

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:

Downtown Carpark Site Development

Fast-Track application number:

FTAA-2512-1158

BUN60460864, LUC60460865, DIS60460866 and WAT60460867

2.0 Technical Specialist Memo – Healthy Waters and Flood Resilience

To:

Sarah Wilson – Lead Planner

Adonica Giborees – Principal Project Lead

From:

Hillary Johnston – Healthy Waters Fast Track Lead

Qualifications
& Relevant
Experience:

I hold the qualification of Bachelor of Science in Environmental Science and Geography and have 12 years of experience in regulatory stormwater assessments.

I am a Certified Environmental Practitioner, a full member of the Environmental Institute of Australia and New Zealand, a member of WaterNZ, and an associate member of Engineering New Zealand. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation, and fast-track applications, and have appeared as an expert witness for Council before consent authorities and the Environment Court on multiple occasions.

Preparation in
Accordance
with the Code
of Conduct:

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

Signature:

H. Johnston

Date:

22 April 2026

3.0 Executive Summary / Principal Issues

Healthy Waters and Flood Resilience (HWFR) have reviewed the Application and provide only minor, high-level comments, with one additional condition sought as follows.

Authorisation

It is proposed to continue discharge stormwater runoff to the public stormwater network. The redevelopment of the site will trigger the need for authorisation under HWFR Regionwide Network Discharge Consent (RWNDC) as a Brownfield's Large Development. A Stormwater Management Plan demonstrating compliance with Schedule 4 of the RWNDC has not been submitted with the Substantive Application and should be resolved prior to lodgement of any Engineering Plan Approval. HWFR remain available to work through authorisation under the RWNDC outside of the FTAA process.

The Applicant has not sought a private diversion and discharge consent as part of their FTAA application, and outlines that they intend to rely on the RWNDC. It should be clarified that it is the Applicant's risk to proceed with their application without adoption a Stormwater Management Plan under the RWNDC or a private diversion and discharge consent.

Natural Hazards

The HWFR Catchment Management Team have reviewed the Application and have noted in general they do not have any major concerns with this development. The site is subject to a flood prone area but does not sit within a floodplain. They have advised that flood prone areas are generated using LiDAR, and that the accuracy of what is represented on ground will change with this development.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

Substantive Application Documents

- *Downtown Carpark Site Development, Fast-track Approvals Act Substantive Application* dated 7 November 2025 and prepared by Barker & Associates
- *Appendix 19: Downtown Carpark Site Development, Infrastructure Concept Design Report* Revision 1 dated November 2025 and prepared by Tonkin + Taylor
- *Appendix 22: Rules Assessment* prepared by Barker & Associates
- *Appendix 23: Downtown Carpark Site Development, Flood hazard and risk assessment* Version 7 dated 7 November 2025 and prepared by Tonkin + Taylor
- *Appendix 24: Downtown Carpark Site Development – Conditions of Consent*

Response Documents

- *Appendix 1: Downtown Carpark Redevelopment - Section 67 request Coastal and flood hazard response* dated 7 April 2026 and prepared by Barker & Associates

- Addendum 8: *Downtown Carpark Redevelopment - Section 67 request Coastal and flood hazard response* dated 7 April and prepared by Tonkin + Taylor

5.0 Recommendation

Overall, based on the information provided, we consider there is a strong basis for supporting the Application subject to resolution of the authorisation under the RWNDC prior to any application for Stormwater Engineering Plan Approval.

6.0 Proposed Conditions

The conditions put forward within Appendix 24 are generally supported subject to the following suggested addition.

NEW Stormwater Management Plan (SMP)

Prior to the lodgement of any Engineering Plan Approval (EPA) relating to the public stormwater network, the Consent Holder must ensure that a Stormwater Management Plan (SMP) has been prepared and formally adopted under Auckland Council Regionwide Network Discharge Consent (RWNDC).

The adopted SMP must demonstrate compliance with the relevant requirements of Schedule 4 of the RWNDC and must apply to all stormwater discharges to the public stormwater network associated with the development.

Advice Note:

The consent holder is advised that as they have not sought a private diversion and discharge consent as part of their FTAA application, and as their FTAA application stipulates that they will rely on the RWNDC, it is at the Applicant's risk to proceed at this point without adoption an SMP or a private consent.