

If calling ask for Nellie Aroa

24 September 2026

Environmental Protection Agency
Private Bag 63002
Wellington 6140

Dear Sir/Madame

Re: Minute 2 of the Panel Convener – Convener Conference - Brookvale Green Project – Fast-Track Approvals Act 2024 (File Ref: FTAA-2607-1266)

Hastings District Council provides the following comments in response to Minute 2. These comments are intended to assist the Panel Convener in determining panel composition, process requirements and a timeframe for determination of the application.

Matters Setout in Schedule 1:

1. The number and range of approvals sought:

Application includes a number of reasons for consent under the Hastings District Plan.

The application also includes the use of/legal arrangements involving Council reserve land.

The application is complicated by the need for a Regional Consent for transfer of water allocation from existing rights on site to HDC global urban water allocation consent. It is unclear whether this consent is better to be processed through the FTAA or via a separate parallel process.

2. Level of complexity

Council considers the application raises several potentially novel or unusual issues including the HDC Reserve Land Arrangement, water allocation issues briefly addressed above. Water allocation is linked the application being unanticipated under the Future Development Strategy growth area and therefore has not been provided for as part of future growth projection.

The application is supported by a substantial volume of technical documentation requiring review across numerous specialist disciplines. Of particular significance:

- Geotechnical assessment;
- Slope stability;
- Retaining wall design and long-term performance;
- Liquefaction susceptibility;
- Stormwater management and maintenance;
- Water source protection
- Acoustic & reverse sensitivity
- Transportation and access.

- Urban design
- Contaminated land

Given the scale of development and reliance on geotechnical mitigation measures to address the steepness of the land for the western portion of the site, and the risk to council infrastructure and public safety Council currently considers an independent geotechnical peer review is warranted. In particular, a review should examine:

- Slope stability assumptions;
- Retaining wall design methodology;
- Liquefaction risk assessments; and
- Long-term geotechnical risk management.

Council anticipates this review would be limited to a review of methodology, assumptions and conclusions and would materially assist the panel's understanding of the risks and overall suitability of the site for development.

3. Issues

- a. Council has been vocal from late 2025 (including in referral application comments) that further consideration and consultation should be given to roading connection/access from the subject site to neighbouring sites (either through shaggy range or Aratki Extension) to ensure network resilience in the event of evacuation, better access to public transport and better travel routes to nearby schools. Council has also been vocal around reserve sensitivity issues and boundary treatments in regard to neighbouring sites but in particular 104 Arataki Road.
- b. No residential subdivisions consents have been sought previously on the site. But noted that the site does have a relatively long consenting and compliance history.

4. N/a

5. Panel Membership

Given the location of Brookvale Green next to the Arataki Extension, previously consented through the Fast Track Process, HDC is supportive of the use of the same panel members as Arataki being; Jennifer Caldwell (chair), Matt Lindenberg (member), and Michael Parsonson (Nominated Member from HDC/HBRC) subject to availability.

Additionally, given the sites close proximity to the Brookvale source water protection area, and the history of the 2016 Havelock North Water Crisis, HDC advocates for the inclusion of a fourth panel member specialised in groundwater.

Other matters:

Principle issues for consideration on the application where HDC position may not align with applicant are anticipated to be:

- Geotechnical issues relating to slope stability & retaining walls, and liquefaction.
- Plains Production Zone Versatile Soils and general policy direction (Particularly as site not identified within the Future Development Strategy)
- Reverse Sensitivity Issues
- Stormwater Management
- Secondary access (questionable network resilience)

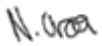
Gaps in the application include:

- The applicant states all earthworks are permitted activity, but consent is likely required under EM11 for removal of more than 25m² of topsoil, sand, gravel, metal or earth any site in the Plains Production Zone.

- The earthworks exemption under 27.1.5 of the Hastings District Plan is only applicable to performance standards provided they are assessed in the application; the application will need to provide a true assessment of these earthworks especially given the significant area and volume to be undertaken, and the close proximity to the Brookvale source protection area/ground water risks.

In considering timeframes the panel will need to consider close down periods and leave around Christmas & New Year Holidays.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'N. Aroa'.

Nellie Aroa
Team Leader
Environmental Subdivision/Consents