Rangitoopuni – Comments Tracker

Name (Lead)	Specialism	S67 Comments	Site visit Required	Preliminary Comments Provided	Preliminary Comments	Applicant Response
Emma Chandler	Planning	1. Plan Information There is information lacking with respect to the following aspects of the development which directly relates to confirming the relevant reasons for consent under the AUP: OP: a. Site Coverages (building coverage) for Lot 2 (Retirement village site) for both pre- and post-subdivision; b. Volume of earthworks within the flood plain and riparian margins. c. Are any buildings or structures proposed that will be located on "Land that may be subject to instability" and if so is consent required under E36.4.1 (A51)? d. A plan that clearly shows the dimensions of the proposed accessways to confirm the applied for non-compliances relating to E27 of the RMA. e. A plan that clearly shows the proposed subdivision layout against the underlying zoning, noting that the site is split-zoned and this is required to understand the relationship of the CSL subdivision with the Rural Production Zone. f. A plan that clearly shows all proposed areas of vegetation clearance and replacement/infill/landscape planting proposed, and includes a table of areas to quantify the associated reasons for consent and enable a full understanding of the proposed replanting package. This should distinguish between areas of landscape planting vs. ecological planting enhancements/mitigation planting, and it would be useful to clarify the stage within which the landscape/planting works must be carried out as part of. g. The scheme plans do not show areas identified as Significant Ecological Areas, or other areas of indigenous vegetation, wetlands, waterways, streams, rivers and lakes, as is required by E39.6.1.6. Please provide updated plans and or information that confirms the above matters. 2. Retirement Village Planting and Protection Mechanisms a. The provided Scheme Plans do not show any proposed protection mechanisms over the replanting within Lot 2 (the retirement village/Integrated Māori Development [IMD] site). Please confirm if any protection mechanisms are proposed for this site, and if so update the scheme plan to clearly show this. *Note: As discussed at pre-application stage, whilst this would not address the Council concerns in itself if the applicant is not providing any wider mitigation within Lot 2 it is strongly recommended that legal protection mechanisms be offered around these areas to contribute to the mitigation measures being offered for the intensity and scale of the retirement village/IMD.*	No (already undertaken)	Yes	Council's planning and policy position on this application remains largely consistent with the advice provided at pre-application stage, which concluded "overall, while we acknowledge the site and proposal accommodates a range of positive overall outcomes, we retain concerns at this stage of the consistency of the proposal with the relevant provisions of the AUP: OP" and included a series of recommendations and suggested other matters to be reviewed were identified in the pre-application advice letter for further consideration and response. Based on the information reviewed to date, it does not appear that our recommendations have been accommodated into the proposal. Primary outstanding issues at this point include: • Traffic and Transportation – Including need for upgrades to the SH16 / Coatesville-Riverhead Highway intersection and SH16 east of this junction, limitations of modelling (assumptions and extent), effects on operation of the networks, access and intersection design and safety,Foresty Road (vested asset design), sequencing of works, and internal JOAL design. • Effects on Operation and Quality on Streams and Natural Hazards – Information gaps in relation to the assessment of potential onsite and downstream flooding effects, in-stream attenuation and management, potential for Stream erosion and effects on Water quality • Infrastructure – Resilience of the proposed infrastructure supply including details on proposed bore, in particular relating to water supply for Integrated Māori Development and firefighting supply. • Ecological Specialist Advice – Key further information requests and comments on conditions/management structures ability to achieve ecological outcomes proposed in the medium and long term. • Countryside Living Subdivision – Balance and consideration of the provisions of AUP(OP) chapters E39, E21 and H19 collectively, role and weighting of revegetation and other wider public benefits in assessment, disagreement on future 'TRSS donor' eligibility. • Integrated Māori Development (Retirement Village) – Agreed definition, rural/urban character and intensity concerns noting Council pre-application recommendations not followed in respect to protection of the balance of the lot. • Precedent Effects of limited consideration/weighting of underlying zoning.	Information to address **item 1(a)-(g)** can be provided but, other than information already within the application package, that information is not available at the time of completing this response. Regarding item 1(d), dimensions of proposed accessways are shown on the landscape concept plans (pages 11 and 12). **Item 2(a)** - there is no specific mechanism proposed to protect the indigenous replanting that is intended within Lot 2. As has been noted previously, the replanting is not proposed as mitigation and the retirement village/IMD will be retained and operated by the iwi. There is no intention to plant out Lot 2, at significant cost, and then remove the vegetation later. **Item 3** – the issue of precedent is addressed at pages 171 and 172 of the AEE. Precedent issues can arise where similar circumstances create an expectation that successive applications should be determined on a like for like basis. Regarding the area of Riverhead Forest beyond Lots 1 and 2, that land falls within the Rural Production Zone and therefore the circumstances differ. It is therefore considered that a decision to grant consent would not give rise to a precedent. It is also noted that the IMD is a listed discretionary activity under the AUP. In that context, where the AUP contemplates consent for such activities being granted, no precedent arises. Finally, and as noted in the AEE, even if there were other situations of a similar nature that might give rise to an expectation of a 'precedent', then any such precedent that arose would be wholly positive as it would mean that Treaty Settlement Land was being used for its intended purpose and in a way that provides for the outcomes sought by the AUP. **Item 4** – a plan showing the full extent of the walking track network is included in the submitted application package (refer Appendix M to the AEE, page 23). That plan also shows the connection from the retirement village to Riverhead, which stops at the boundary. Existing plans showing standard details of walking tracks are at Appendix

		b. The provided Lot 2 Landscape Concept shows an area in the north-eastern corner of the proposed subdivided retirement village site that is not being replanted. Please clarify why this is not being subject to enhancement planting like the remainder of the areas outside the retirement village building platform. *Note: it is recommended that consideration be given to incorporating planting into this area*. 3. Precedent An assessment of precedent has been provided in the submitted AEE, concluding that there are no precedent effects because Treaty Settlement Land is not widespread and there are no other equivalent situations across Auckland. This does not, however, include consideration of the issue of precedent for the remainder of the Lot 2 site or the remainder of the adjacent Treaty Settlement Land which is subject to Chapter E21 and generally Rural Production Zoning which is not being developed or subject to any proposed controls for future development as part of this application (in this case of Lot 2). In particular, with respect to the possibility of this land within the application site also being developed for retirement village activities (or expansion of the current retirement village) or rural subdivision in the future. Please provide a further assessment of these potential precedent effects, noting the concerns raised in our preliminary comments. 4. Walking Tracks The application is lacking detail relating to the proposed walking track network throughout the site. To clarify, please provide: a. An overall plan showing the full extent of the proposed walkway network across both the CSL and RV site, including connection points across public roads or JOAL walkways to provide clarity on the interconnectivity of the network; b. A plan that distinguishes between existing, existing to be upgraded, and proposed walkways; c. A plan that clearly shows the proposed extent of the walkway connection from the retirement village to Riverhead, noting that discussions to date have indicated that the full extent of this walkway is not proposed as part of this application; d. A plan that shows the standard details for the proposed walkways; e. Updated earthworks plans that clearly show the earthworks required to establish any proposed new walkways.			We have asked a number of RFIs to assist with clarity in the scope of the application in relation to our recommendations, and withhold a final position upon review of that information. We also note that we are reviewing the proposed conditions of consent and expect we will have comments/suggestions on a range of conditions that may also assist in addressing/resolving some of our preliminary concerns, and look forward to further discussions with the applicant in this regard. We are working on compiling Council comments on conditions and will circulate once ready and look forward to further consultation in that regard.	2 of the Landscape Elements document (attached to AEE as Appendix O.3)
Ryan Bradley	Policy	1. TRSS "Donor" Site Clarification The AEE mentions in part 6.11.1 that "there is an intention to potentially claim Transferable Rural Subdivision Sites as a result of the revegetation that is being undertaken. Please confirm if	Yes	No		**Policy 1** – Confirmation of the revegetation as qualifying for TRSS donor sites is not proposed as part of this application.

