

188 Beaumont Street Fast-track

Auckland Council Specialist Memo

Annexure 17:

Coastal

Dr. Tola Omidiji

13 July 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: 188 Beaumont Street

Fast-Track application number: EPA: FTAA- 2604-1205
Council: BUN60464683

2.0 Technical Specialist Memo – Coastal Specialist

To: Lewis So– Lead Planner
Russell Butchers – Principal Project Lead

From: Dr. Tola Omidiji

Qualifications
& Relevant
Experience:

I hold the qualification(s) of Bachelor of Science in Geography, Master of Science in Geography and Planning and Doctor of Philosophy in Physical Geography.
I have 11 years of experience in coastal geomorphology.
I have over 2 years of experience working under the RMA, including the preparation of technical assessments and expert evidence for resource consent applications and plan changes.

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:



Date: 13 July 2026

3.0 Executive Summary / Principal Issues

The applicant, Westhaven Residential Limited Partnership, seeks resource consent for a residential-led mixed-use development at 188 Beaumont Street, Auckland Central. The proposal includes apartments, retail, car parking, and associated underground infrastructure within a Coastal Erosion Hazard Area (CEHA).

The proposal is a Restricted Discretionary Activity under Rules E36.4.1 (A4) and (A5) and E38.4.1 (A11) of the Auckland Unitary Plan Operative in Part (AUP OiP) due to the location of the buildings and infrastructure within the coastal erosion hazard area.

The proposal does not trigger the coastal erosion hazard rules of the AUP Plan Change 120.

The site is located on reclaimed land within an existing marine environment where coastal protection structures are already established and form part of critical coastal infrastructure. On the basis of the information provided, the proposed development and subsequent subdivision is not anticipated to exacerbate or increase coastal erosion risk at the site or at adjacent properties.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- AEE Report titled: *188 Beaumont Street, Auckland Central Fast-track Approval Substantive Application Assessment of Environmental Effects and Statutory Analysis*, prepared by Barker & Associates Limited, 9 April 2026
 - Appendix 30 - Rules Assessment, prepared by Barker & Associates Limited, undated
 - Appendix 29 - Ineligible Activity Assessment prepared by Barker & Associates Limited, undated
- Report titled: *Coastal and flood hazard and risk assessment*, prepared by Tonkin & Taylor Limited, dated March 2026.
- Application Plans:
 - Appendix 5 - Architectural Drawings Part 6*, prepared by Warren and Mahoney Architects, Revision A, dated 06/03/2026.
 - Appendix 9 - Civil Preliminary Design Report and Engineering Drawings*, prepared by Tonkin & Taylor Limited, 17 December 2025.
 - Appendix 8, Subdivision Scheme Plans Part 2*, prepared by Yeomans Survey Solutions, dated March 2026.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

Additional reasons for consent

The area of proposed development is within the coastal erosion hazard area (CEHA) as per the part (b)(i) definition in Chapter J (definition) of the AUP(OiP). The applicant's site is at an elevation less than 7 m above mean high water springs (MHWS) and the activity is within 40 m of MHWS.

- The proposed development and subdivision at the above site trigger the various consents below which were not identified in the AEE Report:

Activity

- a. New residential building, concrete deck and car parking spaces within the coastal erosion hazard area.

Rule

*E36.4.1 (A4): All other buildings and structures on land in the coastal erosion hazard area is a **Restricted Discretionary Activity**.*

Activity

- b. New infrastructure (stormwater drainage (concrete manholes, PVC-U & perforated subsoil pipes), wastewater (pipe) and water (main and pipe)) within the coastal erosion hazard area.

Rule

*E36.4.1 (A5): On-site septic tanks, wastewater treatment and disposal systems, effluent disposal fields, underground storage tanks, water tanks (including rainwater tanks) or stormwater pipes or soakage fields on land in the coastal erosion hazard area, is a **Restricted Discretionary Activity**.*

6.0 Specialist Assessment

Council's Regulatory Review:

6.1 Hazard Assessment

The relevant matters to the proposal are the AUP provisions that establish the coastal erosion hazard area (CEHA), particularly Rule E36.4.1 (A4) & (A5), the matters of discretion in E36.8.1(1) and the special information requirement E36.9. The Council's Areas Susceptible to Coastal Instability and Erosion (ASCIE) are a s104(1)(c) matter.

