects on species, which are considered endangered or critically endangered.
- 2.5 The mitigation plan proposed by Watercare is unrealistic because frequent and heavy rains will likely spread contaminated soil and water over lower areas with healthy kauri forest leading to destruction of a significant number of healthy kauri.
- 2.6 The argument that Waima/Waitakere ranges is the only appropriate place for a water treatment plant is invalid because the second year in a row there is no sufficient water in the catchment reservoirs even for an existing water treatment plant to process.

Consistent with the Auckland Council current policies regarding Kauri dieback and based on the reasons outlined in my evidence I request that no consent should be granted to Watercare for this project.

Name Dr Oleg Medvedev