Drury Metropolitan Centre Fast-track

Auckland Council Specialist Memo

Annexure 7:

Healthy Waters & Flood Resilience

Hillary Johnston

11 August 2025

Healthy Waters & Flood Resilience Memo

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Approved by: Mark Iszard, Manager, Growth & Development, Healthy Waters
Date: 11 August 2025

1. INTRODUCTION

1.1 This memorandum provides Healthy Waters and Flood Resilience Departmental (**HWFR**) technical assessment and comments on the stormwater aspects of the Drury Metropolitan Centre Fast Track approval application (**Application**).

1.2 It is structured as follows:

(a) Introduction

i. Executive summary

ii. Documents reviewed

iii. Engagement with the Applicant

iv. Site visit

(b) Reasons for consent relevant to stormwater

(c) Assessment of the stormwater aspects of the Application

(d) Proposed conditions

Executive Summary

1.3 The Application proposes the further subdivision of the Stage 1 superlots, and to obtain all necessary consents for Stage 2 of the development. The consolidated Drury Centre development is proposed to include residential activity as well as retail, commercial, community, residential, and visitor accommodation activities. The location of these stages is shown in Figure 1 below.

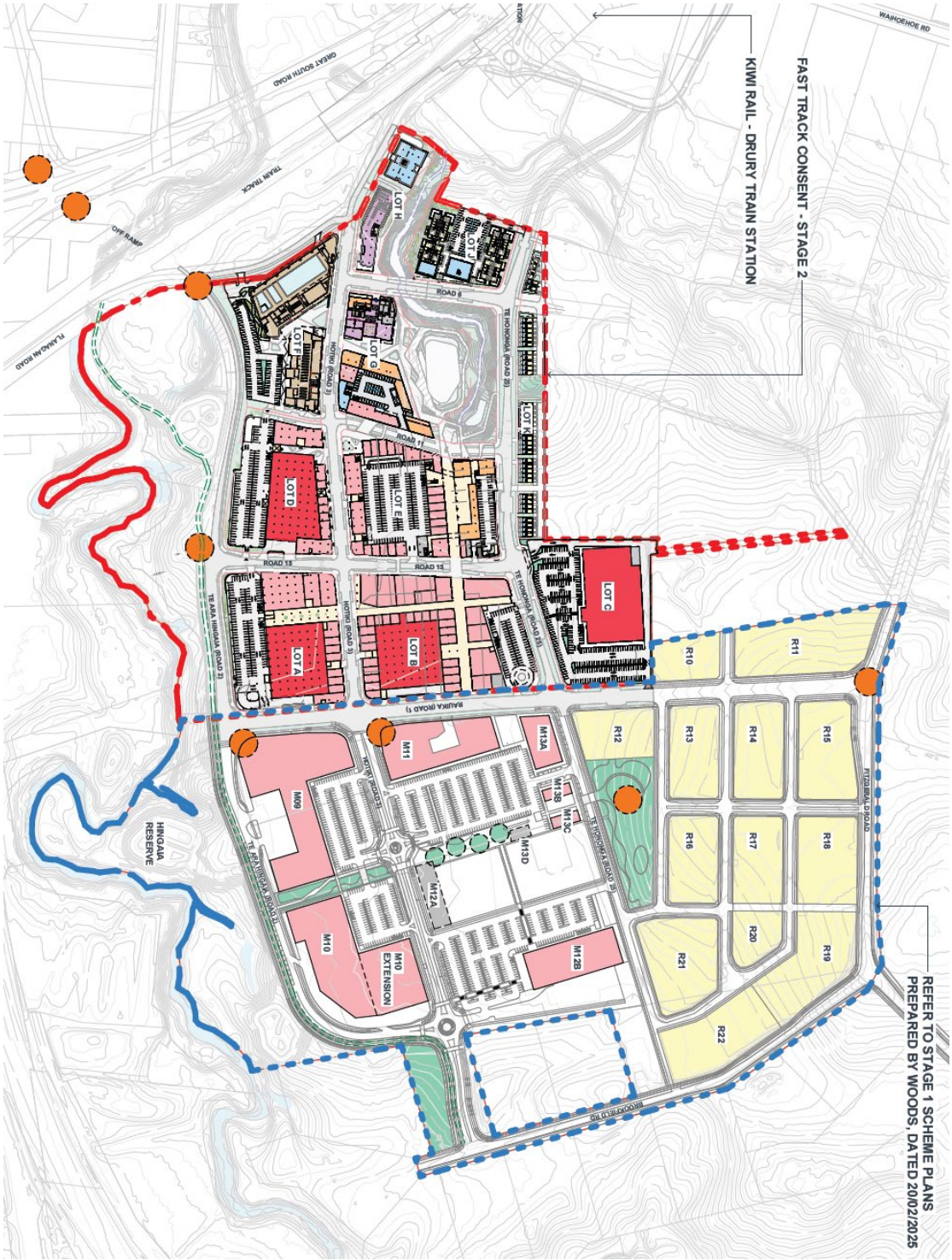

Figure 1. Drury Town Centre Stage 1 (blue outline, superlots shaded yellow) & Stage 2 (red outline) – DWG. 00-1001, dated 07.03.2025, prepared by Ignite

1.4 Stage 1 of the development is subject to existing consents granted under the COVID-19 Recovery Fast Track Consenting Act 2020 on 17 July 2023. The consents authorise the establishment of 13 super-lots and associated servicing (shown in yellow within Figure 1). The Application proposes to further subdivide the superlots to create 292 fee simple residential lots.

1.5 The development area is also subject to an approved private plan change – PC48. The Stormwater Management Plan (**SMP**) put forward in support of the private plan change has not yet been adopted by HWFR under the Region Wide Network Discharge Consent (**RWNDC**). The SMP titled *Drury Centre and Drury East Stormwater Management Plan* (most recent version dated May 2025) prepared by Woods has been prepared to support development within both PC48 and PC49. Stormwater management proposed for the Drury Metropolitan Centre is intended to meet the requirements of the Drury Centre and Drury East SMP.

1.6 HW assessment and key points of concern with the Application are addressed in detail in **Section 3** below and include:

(a) **Flood Assessment**

(b) **Erosion Assessment**

(c) **Vesting of Land**

(d) **Stormwater Management Devices**

(e) **Stage 1 Superlot – Stormwater Management**

1.7 The key recommendations arising from the assessment outlined in this memorandum are summarised in **Section 4**. Comments on the Applicant's proposed conditions are provided in **Section 5** and **Appendix A**. Additional recommended conditions are provided in **Appendix B**.

Documents Reviewed

1.8 The following documents have been reviewed in preparing this memorandum:

- '*Drury Metropolitan Centre Stage 1 and 2, Fast Track Approval Application, Assessment of Environmental Effects and Statutory Analysis*' – Final Revision 1, dated 25 March 2025 and prepared by B&A
- Appendix 5: Proposed Draft Consent Conditions
- Appendix 9 (Part 1 – Part 3): Engineering Drawings, prepared by Woods
- Appendix 10: '*Infrastructure Report, Drury Centre – Stage 2'* – Version 5, dated 25 March 2025 and prepared by Woods
- Appendix 11: '*Stormwater Assessment Report, Drury Centre, Stage 2*' – Version 4, dated 21 March 2025 and prepared by Woods
- Appendix 12 (Part 1 – Part 8): '*Proposed Subdivision and Development, Flannagan Road, Drury, Drury Centre Stage 2, Addendum Geotechnical Investigation Report* ' – Version 3, dated 21 March 2025, and prepared by CMW Geosciences
- Appendix 15: 'Drury Metropolitan Centre, Stage 2, Ecological Impact Assessment' – Version 2.1, dated 26 March 2025 and prepared by Tonkin + Taylor
- Appendix 21: '*Rules Assessment'* prepared by B&A
- Appendix 25: '*Wetland 2-1 Operations and Maintenance Manual, Drury Centre, Stage 2'* – Version 0, dated 14 March 2025, and prepared by Woods
- '*Response s67 further information memorandum recommended by Auckland Council*' (including attachments), dated 24 July 2025 and prepared by B&A
- '*Response to s67 further information recommended by Auckland Council Healthy Waters'*, dated 5 August 2025 and prepared by B&A

Engagement

1.9 A pre-application meeting between HWFR and the Applicant's team was held in December 2024 to introduce the proposed stormwater management approach for Stage 2.