		this relates to the full extent of all revegetation occurring across the CSL subdivision site and the retirement village site. As per comments at pre-app and in relation to our outstanding concerns with the application, Council are of the opinion that the revegetation being provided forms a key component of the mitigation package of this application and as such that allowing this to be used in the future for TRSS is not appropriate.				
Doug Sadlier	Parks	In relation to potential qualifying 3m waterbodies within Lot 1 and Lot 2 that would trigger the requirement of 20m wide esplanade reserves as part of a future subdivision consent process, as per section 230 of the Resource Management Act 1991 (RMA), Parks and Community Facilities relies upon the feedback provided by Ken Berger (Council Subdivision Advisor) in response to a point C question that was posed around confirmation of the surveyor methodology as follows: *"In regard to **point 'C'** to provide comment on methodology for stream width of appendix Q. I have reviewed the report signed by Licensed Cadastral Surveyor Reece Moody to determine the width of the watercourse through Lot 2 DP 590677 and accept his methodology and advice that the subject watercourse has an average width of less than 3.0m and is therefore not subject to s230 of the RMA. I would however ask that further confirmation is sought from Mr Moody as the signed provided report only discusses the one watercourse over Lot 2 DP 590677 and I ask that further comment is provided on a signed declaration confirming that an investigation across all of the subject sites watercourses, being all of Lots 1 & 2 DP 590677 and the results of that complete investigation, rather than just the current advice which is restricted to the one watercourse.* The methodology utilised to determine that the average width of the watercourse in Lot 2 is less than 3m in width confirms that the requirement for an esplanade reserve under s.230 of the RMA has not been triggered.	No	Yes	**Key Findings:** The Auckland Unitary Plan (Operative in Part) (AUP(OP)) identifies the subject site(s), Lot 1 and Lot 2 as land zoned Rural – Countryside Living zone. The Auckland Council Open Space Provision Policy 2016 provision targets for neighbourhood parks or suburb parks do not apply where either the lot sizes are a minimum of 1ha (as per Lot 1) or a retirement village is proposed (as per Lot 2). No provision metrics means no open space acquisition or development budgeted for in the Long-Term Plan (LTP) or countenanced in budget projections beyond the current LTP. So, in short, the council does not require or will not acquire parks land as part of this proposed development. The Auckland Council Open Space Provision Policy 2016 provision targets for sports parks are also not required as capacity is accommodated elsewhere in Riverhead within an 18-minute drive. Given the large lot sizes proposed the space for informal private open space on site will be adequate to compensate for the need and wellbeing of the community that will locate within the development and supports the view that formal open and recreational space is not required. Connectivity and pedestrian access are a key element for any park, or open space provision in the future. A review of the submitted roading and landscape plans indicate that private Joint Owned Access Lots (JOALS) will be the primary means of pedestrian and vehicle access into, within and around Lots 1 and 2. I understand that easements for public use of some of these accessways (some recreational trails, on road walking tracks, off road walking tracks, existing mountain bike tracks and connections to Riverhead Forest, boardwalk crossings and bridges, walking tracks around the retirement village proper) will be provided over some of these private land areas. The easements to secure connectivity would require the approval from Council. This will include the involvement of the Local Board. Any accessibility infrastructure will need to be constructed and maintained by the developer for public access where required and comply with relevant standards given its public use.	The only watercourse within Lots 1 and 2 that is even remotely close to 3m in width is the watercourse that has been assessed in detail. All the other watercourses would clearly not qualify for esplanade reserves from a visual inspection, and their width does not warrant the time and expense required to provide surveyor's certification. Refer also to comment below in response to Subdivision RFI.

					Greenway connectivity is also a long-term aspiration for the Rodney Local Board (December 2016 Greenway Maps) targeted within, adjoining (Riverhead Forrest for example) and into the coastal surrounds of the existing Riverhead Township. Lot 1 is located outside the aspirational greenway connection maps and the southern point of Lot 2 intersects with the proposed ecology link. Future private greenway connectivity from Lot 2 to the Riverhead Township should take into consideration the December 2016 Greenways Plan for the Rodney Local Board area especially the ecology linkage opportunities. Boffa Miskell Landscape Concept Plan noted as Lot 1 – Lot 57 – Community Facilities – illustrates a shared path; a boat washdown area; facilities and repair station; publicly accessed carpark; resident's carpark; community buildings; nature play and swings; multi-functional lawn; basketball half court; tennis / pickleball court; pergola shelters; bush trail; and extensive landscaping. This is all located on private land. These assets will not be acquired by the Parks and Community Facilities Department and will remain privately owned and maintained. The developer may wish to make it available for public use but will then have to secure this through an easement with prior approval Council where necessary. Maven Associates Retirement Village Proposed Scheme Plan, Drawing C190-1-1, Revision A, dated March 2025, illustrates an unformed northern part of Forestry Road (notated as Lot 3 Road to Vest) will be vested with Council and as such must comply with: • The Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape. • Auckland's Urban Ngahere (Forest Strategy). • Tree Stock for Landscape Use: Australian Standard (AS) 2303:2018. No street gardens will be permitted except where it relates to stormwater infrastructure such as rain gardens, swales and stormwater dry basins. Note: *A review of the submitted engineering roading plans indicates that Joint Owned Access Lots (JOALS) will be the primary means of vehicle access into, within and around Lots 1 and 2. The Auckland Code of Practice for Land Development and Subdivision – Chapter 3 Transport, provides guidelines on private road functionality.* 1. No Auckland Council administered park land (or open space zones) will be impacted by the proposed development. **Conditions** Parks Planning acknowledge the conditions (and advice notes) proposed by the applicant but it is preferred to use (in-part) the tested and standard conditions (and advice notes) to ensure consistency in its execution whilst also clarifying its application	

					to the various stages for the development. To note is that the vesting of roads is not possible under land use and conditions relevant to Parks infrastructure will only be required under the subdivision consent. Recommended additional conditions (and advice notes) are proposed in the attached: BUN60449727 Appendix 1 Rangitoopuni – Parks Planning Conditions document. The applicant's proposed conditions (and advice notes) have been amended and depicted with additional insertions in blue (underlined) text and deletions in green (struck-through) text. BUN60449727 Appendix 1 - Rangit The additional conditions (and advice notes) primarily relate to tree planting and rain garden / stormwater infrastructure planting in the road to vest being Lot 3 – Forestry Road Extension of Subdivision Lot 2 DP 5906777 and stream surveys are undertaken to ensure that where s230 esplanade reserves are triggered that they are appropriately vested.	
Anna Jennings/ Ameya Bhiwapurkar	Watercare	N/A	No	Yes	**Working in partnership** Watercare acknowledge the site's significance as Treaty Settlement Land, and confirms we are happy to hui with Te Kawerau ā Maki to explain our position, and hear any concerns. The kawenata between Watercare and Te Kawerau ā Maki does not create and express obligation for Watercare to provide services to developments of this nature. However, the kawenata affirms a commitment to work in good faith and uphold the spirit of partnership. **Our response** The proposed development site by Te Kawera ā Maki and Avant Property Development is zoned rural under the Auckland Unitary Plan and sits outs the rural urban boundary. In line with Watercare's statutory obligations, which include requirements to support growth areas identified by Auckland Council, Watercare does not provide water supply and wastewater servicing to rural zoned land. Watercare acknowledge the proposal by the Applicant that this development will not be connected to Watercare's network. Any assessment of the private water and wastewater servicing will be made by Auckland Council. **Advice note** This review does not constitute resource consent or engineering plan approval. You will need to apply to Auckland Council and submit these documents with your consent application.	Engagement with Watercare was undertaken via email throughout March 2025, with Watercare providing confirmation via email that it has no intention to service the site as it is rural zoned and outside the Rural Urban Boundary. Four follow-up emails requesting meetings to further discuss the proposal and potential water supply solutions were requested with an email response received on 25 March 2025 reconfirming its position that the site is not planned to be serviced in the near future. We are aware of the kawenata between Watercare and Te Kawerau ā Maki. Despite the commitment to work in good faith and uphold the spirit of partnership, the applicant was unable to secure a meeting with Watercare.

Hillary Johnson	Healthy Waters	**<u>S67 Information Gap Identification</u>** This specialist response identifies critical information gaps that prevent proper assessment of the Rangitoopuni development proposal under the following subheadings: 1. Flood assessment 2. In-stream attenuation 3. Stream erosion 4. Water quality **1. FLOOD ASSESSMENT** **<u>Description of Missing Information</u>** *Clearly describe the specific information or assessment that is missing from the application.* 1.1. A copy of the Applicant's flood model for the Riverhead catchment including all of the modelled pre-development model and post-development scenarios. 1.2. Additional modelling scenarios (50%, 20%, 10%, 5%, 2% and 1%) and associated assessment of effects for the development relative to existing land-use and rainfall. These scenarios are to be included with copy of the model requested under Item **Error! Reference source not found.**. 1.3. Further justification on the filtering of flood comparison maps to 10mm. 1.4. Further justification on the use of a uniform pre-development curve number (CN) of 74 across the entirety of the proposed site. 1.5. Details on how the function of the Retirement Village Stormwater Pond was incorporated in the model. 1.6. Further assessment of effects on flooding from the proposed Forestry Road upgrade pertaining to the effects from the upgraded culverts, and the effects from upgraded vehicle access to private driveways. 1.7. Further assessment of effects on flooding from the proposed Forestry Road upgrade pertaining to changes in flood velocities. 1.8. Confirmation whether consultation was carried out with the landowner of 100 Forestry Road on the increase in flooding within their property. 1.9. Overland flow path assessment including catchment plans and representative cross-sections of the overland flow conveyance corridors, and culvert spill/overtopping points with supporting calculations assuming Maximum Probable Development (MPD) and 3.8-degree climate change (and primary network blockages as required).	Yes	No	Given extent and amount of information required to be addressed – reasons as to why information is required should be referred to. **Meeting notes 23/07/25** Focus on flood assessment component today. 1.1 No problems, will provide the model. 1.2 Model does include these in the more recent lodgement package. 1.3 Applicant to provide more clarity on the approach here and HW then to advise further on whether tolerance needs any modifications in their opinion. 1.4 HW to discuss justification provided/discussed at meeting & confirm. 1.5 HW to interrogate how this got modelled once model has been circulated. 1.6 Maven to model the ramp down to the existing vehicle crossings where they will have to be built up to the new road level proposed. Frequency + velocities. 1.7 As above 1.6 1.8 As above 1.6 1.9 Maven to provide a few more indicative cross sections at critical points (culvert crossings & then all JOALs in CSL), point to anything that is already provided & might have been missed. 1.10 Maven to talk to this in the response and point to key report sections ETC that address. 1.11 HW to circulate the survey data for the bridges and then Maven to consider including into the model. HW to clearly specify which bridges are needed. Noted also for PPC 100 and being discussed. 1.12 HW to provide more guidance on their thinking here. HW clarifications, sent 25/07/25 1. Pre-development CN (logging areas) – Healthy Waters modelling specialists have been consulted and have advised that a CN number of 70 is to be used for all logging areas irrespective of whether these have been logged. This is largely based on observations from calibration modelling after January 2023 events. 2. Post-development CN (covenanted bush) – Following from pre-development CN advice above, CN 70 can be applied to all covenanted and planted bush areas provided these will not be subjected to extensive earthworks. 3. Initial abstraction (Ia) – Confirming Ia as per TP108 Table 3.1 is acceptable across all scenarios. 4. Model Runs: Healthy Waters hydraulic model shows that the stream is already overtopping its banks into Duke Street at the intersection with Te Roera Place, including into the surrounding private properties, during the 50% AEP event with existing land use and no climate change. On this basis, as requested under S67 Item 1.2,	**1 FLOOD ASSESSMENT** 1.1 We can provide the model to HWs for review. As discussed with HWs meeting (23/07/25), the model will be provided for review upon formal RFI being received; and any further scenarios run. 1.2 These have already been done and included in the flood memo and report within the application. The additional modelling was done prior to the re-lodgement, after we received the request as part of the formal pre-application minutes. 1.3 Hydraulic models, which are used to simulate flood events, have inherent limitations and uncertainties. These models are complex mathematical representations of real-world conditions and are influenced by the quality of input data, such as ground level surveys (LiDAR), rainfall data, and assumptions about a catchment's characteristics. The vertical accuracy of the LiDAR data used in these models is typically in the range of +/- 0.20 meters. Given these tolerances, changes in water surface elevation that are less than 10mm (0.01m) are generally considered to be within the "noise" or margin of error of the model. Attempting to report on such small differences would be statistically insignificant and could be misleading. That being said, the legend of the difference mapping shall be updated to shall differences less than 10mm. 1.4 The site and wider forest catchment are associated with a plantation forest that is in the process of being logged, and is in a continued forest harvest. Thus, we have to assume an assumption for the forest (and pre-development area), that allows for the removal of forest cover, and the possibility of this going back to pasture. Outside of the site (Lots 1 and 2) we have assumed the same CN value for pre and post, which is CN74. The same CN value has been applied in all modelled scenarios. Altering the CN value of these areas will not change the outcome of the model, as they will remain relative. We note that we are not able to remove downstream flooding, and instead we are tasked with ensuring no downstream effects, to which the civil design currently achieves. For Lot 2, with respect to the balance of the site around the RV, we have also retained the CN of 74, as there is no formal mechanism to protect the planting. Therefore, we are not assuming any