The RMA, and Policy 25 of the New Zealand Coastal Policy Statement (NZCPS) require avoiding increased risk of development in areas affected by coastal hazard over at least the next 100 years. In addition,

Policy 24 of the NZCPS requires parties to undertake coastal hazard assessments using the best available information.

The National Policy Statement for Natural Hazards (NPS NH) establishes objectives and policies to managing natural hazards, including coastal erosion. It came into effects on 15 January 2026. The NPS NH sets objectives and policies for managing natural hazard risk. It also introduces a risk matrix to assess that risk.

The NPS NH does not apply to infrastructure as defined in the RMA. As such it does not apply to those matters under Rule E36.4.1 (A5).

Tonkin & Taylor Limited, on behalf of the applicant, has not presented a site-specific coastal erosion report that includes the consideration of site-specific coastal processes, future erosion rates taking into account the latest sea level rise projections and Vertical Land Movement (VLM), as recommended by the Ministry for the Environment's *Coastal Hazards and Climate Change Guidance* (2024).

Tonkin & Taylor Limited (T&T) has provided a qualitative assessment of effects within the CEHA (Section 6.1.5 of the T&T coastal report).

This assessment is proportionate to the nature of the site. The application site is reclaimed land within an established marine environment. The reclamation is supported by significant existing engineered coastal protection structures, being seawalls and associated reclamation edge protection structures. The reclamation is fully dependent on these structures for its integrity and is in effect independent of natural shoreline equilibrium processes.

The reason the coastal erosion provisions of AUP PC 120 do not apply is because the Council's regional scale ASCIE lines do not extend to this area. The lack of ASCIE lines reflects the presence and scale of the seawalls in this location.

The qualitative approach adopted by T&T is considered appropriate for this location for the reasons set out above.

6.2 Matters of discretion – AUP Operative

6.2.1 E36.8.1(1)(b): Likelihood of the event occurring and likely extent of damage

The site is located on reclaimed land within an engineered marine environment. The shoreline position is fixed by existing coastal protection structures. Due to the nature of these coastal protection structures the shoreline position is fixed. There is no shoreline retreat.

Given the current defended condition, the likelihood of active erosion directly affecting the development footprint is low, provided that existing coastal protection structures are maintained. However, over a 100-year planning horizon, the residual risk is primarily associated with climate change-driven sea level rise and increased wave loading on the coastal defense assets.

If failure of coastal protection structures were to occur, this would likely be caused by maintenance issues or replacement requirements. This represents a structural integrity risk rather than a progressive coastal erosion process. Accordingly, the hazard risk can be managed by maintenance and replacement of existing structures.

6.2.2 E36.8.1(1)(c): Effects on public access, landscape, and environmental values

The proposal is located within a highly modified reclaimed land environment with limited natural coastal character remaining. The proposal is to be located on private land. As such, effects on natural landscape values and coastal processes are inherently constrained by the existing urbanised context.

Public access within the marine environment is already structured and managed. The development does not remove or significantly alter existing public access routes along the coastal edge.

In terms of environmental values, the site does not support significant natural coastal ecosystems due to its reclaimed and engineered nature. Accordingly, effects on ecological coastal values are considered low.

6.2.3 E36.8.1(1)(d): Ability to relocate buildings or structures within a hazard area

The proposed development comprises multi-storey residential and mixed-use buildings, associated underground parking, and integrated infrastructure, all of which are inherently permanent and not designed for relocation.

Given the nature of the development, relocation of buildings or major infrastructure within the hazard area is not practicable. Any future adaptation would likely be limited to asset protection, redevelopment, or potential structural reinforcement of coastal defense systems rather than physical relocation of built form.

For this application, it is relevant that the site's reclaimed and engineered setting provides a fixed platform, and therefore the primary adaptation pathway is dependent on the long-term management of coastal protection infrastructure rather than relocation strategies.

6.3 Assessment against Matters of Discretion E38.7.3.4 - Subdivision

(a) a specified building area that meets the requirements of Standard E38.8.1.