1.10 In addition, there has been ongoing communication with the Applicant's stormwater engineers throughout the relevant private plan change processes. This has included review and feedback on the Plan Change SMP, which remains unresolved at this time.

Site Visit

1.11 A site visit specifically for this Application has not been undertaken. HW specialists are familiar with the site having been involved in the COVID-19 Fast Track consenting process for Stage 1. The Waterways Planning Specialist providing input to this assessment has visited the proposed outfall locations.

2. REASONS FOR CONSENT

2.1 The Planning Report correctly asserts that the Drury Centre and Drury East SMP has not yet been adopted under the RWNDC[1]. The Applicant's Engineers have outlined that stormwater management proposed for the Stage 1 Superlots and Stage 2 development is consistent with the stormwater management proposed under the Drury Centre and Drury Eat SMP. HWFR continues to work towards resolution of outstanding comments on the SMP with the Applicant's Engineers to enable its adoption under the RWNDC.

2.2 The diversion and discharge of stormwater from development proposed to be authorised by this Fast Track Application therefore cannot be authorised under Healthy Water's RWNDC at this time. A private diversion and discharge consent is needed at this time and has been sought by the Applicant[2].

3. ASSESSMENT OF STORMWATER ASPECTS OF APPLICATION

Stormwater Management Proposed

Stage 1 Superlots

3.1. The Stage 1 COVID Fast Track (2020) consent conditions include requirements for the management of stormwater runoff which are outlined in detail within the Stormwater Assessment Report prepared to support this Application[3].

3.2. The consent condition includes a Stormwater Management Works table, where stormwater management requirements vary by land use and risk level. All roofs and buildings must be constructed using inert materials, with rainwater tanks or equivalent devices required to provide hydrology mitigation of runoff from roof areas. Hydrology mitigation of runoff from all impervious areas must be achieved in accordance with SMAF-1 requirements. For JOALs and private roads, stormwater quality treatment requirements are scaled by contaminant risk, requiring at minimum screened catchpits and at a maximum water quality treatment achieved

[1] Section 6.7.1, page 53
[2] Section 7.2, page 66
[3] Section 8.2, page 19

by GD01 or equivalent designed devices. Stormwater from public and private roads must be treated to GD01, preferably via communal bioretention with gross pollutant pre-treatment. All stormwater infrastructure must be designed to accommodate a 3.8°C climate change scenario. In terms of flood management a pass-forward approach is supported, with maintenance of sub-catchment boundaries to ensure hydraulic neutrality to downstream wetlands. Outfalls must be green outfalls designed with planted, soil-filled rock rip-rap.

Stage 2

3.3. Stage 2 is divided into two sub catchments. Area 1 (shaded red within Figure 2) includes approximately 14.7ha which drains to this Fitzgerald Stream. Area 2 (shaded purple within Figure 2) includes 9.9ha which drains to the Hingaia Stream (Figure 2).

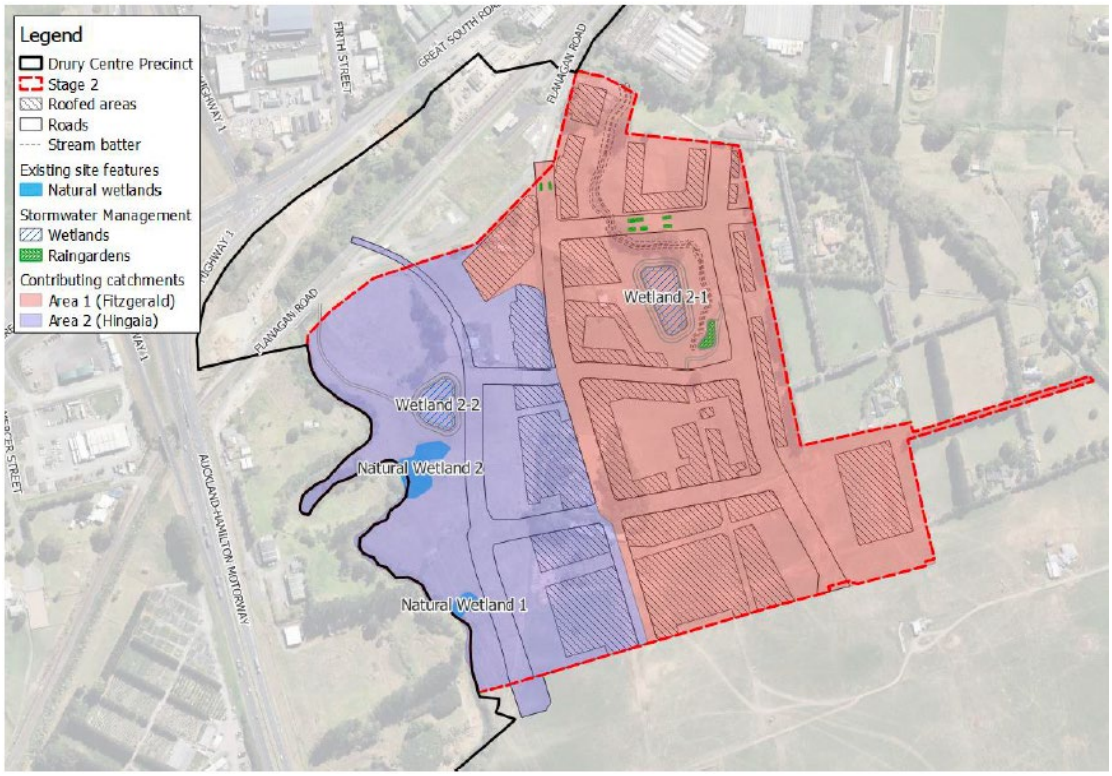

Figure 2. Stormwater Management Devices and Areas (Figure 3. extracted from the Stormwater Assessment Report, Drury Centre – Version 4, dated 21 March 2025, prepared by Woods)

3.4. The proposed stormwater management for both Area 1 and Area 2 is similar to that required for Stage 1 and is outlined in detail within the Stormwater Management Assessment[4]. Each of the areas primarily relies on newly proposed constructed wetlands for stormwater management, Wetland 2-1 and Wetland 2-2, which at this stage are proposed to remain in private ownership.

Flood Assessment

Modelling

[4] Section 9, pages 23 to 28

3.5. Following review of the Application, HWFR considered that further modelling was required to assess the effects of the proposed development on flooding. This included a scenario relative to existing land use without climate change and a 3.8-degree climate change scenario in accordance with the Auckland Council Guideline Document GD15 (Climate Change Scenarios, March 2024), consistent also with the Auckland Unitary Plan Chapter E36 provisions.

3.6. Justification was needed for the post-development modelling assumptions, which included consented developments such as Drury Centre Stage 1 and Fulton Hogan Stages 2 and 3, but excluded Fulton Hogan Stage 1 despite this area containing temporary flood storage features that appear to support the Applicant's proposed approach of providing no additional attenuation.

3.7. The Application proposes the discharge of stormwater to Fitzgerald Stream, where downstream culverts under the railway and Great South Road are known to have limited capacity. While the Applicant's Engineers assert that attenuation would increase downstream flood levels, supporting evidence or modelling was not provided within the original Application documents.

3.8. Healthy Waters requested a full copy of the flood model, modelling of additional scenarios, and justifications outlined above as part of the S67 process. The Applicant provided a copy of the model as well as further justification of the proposed approach on 21st July 2025. At the time of writing, HWFR have not been afforded sufficient time to review, verify, and interrogate the model in detail to confirm it is fit for purpose and to confirm support the proposed stormwater management strategy.

3.9. Based on the preliminary review of the model, the proposed management of flooding to downstream properties, implementing a 'no attenuation' approach, is considered appropriate in principle. This is subject to the following requirements which have been recommended as additional conditions of consent within **Appendix B**:

a) Final surface design to be provided prior to commencement of earthworks that demonstrates no loss of storage within Fitzgerald Stream floodplain

b) Final hydraulic model to be submitted for review at Engineering Plan Approval stage and prior to establishment of impervious surfaces.

Overland Flow Path Assessment

3.10. In addition, a full overland flow path assessment including catchment plans, representative cross-sections, and calculations for MPD and climate change scenarios was requested as part of the S67 process. This was considered necessary to confirm that overland flows can be safely conveyed within the site without creating new flood hazards.