		1.10. Details on the provisions that will ensure the spillway function on Lot 1 (Countryside Living Subdivision) doesn't restrict access for residents or emergency services during high intensity rainfall and details on whether easements or consent notices will be implemented to secure this overland flow path and its function. 1.11. The Flood Modelling Report states that the downstream bridges do not result in an increase in flood levels. However, it is noted that the bridge decks were not included in model. Please clarify whether this conclusion is based on the comparison between pre-development and post-development flood levels, if so, please provide flood extent and depth maps. Please also include the justification for omitting bridge decks from the model. 1.12. Clarification whether the use of initial abstraction (I_a) of 5mm is appropriate for the existing bush areas and whether the use of I_a = 0.2S (where S is determined by TP108 Equation 3.2) is more appropriate. 1.13. Clarification of whether the referred 'eastern catchment' only provides attention to 2% AEP as it has not been specifically mentioned in the SMP that 1% AEP will also be attenuated to. This would impact the design of the proposed culverts, and also the area/height behind the culverts. **Why is this Information Essential?** *Explain why the absence of this information significantly limits your ability to assess the project or its effects.* A review of the supporting hydraulic model is required in order to confirm the modelling assumptions, proposed and existing stormwater infrastructure size, verify the model performance and outputs, and confirm that the model is 'fit for purpose' to support the associated flood hazard and risk assessment. Due to the receiving environment being subject to flooding at present (considering existing land use and no climate change) the modelling of additional scenarios relative to existing land use and no climate change is required to assess the potential effects of the proposed development in the immediate future (i.e. in the short-term). Logged areas still have vegetative cover. The justification that a CN number of 88 could be appropriate and that the modelled CN of 74 is conservative is not agreed with. Based on the latest aerial imagery, large portions of the site are covered by existing forested areas (not logged). Logged areas would have forest floor coverage, which warrant a lower CN number than 74 (i.e. 70 as a minimum). Overall, this would lower the baseline pre-development runoff from the site and increase the risk of potential effects on the proposed development in regard to flooding. The difference between post-development and pre-development runoff would be higher than currently assumed.			Healthy Waters will require the existing-land use, and no climate change events (i.e. having lower overall intensity and runoff) to be modelled and assessed to demonstrate the flood hazards and risks to downstream properties and infrastructure are not exacerbated. The need for this is further reinforced with to the use of culverts to provide attenuation, which may provide limited attenuation as the intensity of rainfall and associated peak flows reduce. 5. Bridge Structures: For completeness the bridge structures within the stream should be represented in the model. Should this not be incorporated into the model, then the stormwater modelling report will need to provide clear justification on the appropriateness and accuracy of the results. As discussed, HW have the bridge structures surveyed, and please find the survey file saved in this link here: Bridge Survey.zip. Please note that the survey data being shared was originally completed in 2017 and is being provided in good faith to assist the work. While due care was taken at the time to procure the survey results, Auckland Council makes no warranty as to the accuracy or completeness of the information and accepts no liability for any errors, omissions, or reliance on this data. This information does not replace the need for a suitable site-specific assessment.	benefit from the planted areas within Lot 2 in the flood model. For Lot 1, as part of the CSL development, we have assumed CN 74 for the pre-development for the largely logged site. We remain of the view that this is a conservative representation, with the current CN (at time of the consent being lodged), in the views of Maven most likely defined at Class C, pasture/Grassland with Poor conditions (86), as per Table 2-2c TP108 Appendix B. Refer TP108 extracts below: **Table 2-2c.-Runoff curve numbers for other agricultural lands[1] (SCS, 1986)** **Cover description** / **Curve number hydrologic soil g** **Cover type** / **Hydrologic condition** / **A** / **B** Pasture, grassland, or range-continuous forage for grazing.[2] — Poor 68 79; Fair 49 69; Good 39 61 Meadow-continuous grass, protected from grazing and generally mowed for hay. — 30 58 Brush-brush-weed-grass mixture with brush the major element.[3] — Poor 48 67; Fair 35 56; Good [4]30 48 Woods-grass combination (orchard or tree farm).[5] — Poor 57 73; Fair 43 65; Good 32 58 Woods.[6] — Poor 45 66; Fair 36 60; Good [4]30 55 Farmsteads-buildings, lanes, driveways, and surrounding lots. — 59 74 [1] Average runoff condition, and Ia = 0.2S. [2] *Poor*: <50% ground cover or heavily grazed with no mulch. *Fair:* 50 to 75% ground cover and not heavily grazed. *Good:* > 75% ground cover and lightly or only occasionally grazed. [3] *Poor*: <50% ground cover. *Fair:* 50 to 75% ground cover. *Good:* > 75% ground cover. [4] Actual curve number is less than 30; use CN = 30 for runoff computations. [5] CN's shown were computed for areas with 50% woods and 50% grass (pasture) cover. Other combi conditions may be computed from the CN's for woods and pasture. [6] *Poor:* Forest litter, small trees, and brush are destroyed by heavy grazing or regular burning. *Fair:*. Woods are grazed but not burned, and some forest litter covers the soil. *Good:* Woods are protected from grazing, and litter and brush adequately cover the soil. The planting and protection (via covenant) of the native bush within Lot 1 will provide benefit for the receiving catchment. This is consistent with all literature on the topic, where bush provides decreased runoff in a catchment. We have not sought to rely upon the possible full reduction of CN value from the current state, rather, the assumption is that the post-development CN for the bush area within Lot 1 is CN 70. The lower pre-development CN base value ensures further conservatism whilst the bush is reaching maturity. Finally, we note that we are ensuring flows are attenuated to pre-development rates, which is