The specified building areas on proposed Lots AU 12P to AU 27P, PU 2R, and AU 2T are within the coastal erosion hazard area.

However, these areas are situated within an existing reclaimed platform where the coastal edge is already fixed and protected by engineered seawalls. The erosion hazard exposure is therefore governed

by the integrity and maintenance of existing coastal defense structures rather than natural shoreline retreat processes.

(b) access to all proposed building platforms or areas

Access locations to all proposed building platforms on Lots AU 12P to AU 27P are within the erosion hazard area.

Given the reclaimed and serviced nature of the site, access routes are similarly embedded within an engineered coastal landscape where future erosion exposure is primarily contingent on the performance of existing coastal protection infrastructure. No new coastline works are proposed that would alter this condition.

(c) on-site private infrastructure required to service the intended use of the site.

The proposed Lots will be serviced by new (private stormwater, water, gas and wastewater connections) infrastructure.

These services will be located within reclaimed land that is already subject to a managed coastal defense regime. As such, the infrastructure is not expected to be exposed to increasing natural erosion processes, provided existing coastal protection structures are maintained over time.

Overall, in the context of a reclaimed and structurally defended coastal environment, the proposal is considered to maintain the status quo in terms of coastal erosion hazard exposure and does not give rise to additional adverse effects on coastal processes or adjacent properties.

Based on the information provided and the nature of the receiving environment, I support the application from a coastal erosion hazard perspective.

Summary:

- The applicant has proposed a residential building, concrete deck, associated car parking spaces and new infrastructure (stormwater, wastewater and water connections) and subdivision within a coastal erosion hazard area.
- These proposed development and subdivision trigger resource consent under the CEHA provisions of Chapter E36 and E38 of the AUP (Operative).
- The proposed site is supported by existing seawalls and the proposal.
- The proposed stormwater, water and wastewater connection pipes are non-habitable, low risk structures.

- The proposal does not exacerbate erosion at the site or adjacent sites.

7.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps.

8.0 Recommendation

I support the application based on the information available.

9.0 Proposed Conditions

I have no amendments / recommended additional conditions for this application.

10.0 Supporting Documents

References

Roberts, R., N Carpenter and P Klinac (2020). Predicting Auckland's exposure to coastal instability and erosion, Auckland Council, technical report, TR2020/021.

<https://www.knowledgeauckland.org.nz/publications/predicting-auckland-s-exposure-to-coastal-instability-and-erosion/>