3.11. The Applicant's Engineers provided an Overland Flow Path Assessment memorandum dated 14th July 2025 as part of the S67 response information. The assessment assumes that:

a) No overland flows will enter the proposed Stage 2 development from the already consented Stage 1 development; and

b) Overland flows can be accommodated by the piped network at some locations.

3.12. Based on the provided design information, the assumptions summarised above are not considered appropriate and it has not yet been demonstrated by the Applicant's Engineers that overland flows can be managed in a way that does not create flood hazard and risk to future public road users.

Lot 40

3.13. The development proposes earthworks within Lot 40 (Stage 2.10.2) to enable future development of Building H2 (Figure 3). The earthworks extend into the Fitzgerald Stream 10% and 1% AEP floodplains immediately adjacent to the existing public stormwater culvert under Flanagan Road. This culvert is over 50 years old and is considered critical public stormwater infrastructure for this catchment. A supplementary culvert has undergone public. Public consultation and is has been undertaken regarding this culvert with an upgrade planned for post 2040. The supplementary culvert is included in the Auckland Council Development Contributions Policy 2025 and is essential to enable the ultimate development of the upstream contributing catchment in accordance with the Drury Centre and Drury East SMP. The upgrade of this culvert is critical to provide flood resilience to the wider area, and in particular the area immediately upstream of the culvert including Drury Centre Stage 2 and Drury Rail Station.

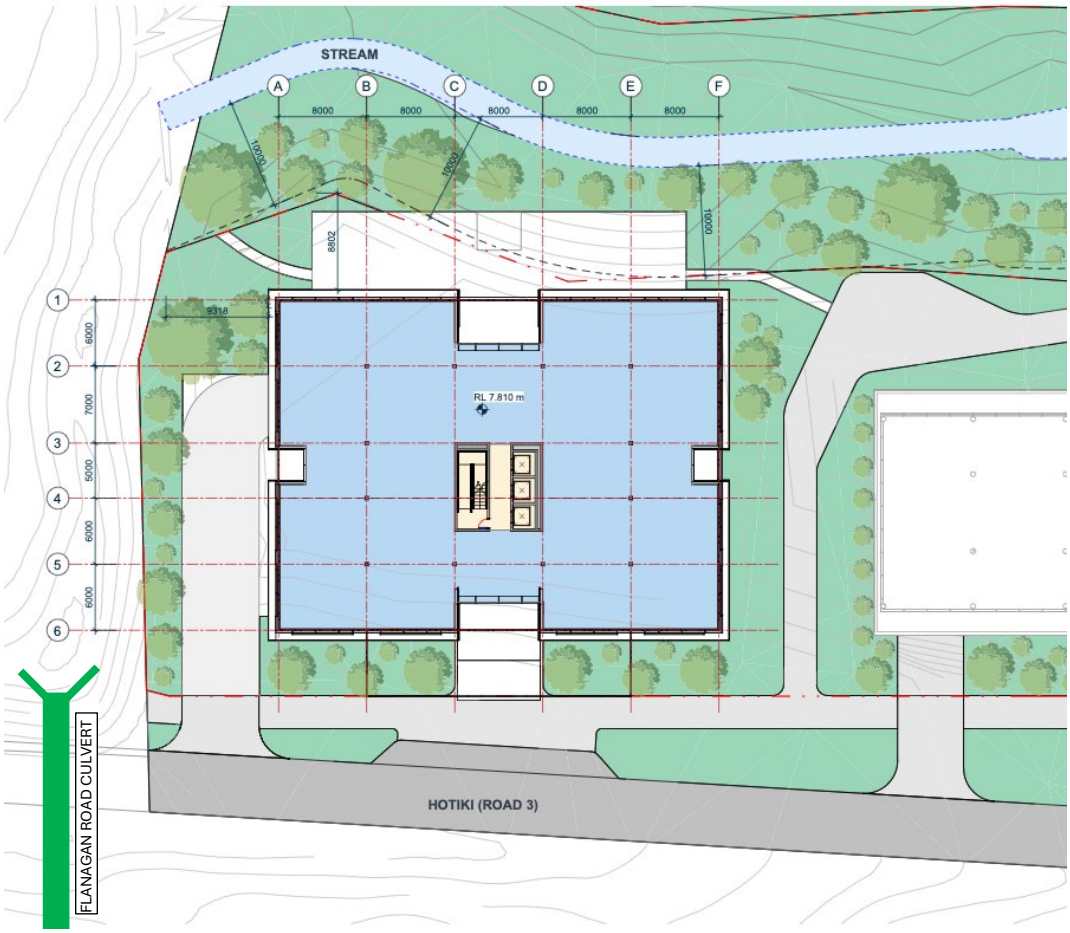

Figure 3. Lot H2 - Level 00 - Floor Plan – DWG. H2-1302, date 07.03.2025, prepared by Ignite. Mark-up of Flanagan Road culvert location by HWFR (annotated)

3.14. The proposed development of Lot 40, including Building H2 and ancillary hardstand areas, presents a significant risk to the practicability of the Flanagan Road Culvert upgrade. This is

due to the proximity of the proposed building and infrastructure being offset by less than 10m from the top of stream bank. To enable adequate space for the Flanagan Road Culvert upgrade, HWFR recommends that the extent of proposed development within Lot 40 is amended so that a minimum of 20m offset is provided from the top of bank of the stream to the edge of any building or infrastructure.

3.15. Due to the nature of progressive urban, commercial, and industrial development of the Flanagan Road Culvert catchment, including the proposed LFR development, the risk of blockage to the culvert will increase. HWFR holds several records and evidence of culverts blocking during the flooding events across the Auckland Region (refer Figure 4). This includes both small and large culverts. In the event of blockage, flooding behind the culvert could rise up to a minimum 9.6mRL. The proposed FFL for Building H2 is 7.8mRL (with basement carparking proposed at 4.6mRL). On this basis, the risk of flooding to building H2 is considered significant.

Figure 4. Records of culvert blockages during flooding events across the Auckland Region, prepared by HWFR

Erosion Assessment

3.16. An indication of the existing Natural Wetlands and the proposed Stormwater Management Wetlands is included within Figure 2.

3.17. The proposed development will substantially increase both imperviousness and the total contributing catchment of Area 2 which discharges to existing Natural Wetland 2 and to the Hingaia Stream corridor downstream of the proposed rock chute. This change, along with increased imperviousness also proposed within Area 1, is expected to increase peak flows and poses a risk of erosion within the receiving environment.

3.18. An erosion assessment was sought as part of the S67 request which specifically addresses the existing Natural Wetland 2 downstream of Area 2, the Hingaia Stream corridor, and Stormwater Management Wetland 2-1 and 2-2 embankments. These assessments were considered necessary to confirm whether the proposed erosion protection and planting measures are sufficient to prevent bank slumping or structural failure. Additionally, the design flows and velocities used to size Stream A were sought to ensure that adequacy of its design could be demonstrated.

3.19. The Applicant has responded to the S67 items raised in respect of erosion risk and assessment within the S67 Response Memorandum dated 5th August 2025.

Natural Wetland 2 and Hingaia Stream

3.20. During site visits in 2023 and 2024 the HWFR Waterways Planning Team identified this segment of the Hingaia Stream bank is actively eroding, and many erosion hotspots were identified along the true right bank.

3.21. The S67 response outlines that the final finished surface for the area surrounding existing Natural Wetland 2 and Hingaia Stream corridor downstream of the rock chute will consist of grass/landscaping that is able to withstand the estimated velocities[5]. It is not yet understood, practically, how the existing natural wetland and stream will be planted with specifically selected grasses that can withstand the estimated velocities.

3.22. These velocities were estimated using development peak flows from the 10% AEP rainfall event only. However, the rock chute will receive development peak flows from the 1% AEP rainfall event, which are of greater magnitude and are expected to generate higher velocities.

3.23. HWFR's current view is that the Applicant has not yet demonstrated that the risk of increased erosion to existing Natural Wetland 2 and the Hingaia Stream corridor can be sufficiently mitigated.

3.24. HWFR recommends that a Geomorphic Risk Assessment is carried out to assess the increased risk of erosion to this receiving environment from the increased development flows.

Stormwater Management Wetland 2-1 and Wetland 2-2

3.25. In respect of the potential risk of erosion to Wetland 2-1 and Wetland 2-2, the S67 response memorandum explains that:

a) For Wetland 2-1 the velocity in the stream is at a maximum of approximately 1.1m/s (up to 10% AEP rainfall event) and will pose low risk of erosion considering the proposed landscaping of the embankments[6]; and

b) For Wetland 2-2 the embankments are located above the 1% AEP flood level within the Hingaia Stream and risk of erosion is low[7].