		Any changes to the existing flood characteristics should be captured to enable the assessment of potential flood related effects. It is not clear why changes in flood elevation of less that 10mm between pre-development and post-development scenarios have been excluded from the assessment. Section 3.2.7 of the Flood Modelling Report outlines that the Retirement Village stormwater attenuation basin was modelled using a combination of increasing the initial abstraction and using an inflow hydrograph, however no further details were provided on the functionality of these modelling assumptions (e.g. showing catchment flows, pond volume relationship and outflows, and total catchment outflows). As such Healthy Waters cannot assess the appropriateness of the methodology and complete the review. Section 9.3.1 of the Flood Modelling Report outlines the potential flooding effects of the proposed development on 100 Forestry Road. Healthy Waters are concerned that the scale of potential effects from the proposed Forestry Road upgrade has not been adequately represented in the flood model. This is based on the provided cross-section depicted in Figure 7, which indicates that the formation of the new property access connecting the existing 100 Forestry Road driveway to the elevated Forestry Road (which has the potential to obstruct the flood flows) has been omitted from the model. JOALs and access roads are proposed to convey the proposed development overland flows to the receiving environment. Overflow spill points are also expected at culvert crossings. Details of the overland flow path conveyance and culvert overflow design including peak flow, depth, velocity and hazard (depth x velocity) is required so that it can be verified that the flows within the proposed development can be conveyed in a way that does not present hazard and risk to people, property, and infrastructure. **2. IN-STREAM ATTENUATION – CONDITIONS** **<u>Description of Missing Information</u>** *Clearly describe the specific information or assessment that is missing from the application.* 2.1 Culvert 1-1 (Lot 1), Culvert 7 (Lot 2), and the Retirement Village attenuation basin (Lot 2) are proposed to provide peak flow attenuation in a range of storm events. Condition 83 outlines proposed stormwater management works, catchment area, and design objectives for the Retirement Village, the Countryside Living Development, and the Forestry Road upgrades. Condition 83. Culvert 1-1 (Lot 1), Culvert 7 (Lot 2), and the Retirement Village attenuation basin (Lot 2) are not included within the proposed Stormwater Management Works condition. 2.2 Conditions outlining the long term operation and maintenance requirements of the Culvert 1-1 (Lot 1), Culvert 7 (Lot 2), and the Retirement Village attenuation basin (Lot 2) are not included within the proposed conditions. With respect to the stormwater management works within Lot 1, conditions that outline and will ensure any legal mechanisms required to facilitate ongoing joint operation and maintenance of these assets in perpetuity (via consent notice, or managed through a residents			considerably less than the assumed MPD in Council's model. 1.5 Inflow hydrographs have been generated in HEC HMS for the RV catchment which is collect and discharged into the attenuation pond via a piped network. The hydrographs were applied in the 2d model as a inflow boundary conditions. 1.6 The effects on Forestry Road upgrade have been considered in the Maven Flood Modelling Report. This was based on the post development design surface. This model includes the new road alignment, surface, upgrades culverts etc, and discussion was made specifically where there was an effect, i.e. No. 100 Forestry Road. As agreed, with Healthy Waters during meeting of 23/07/25, the access ramp from the road to the existing bridge will be included and the model re-run as part of the formal RFI process. 1.7 This will be provided as part of the formal RFI. We note that the overall flows are being reduced from the site. The modelling report and assessment can look at flows, alongside height and duration which has currently been assessed. 1.8 Initial consultation with the owner has been undertaken and they were supportive of the project. The design of Forestry Road extension has factored in downstream effects. Whilst there is reduction of flood levels along Forestry Road to that of pre-development levels; in one location, where significant - and assumed to be unlawful modification has occurred – there is no ability to avoid a minor increase in flood levels. A maximum ponding depth increase of 80mm is modelled which affects a private accessway, under the 100yr (blocked scenario). Please refer to the Maven Flood Modelling Report for further detail and assessment. The conclusion is that the effects results in less than minor effects. The owners of 100 Foresty Road will have the ability to provide comment on the application through the process. 1.9 Maven has produced stormwater catchment plans which show location of OLFPs and associated 100-yr flows. Please refer to drawings C455-C457 PN147007. The OLFP locations are also shown within the relevant drawings C450-0 – C470-13 PN 147016. These flows are all shown as per SW CoP v4. 1.10 Refer to drawing number C484 Rev A, the 100-yr flows are conveyed through the 1.5m x 4m box culvert. Which according to SwCoP will not be blocked. We have modelled a 50% blockage as sensitivity test, and the flood waters did not overtop the roadway. A further sensitivity check of the culverts being 100% blocked was also done,

		association or body corporate) have not been included within the proposed conditions. **<u>Why is this Information Essential?</u>** *Explain why the absence of this information significantly limits your ability to assess the project or its effects.* Culvert 1-1 (Lot 1), Culvert 7 (Lot 2), and the attenuation basin serving the Retirement Village (Lot 2) are key stormwater management assets proposed to mitigate downstream effects of the development. However, in the absence of consent conditions specifying the design objectives for these assets, there is no mechanism for Council to ensure they are constructed and perform as intended. Without such conditions, the effectiveness of these devices in managing stormwater and protecting downstream environments cannot be guaranteed. Culvert 1-1 and Culvert 7 are proposed to provide flood attenuation for the overall development. As the culverts will remain in private ownership it needs to be clear what legal mechanisms and procedures are proposed that will ensure the operation, maintenance and renewal of these culverts in perpetuity. In absence of this, it is considered that the potential risk of flooding downstream of the proposed development will be increased. **3. STREAM EROSION** **<u>Description of Missing Information</u>** *Clearly describe the specific information or assessment that is missing from the application.* A fluvial geomorphology review has been conducted. In summary, key areas of concern are outlined in the following section. **<u>Context</u>** The watercourse is actively eroding. A council Watercourse Assessment from 2014 shows the main stem of the stream within the FTA is marked as having 40-60% erosion on the banks. The lodged Geotechnical Report describes the stream as having incised gullies, a high risk of slope instability, and a medium risk of soil erosion. The Ecological Impact Assessment (**EiA**) describes various streams as being damaged from slash and mobilised sediment, having little riparian yard function for stream stability, being relatively incised, eroded and steep, with some heavy loaded of fine sediment. The sites history as a commercial forestry operation presents a risk due to the effects of deforestation (e.g. landuse change resulting in hydrological changes, increased sediment runoff, slash effecting stream geomorphology). These streams will be highly sensitive to change. The existing 100-year floodplain will be modified due to impervious surface increase from development. If there is an attempt to contain these flows within the stream channel, this will cause incision and widening, putting homes and assets at risk. 3.1 Figure 6 in the SMP and Figure 8 in the EiA indicate a range of riparian setbacks (10, 20, 100m). It is not clear how these			and it will overtop, but less than 200mm flood depth across the JOAL, which ensures compliance with AUP and TDM. 1.11 We are decreasing flows post-development, therefore we didn't see the need to include the bridges, as the effects would be reduced. We have been provided with this information from Healthy Waters (post meeting on 23/07/25), and we can include this within the pre and post model if required, and this can be included in the formal response. 1.12 The initial abstraction would increase if this alternative solution was used. However, it would be the same for pre and post, therefore in Maven's eyes would not result in any net difference. Thus, reliance on the TP108 guidance remains suitable. Written confirmation has been received from Healthy Waters following meeting on the 23/07/25, which confirmed approval of this approach. 1.13 Confirming that the overall attenuation strategy is to 1% AEP. The western catchment has been modelled for the 2, 10 and 100-yr. The eastern catchment has been modelled for the 2, 5, 10, 20, 50 and 100-yr events, due to the sensitivity. **2 IN STREAM CONDITIONS** Thank you for noting this. The draft conditions will evolve through the process and be updated to address this matter. We have proposed a draft conditions workshop with the Council to ensure that the conditions are acceptable. **3 STREAM ERROSION** 3.1 Maven response: The planted areas are clearly shown on relevant plans, with the corresponding covenant extents also included on the Maven scheme plans. Any infringements have been listed. Applicant Ecologist Response: Riparian margins in the EcIA are determined by the relevant setbacks outlined in the AUP OP (20 m for wetlands and streams under current zoning) and the NES-F standards for wetlands (10 m and 100m). Building platforms are located outside the 10 m setback. Infringements into this setback occur from roading. Where the roading intersects

		different margins have been determined for the different areas, or how the margins are being planted or enforced. The SMP and EiA also indicate infringements into the riparian margin of infrastructure such as roads and building platforms. While this may be offset in other areas, a 10m riparian margin is required as a minimum which should be adjusted based on site specific parameters like soil and slope. From a geomorphic point of view, retaining the appropriate width for the length of the stream is critical (see below, '*Why is this information Essential?*'). 3.2 Further information is required on the proposed management of stormwater runoff from impervious surfaces during low intensity rainfall events and the associated potential effects on stream erosion. 3.3 A Geomorphic Risk Assessment is required to: a. Evaluate the Current State of the Network: Assess the present condition and sensitivity of the present stream networks, including its response to flow modifications and increased impervious surfaces, as well as assess the strength and resistance parameters of the soils to be used for the constructed networks. b. Identify Development Impacts and Mitigation Strategies: Determine whether the proposed development will affect the health and stability of the stream network over the design life of the development and provide a detailed mitigation plan to address any adverse impacts. c. Assess Natural Hazards and Public Safety Risks: Evaluate whether the stream network's sensitivity poses risks to the development or public safety. Develop strategies to mitigate these risks, with a preference towards nature-based solutions and green infrastructure. 3.4 Proposed strategies should: a. Specify the type and scale of instream and stream margin work required to manage ecological and geomorphological impacts and ensure resilience to future flow changes. b. Ensure that instream and stream margin work improve degraded channels over time or maintains high-value stream conditions where they exist. c. Prioritise nature-based solutions and green infrastructure that are resilient and adaptable to climate and flow changes, rather than relying on permanent hard engineering solutions. **<u>Why is this Information Essential?</u>** *Explain why the absence of this information significantly limits your ability to assess the project or its effects.* The missing information is required to gain an understanding of effects from the proposed development. Scour, erosion and				via culverts, no riparian yard infringement occurs as water that is in a pipe is not a "waterbody" under the RMA, and riparian yards are measured perpendicular to the waterbody. All riparian margins will be re-vegetated with indigenous riparian vegetation per the landscape plan. 3.2 The Maven flood modelling completed, included 2yr rainfall events, and confirmed that the 2-yr rainfall flows were reduced. Summary below CSL • roof area assumed detained for 95th percentile. • Driveways and JOALs unattenuated • Bush area CN value improvement • = less runoff in 2yr event. RV • Roof area – 95th percentile captures and reuse • JOAL and driveways (western catchment RV) to pond which contains 10yr attenuation • Eastern catchment unattenuated. • = less runoff in 2yr event. 3.3 Question the need, given we are improving current stream health. i.e if there is no effect, why should more reporting be requested? 3.4 Maven response: Question the need, given we are improving current stream health. I.e if there is no effect, why should more reporting be requested? Applicant Ecologist Response: Refer to Section 5.4.3.1 of the EcIA and landscape/management plan **4 WATER QUALITY** 4.1 We are not in the Region Wide NDC, so we are we needing to argue a BPO. We are bound by the AUP, which we have demonstrated full compliance with. In fact, we are providing treatment via means detailed within the reporting which is above what is expressly required. We have also justified the approach taken and the nature of the devices within the Maven SMP. As the assets (aside from Forestry Road which will not have treatment as per AT comments) are being held in private ownership,

