

Delmore Fast-Track

04/05/2026 – Auckland Council Response

Annexure 14:

Hazardous Substances

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Delmore Fast-Track

Fast-Track application number: FTAA-2512-1164

2.0 Technical Specialist Memo – Hazardous Substances

To: Dylan Pope – Lead Planner & Carly Hinde - PPL

From: Louis Boamponsem

Qualifications
& Relevant
Experience:

I hold a PhD in Environmental Science degree from The University of Auckland. I have 14 years' experience in research and broad environmental science lecturing including more than 20 published articles.

I am employed as a Senior Specialist within the Contamination, Air and Noise team of the Specialist Unit, Planning and Resource Consents Department, Auckland Council. I have held this role since May 2024 and am principally involved in evaluating and preparing specialist and technical input to resource consenting issues and proposals.

Preparation in
Accordance
with the Code
of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:



Date: 17/3/2026

3.0 Executive Summary / Principal Issues

The hazardous substances component of the revised Delmore application remains unchanged from the original proposal. The same chemicals, volumes and storage arrangements assessed in the initial application continue to apply, and the updated design information confirms there has been no change to the hazardous substances risk profile of the temporary wastewater treatment plant (WWTP).

As before, the aggregate quantities of toxic, corrosive and eco-toxic substances exceed the permitted thresholds for the Future Urban Zone, meaning the activity retains its Discretionary Activity status under AUP (OP) E31 provisions.

What has changed in the current application is the structure and wording of the proposed consent conditions relating to hazardous substances. In Appendix 44, the original “Wastewater Treatment Plant Management Plan” (WTPMP) framework has been replaced with a more comprehensive Wastewater Management Plan (WMP). The WMP conditions now sit within the on-site wastewater servicing and wastewater discharge consent sections and have been refined to:

- strengthen requirements for spill response and reporting,
- clarify expectations around drainage plans, inventories and auditing,
- integrate operational requirements for the WWTP (including staff training and maintenance), and
- introduce additional controls where wastewater is taken off-site (e.g., tanker filling hygiene and odour controls).

Despite these structural changes, the purpose and effect of the proposed conditions remain consistent with the earlier version: to ensure safe handling, containment and management of hazardous substances associated with the WWTP. The HSITA assessment still applies as originally prepared, and the updated conditions maintain or enhance the level of control expected for a discretionary hazardous facility.

Overall, the revised condition set does not alter the hazardous substances risk profile of the proposal. With the updated WMP-based conditions in place, the hazardous substances aspects of the WWTP continue to present a low overall risk to people, property and the environment, and can be supported.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Delmore Fast-track Approval Application – Assessment of Environmental Effects (AEE), prepared by Barker & Associates Ltd, dated 17 February 2025.
- Appendix 22 – Delmore Fast-track: Proposed Consent Conditions (withdrawn application).
- Appendix 32: Delmore Subdivision: Hazardous Substances and ITA Assessment (HSITA), 13, February 2025, (withdrawn application)
- Appendix 40: Delmore Subdivision: Hazardous Substances and ITA Assessment (HSITA), 16 December 2025, (New application)

- Appendix 44 – Proposed Conditions (December 2025 application), including the updated hazardous substances conditions.
- Wastewater Disposal Memorandum (Vineway Ltd), dated 18 December 2025 (supporting information for treated/untreated wastewater tankering).

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

N/A

6.0 Specialist Assessment

6.1 Existing Environment and Proposal Context

The temporary WWTP is located on a knoll between two gullies containing tributaries of the Ōrewa River, which naturally separates the facility from both existing and proposed residential areas. This remains unchanged from the original application, and the hazardous substances proposed (acetic acid, sodium hydroxide, sodium hypochlorite, aluminium sulphate, citric acid and diesel) are the same substances and volumes previously assessed. No new substances or storage configurations have been introduced in the revised application.

6.2 Actual and Potential Effects

The activity continues to exceed the permitted thresholds for toxic, corrosive and eco-toxic substances under AUP (OP) E31, and therefore retains its Discretionary Activity status. The HSITA assessment confirms that with standard engineering controls (secondary containment, bunding, closed transfer systems, spill containment) and operational controls (training, inventories, spill response, stormwater isolation), the likelihood of an off-site release is very low and any potential consequences are low to moderate. Overall, the WWTP presents a low level of residual risk to people, property and the environment.

6.3 Mitigation Measures and Proposed Conditions

Although the hazardous substances profile of the proposal has not changed, the applicant has refined the conditions in the revised Appendix 44. The previous WTPMP framework has been replaced with a more comprehensive Wastewater Management Plan (WMP), which strengthens requirements around spill response, drainage mapping, auditing, staff training and maintenance. The updated condition set also integrates stormwater isolation, tanker-filling hygiene, and odour controls where wastewater is taken off-site. These refinements maintain or improve the level of protection anticipated in the initial application.

Based on the information provided and the controls proposed, I consider the potential adverse effects associated with hazardous substances to be acceptable. The proposed Conditions 51, 60 and 209 are appropriate to ensure safe operation of the WWTP for the duration of its use.

7.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps.

8.0 Recommendation

Based on the information provided in the AEE, the HSITA assessment, the updated condition set in Appendix 44, and my review of the hazardous substances aspects of the proposal, I support the application from a hazardous substances perspective.

The revised application does not introduce any new hazardous substances or alter the volumes or storage arrangements previously assessed. The overall activity status under E31 remains Discretionary due to exceedance of the toxic, corrosive and eco-toxic thresholds, consistent with the original application.

The updated conditions (now incorporated into the Wastewater Management Plan (WMP) framework) strengthen operational requirements around spill response, containment, inventories, training, auditing, and stormwater isolation. These refinements maintain or enhance the level of control anticipated in the earlier version of the application.

The HSITA concludes that, with the proposed controls, the likelihood of an off-site release is very low and any potential consequences are low to moderate, resulting in a low overall risk to people, property and the environment. I agree with these conclusions.

Accordingly, I consider that the hazardous substances component of the proposal can be appropriately managed through the recommended conditions and that the application can be supported.

9.0 Proposed Conditions

Proposed condition 209, together with the supporting site-management requirements in conditions 51 and 60, provides a sufficient framework to manage and mitigate potential adverse effects associated with hazardous substances. These conditions collectively ensure that hazardous substances are stored, handled and used in accordance with appropriate containment, spill response, operational controls and environmental safeguards.

In my view, these conditions are adequate to avoid or minimise risks to people, property and the environment over the duration of the temporary WWTP.