3.26. The 10% AEP flow been used to evaluate risk of erosion to the Wetland 2-1 embankment, being adjacent to Stream A. However, Stream A also conveys peak flows from the 1% AEP rainfall event which are of greater magnitude and are expected to generate higher velocities. The 1% AEP rainfall event should also be included in the assessment of the risk of erosion to Wetland 2-1.

3.27. Although the Wetland 2-2 embankment is located outside of the Hingaia stream 1% AEP floodplain, this does not demonstrate that the existing Hingaia Stream banks will not erode at that location, potentially resulting in undermining of Wetland 2-2 embankments. HWFR

[5] S67 Response Memorandum dated 5th August 2025, Section 2.1
[6] S67 Response Memorandum dated 5th August 2025, Section 2.2
[7] S67 Response Memorandum dated 5th August 2025, Section 2.3

recommends that a Geomorphic Risk Assessment is carried out to assess the risk to Wetland 2-2 embankment stability from ongoing erosion of the Hingaia stream.

Hingaia Stream – Proposed Road

3.28. As noted above, Hingaia Stream is actively eroding in the vicinity of the proposed development. Figure 5 indicates that there is only 19.5m between the proposed road and the Stream. An outer bend of the stream is located adjacent to the proposed road. This bend will be subject to increased erosive forces which will increase the potential erosion risk to the road.

3.29. It has not yet been demonstrated that the proposed road will remain stable long term, and will ultimately comply with the Building Code's required structural lifespan of 50-100 years. HWFR recommends that a Geomorphic Risk Assessment is undertaken to assess and understand long term erosion risk. The outcomes of this Assessment should inform appropriate structural design or the implementation of suitable mitigation measures.

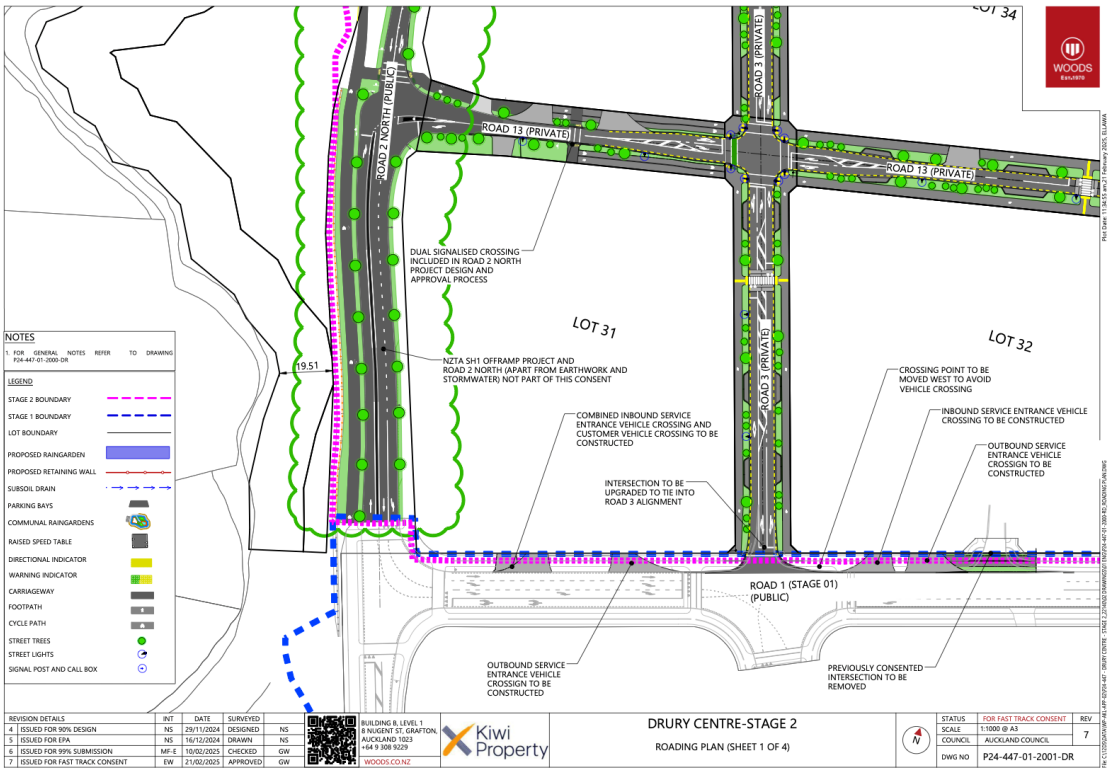

Figure 5. Drury Centre Stage 2, Proposed Roading Plan (Sheet 1 of 4) – DWG. P24-447-01-2001-DR, Revision 7, dated 21.02.2025, prepared by Woods

Fitzgerald Stream

3.30. Erosion is also occurring along the Fitzgerald Road Stream. Building H2 and Lot J are proposed to be located relatively close to the Fitzgerald Stream (Figure 3). It has not yet been determined that stream erosion will not undermine the proposed Building, and that the Building will ultimately comply with the Building Code's required structural lifespan of 50-100 years.

3.31. Consent has been sought for an infringement of the 10m riparian yard for Stream A with respect to a corner of Building H2[8]. The Architecture Plans indicate that that the driveway for building H2 is located within the riparian yard of the section of stream at the outlet of the Flanagan Road Culvert (Figure 3). It appears that consent has not been sought for this infringement, including for imperviousness that may exceed 10%. Broader concern with the proposed location of this building and driveway are outlined in Section 3.13 and 3.14.

Vesting of Land

3.32. The land generally containing the Stream A which discharges north to Fitzgerald Stream (Lot 601, Lot 602 and Lot 604), including its riparian margins, was initially proposed to be vested to Council as a *Local Purpose Reserve (Drainage)*[9].

3.33. The Application documents did not sufficiently demonstrate whether the extent of the proposed land to vest is appropriate and would deliver additional public benefit that cannot otherwise be achieved through private ownership and maintenance. It was unclear how some of these areas would function beyond a stormwater purpose. S67 items in this regard were raised by HWFR.

3.34. Vesting of land for stormwater management to Council must be limited to only what is essential for ongoing network performance, maintenance, and resilience. In general, Healthy Waters does not support vesting land containing wider floodplains, streams, or overland flow paths where that land does not contribute meaningfully to stormwater function as well as deliver additional recreational, ecological, or amenity value.

3.35. In response to S67 items relating to the function and ownership of Lots 601, 602, and 604 the Applicant has confirmed that these lots will remain in private ownership[10]. This is acceptable subject to changes being made to the proposed scheme plans to reflect this.

3.36. In addition, Lot 604 contains a proposed public Communal Raingarden 2-1 which will need to be located within a separate, public, lot in order to enable the vesting of this asset.

Stormwater Management Devices

Ownership

3.37. The Application proposes two Stormwater Management Wetlands (Wetland 2-1 and Wetland 2-2) as shown within Figure 2. The Stormwater Management Wetlands are currently proposed to remain in private ownership, but are designed to receive stormwater from network that is proposed to be vested as public upstream.

3.38. In response to the S67 request for clarification on the proposed operation and maintenance responsibilities of the Stormwater Management Wetlands, the Applicant has confirmed that maintenance obligations will be secured via the stormwater discharge consent[11].

[8] AEE, Section 7.2, page 67
[9] Appendix 8 – DWG. P24-447-02-0016-SC, DWG. P24-447-02-0020-SC, DWG. P24-447-02-0021-SC
[10] S67 Response Memorandum dated 5th August 2025, Section 3.1
[11] S67 Response Memorandum dated 5th August 2025, Section 4.1

3.39. The currently proposed ownership and operations and maintenance arrangements for the stormwater management wetlands has been considered by HWFR and is not supported. The proposed arrangement presents significant operational, liability, and compliance risks, given the reliance on privately managed infrastructure to meet obligations of HWFR's RWNDC. On this basis HWFR seek that Wetland 2-1 and Wetland 2-2 are vested as public assets, or alternatively, should these devices remain in private ownership then HWFR reserves the right to not accept any upstream stormwater network as public assets.

