

10 December 2025

Auckland Council

135 Albert Street

Auckland

Attn: Carly Hinde

Principal Project Lead – Premium Unit – Planning and Resource Consents

Dear Carly

RE: Devonport Town Centre Revitalisation Project – Auckland Council Pre-App Meeting Minutes - Engineering

Thanks very much for the Auckland Council minutes of the Engineering related aspects of this proposed Fast Track Approvals Act Referral Application.

Our consultants have reviewed the minutes in conjunction with the applicant, and we provide the following comments.

Stormwater/Flooding

- The applicant supports the Council's view that a Stormwater Management Plan is NOT required for the proposed development.
- The applicant's position on the proposed classification of the proposed development as "Brownfields Large" is yet to be determined as it is still refining the extent of the redeveloped area and therefore does not as yet accept the Brownfields Large categorisation.
- The applicant supports the Council view that there are no stream hydrology, SMAF requirements or water quality issues arising from the proposed development.
- The applicant supports the position that no flood modelling is required, subject to the applicant providing a sufficient quantitative assessment/hydrological analysis of effects on the flood prone area including any changes in the frequency of overtopping of the spill point. The applicant agrees with this approach and supports the position that no flood model is necessary.

Coastal Inundation

- The applicant has reviewed the Council's recommended methodology and responds as follows:

Agree that Category B from MfE (2024) guidance is the most suitable category for this development. We want to highlight that the planning categories in Table 8 of MfE (2024) provide 'interim and precautionary' parameters for areas without detailed or site-specific risk assessment information or adaptation plans and this scenario represents a plausible upper range (Table 3, MfE, 2024). As set out on pg 53, MfE (2024) "the upper-range SSP5-8.5 H+ should continue to be used in screening and detailed hazard and risk assessments to identify coastal areas potentially affected (Policy 24, NZCPS, DOC, 2010) and high-end stress testing of adaptation options and pathways".

A site-specific risk assessment will be prepared for this development for the substantive application, following methods outlined Auckland Councils guidance for a hazard-risk assessment and definitions in PC120.

SSP5-8.5p83+VLM is identified in the MfE guidance as a stress test for a risk assessment providing a plausible upper bound level. The application of this pathway as a base inundation level and to then add freeboard is overly conservative and puts unnecessary constraints on brownfield development that can still achieve low risk outcomes for at least the next 100 years, particularly given the economic life of buildings are in the order of 70 to 80 years (pg 21, MBIE 2023 guidance^[1]). For informing finished floor levels, we have followed the example in Auckland Councils Guidance Document 13 and utilised the 50 percentile RSLR (SSP8.5 m) to 2130. [FINAL Freeboard GD13v1 December 2024.pdf](#) (appendix A1.0). We agree that SSP5-8.5p50+VLM is the appropriate scenario to add freeboard and wave setup for informing finished floor levels.

Snip from GD13 AppendixA1.0 that shows the use of SSP8.5m (p50)

Determine extreme inundation water level	Say use SSP8.5 m to 2130 + VLM = 1.29 m 3.79 m RL	SSPM8.5 m + VLM = 1.52 If added to 1% AEP = 4.53 m RL
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We also note that shallow flood depths (<0.3 m) are classified as low hazard exposure in PC120, suggesting that some exposure over a 100-year timeframe is potentially tolerable. However, our recommendation would be to have any sensitive elements of the development above the water level associated with SSP5-8.5p83+VLM and above the SSP5-8.5p50+VLM + setup + freeboard.

Snip from PC120 hazard definition

^[1] Natural Hazards Provisions: Guidance on Complying with Sections 71 to 74 of the Building Act 2004 (MBIE 2023 Guidance)

- Low flood hazard area –
 - for floodplains and overland flow paths, where floodwaters have depth equal to or less than 300mm or depth x velocity product less than or equal to 0.24m²/s in a 1 per cent AEP event
 - for flood prone areas, all other flood prone areas not meeting the definition for very high, high and medium flood hazard areas

Transport

- The applicant advises that an appropriate methodology for refuse disposal will need to be provided for from the rear of the proposed building on the corner of Clarence Street and Victoria Road. The applicant would like to resolve this and agree a solution with Auckland Council/AT as soon as possible.
- The applicant notes the recommendations regarding vehicle crossing splays and visibility splay dimensions of 5m x 2.5m on both sides of the proposed vehicle crossings. and provides the following response – this will be endeavoured to be incorporated into the design.
- The minutes need to be amended to correct the comments relating to on-site loading provision to recognise the proposed on-site loading space identified on the ground level plan, which is accessed from the proposed vehicle access on Wynyard Street.
- Parking and Other Traffic Services Requirements – The applicant wishes to reiterate that the level of detail that will be provided with the referral application will be commensurate with the information necessary to satisfy the requirements of the Fast Track Approvals Act. The minutes should be amended to reflect this. The applicants traffic engineer will provide the table noted in the minutes which will address this matter further.

Earthworks/Geotechnical

- As noted in the minutes, we await the Council's specialists' memos on these matters.

Please do not hesitate to contact us if you have any queries in regard to this letter.

Many thanks.

Regards,

A handwritten signature in blue ink, appearing to read 'Vijay Lala', is displayed on a light yellow rectangular background.

Vijay Lala

Director/Planning Consultant

Tattico Limited