

**BEFORE THE WAIPĀ DISTRICT COUNCIL AND WAIKATO REGIONAL
COUNCIL**

**TOKANUI HOSPITAL DEMOLITION, REMEDIATION AND LANDFILL
UPGRADES**

Under the Resource Management Act 1991

In the matter of resource consent applications by Toitū Te Whenua Land
Information New Zealand under section 88 of the Act for
demolition and remediation works, and landfill upgrades, in
respect of the former Tokanui Hospital site

**SUMMARY STATEMENT OF EVIDENCE OF EMILY CHEE WIN BUCKINGHAM
(PLANNING) ON BEHALF OF THE APPLICANT**

Dated: 29 September 2025

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1. My name is **Emily Chee Win Buckingham**. I provided evidence dated 12 September 2025 on behalf of Toitū Te Whenua Land Information New Zealand (**LINZ** or **Applicant**) addressing the planning aspects of the Project.

Summary of effects assessment

2. The Project has a number of positive effects, including remediating a large Site so that it is appropriate for a range of future land uses; enabling the Site to be offered back to iwi as per a Treaty Settlement as part redress for whenua raupatu; the upgrade of an existing landfill which will improve water quality and ecological outcomes; and improvements to water flow and fish passage through additional stream daylighting.
3. The Project is of significant interest to iwi and mana whenua, with whom LINZ has continued to engage since lodgement of the Applications, and LINZ has made a number of further updates to the Project in response to concerns raised. These updates have focused on protecting the culturally and spiritually significant Wharekōrino Stream (**Stream**), ensuring that no culturally offensive material is disposed of in the landfill, and enabling mana whenua to uphold kaitiaki responsibilities. The Ngāti Maniapoto Post Settlement Governance Entity (**PSGE**), Te Nehenehenui Trust (**TNN**), is now comfortable that its concerns have been addressed and defer to mana whenua to address any cultural concerns.

Responses to submissions

4. Cultural concerns have been the focus of submissions received from mana whenua, with no specific challenge to the technical assessments expressed. I am confident that LINZ will be able to work with TNN and mana whenua to reach a position whereby cultural effects of the Project will be appropriately managed, enabling the positive outcomes of the Applications to be realised. In my view, it is appropriate for the Panel to grant both Applications for the requested terms, subject to conditions.

16 September 2025 hui

5. Since submitting my evidence, I attended the hui held on 16 September 2025 with TNN and mana whenua (including submitters), to discuss the engagement of cultural support services for the Project. From my observation of that hui, I understand that there is general agreement on the importance of cultural monitoring of the Project, and interest in the role(s). However, the appropriate entity and representatives to be engaged for

cultural monitoring and support services were not able to be confirmed at the hui. It was agreed that mana whenua would confirm who would like to participate and what the legal entity and representatives would be for the engagement by 16 October 2025.

6. As stated in my evidence in chief, LINZ has always intended to ensure strong cultural monitoring and induction protocols are in place for the Project and continues to progress this engagement (as demonstrated by the draft Cultural Support Work Request and hui). A Cultural Management Plan¹ was implemented for the investigations stage of the Project ("Phase 1"), and I understand this trial was considered, overall, to be a success, as described in Mr Bradley's evidence in chief. This Cultural Management Plan provides a good base to inform cultural engagement requirements for the next phase of the Project.
7. I am confident that an appropriate entity will be engaged to undertake this work, and that the Cultural Management Plan will be updated to reflect the requirements of the next phase, in collaboration with this entity. However, due to no entity currently being engaged, the consent conditions relating to cultural monitoring need to allow for some flexibility.

Clarification regarding cleanfill discharge

8. As part of the remediation, LINZ aspires to reuse clean crushed concrete (sourced from roads and building material) to backfill excavations and for farm tracks, in order to minimise waste and transport movements. The Remediation Application is clear that building foundation and service line excavations will be backfilled and topsoiled to existing ground levels, and LINZ has applied to Waikato Regional Council (**WRC**) for consent to discharge cleanfill to these trenches and foundations.
9. Since submitting my evidence, it has come to my attention that the use of crushed concrete as a component of 'cleanfill discharge' is not clearly described in the Project scope and Waikato Regional Plan (**WRP**) rules assessment. Therefore, I would like to clarify that LINZ seeks to include this component within the scope of the cleanfill discharge consent sought. For further clarity, this would only occur outside of the High Risk Erosion Area as provided for by WRP Rule 5.2.5.5, which LINZ applied for consent under and would remain the applicable rule.

¹ Appendix B2 to the Remediation Application

10. I have raised this matter with Ms Hills and understand that we are both of the view that the set of proposed cleanfill discharge conditions remains fit for purpose (as it would require the concrete to be tested and confirmed as meeting the definition of cleanfill before any reuse).

Updates to conditions

11. Following receipt of the section 42A reports and recent discussions with submitters, I have tracked changes onto WRC's and WDC's respective condition sets and have pre-circulated these tracked change versions in advance of the hearing as **Appendix EB7** (WRC conditions) and **Appendix EB8** (WDC conditions).
12. The rationale for these changes was largely included in the evidence in chief of Dr Finnigan and myself. I have made some additional comments below, which I have discussed with Dr Finnigan.

Cultural monitoring

13. The changes I have proposed to the WDC cultural monitoring conditions² are intended to ensure that the opportunity for input and cultural monitoring by mana whenua is preserved while at the same time ensuring that the Project does not rely on third-party action in order to be implemented (and in order for the conditions to be complied with). The conditions envisage that mana whenua will be involved in the preparation of an updated Cultural Monitoring and Management Plan (**CMMP**). This CMMP will then be implemented by the appointed cultural monitors during the Project.
14. I have also proposed amendments to the WRC cultural monitoring condition for consistency with the WDC condition and to add in specific aspects of the Project which have been identified by mana whenua as important to be culturally monitored.³

Soil disposal in the landfill

15. I have added in the correct technical standards for the material that is proposed to be accepted for disposal in the landfill on the advice of Dr Finnigan.⁴ The purpose of the change is to codify the standards in the conditions thereby providing reassurance that the most offensive material will

² WDC remediation and landfill condition 6 – proposed to be replaced with conditions 6A-6D

³ WRC schedule one – General conditions, condition 4

⁴ WRC Condition 3 of AUTH146952.05.01, and added condition 3A

not be disposed of in the landfill. I have also included a condition requiring medical waste to be removed and disposed of offsite.

Discharges associated with earthworks for the landfill upgrade

16. I have discussed WRC's discharge standard conditions with Dr Finnigan and proposed amendments on the basis of his advice.⁵ The changes apply the applicable suspended solids standards from the WRP for surface class waters.

Cleanfill discharge

17. I have deleted a reference to "imported material" in the WRC cleanfill discharge conditions for the Remediation Application so that it is clear that the cleanfill definition and acceptance thresholds also apply to material sourced from within the Site for backfilling (such as the clean crushed concrete mentioned above).⁶ However, in the case of the Landfill Application I consider that the equivalent cleanfill conditions⁷ should only apply to imported material, as the Project involves disposal of material in the landfill that does not meet the cleanfill criteria.

Final set of conditions

18. The conditions will be updated following the hearing and a final set of proposed conditions will be provided with LINZ's closing submissions.

⁵ Conditions 26 & 27 06.01

⁶ WRC Conditions 20-22 of AUTH146952.01.01

⁷ WRC Conditions 33-35 of AUTH146952.06.01