		movement of waterways are a common occurrence which can damage infrastructure, buildings, and land. The missing information is critical for understanding the scale, function, and form of infrastructure, including streams. The stability of the proposed network over the design life of the development needs to be determined, considering increased impervious areas, efficient flow delivery, the effects of climate change and constrained flood energies. The proposed increase in impervious surfaces increases the stormwater flows and volumes from the site. Retention via non-potable and potable rainwater reuse of the 95th percentile event is proposed for all roof areas within the Countryside Living Stages 1-14 and the Retirement Village. However, no information has been provided on how the runoff from the remaining proposed impervious surfaces will be managed in order to ensure the proposed development does not result in an increase in volumes and flows to the receiving stream environment during frequent low intensity rainfall events and consequently increase the risk of stream erosion. In this context, it is unclear how the proposed revegetation has been incorporated into the assessment as no supporting information or calculations have been provided. Without this information, it is impossible to undertake a complete assessment of the application. This information cannot reasonably be deferred to implementation, or addressed through conditions, and the information is not considered a minor uncertainty. This assessment is essential due to: a. Environment: allowing the stream to perform critical hydrologic functions; b. Health and safety: reducing risk of flooding and geotechnical failure in habitable areas; and c. Economy: increasing asset lifespan, reducing need for ongoing maintenance or replacement, and avoiding buy out of private properties following erosion and scour of land due to geomorphological processes. **4. WATER QUALITY** **<u>Description of Missing Information</u>** *Clearly describe the specific information or assessment that is missing from the application.* 4.1 Further information is required that demonstrates the proposed stormwater management approach will maintain or enhance the quality of stormwater runoff within the receiving environment and is the Best Practicable Option (BPO). For example, an evaluation of the various stormwater management devices and strategies. 4.2 It is noted that stormwater treatment is not proposed for private driveways and hardstand areas with the justification that the development is not subject to Healthy Waters Region Wide Network Discharge Consent, and as the private roads will be low volume (less than 5000 vehicle			ongoing costs to Council are not a matter for consideration which normally forms the BPO. 4.2 We have assumptions for the lots, which has a maximum impervious of 1000m2 modelled. 250m2 assumed to be roof (and thus 95th percentile attenuated (35mm abstraction) the remaining impervious is assumed to be uncontrolled. The actual impervious make up will be subject to future design and is likely to be much less than what is listed. A consent notice is assumed that will limit impervious to 1000m2 per lot, unless mitigation is provided for increased impervious as to ensure there are no effects caused from more than 1000m2 of impervious being provided in a lot(s). 4.3 Maven has reviewed this and has confirmed that a compliant access track can be provided. Updated drawings can be provided as part of the formal RFI.

		movements per day. Please clarify total impervious area proposed per lot as well as shared driveways and JOALS. 4.3 In the drawing 'Retirement Village Stormwater Dry Pond Plan' (Appendix AA.4), it shows a proposed 3.0m wide dry pond maintenance track (up to 20% grade). However, GD01 states that vehicle access should be 3.5m wide and no steeper than 1V:8H, with no sharp bends. **<u>Why is this Information Essential?</u>** *Explain why the absence of this information significantly limits your ability to assess the project or its effects.* No information has been provided on the water quality treatment requirements for hardstand surfaces within future individual Countryside Living lots. No water quality is proposed within the Retirement Village for access ways servicing less than 10 units. Swales have been proposed for Countryside Living JOALs, however preliminary analysis of the JOAL longitudinal grades within the Stages 8-14 indicates that 50% of these exceed the 8% longitudinal grade which is the upper limit to provide water quality treatment within a swale. Overall, the proposed development will potentially generate over an estimated 20 hectares of untreated impervious surfaces which will increase the risk of adverse effects on the water quality of receiving environment. Within Section 7.3.2 of the SMP the Applicant's Engineer has asserted that as the site is not bound by Healthy Water Region Wide Network Discharge Consent, and as the private roads will be low volume (less than 5000 vehicle movements per day), that water quality treatment is not required. This is in reference to the high contaminant generating area provisions under E9 of the AUP, which are a specific, targeted overlay for land uses that are regarded as being high contaminant generating. However, the provisions of E8 together with the overarching objectives and policies outlined through E1 set a broader framework for water quality, with expectations beyond just the high contaminant generating land uses. This framework includes directive policies E1.3(2)(a) (*to maintain or enhance water quality, flows, stream channels and their margins and other freshwater values*…) and E1.3(8)(b)/(e) (*minimising the generation and discharge of contaminants… and providing for the management of gross stormwater pollutants*…). It is recommended that a Best Practicable Option (BPO) assessment is undertaken to evaluate the potential stormwater management solutions that will ensure the stormwater runoff from the proposed development will maintain or enhance the water quality of the receiving environment.				
Siva	Auckland Transport	Description of Missing Information a) The trip generation used for the residential component is considered low due to the rural location of the site and proximity to amenities. A more appropriate residential trip generation should be used to assess the traffic effects of the development. Applicant is advised to run a sensitivity test with a higher trip generation rate.	Yes	Yes	Auckland Transport (AT) has reviewed the proposed Rangitoopuni development in Riverhead, which includes 208 single dwellings, a retirement village with 260 units and 36 care beds, and the upgrade and vesting of Forestry Road. The assessment identifies several key issues that must be addressed to ensure the development proceeds in a manner that is safe, efficient, and aligned with transport planning objectives.	Please refer to the response provided by Commute (attached). Maven has provided additional responses to the following questions: 5. There are already existing vehicle crossings / logging access points which provide suitable construction access until the time the

		b) Trips associated with the existing and future uses of Access 2 for recreational use (as anticipated with the provision of the car park at Access 2 for public use), and potentially for Access 1 if the public is anticipated to use this to access walking tracks should be considered in the assessment, particularly at the site accesses c) Further commentary is required to justify the trip distribution, particularly in relation to the Forestry Road / Deacon Road access and the assignment of traffic at the SH16 intersections at Oraha Road and Riverhead Road d) There appears to be various errors with some traffic movements reporting zero development where volumes would be expected, including at the SH16 / Coatesville-Riverhead Highway intersection and these errors have been carried over into the other diagrams. Furthermore, it is not clear how development traffic has been assigned to the SH16 Riverhead Road and the Oraha Road intersection. Errors in the "Generated trip distribution" diagrams in the ITA Appendix C should be corrected and consequential errors in the other diagrams. e) The following matters need to be addressed in the traffic modelling: I. All traffic models need to be calibrated for existing conditions (i.e. queues and delays, and in the case of the SH16 intersections, interaction between intersections has not been taken into account) and evidence of calibration should be provided; II. At the SH16 / Coatesville-Riverhead Highway intersection, the modelling does not reflect the queues and congestion that occur on the western leg (eastbound flows) of the intersection, particularly in the AM peak. The operation of the SH16 / Coatesville- Riverhead Highway intersection, which effectively reverses priorities between eastbound SH16 traffic and movements turning to and from SH16 should be addressed in the model (particularly the AM peak); III. The interaction between the SH16 / Coatesville-Riverhead Highway and SH16 / Old North Road intersections should be taken into account in the traffic modelling.; IV. Potential supressed traffic demand on eastbound SH16 needs to be taken into account in the modelling of the SH16 intersections with Coatesville-Riverhead Highway and Old North Road; and V. SIDRA Model Layout drawings should be provided. f) An assessment of the effects of the development on the operation of SH16 east of Coatesville-Riverhead Highway is required to understand the impacts on the capacity of SH16			One of the primary concerns raised by AT relates to trip generation and traffic modelling. The trip rate used in the application (0.85 trips per dwelling) is considered too low for a rural context. AT recommends using the NZTA Research Report 453, which suggests a more appropriate range of 1.1 to 1.4 trips per dwelling. Additionally, the modelling does not account for recreational traffic or potential public use of the proposed facilities. The SIDRA traffic models provided are not calibrated to reflect actual conditions, such as existing queues and delays, and omit key interactions at critical intersections like SH16 and Coatesville-Riverhead Highway. Errors in the trip distribution diagrams further undermine the reliability of the traffic impact assessment. The assessment also fails to demonstrate that the development can proceed without prior upgrades to the SH16 / Coatesville-Riverhead Highway intersection and SH16 east of this junction. These intersections are already under pressure, and the additional traffic generated by the development would likely exacerbate congestion and safety issues. Without confirmed plans and funding for these upgrades, AT cannot support the development proceeding as proposed. Access arrangements are another area requiring further detail. Access 1 (Pinetone Road) and Access 2 (Browns Road) present visibility and design challenges. Access 1 is located near an existing intersection. Access 2 is situated on a curved section of road, limiting sight distances and potentially causing queuing issues. Accesses 3 to 5 are not shown on the plans, and no visibility assessments have been provided. AT requires comprehensive access designs and safety evaluations to ensure all proposed vehicle entries and exits are viable. The proposed upgrade to Forestry Road includes a 6.0-metre carriageway, which meets the AT Transport Design Manual (TDM) standard for minimum road width but not the preferred road width. AT notes that this may not be sufficient for safe two-way movement of larger vehicles, such as 6.3-metre vans and 10.3-metre trucks. Tracking assessments are needed to confirm that vehicles can pass without conflict. Additionally, some of the proposed access modifications extend into third-party properties, necessitating consent from affected landowners. Retaining walls over 4 metres in height proposed on Forestry Road within the road reserve also require AT approval and must be designed to AT's TDM standards. The shared path proposed as part of the development has a gradient of 11.6%, which may be too steep to be accessible for people with mobility impairments and disabilities. Furthermore, the path does not provide a continuous connection to the Riverhead town centre or other key destinations. AT recommends improving pedestrian connectivity and ensuring that all shared paths are accessible and integrated with the wider transport network.	new crossings are going in place. As there is no upgrade to the existing crossings, there is no increased disruption to road users. 6. As had been detailed in the Infrastructure Report, the need for treatment in Forestry Road was a decision for AT. The raingardens will be removed from the Maven civil engineering drawings, as part of any formal RFI. We agree that that AUP does not require. We can also confirm that all culverts are not classified as a dam, as are contain less than 20,000m3 of stored water.