Retention

3.40. The design of the Stormwater Management Wetlands relies on the assumption that reuse of runoff from roof areas of large-format retail (LFR) can achieve the required SMAF retention volumes. LFR activities typically have limited demand for reuse relative to the retention volume required to be achieved for the roof area. There is insufficient evidence within the Application documents to demonstrate that the LFR buildings will consistently reuse, or 'draw-down' required retention volumes. If a sufficient reuse volume cannot be achieved, excess runoff would be discharged to the Stormwater Management Wetlands, potentially resulting in underperformance.

3.41. In response to S67 requests from HWFR seeking clarification on the proposed retention approach the Applicant has confirmed that retention will be achieved as proposed[12]. To ensure this outcome, HWFR recommends that a specific consent notice be registered on the lot titles as part of this consent. A recommended condition is included within **Appendix B**.

Design Sizing

3.42. On review of the Application it appeared that Stormwater Management Wetland 2-2 may not have been sized to accommodate the entire contributing catchment area. Clarification regarding the sizing of the device was sought by HWFR as part of the S67 process.

3.43. In response to S67 request regarding the sizing of Stormwater Management Wetland 2-2, the Applicant has provided updated sizing calculations[13]. The revised sizing is considered acceptable for the purpose of this consent.

Stage 1 – Superlot Stormwater Management

3.44. From the information provided within the original Application it was not clear whether the stormwater management for the Stage 1 Superlots was compliant with the conditions of the existing diversion and discharge consent for Stage 1 granted under the COVID Fast Track consent. Further information was sought by HWFR as part of the S67 process to confirm whether stormwater management for residential development within the Stage 1 superlots is proposed to be achieved source.

3.45. In response, the Applicant has confirmed that stormwater management will be achieved at-source as required by the underlying consent[14]. The Applicant has also confirmed that the proposed JOAL areas are within the designed threshold of the downstream devices.

[12] S67 Response Memorandum dated 5th August 2025, Section 4.2
[13] S67 Response Memorandum dated 5th August 2025, Section 4.3
[14] S67 Response Memorandum dated 5th August 2025, Section 5.1

3.46. It is recommended that a consent notice is imposed on the individual private lots to ensure all required hydrology mitigation will be provided at-source. This is to secure that the 18% imperviousness threshold is not exceeded as part of the future development of the individual lots. A recommended condition is included within **Appendix B**.

4. RECOMMENDATIONS

Key recommendations outlined in the above assessment are summarised as follows:

Flood Assessment

- The Applicant must provide a final copy of the hydraulic model prior to Engineering Plan Approval and prior to establishment of any impervious surfaces authorised by this consent.

- The Applicant must provide the final proposed finished surface design that demonstrates no loss of storage volume within the Fitzgerald Stream 1% AEP floodplain.

- The Applicant must provide an updated Overland Flow Path Assessment to address the concerns outlined under Section 3.11. It is not considered appropriate to defer resolution of remaining concerns in this regard to Engineering Plan Approval stage as any design changes required to accommodate increased overland flows may trigger the need to vary the resource consent under Section 127 of the RMA.

- The Applicant must provide revised development layout for Lot 40 that provides a minimum of 20m of 'green space' offset from the Flanagan Road Culvert to any buildings or infrastructure (including access roads or driveways.

- The Applicant must assess the risk of flooding to proposed buildings and infrastructure adjacent to Fitzgerald stream from potential blockages of Flanagan Road culvert.

Erosion Assessment

- The Applicant must provide an updated erosion assessment demonstrating that the proposed development will not increase the risk of erosion to existing Natural Wetland 2 and the Hingaia Stream (downstream of the discharge point associated with Wetland 2-2) and the overland flow path rock chute from Area 2. It is not considered appropriate to defer the update of the assessment to Engineering Plan Approval stage. Any design changes required to manage erosion may require a variation to the resource consent under Section 127 of the RMA.

- The Applicant must carry out a Geomorphic Risk Assessment of the Hingaia Stream, adjacent to the proposed development in order to understand long term erosion risk. The outputs of the Geomorphic Risk Assessment can be used to ensure that the proposed assets and structures adjacent to the stream are designed appropriately and will not be undermined by ongoing stream erosion.

- The Applicant must provide an erosion assessment of the Fitzgerald Stream to understand the potential migration of the stream overtime and demonstrate this will not undermine the proposed structures adjacent to the stream.

Stormwater Management Devices

- The Applicant must either propose to vest Wetland 2-1 and Wetland 2-2 as public assets or confirm acceptance that any stormwater network upstream of the Stormwater Management Wetlands cannot be vested as public. If the Applicant prefers that the assets are vested as public, updated scheme plans must be provided indicating the Stormwater Management Wetlands (including maintenance access tracks) are located within '*Land in Lieu of Reserve – for Drainage Purposes*'.

- The Applicant must provide updated scheme plans that showing the public Communal Raingarden 2-1 (including maintenance access tracks) located within a '*Land in Lieu of Reserve – for Drainage Purposes*'.

Stage 1 – Superlot Stormwater Management

- Conditions requiring that hydrology mitigation and water quality treatment are provided at-source on all individual private lots have been recommended within **Appendix B**. These requirements are to be secured via consent notices registered on the relevant titles.

5. PROPOSED CONDITIONS

5.1 Initial comments on the Applicant's proposed stormwater related conditions,[15] as well as on additional conditions sought, if the Panel is minded to grant approval, are provided as **Appendix A** and **Appendix B** respectively.

5.2 These initial suggestions are provided to assist the Panel, but are offered without prejudice to the Council's ability to make more comprehensive comments on any draft conditions under section 70 of the Fast Track Approvals Act 2024, should the Panel decide to grant approval.

[15] Appendix 5 to the Application.