Figures

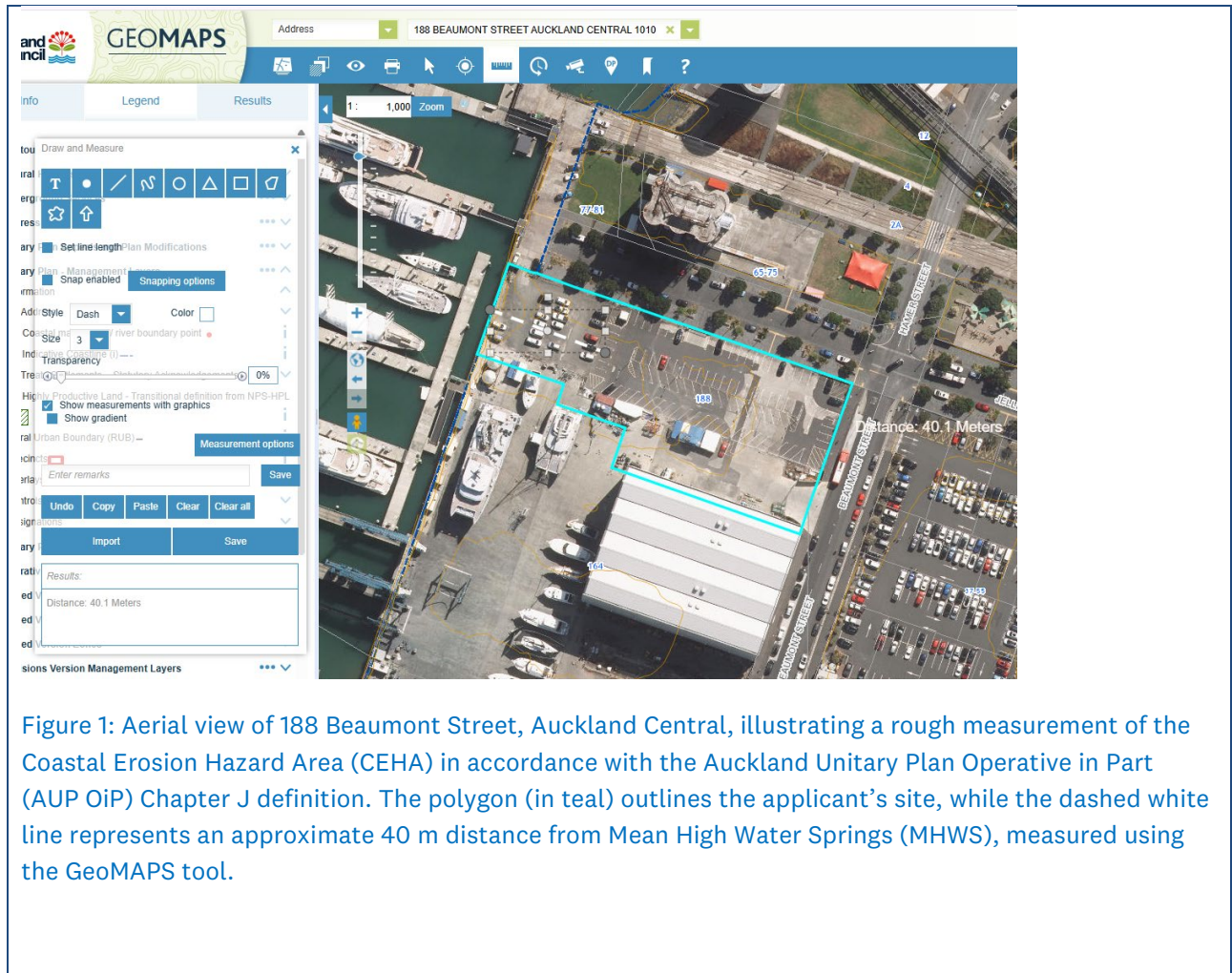
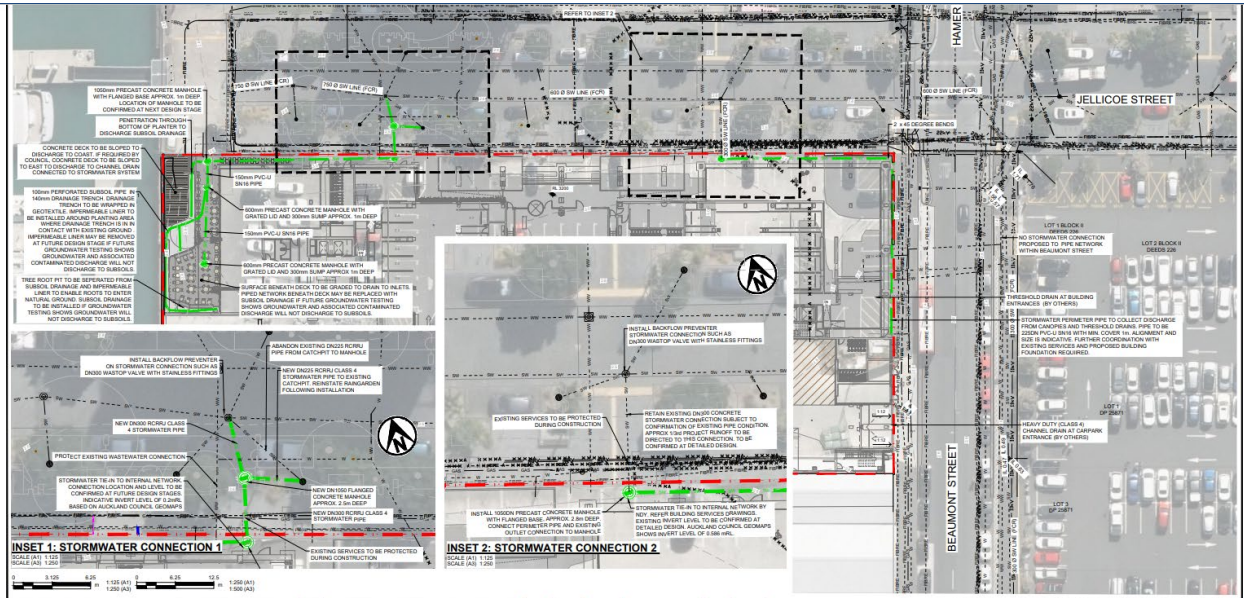


