

Memorandum

To: The Environmental Protection Agency (EPA)
From: Bell Road Limited Partnership (BRLP) & Bay of Plenty Regional Council (BOPRC)
Date: 21/08/2026
Subject: **Wairakei South Fast-Track Application (FTAA-2605-1227) – In Response to the Panel Convener’s Minute 3, Stormwater and Flood Modelling Joint Memorandum**

1. Purpose and Background

This memorandum is provided jointly by BRLP and BOPRC in direct response to paragraph 39 of the Convener’s Minute 3 (dated 5 August 2026).

The purpose of this memorandum is to:

- a) Confirm the status of the technical review of the Applicant’s model, information gaps identified in that review that remain unresolved including inconsistencies between BRLP and BPRC’s Model (refer [39](a));
- b) Outline areas of agreement reached on the steps required to resolve the issues identified in the technical review and the likely timeframe required to do so (refer 39](b));
- c) Outline further time required to run the models for additional scenarios not modelled to date but jointly agreed to be desirable or necessary ((refer 39](c));
- d) Outline the extent to which further technical review and effects assessments (by BPRC Experts are dependent on the resolution of modelling issues and verification of modelling output and the associated timeframes ((refer 39](d));

On 11 and 18 August 2026, as part of preparing this response to the Panel Convenor, the BRLP and BOPRC technical experts, Mr Stoffel Bakkes and Mr Bill Noell, met to discuss the Panel Convener’s Minute 3, paragraph 39 and the questions provided by Maven on 11 August 2026 (1;Are there differences between the BRLP and BOPRC models?, 2; If so, are the differences material?, 3; How are these to be closed out?).

This memo only addresses the areas of agreement between the parties.

Minute 3, Paragraph [39](a); Confirm the status of the technical review of the Applicant’s model, information gaps identified in that review that remain unresolved including inconsistencies between the Applicant and BPRC’s Model:

BOPRC provided their technical stormwater and flood hazard assessment of the Wairakei South substantive application information to BRLP on 7 August 2026. The review considers the flooding and flood hazard effects arising from the hydraulic modelling undertaken by the Applicant and BOPRC, including a comparison of the respective modelled results across the floodplain. While the review is focused on the resulting assessment of effects rather than a technical review of the Applicant’s hydraulic model itself, the status and limitations of the modelling are relevant given the Applicant’s

reliance on its modelling outcomes. Additional scenarios undertaken as part of the BOPRC workstream included stopbank breach and pump failure scenarios for risk assessment purposes.

Further information is identified through the stormwater and flood hazard assessment technical review to understand the stormwater and flooding effects. To be able to provide a response to the technical review, the technical experts from both parties have agreed a pathway to progress model calibration, verification and validation (herby referred to as Validation).

Information Gap 1: Model Validation

Mr Noell's assessment states that there are inconsistencies between the Applicant's model and the Council's model and notes differences in levels produced by the two models. Model validation is key to providing confidence that the Applicant's model is suitable for assessing the full range of flood and stormwater effects relevant to this application. Both parties have agreed to progress a model validation workstream. BRLP has provided (on 20 August 2026) a draft scope for this process to BOPRC for consideration, which BOPRC are actively reviewing.

Information Gap 2: CAPEX, OPEX and Lifecycle Cost Assessment

BOPRC has identified a further workstream to assess the capital expenditure, operational expenditure and lifecycle costs associated with the proposed stormwater infrastructure, including the potential financial implications of vesting the pumping infrastructure in BOPRC ownership. BOPRC considers that this information is required to inform its position on the potential ownership and ongoing management of the assets. This workstream has not yet been completed, but BRLP has committed to providing this information relative to the concept design provided in the substantive application. Completion of the assessment will require input from BOPRC regarding relevant information on existing and planned pump infrastructure, together with the costing assumptions and information relevant to those works. BOPRC agrees to provide information to the Applicant where it is available and required for this workstream.

Minute 3, Paragraph [39](b); Outline areas of agreement reached on the steps required to resolve the issues identified in the technical review and the likely timeframe required to do so:

1) Validation of BRLP's Model

BOPRC and BRLP have agreed to a model validation workstream (which is subject to BOPRC acceptance of validation scope).

The model validation workstream was discussed between BOPRC and BRLP's technical stormwater experts, and it has been agreed that BOPRC would assist with providing relevant available data required to undertake the validation.

Maven will undertake the model validation and update the floodplain effects assessment results based on the outcomes of the validation.

BRLP anticipate that the model validation workstream can be completed within five weeks, subject to agreement to the model validation scope (anticipated to take up to three weeks) and timely receipt of the required data from BOPRC, following which the updated assessment will be provided for technical review to BOPRC. BOPRC anticipates that the technical review of the Applicants results and assessment will take two – three weeks.

2) Proposed Pumping Infrastructure – CAPEX, OPEX and Lifecycle Cost Assessment

The parties have agreed to progress a workstream to assess the capital expenditure, operational expenditure and lifecycle costs associated with the proposed pumping infrastructure. This will include consideration of the potential financial implications of vesting the pumping infrastructure in BOPRC ownership and is intended to inform BOPRC’s position on the proposed ownership and ongoing management arrangements. The assessment may require BOPRC input on existing and planned pumping infrastructure upgrades within their region and relevant costing assumptions to inform the development of the scenarios. The BOPRC will provide this information where possible.

Minute 3, Paragraph [39](c); Outline further time required to run the models for additional scenarios not modelled to date but jointly agreed to be desirable or necessary:

The Applicant’s intended timelines for the two committed additional workstreams are outlined below:

Matter	Timeframe	
	BRLP	BOPRC
Model validation	5 weeks following agreement to scope and all information being collected <i>Modelling results and reporting +4 weeks</i> <i>Internal review +1 week</i>	BOPRC feedback +2-3 weeks following model validation completion, reporting and an updated assessment of effects being provided
Long-term pumping viability / CAPEX-OPEX / asset ownership	5 weeks <i>Financial results +4 weeks</i> <i>Internal review +1 week</i>	BOPRC feedback +2-3 weeks

Timeline Management Process

The timeframes above represent the BRLP’s committed programme for progressing and providing the outputs for each workstream. Progress will be monitored throughout, with BRLP and BOPRC maintaining communication on delivery to provide transparency on the status and progression of the work.

Minute 3, Paragraph [39](d); Outline the extent to which further technical review and effects assessments (by BOPRC experts) are dependent on the resolution of modelling issues and verification of modelling output and the associated timeframes:

The stormwater and flood hazard assessment and relevant technical review is dependent on resolution of the modelling issues.

All other technical assessment workstreams e.g. water quality and ecology, can progress independently of and in parallel with the stormwater modelling.

BOPRC Representative	BRLP Representative
Name: Danielle Petricevich	Name: Nathan York
	
Date: 21/08/26	Date: 21/08/26