APPENDIX A: PROPOSED CONDITIONS COMMENTS REGISTER

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
A: LAND USE CONSENT		
1	**Activity in Accordance with Application** The consent holder must undertake the works in general accordance with the application formally received by the Environmental Protection Authority on 25 March 2025, and the following documents. In the event that any of the provisions of the following documents conflict with the requirements of these conditions of consent, these conditions of consent must prevail. a) Application form, Statutory Analysis and Assessment of Environmental Effects prepared by Barker & Associates Ltd titled "Drury Metropolitan Centre Precinct Stage 1 and 2" and dated 25 March 2025; b) The reports listed at **Attachment 1;** and c) The plans listed at **Attachment 2.**	No objection, standard condition.
4	**Management Plans** Any management plan required in in the conditions below must be: a) prepared and submitted to the Council for certification; b) prepared by a Suitably Qualified and Experienced Person(s) (SQEP); c) accompanied by a description of comments received from Mana Whenua and other stakeholders, along with a summary of where comments have: i) been incorporated; and ii) where not incorporated, the reasons why. d) Any management plan developed in accordance with Condition 4 may: i) be submitted in parts or in stages to address a particular or stage of work for the Project, or to address specific activities authorised by the consent. ii) except for material changes, be amended to reflect any changes in design, construction methods or management of effects and submitted to the Council for information without further process. e) Any material changes to the relevant management plans are to be submitted to the Council for information as soon as practicable following identification of the need for any material changes.	No objection.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
	f) No earthworks or other works that are subject to the relevant management plan must commence until the relevant management plan has been certified by the Council. g) The Project must be implemented in accordance with the most recent version of the certified management plans required.	
5	**Certification of Plans or Further Detail** The consent holder must not commence any physical works until it has obtained certification from the Council to the following: a) Final Architectural plans that comply with Condition 24; b) A Construction Noise and Vibration Management Plan – see Conditions 6-7; c) A Construction Management Plan – see Conditions 9-11; d) A Construction Traffic Management Plan – see Conditions 12-14; e) An Erosion and Sediment Control Management Plan – see Condition 15-17; f) An Adaptive Management Plan – see Condition 18-20; g) An Ecological Management Plan – see Condition 21-23; h) A Chemical Treatment Management Plan - see Condition 32.	No objection.
75	**Stormwater Outfall Structures** All stormwater outfall structures must be designed and constructed to comply with Standard E3.6.1.14 of the AUP and to achieve the following: a) Energy dissipation and/or erosion protection is required and must not exceed 5m in length within the stream bed, either side of the extended structure; b) During construction bed disturbance upstream or downstream of the structure must not exceed 10m either side, excluding the length of the structure; c) The structure must not cause more than minor bed erosion, scouring or undercutting immediately upstream or downstream; and d) Construction material and ancillary structures must be removed from the bed following completion of the activity.	No objection.
76	**Culvert Removal**	No objection.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
	The removal of the existing culvert at the lower reaches of Stream A must be undertaken to comply with Standard E3.6.1.13 of the AUP and must achieve the following: a) during the activity bed disturbance upstream or downstream of the structure must not exceed 10m either side, excluding the length of the structure; b) debris or other material must not be re-deposited elsewhere in the bed of the lake, river or stream, or within the one per cent annual exceedance probability (AEP) flood plain; c) the activity must not cause more than minor bed erosion, scouring or undercutting immediately upstream or downstream; d) the structure must be removed from the bed as far as practicable; e) Any remaining sections must not be a hazard to public access, navigation or health and safety; and f) The bed must be restored to a profile that does not inhibit water flow or prevent the passage of fish upstream and downstream in waterbodies that contain fish.	
80	**Flood Management** The consent holder must ensure the finished floor levels (FFLs) for the buildings approved in this consent are based on modelling using the 1% AEP rainfall with climate change temperature increase of 3.8°C.	Amendment proposed: The consent holder must ensure that the finished floor levels (FFLs) for all development enabled under this consent are established based on flood modelling using the 1% Annual Exceedance Probability (AEP) rainfall event, incorporating a climate change temperature increase of 3.8°C. All FFLs must include freeboard in accordance with the requirements set out in the Auckland Council Stormwater Code of Practice (Version 4).
STORMWATER DISCHARGE PERMIT CONDITIONS		
1	**Activity in Accordance with Application** The discharge must proceed in general accordance with the information and plans submitted with the application formally received by the Environment Protection Agency on 21 March 2025, including all supporting additional information submitted. In the event that any of the provisions of the following documents conflict with the requirements of these conditions of consent, these conditions of consent prevail.	No objection, standard condition.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
	a) Application form, Statutory Analysis and Assessment of Environmental Effects prepared by Barker & Associates Ltd titled “Drury Metropolitan Centre Precinct Stage 1 and 2” and dated 25 March 2025; b) The reports listed at Attachment 1; and c) The plans listed at Attachment 2.	
4	**Stormwater Network** The consent holder must design and construct the piped stormwater network in accordance with the Council’s Stormwater Code of Practice – Version 3 dated January 2022.	Amendment proposed: The consent holder must design and construct the piped stormwater network in accordance with the Council’s Stormwater Code of Practice – Version 4 dated 1 July 2025.
5	The consent holder must provide developed design details, calculations and documentation of all impervious surface sub-catchments and their respective receiving treatment devices must be approved by the Council prior to submission for Engineering Plan Approval.	Amendment proposed : The consent holder must provide final design details, calculations, and documentation of all impervious surface sub-catchments and their respective receiving treatment devices, for approval by the Council prior to submission for Engineering Plan Approval.
6	**Stormwater Outfall Structures** All stormwater outfall structures to be constructed within Stream A as shown on the plans titled ‘Stormwater Layout Plans’ prepared by Woods and dated 21 February 2025 must be designed and constructed so that the discharge of stormwater does not cause or increase scouring or erosion at the point of discharge or downstream.	No objection.
7	**Stormwater Management Works** The management of stormwater must be in accordance with the Drury Centre Stage Stormwater Assessment prepared by Woods dated 28 February 2025 and achieve the following design requirements: a) Water quality treatment i) New buildings must be constructed using inert cladding, roofing and spouting materials ii) Treatment of all impervious areas by a stormwater management device designed in accordance with GD01/ TP10 for relevant contaminants. b) Stream hydrology	Condition supported.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
	i) Provide retention (volume reduction) of a minimum of 5mm runoff depth for all impervious surfaces; and ii) Provide detention (temporary storage) with a drain down period of 24 hours for the difference between pre-development (grassed state) and post-development runoff volumes from the 95th percentile, 24-hour rainfall event minus the retention volume for all impervious areas c) Flooding – Buildings 1% AEP event i) Development does not worsen flood risk to people and property upstream or downstream of the Precinct in accordance with the Stormwater Code of Practice Version 3 and January 2022. *Advice Notes:* • The final design details for the stormwater management works will need to be submitted and approved at Engineering Plan Approval stage. • References to 'screened catchpits' refers to a normal catchpit/cesspit, and does not include Enviropods).	
8	**Stormwater Implementation Management Plan** The consent holder must prepare and submit a Stormwater Implementation Management Plan (SIMP) for the public stormwater management system (including water quality and hydrology mitigation devices) to the Council for certification and prior to submission for Engineering Plan Approval. The SIMP must: a) address how the public Stormwater Management Works achieve the design requirements in Condition 7 with a description of the extent and provision of the hydrological mitigation and water quality treatment provided by the bioretention treatment devices described in Condition 9; b) describe all the proposed public devices water quality and hydrological SMAF-1 mitigation. This must include a description of the type of device, dimensions (including detention volume), number and location of devices, and the proposed function of the device including hydrological mitigation and/or water quality mitigation and catchment attenuation where applicable; c) demonstrate design (i.e., detailed design) is completed in accordance with climate change provisions for 3.8°C; and	Amendment Proposed: **Stormwater Implementation Management Plan** The consent holder must prepare and submit a Stormwater Implementation Management Plan (SIMP) for the public stormwater management system (including water quality and hydrology mitigation devices) to the Council for certification and prior to submission for Engineering Plan Approval. The SIMP must: a) address how the public Stormwater Management Works achieve the design requirements in Condition 7 with a description of the extent and provision of the hydrological mitigation and water quality treatment provided by the bioretention treatment devices described in Condition 9; b) describe all the proposed public devices water quality and hydrological SMAF-1 mitigation. This must include a description of the type of device, dimensions (including detention volume), number and location of devices, and the proposed function of the device including hydrological mitigation and/or water quality mitigation and catchment attenuation where applicable; c) demonstrate design (i.e., detailed design) is completed in accordance with climate change provisions for 3.8°C; and

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
	d) provide hydraulic modelling and assessment of flood hazard risk using proposed known landforms within the Plan Change 48 and 49 areas including the consented Drury Central train station and associated transport interchange, proposed public stormwater networks and proposed temporary attenuation where relevant.	provide hydraulic modelling and assessment of flood hazard risk using proposed known landforms within the Plan Change 48 and 49 areas including the consented Drury Central train station and associated transport interchange, proposed public stormwater networks and proposed temporary attenuation where relevant. *Advice Note:* *The Stormwater Implementation Management Plan (SIMP) should address the public stormwater management system for the entire development area (including all stages), rather than being submitted in multiple separate SIMPs for individual stages or sites.*
9	In the event that the 'Drury Centre and Drury East SMP' has been approved by Auckland Council at the time of lodgement of Engineering Plan Approval for the stormwater management works, condition 8 requiring the preparation of the SIMP is no longer required.	Condition supported, however could be more appropriate as an advice note to Condition 8.
10	The consent holder must construct the following bioretention treatment devices for the areas to be treated as described in the following table and shown indicatively on the 'Stormwater Layout Plans' prepared by Woods and dated 21 February 2025. The treatment devices must be constructed and operational prior to any stormwater discharges commencing:	Condition not supported, as it is proposed to discharge public upstream networks into the wetlands, it is preferable that the wetlands are vested as public assets. This condition may need redrafting based on resolution of HWFR comments on ownership. In addition, references to 'aggregated raingardens' should be updated to 'private aggregated raingardens' to avoid ambiguity.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025