		g) The Access 1 (Opposite Pinetone Road) design needs to address the following matters I. The design needs to take into account Pinetone Road; II. The access is within 10m Pinetone Road and therefore Vehicle Access Restrictions apply under E27.6.4.1(2) and (3). An assessment as a Restricted Discretionary activity is required. III. It should be demonstrated that where the access splits into two JOALS, that the design would not result in vehicles accessing the site blocking back onto Old North Road h) At Access 2 (Browns Road) I. Visibility to the west is restricted. An assessment of the effects of the shortfall of the visibility is required and any measures needed to mitigate the shortfall of visibility. II. A gate is proposed on the access way north of Access 2. It should be demonstrated that vehicles would not queue back onto Old North Road from the gate. i) Access 3, 4 and 5 should be clearly identified on the plans and an assessment of the visibility as these accesses provided. j) An assessment should be provided as to whether an upgrade to the Forestry Road / Deacon Road intersection is required with the increased development flows k) For the upgrade of Forestry Road, the following information is required I. Tracking of a 6.3m van and a 10.3m truck is required to demonstrate that these vehicles can pass without conflict. II. Where vehicle crossings need to be amended for the revised vertical (and horizontal) alignment of Forestry Road, confirmation of approval for such works within private property should be provided by the property owners. l) Following information is required to review the stormwater management I. Can detailed design information be provided for the proposed raingardens, including their construction methodology, functional performance, and maintenance requirements			Construction traffic is another concern. AT advises that Accesses 1 and 2 should be upgraded to their final form in accordance with AT TDM standard before any construction activity begins. This will ensure that heavy vehicles can enter and exit the site safely and efficiently, minimizing disruption to the surrounding road network. Raingardens are proposed along Forestry Road. However, they are not required under the Auckland Unitary Plan and have high maintenance costs. The plans lack detail on their design, function, and maintenance, and their use as online devices (within the road corridor) increases operational risk. It is also unclear if they are intended for hydrology mitigation, which could significantly increase their size. Numerous culverts and bridges are proposed, some with emergency spillways, raises questions about whether they qualify as Large Dams—potentially imposing high compliance costs on AT. Additionally, the site contributes substantial runoff to downstream floodplains, potentially impacting AT's road network, and may require significant onsite flood mitigation. In summary, AT requires significant additional information and revisions to the current proposal. This includes updated trip generation and distribution data, corrected traffic models and diagrams, detailed access designs, confirmation of third-party approvals, and a comprehensive assessment of the impacts on SH16.	

		II. Are any of the raingardens intended to provide stormwater retention or detention for hydrology mitigation, and if so, what are the implications for their size and design? III. If any of the proposed culverts or bridges are classified as Large Dams and are to vest to AT, what are the anticipated compliance obligations and long-term risks IV. Given the site's contribution of significant runoff to downstream floodplains, what onsite flood mitigation measures are proposed to protect AT's existing infrastructure <u>Why is this Information Essential</u>? 1. Trip Generation and Traffic Modelling There are significant concerns regarding the trip generation rates used in the Integrated Transport Assessment (ITA). The residential trip rate of 0.85 trips per dwelling is considered too low for a rural context like Riverhead. AT recommends using NZTA Research Report 453, which suggests a more realistic range of 1.1 to 1.4 trips per dwelling. Additionally, the modelling does not account for recreational traffic or potential public use of Access 1. The SIDRA traffic models used are not calibrated to reflect actual traffic conditions, such as queue lengths and delays. Key intersections, including SH16 and Coatesville-Riverhead Highway, are not accurately represented, and the effects of suppressed demand and reverse priority are not considered. These issues must be addressed to ensure the development's traffic impacts are fully understood. 2. SH16 Intersection and Network Capacity The assessment does not adequately demonstrate that the development can proceed without prior upgrades to the SH16 / Coatesville-Riverhead Highway intersection and SH16 east of this junction. These intersections are already under pressure, and the additional traffic from the proposed development would likely exacerbate congestion and safety issues. AT requires confirmation that these upgrades will be implemented before the development progresses. 3. Access Design and Safety Further detail is required to confirm that the proposed vehicle accesses can be provided safely. • Access 1 (Pinetone Road) and Access 2 (Browns Road) present visibility and design challenges. • Access 1 needs to accommodate turning movements and meet visibility standards, while Access 2 has issues related to road curvature and gate placement that could cause queuing.			

		• Accesses 3 to 5 are not shown on the plans and require visibility assessments. The design must comply with AT's standards and Vehicle Access Restrictions. 4. Forestry Road Upgrade The proposed upgrade to Forestry Road includes a 6.0m carriageway, which meets the minimum requirement but not the preferred width. The road must be capable of accommodating a 6.3m van and a 10.3m truck. Retaining walls over 4m in height require AT approval. Additionally, some vehicle crossing modifications extend into third-party properties, necessitating property owner consent. These upgrades must ensure that vehicles can pass safely without conflict. 5. Construction Access Requirements AT recommends that Access 1 and Access 2 be upgraded to their final form before any construction begins on the site. This is essential to ensure the safe and efficient movement of construction traffic and to minimize disruption to the surrounding road network. Early upgrades will also help mitigate safety risks associated with increased vehicle movements during the construction phase. 6. Stormwater management Raingardens are proposed along the extension of Forestry Road. However, they are not required under the Auckland Unitary Plan as the road is not classified as a High-Use Road. The benefit of these raingardens is unclear when weighed against their whole-of-lifecycle cost, particularly given AT's limited maintenance budget and the higher priority of other contaminant-generating roads. The stormwater overview plans lack detail on the design, construction, function, and maintenance of these raingardens, which are shown as online devices and therefore pose a higher operational risk. It is also uncertain whether these devices are intended to provide hydrology mitigation, which could significantly increase their size. Additionally, the proposal includes numerous new or upgraded culverts and bridges, some with emergency spillways, raising questions about their classification as Large Dams and the associated compliance risks if vested to AT. Finally, the site contributes substantial runoff to downstream floodplains that affect AT's road network, and the development may require significant on-site flood mitigation to address these impacts.				
Ray Smith	Development Engineering	**<u>Description of Missing Information</u>** *Clearly describe the specific information or assessment that is missing from the application.* 1. Water Supply – For the Retirement Village servicing needs, the application is on the basis that a water bore is required to supplement the water supply able to be sourced from roof collection. The application does not appear to provide any further information in support of the bore method and so should therefore include further details and assessment to confirm this method of water supply is possible and would be likely to be approved as part of the application.	Yes	No	Await clarification on further information requests.	1. An application for a water bore and groundwater abstraction was granted to the applicant on 6 August 2025. The consent (LUC60449108) allows for the abstraction of up to 200m^3 of groundwater per day within an overall annual quantity of 29,000m^3. 2. Fire engineer / DGSE have confirmed that the care buildings and other communal facilities will be sprinklered. As such, we just need to provide 45m3 of water storage within 90m of the buildings, which are indicated on the relevant C600 drawing set for 174016. We are expecting FENZ approval shortly.