Figure 1: Aerial view of 188 Beaumont Street, Auckland Central, illustrating a rough measurement of the Coastal Erosion Hazard Area (CEHA) in accordance with the Auckland Unitary Plan Operative in Part (AUP OiP) Chapter J definition. The polygon (in teal) outlines the applicant's site, while the dashed white line represents an approximate 40 m distance from Mean High Water Springs (MHWS), measured using the GeoMAPS tool.



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DESIGNED		DRAWN		DRAWING STATUS		CLIENT	
CJC	OCT 25	ALPO	OCT 25	INFORMATION ONLY		WESTHAVEN RESIDENTIAL LTD PARTNERSHIP	
ALPO	OCT 25	CJC	OCT 25	PROJECT PHASE		PROJECT 188 BEAUMONT STREET CIVIL PRELIMINARY DESIGN	
NSW	17.12.25	NSW	17.12.25	PRELIMINARY DESIGN		TITLE STORMWATER	
THIS DRAWING IS NOT TO BE USED FOR CONSTRUCTION PURPOSES UNLESS SIGNED AS APPROVED						PROPOSED STORMWATER LAYOUT PLAN	
SCALE (A1) AS SHOWN						DWG No. 1098609.2000-0210	
REV 2							

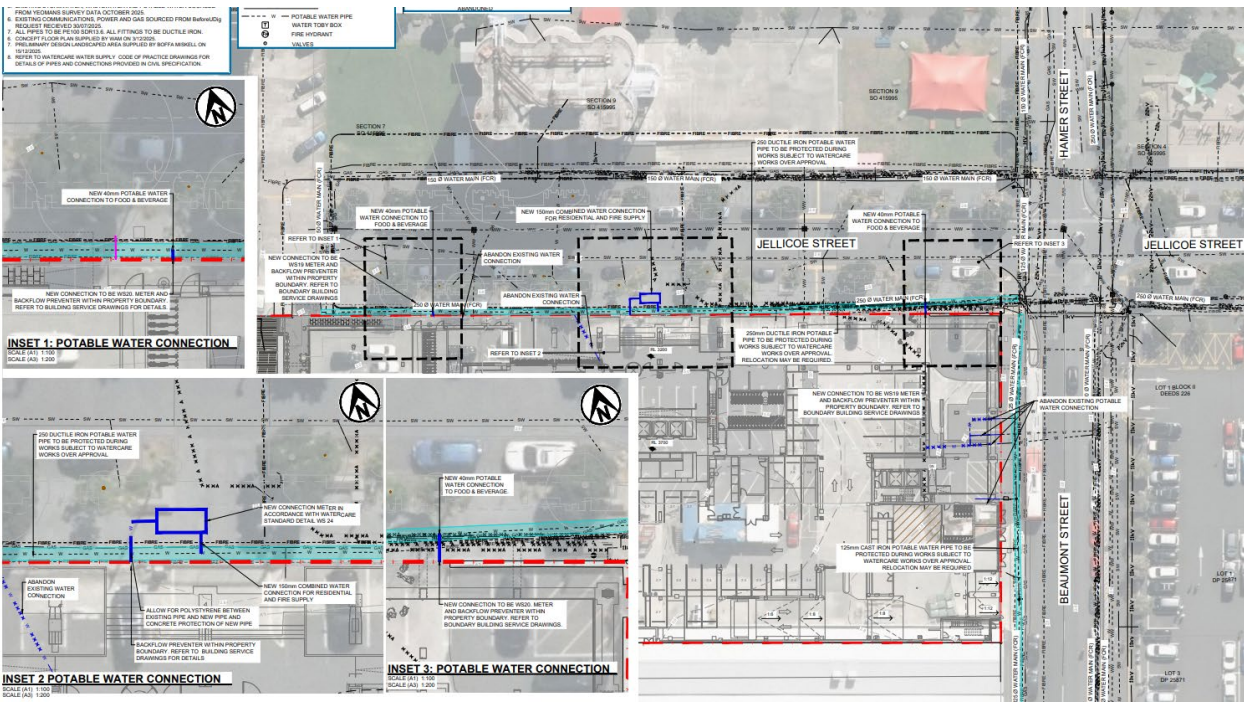


Figure 2: Proposed infrastructure plans (Tonkin & Taylor Limited, 17 December 2025).

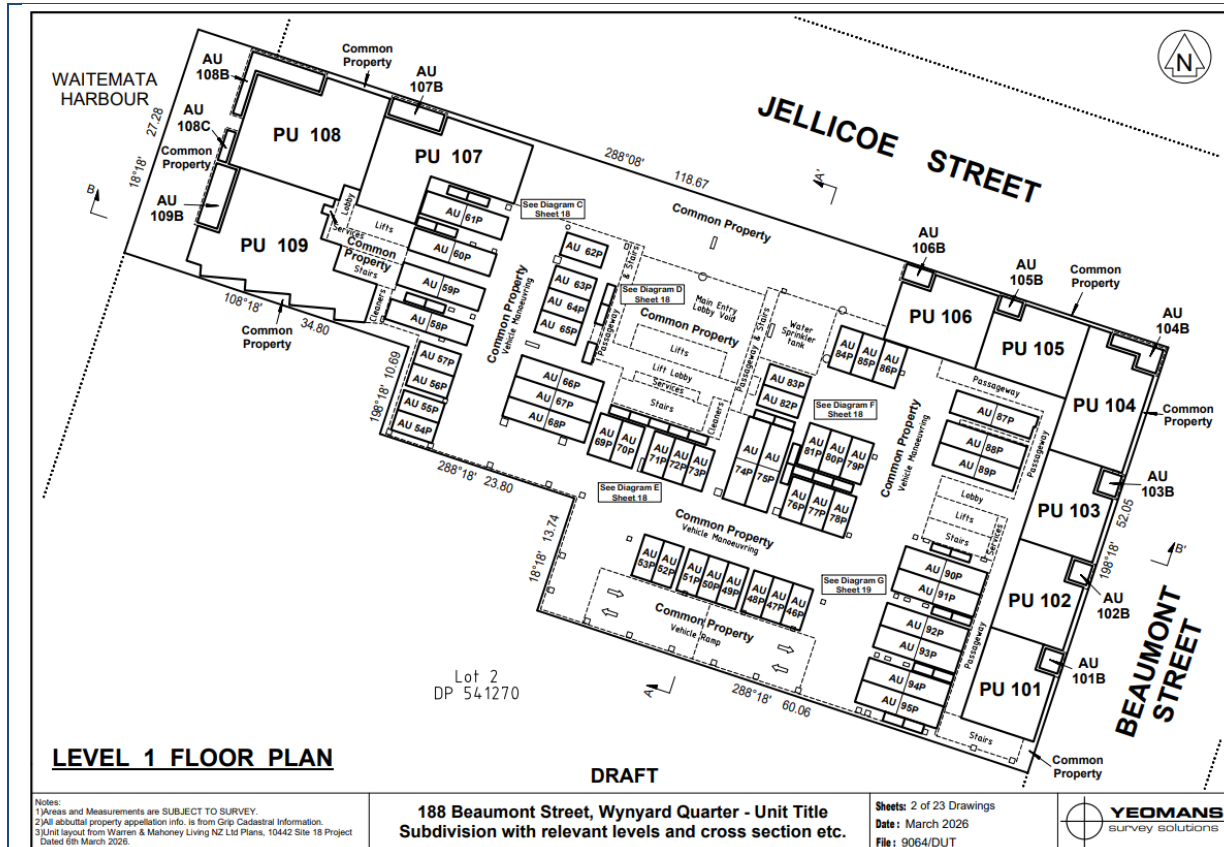


Figure 3: Proposed subdivision scheme plan (Yeomans Survey Solutions, March 2026)