Treatment Device and Location	Areas to be treated
Private permanent communal device Wetland 2-1 on Lot 603	All public roads to be vested with the Council; and Water quality treatment and hydrological mitigation from the associated public road impervious areas, private roads and JOALs/ hardstand areas of the LFR, and detention of the roofed areas of the LFR, to be mitigated within the proposed communal device; and Water quality treatment and hydrological mitigation will be in accordance with the Stormwater Management Works outlined in Condition 7.
Private permanent communal device Wetland 2-2 on balance Lot 40	All public roads to be vested with Auckland Council; and Water quality treatment and hydrological mitigation from the associated public road impervious areas, including the NZTA off ramp, private roads and JOALs/ hardstand areas of the LFR, to be mitigated within the proposed communal device to be mitigated within the proposed communal device; and Water quality treatment and hydrological mitigation will be in accordance with the Stormwater Management Works outlined in Condition 7.
Aggregated rain gardens	Private roads and carparking areas to be owned and maintained by the consent holder.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
	<table><tr><td>Permanent communal device Raingarden 2-1 on Lot 604</td><td>All public roads to be vested with the Council; and Water quality treatment and hydrological mitigation from the associated public road impervious areas, to be mitigated within the proposed communal device; and Water quality treatment and hydrological mitigation will be in accordance with the Stormwater</td></tr><tr><td></td><td>Management Works outlined in Condition 7.</td></tr></table>	
SUBDIVISION CONDITIONS		
3	**Staging of Subdivision** For the purposes of the following conditions, the subdivision of Lot 200 (created by SUB60414913), Lot 1 Deposited Plan 56120, Lot 7 Deposited Plan 102224, Lot 8 Deposited Plan 165262, Lot 1 Deposited Plan 80559 Part Lot 1 Deposited Plan 62094 and Lot 1 Deposited Plan 580346 and involves the following subdivision staging. The following subsequent subdivisions are not restricted to any particular order in their implementation provided legal access and infrastructure servicing are available for each sub-stage as they are developed. • Stage 2.1: Lot 38; Lot 510 as a road to vest; and Lot 1010 (balance lot); • Stage 2.2: Lot 32; Lot 502 and Lot 514 (access lots); and Lot 1020 (balance lot); • Stage 2.3: Lot 31; Lot 503 (access lot); Lot 600 and Lot 609 (private open space); Lot 506 as road to vest; Lot 610 as local purpose reserve (esplanade); and Lot 1030 (balance lot); • Stage 2.4.1: Lot 41; Lot 511 as a road to vest; and Lot 1041 (balance lot); • Stage 2.4.2: Lot 42; Lot 508 (access lot); Lot 512 as a road to vest; and Lot 1042 (balance lot); • Stage 2.4.3: Lot 43; Lot 517 as a road to vest; and Lot 1043 (balance lot); • Stage 2.5: Lot 34; Lot 501 and Lot 515 (access lots); and Lot 1050 (balance lot);	Condition not supported. Areas proposed for vesting must be offered as '*Land in Lieu of Reserve – for Drainage Purposes*'.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
	• Stage 2.6.1: Lot 603 (private stormwater detention pond); Lot 604 as local purpose reserve (drainage); and Lot 1060 (balance lot); • Stage 2.6.2: Lot 36; Lot 500 and Lot 516 (access lots); and Lot 1061 and 1062 (balance lots); • Stage 2.7 & Stage 2.8: Lot 33 and Lot 35 • Stage 2.9: Lot 37; Lot 518 (access lot); and Lot 1090 (balance lot); • Lot 2.10.1: Lot 39; Lot 602 as local purpose reserve (drainage); and Lot 1011 (balance lot); and • Lot 2.10.2: Lot 40 and Lot 601 as local purpose reserve (drainage).	
5	**Survey Plan** The consent holder must submit a survey plan in accordance with the approved resource consent subdivision scheme plan titled 'Drury Centre – Stage 2 - Scheme Plan' prepared by WOODS, Revision 7 and dated 20 March 2025. The survey plan must show all lots to vest to the Council (including roads and reserves), all easements and amalgamation conditions, required by this subdivision consent.	Not supported. Areas proposed for vesting must be offered as *'Land in Lieu of Reserve – for Drainage Purposes'*.
24	**Reserve to Vest** Lot 604 must be vested to the Council as local purpose reserve (drainage). The consent holder must meet all costs associated with the vesting of the reserve.	Not supported. Areas proposed for vesting must be offered as '*Land in Lieu of Reserve – for Drainage Purposes'*.
33	**Reserve to Vest** Lot 602 must be vested to the Council as local purpose reserve (drainage). The consent holder must meet all costs associated with the vesting of the reserve.	Not supported. Areas proposed for vesting must be offered as '*Land in Lieu of Reserve – for Drainage Purposes'*.
36	**Reserve to Vest** Lot 601 must be vested to the Council as local purpose reserve (drainage). The consent holder must meet all costs associated with the vesting of the reserve.	Not supported. Areas proposed for vesting must be offered as '*Land in Lieu of Reserve – for Drainage Purposes'*.
40	**Consent Notice**	Amendment sought: **Consent Notice**

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
	Pursuant to section 221 of the RMA, the following consent notices must be registered against the Records of Title of Lots 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42 and 43: a) Individual private stormwater management devices (e.g., catchpits with a sump volume and submerged outlet, raingardens, rainwater harvesting and storage tanks, or other suitable stormwater management device) must be established to serve each Lot in accordance with the approved Stormwater Management Plan. The owner must operate, monitor and maintain private stormwater management systems in accordance with the conditions below, and must not modify or remove the stormwater mitigation system without express written permission of the Auckland Council. b) Operation and maintenance in accordance with the requirements of the Operation and Management Plan (in accordance with Conditions 14 – 15 of the Stormwater diversion and discharge permit DIS [insert reference] supplied to the Auckland Council for the stormwater device and any other relevant consents. c) Auckland Council may at any time upon prior written notice by its officers, employees, agents or contractors enter the property to inspect or test the stormwater management system and to inspect the owner's records in relation to the operation, monitoring and maintenance of the system. d) Auckland Council may, by notice in writing, instruct the owner to carry out any actions or works in relation to the operation, monitoring and maintenance of the detention system. If the owner fails to carry out those actions or works within 7 working days of receiving Auckland Council's Notice, Auckland Council may carry out said work itself and enter the property to execute the work. Auckland Council may recover all costs of carrying out said work from the owner.	Pursuant to section 221 of the RMA, the following consent notices must be registered against the Records of Title of Lots 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42 and 43: a) Individual private stormwater management devices (e.g., catchpits with a sump volume and submerged outlet, raingardens, rainwater harvesting and storage tanks, or other suitable stormwater management device) must be established to serve each Lot in accordance with the approved Stormwater Implementation Management Plan [Condition 8]. The owner must operate, monitor and maintain private stormwater management systems in accordance with the conditions below, and must not modify or remove the stormwater mitigation system without express written permission of the Auckland Council. b) Operation and maintenance in accordance with the requirements of the Operation and Management Plan (in accordance with Conditions 14 – 15 of the Stormwater diversion and discharge permit DIS [insert reference] supplied to the Auckland Council for the stormwater device and any other relevant consents. c) Auckland Council may at any time upon prior written notice by its officers, employees, agents or contractors enter the property to inspect or test the stormwater management system and to inspect the owner's records in relation to the operation, monitoring and maintenance of the system. d) Auckland Council may, by notice in writing, instruct the owner to carry out any actions or works in relation to the operation, monitoring and maintenance of the detention system. If the owner fails to carry out those actions or works within 7 working days of receiving Auckland Council's Notice, Auckland Council may carry out said work itself and enter the property to execute the work. Auckland Council may recover all costs of carrying out said work from the owner.
43	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 38 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed Stormwater Management Wetlands are to remain private assets.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
49	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 32 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.
61	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 31 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.
68	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 41 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.
75	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 42 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.
82	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 43 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
88	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 34 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.
99	**Infrastructure and Servicing** The consent holder must design and construct the privately owned stormwater assets (wetland) within Lot 603 in accordance with the requirements of Auckland Council and Healthy Waters. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	Condition not supported. as it is proposed to discharge public upstream networks into the wetlands, it is preferable that the wetlands are vested as public assets.
102	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 36 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.
108	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 33 and Lot 35 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.
114	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 37 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.
125	**Infrastructure and Servicing**	This condition is not supported if the proposed wetlands are to remain private assets.

#	PROPOSED CONDITIONS	HEALTHY WATERS COMMENT: 08.08.2025
	The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 39 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	
136	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lot 40 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.
156	**Infrastructure and Servicing** The consent holder must design and construct connections to the public stormwater reticulation network to serve Lots 1001 – 1014, 1101 – 1134, 1200 – 1217, 1301 – 1321, 1401 – 1422, 1501 – 1524, 1601 – 1620, 1701 – 1720, 1801 – 1823, 1901 – 1929, 2001 – 2009, 2101 – 2130 and 2201 – 2228 in accordance with the requirements of the stormwater utility service provider. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.	This condition is not supported if the proposed wetlands are to remain private assets.