		2. Firefighting – For the Retirement Village and in particular for the Care facility, the application includes water storage options for where sprinklers and additional reservoirs may be required, and that liaison is occurring with Fire and Emergency New Zealand. The chosen approved option should be shown on the plans and included as part of the application. 3. Power and Phone Provision – The application indicates ongoing liaison is occurring with Chorus and Vector and written confirmation should be provided that these services can be made available to the proposed development. 4. Infringements to AUP requirements – While the application includes assessment against policies and objectives contained within the unitary plan, the matters for discretion and assessment criteria listed should be provided where infringements occur. **Why is this Information Essential?** *Explain why the absence of this information significantly limits your ability to assess the project or its effects.* 1. Water Supply – If Watercare are unable to otherwise provide for an extension to the public water supply system and service the development or other on-site alternatives (such as increased impermeable surfaces collection and larger reservoir storage) are not pursued, water supply by bore supply confirmation is fundamental to whether the development can proceed and will cater for sufficient servicing and firefighting needs as required by the AUP and other standards. 2. Firefighting – As per the above, the confirmation of possible reservoir locations and FENZ support is fundamental as to whether the development can proceed and meets AUP and other standards. 3. Power and Phone Provision – The confirmation of available power and telecommunications facilities to service the development are fundamental in meeting the provisions of the AUP requirements for subdivision and development. 4. Infringements to AUP requirements – This would help decision makers better confirm that the requirements of the AUP have been met and any infringements (particularly for Chapter 36 - Natural Hazards and Flooding) have been appropriately addressed.				3. Confirmation of supply for underlying subdivision has been received from both Chorus and Vector. We are currently obtaining designs for Chorus and Vector supply for Stages 1-3 of the subdivision. We don't believe anything beyond this is required, given presence of existing power and chorus networks. We also note that we can go wireless for the CSL development if this is desired. 4. Maven has done hazard risk assessment under E36. We are also confident that compliance is achieved with vehicle access flood depths, floor levels etc. All buildings are elevated from areas of flooding, and all roadways (both JOALs and Forestry Road) comply with the AT TDM and AUP for flood depths, so we do not believe any further assessment is needed.
Mat Collins and Ashrita Lilori (Abley)	Traffic (Council)	**Description of Missing Information** In addition to Auckland Transport's s67 RFIs, we request the following information regarding the existing transport network: **1.Road Safety Assessment**	Yes	No	Extent of information required requires review prior to informed comment being able to be provided.	Please refer to the attached response provided by Commute. Additional responses/comments from Maven are provided below:

		The ITA provides a cursory review of historic crash records and does not provide sufficient assessment to determine whether the development could exacerbate existing road safety issues. For example, Section 7.1.3 of the ITA identifies a crash trend (failure to give way) at the Deacon Road / Riverhead Road intersection but concludes the intersection is operating acceptably without assessing how the development might increase crash risk. Deacons Road, Old North Road, and Riverhead Road are rural roads that will serve as key access routes to the development. NZTA's CAS data shows 36 injury and fatal crashes along these roads since 2020 (excluding SH16 intersections), which may indicate a higher road safety risk along these corridors. To quantify the potential effect on road safety, please provide an Infrastructure Risk Rating (IRR) assessment for the following corridors (refer to https://www.nzta.govt.nz/assets/resources/infrastructure-risk-rating-manual-road-to-zero-edition/infrastructure-risk-rating-manual-road-to-zero-edition-2022.pdf) • Deacons Road, between and including the intersections with Old North Road and Riverhead Road • Old North Road, between and including the intersections with Deacons Road and SH16 • Riverhead Road, between and including the intersections with SH16 and Coatesville-Riverhead Highway **2. Sight Distance at Old North Road / Deacons Road** Section 7.3.2 of the ITA states that 181m of sight distance is available at the Old North Road / Deacon Road intersection. However, it appears that sightlines to the south may be obstructed by a vertical crest near 336 Old North Road, along with an embankment and roadside vegetation. Please confirm the available sight distance with further assessment, including geometric constraints and any vegetation encroaching into the sight triangle *This information is required to understand whether existing rural roads can safely accommodate the increase in traffic generated by the development.* **Countryside Living Subdivision RFIs** 3.**Waste Vehicle Trips** The Waste Management Plan (Appendix DD) does not confirm the number of waste vehicle trips expected each week. We note that a 7.2m compactor truck (with lower capacity than Council's 10.3m trucks) is proposed.			9a. All plans which have public easement are clearly indicated on all Maven scheme plans. 9b. The design ensures that Lot 1 can be undertaken without reliance upon RV (Lot 2) and associated Forestry Road upgrades. 10. All roading plans (C300 PN 147007) are to scale, and it is evident where the JOAL cross sections are either 3.5m with passing bays, or 5.5m (dual way movements). A masterplan with the two road formations can be provided at formal RFI stage if this is required. 11a. The Mill Grove bridge crossing the Wautaiti Stream was damaged during recent weather events. The applicant has been in contact with the Local Board, who has confirmed that the bridge is scheduled to be replaced within the coming year. If, for any reason, the bridge replacement does not proceed, the applicant intends to apply for the necessary consents to ensure its reinstatement. It will be constructed in accordance with Auckland Council and parks approval. The likely alignment will be via the existing pedestrian path, where the old bridge was damaged. A new bridge would be required, and LoA from Parks is needed, as both sides are in parks ownership (Esplanade and/or access path). This would be undertaken in parallel to the EPA process for the RV. 11b Owned by RA; public access via way of easement in gross is provided to all public paths in both the CSL and RV. Please refer to the Maven scheme plans for location and nature of the public easements.

		Please confirm the number of weekly truck movements required for the proposed 7.2m truck compared to a standard 10.3m truck. *This information is required to assess efficiency effects from increased heavy vehicle movements at site accesses and within the site.* **4. Sightlines at Vehicle Crossings** Please provide further assessment of sightlines at the following vehicle crossings: a) Maven Drawing C110-6-1 suggests the Browns Road (private) crossing may require a sightline over third-party land (Lots 67 and 403 Old North Road), and the road geometry and embankment may obstruct visibility. b) Maven Drawing C300-1-2 indicates the sightline for drivers exiting JOAL 1 crosses private land (Lot 50). c) JOAL 4, Lot 55, and Lot 67 vehicle crossings to Old North Road require a sightline assessment to confirm unobstructed visibility and that no sightlines rely on third-party land. *This information is required to assess safety and efficiency effects of the proposed vehicle crossings.* **5. Vehicle Crossing Conflicts and Controls** Please assess the safety and efficiency effects of the following: a) JOAL 1's proximity to the Pinetone Road intersection – it appears to be within 10m, contrary to the ITA assessment. b) Limited separation between JOAL 1 and JOAL 2 may cause queuing conflicts. Drawing C1 also shows an 8m truck fully occupying the JOAL 1 carriageway when exiting JOAL 2, potentially conflicting with inbound movements. c) Any gates at vehicle crossings (e.g. JOAL gates in the Landscape Concept Plan) may result in queuing within the legal road. *This information is required to understand potential effects on road safety and network efficiency.* **6. Turning Head Provision for JOALs** Multiple JOALS do not provide turning heads. “TRUCK TURNING FACILITIES” are shown on some drawings, for example Maven Drawing C300-2-2, however these are not located at the end of the JOAL and therefore drivers may be required to undertake extensive reversing manoeuvres, which can affect the safety of other JOAL users. Please provide further discussion of how drivers will safely turn around within JOALs, including waste collection vehicles. *This information is required to understand whether vehicles can safely turn around within JOALs.* **7. JOAL design and check vehicles**			

		Some JOALs will function as roads due to the number of lots served. Please provide an assessment of these JOALs (those serving >10 lots) against Auckland Transport's TDM Section 4.2 – Urban and Rural Roadway Design, including intersection assessments where JOALs meet public roads. Please also provide detailed vehicle tracking for all locations where conflict is identified, ensuring: a. JOAL and Lot numbers are clearly labelled, to allow easier identification of the portion of the site being assessed. b. Conflicts with non-trafficable areas (e.g. berms, footpaths) are addressed **8.Sightlines Between Passing Bays** For any JOAL with a carriageway narrower than 5.5m, please provide drawings demonstrating sightlines between passing bays, taking vertical alignment into account. *This information is required to determine whether one-lane sections of JOALS can operate safely and efficiently.* **9. Network connectivity** a. The Landscape Concept Plan shows multiple pedestrian paths through the site (e.g. to Forestry Road), but these are not shown on the engineering plans or discussed in the ITA. Please confirm whether pedestrian and cycle connections are proposed. If not, provide an assessment of walking/cycling distances between key locations within the subdivision, and to the Community Centre, Retirement Village, and proposed SUP to Duke Street. b. Please confirm whether vehicular access to Forestry Road from Stages 9, 12 and 14 has been considered, to improve permeability and resilience. *This information is required to understand the degree to which the development provides an accessible, connected and resilient movement network.* **10.Cross Sections** Maven Drawings C330-1 and C330-2 show indicative JOAL and ROW cross-sections, but it is unclear where each cross-section applies. Please provide a roading plan identifying the location of each typology. *This information is required to understand whether the cross section for the JOALs and RoWs appropriately accommodate the expected users.* **Retirement Village RFIs** **11. Shared Use Path (SUP) Completion and Access**				