APPENDIX B: ADDITIONAL RECOMMENDED CONDITIONS REGISTER

#	HEALTHY WATERS COMMENT	ADDITIONALLY RECOMMENDED CONDITION
1	A condition requiring an Operation and Maintenance Plan be provided for approval of HW Operations Team at the time of lodgement of EPA us recommended.	**Operation and Maintenance Plan – Public Stormwater Assets** An Operation and Maintenance Plan (OMP) for all stormwater management devices proposed to be vested in Council shall be submitted to Auckland Council Healthy Waters Operations Team for approval at the time of Engineering Plan Approval. The OMP must comply with Healthy Waters Operation and Maintenance Plan Template.
2	The following recommended condition will ensure any communal stormwater devices are properly maintained during development and handed over to Council in a functional and compliant state.	**Maintenance of Communal Stormwater Management Devices** The consent holder must maintain the communal stormwater management devices serving the subdivision in accordance with the following requirements: (a) The consent holder must maintain the communal devices until the earlier of: (i.) 80% of the building sites discharging to the devices have been developed, or (ii.) A period of five (5) years has passed from the date of issue of the final section 224(c) certificate under the Resource Management Act 1991 for the subdivision, (b) The consent holder must remove any sediment from the communal device that has resulted from development activities within the subdivision, if required by the Council, prior to acceptance of the device(s) by Council for ongoing maintenance. (c) At the time of transfer of any stormwater management devices to Council for ongoing maintenance, all planted areas associated with the stormwater management devices must achieve a minimum plant survival rate of 95%. (d) Updated Operation and Maintenance Manuals for all communal stormwater management devices must be provided to the Council at the time of transfer of any stormwater management devices to Council for ongoing maintenance. (e) A bond must be provided at the time of application for the section 224(c) certificate to ensure the ongoing maintenance of the communal stormwater management devices until transfer of any stormwater management devices to Council for ongoing maintenance.

#	HEALTHY WATERS COMMENT	ADDITIONALLY RECOMMENDED CONDITION
3	A condition requiring establishment of a bond will secure proper maintenance and completion of any communal raingarden devices, protecting the Council from costs if the consent holder fails to meet their obligations.	**Requirement for Bond** Prior to the issue of the section 224(c) certificate under the RMA, the consent holder must provide a bond to the Council in accordance with Section 222 of the RMA to ensure the performance of the proposed stormwater management devices. The bond must: (a) Be calculated at a rate of communal device area; (b) Be provided in the form of a cash deposit, a bank bond guaranteed by a New Zealand-registered bank, or another form of security (e.g., an encumbrance) as agreed with the Council. (c) Be documented and executed by the Council's solicitor. All legal and administrative costs associated with preparation, execution, variation, administration, or release of the bond must be met by the consent holder. (d) Be released once the relevant condition(s) have been satisfied and all associated Council costs have been paid. *Advice Notes:* *The Council may use the bond to restore the communal stormwater device(s) to comply with Auckland Council's GD01 standards if the consent holder fails to meet the condition requirements.* *The final bond amount will be confirmed and agreed by Council prior to Engineering Plan Approval. It will be calculated based on a per-square-metre rate of communal raingarden area, with the rate to be determined at that time. The bond value will be adjusted for inflation using the Reserve Bank inflation calculator or another method agreed with Council*.
4	A condition clarifying ownership of retaining walls is important to ensure that long-term ownership and maintenance responsibilities are clearly defined. Retaining structures are not stormwater assets and are not maintained by Healthy Waters due to their structural complexity, ongoing maintenance requirements, and associated liability.	**Exclusion of Retaining Walls from Vesting** No retaining walls shall be vested in Auckland Council's Healthy Waters department. All retaining structures shall remain in private ownership and maintenance responsibility unless otherwise agreed in writing by Auckland Council (Healthy Waters).
5	This condition will ensure that the development does not exacerbate flooding on neighbouring properties, maintain existing levels of flood risk, and protect both public and private assets from adverse effects during a range of storm events.	**Flood Risk and Nuisance** The consent holder must ensure that the development does not result in any increase in flood risk or flood nuisance to upstream or downstream properties, measured against the

#	HEALTHY WATERS COMMENT	ADDITIONALLY RECOMMENDED CONDITION
		existing rainfall and land use conditions for the 50% AEP, 10% AEP, and 1% AEP storm events.
6	This condition will ensure that any stormwater management devices intended for public ownership and maintenance are assessed and accepted by Auckland Council's Healthy Waters team before progressing to detailed engineering design or legal subdivision.	**Stormwater Asset Acceptance** Prior to the submission of any Engineering Plan Approval and prior to Auckland Council approving a survey plan pursuant to s223 of RMA for any stage, the consent holder must confirm and agree with Auckland Council Healthy Waters, acceptance in respect of all stormwater devices proposed to vest to Healthy Waters. Should any stormwater devices not been accepted by Healthy Waters for vesting, the relevant plan must be updated, and it must show was a separate allotment on the survey plan and must be owned by a common entity as outlined in the conditions.
7	This condition is important to ensure that all permanent structures within the development are designed and located in a way that avoids long-term erosion risk, protecting both public safety and infrastructure integrity.	**Erosion Risk Assessment** The consent holder must demonstrate, to the satisfaction of the Healthy Water's, Waterway's Planning Team Leader, that all permanent structures associated with the development including buildings, stormwater outfalls, retaining walls, and other infrastructure are not at risk of being undermined by erosion over their intended design life (50 to 100 years). This must be confirmed through a geotechnical and/or hydraulic assessment prepared by a suitably qualified and experienced professional, taking into account site-specific erosion potential, hydrological conditions, and the effects of climate change.
8	Additional condition proposed to ensure that earthworks do not result in the loss of floodplain storage capacity, which could increase flood risk to surrounding properties	**Downstream Flood Hazard Management** Prior to the commencement of earthworks, the Consent Holder shall submit a finalised proposed surface design to Council for certification. The plan must demonstrate that there is no loss of flood storage within the Fitzgerald Stream floodplain as a result of the proposed works.
9	Additional condition proposed to confirm that the final stormwater design maintains downstream flood risk at existing levels, in line with the proposed 'no attenuation' approach and best practice flood management.	**Hydraulic Model Verification** Prior to the lodgement of Engineering Plan Approval (EPA) and before any impervious areas are established on the site, the Consent Holder shall submit the final hydraulic model to the Council for review and verification.

#	HEALTHY WATERS COMMENT	ADDITIONALLY RECOMMENDED CONDITION
10	The proposed stormwater management approach relies on reuse of roof runoff from large-format retail buildings to meet SMAF-1 retention requirements. Given the typically low water demand associated with these building types, there is a risk that retention volumes may not be consistently drawn-down between storm events. This condition ensures that adequate reuse infrastructure is provided and maintained, or alternative mitigation is implemented, to avoid underperformance of the downstream wetlands and ensure compliance with hydrological mitigation requirements.	**Large Format Retail – SMAF-1 Retention** The Consent Holder shall ensure that hydrology mitigation of runoff from roof areas of large-format retail buildings is achieved in accordance with the approved stormwater management plan and SMAF-1 requirements, specifically in relation to retention volumes. Where retention is proposed to be achieved via reuse of roof runoff, the following must be maintained in perpetuity: (a) A functional and appropriately sized reuse system capable of drawing down the required retention volume between storm events; (b) Ongoing operational demand sufficient to ensure regular draw-down of retained water; and (c) Maintenance of reuse infrastructure in accordance with the manufacturer's specifications. If reuse demand proves insufficient to achieve the required retention volumes, the Consent Holder shall implement alternative mitigation measures to achieve compliance with SMAF-1 retention requirements to the satisfaction of the Council. This condition shall be secured via a consent notice registered on the title(s) of all relevant lots.
11	Stormwater management for Stage 1 relies on hydrology mitigation being achieved at-source, in accordance with the existing diversion and discharge consent granted under the COVID-19 Fast Track process. Implementation of a consent notice will ensure compliance with consented design assumptions, including the 18% impervious threshold, and will avoid overloading downstream stormwater infrastructure. A consent notice is necessary to secure this requirement at the individual lot level during future residential development.	**Stage 1 Superlot – Hydrology Mitigation** The Consent Holder shall ensure that the required hydrological mitigation and water quality for stormwater runoff from residential development within the Stage-1 Superlots is provided at-source, in accordance with the conditions of the existing diversion and discharge consent for Stage 1. This condition shall be secured via a consent notice registered on the title of each individual residential lot within Stage 1.