		a) Maven Drawing C300-6 shows the SUP terminating short of Mill Grove, with the final segment excluded from the application. Please confirm when and by whom this remaining section will be completed. b) Please confirm ownership of the SUP and whether public access is proposed. *This information is required to understand whether the SUP will provide a degree of active modes accessibility to the site.* **12. Vehicle Tracking Drawings** Please also provide detailed vehicle tracking for all locations where conflict is identified, ensuring: a) Accessway and Unit numbers are clearly labelled, to allow easier identification of the portion of the site being assessed b) Conflicts with non-trafficable areas (e.g. berms, footpaths) are addressed *This is required to confirm safe and efficient vehicle movement throughout the site.*				
Ken Berger	Subdivision	I have reviewed the report signed by Licensed Cadastral Surveyor Reece Moody to determine the width of the watercourse through Lot 2 DP 590677 and accept his methodology and advice that the subject watercourse has an average width of less than 3.0m and is therefore not subject to s230 of the RMA. I would however ask that further confirmation is sought from Mr Moody as the signed provided report only discusses the one watercourse over Lot 2 DP 590677 and I ask that further comment is provided on a signed declaration confirming that an investigation across all of the subject sites watercourses, being all of Lots 1 & 2 DP 590677 and the results of that complete investigation, rather than just the current advice which is restricted to the one watercourse.	No	Yes	**A.** *Please review proposed scheme plans (including staging) and offered conditions of consent (attachment A) & provide comment.* **B.** *May require further input at condition stage for final wording of any specific conditions required.* **C.** *Please also provide comment on methodology for stream width of appendix Q.* My responses are as follows. In regards to **point 'A'** I have reviewed the scheme plans as lodged in 'Appendix N – Countryside Living Scheme Plan' and 'Appendix N.1 Retirement Village Scheme Plan' with comments as follows. Countryside Living Scheme Plan – 14 Stages and Retirement Village Scheme plans are well drawn and fit for purpose with easements as required shown in a 'Memorandum of Easements', Residents Associations notes, well advised for relevant lots and lot owners and land covenants for ongoing protection. Staging appears well planned and development follows after earlier stages. Proposed Subdivision conditions 166 (Survey Plan Approval (s223) conditions) onwards – comments. Condition 166 is partially acceptable and should be amended to include standard AC wording as follows. 166. The consent holder must submit a survey plan for each stage in accordance with the approved resource consent subdivision scheme plan(s) titled	Maven response: C A review of the site was undertaken to see which of the streams needed specific assessment via an LCS. The stream which was the subject of Reece's letter is clearly the largest stream within the catchment. See section 6.4.2 of the AEE. All other streams on the site were determined to be less than 3m in width and did not require further surveys. The Ecological Impact Assessment (Appendix F) includes site photos of the other streams on the site and a map outlining the location of where the photos were taken. The site photos are considered to clearly show that all other streams on the site would not trigger esplanade requirements and are generally in a degraded state and have a width that is visibly less than 3m. This would simply add significant cost to the Applicant, which is not justified given the scale of the stream assessed and fact this remained less than 3m in width

					'TITLE OF PLAN', prepared by AUTHOR, dated DATE. The survey plan must show all lots to vest in Council (including roads, parks and land in lieu of reserves), all easements, any amalgamation conditions, any amalgamation covenants, and any areas subject to other covenants [delete / amend as necessary e.g., delete covenant areas and amalgamation conditions where there are none] required by this subdivision consent. Conditions 167, 168 & 169 are standard expected subdivision conditions and are acceptable. Condition 171, re the creation of a Resident's Society (or similar). I'm not convinced this condition should be part of the s223 approval and would suggest moving to be part of the s224c conditions. My reasons are that a consent notice condition as outlined in Condition 190.E. requires that the owner of all lots will be and remain members of the required legal entity thus completing the requirement. The only way that the applicant can satisfy any conditions such as the current proposed 171, is to provide Council with a copy of the covenant or legal document outlining the requirements of the relevant legal entity and a legal undertaking that the said document as approved by Council will be registered with the completion of each stage and prior to the issue of Titles so that it may be included thereon. All other (SUB s223) conditions appear relevant and are acceptable. In regards to **point 'B'** happy to review draft sub conditions and to provide comment at that time. In regards to **point 'C'** to provide comment on methodology for stream width of appendix Q. I have reviewed the report signed by Licensed Cadastral Surveyor Reece Moody to determine the width of the watercourse through Lot 2 DP 590677 and accept his methodology and advice that the subject watercourse has an average width of less than 3.0m and is therefore not subject to s230 of the RMA. I would however ask that further confirmation is sought from Mr Moody as the signed provided report only discusses the one watercourse over Lot 2 DP 590677 and I ask that further comment is provided on a signed declaration confirming that an investigation across all of the subject sites watercourses, being all of Lots 1 & 2 DP 590677 and the results of that complete investigation, rather than just the current advice which is restricted to the one watercourse.	
Marie Meridith	Contamination	None	No	Yes	I have reviewed the following documents submitted by the applicant for the proposed Rangitoopuni development at Lot 1 and 2 DP 590677 Old North Road & Forestry Road, Riverhead, in the context of the *National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health* (NES:CS, Ministry for the Environment (MfE),	No response required.

					2011) and Chapter E30 of the Auckland Unitary Plan: Operative in Part (AUP(OP)): - *Rangitoopuni Application under Fast Track Approvals Act 2024* (AEE), prepared by Campbell Brown, dated 5-May-2025 - *Desktop Contamination Assessment – Rangitōpuni Riverhead (Lots 1 and 2), Forestry Road, Riverhead* (PSI), prepared by ENGEO, dated 2-May-2024 I understand from the AEE that Lot 1 is proposed to undergo residential development and subdivision, whereas Lot 2 is to be developed into a retirement village. The PSI has conducted desktop research, on-site observations (during the geotechnical work the SQEP is also undertaking at the site) and a review of available property information. It appears the site has been used for forestry since at least 1940. And while one previous consent is noted to have been for the discharge of treated sewage by spray irrigation, this consent expired in 1996 and the activity is not considered to meet the threshold of being considered an activity included on the MfE's Hazardous Activities and Industries List (HAIL). Based on the available property information the PSI has presented, I consider that it *does not seem more likely than not* that any activities included on the MfE's HAIL have occurred at the site. Therefore, the site is not a 'piece of land' under Regulation 5(7) of the NES:CS and the NES:CS does not apply to this application. For the same reason, I agree with the PSI that it is unlikely that the site contains 'elevated levels of contaminants' and therefore the provisions of Chapter E30 of the AUP(OP) also do not apply on this occasion.	
Bin Qiu	Noise and Vibration	Further information / updated reporting and mitigation is recommended to be provided in response to potential reverse sensitivity and onsite amenity effects of the proposed Gun Club. - Further mitigation should be considered for the proposed properties where the shooting noise is predicted to be at or over 55 dB LAmax. - Clarification on whether the gun club noise meets the AUP noise limits or not. The noise (rating) level and maximum noise level arising from any recreational activity in the Open Space – Sport and Active Recreation Zone measured within the boundary of a site in a residential zone or notional boundary of a site in a rural zone must not exceed the levels in Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface below:	Yes	Yes	<u>Construction Noise</u> I have reviewed and concurred with the MDA assessment on that the noise and vibration level emitted from the project construction works can comply with the relevant noise and vibration standards of Auckland Unitary Plan Operative in part E25.6.27 and E25.6.30, provided that the construction works are to be undertaken during hours of 7:30am to 6:00pm Monday to Saturday. <u>Wastewater Treatment Plant (WWTP) and Potable Water Treatment Plant (WTP)</u> Due to the large separation of the proposed WWTP and WTP to the neighbours and given that the noisy plants are enclosed or submerged in water, I agree that the noise emissions from the proposed WWTP and WTP can comply with the AUP noise Standards E25.6.3.(2) and E25.6.2. <u>Reverse Sensitivity – re the existing Waitemata Gun Club noise</u> The applicant's agent Campbell Brown has reviewed the gun club's operation and advised that • The gun club has a council permit (1966) for shooting one day per month between 11am and 5pm.	For the purposes of assessing the Rangitoopuni application, only lawful activities may be considered as part of the receiving environment. Activities that exceed the scope of the 1966 permit, and for which no existing use rights have been confirmed, must be treated as unlawful and therefore excluded from the receiving environment. It is not the applicant's responsibility to monitor or ensure compliance of the Gun Club with the AUP noise limits. The onus rests with the Gun Club to operate within those limits, and it is the Council's role to monitor compliance and take enforcement action where necessary. The relevant noise limits form part of the existing environment against which the application must be assessed. Specific mitigation is not required for lots predicted to receive noise levels of less than 55 dB LAFmax, for the reasons set out in the Earcon Acoustics report.

Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface

Time	Noise level
Monday to Saturday 7am-10pm	55dB L_{Aeq} Except that for a cumulative period of: (i) 3 hours per day between 7am and 9.30pm Monday to Friday; and (ii)6 hours between 7am and 10pm on Saturdays. the noise level must not exceed 60dB L_{Aeq}
Sundays and Public Holidays 9am to 6pm outside the daylight saving period	55dB L_{Aeq} Except that for a cumulative period of 3 hours between 10am and 3pm on Sundays the noise level must not exceed 60dB L_{Aeq}
Sundays and Public Holidays 8am to 7pm during the daylight saving period	55dB L_{Aeq} Except that for a cumulative period of 3 hours between 10am and 3pm Sundays the noise level must not exceed 60dB L_{Aeq}
All other times	40dB L_{Aeq} 55dB L_{eq} at 63 Hz 50dB L_{eq} at 125 Hz 75dB L_{AFmax}

- Activities which exceed the scope of the 1966 permit must be excluded from the receiving environment.

The assessment and recommendations provided by the applicant through MDA and Earcon have been based on this advice, which have found that the future properties in the proposed development will receive the shooting noise from less than 35 dB LAmax to over 65 dB LAmax, and both reports agree to address the permitted shooting (one day per month between 11am and 5pm) by imposing a non-complaint covenant on the properties where shooting noise is at or above 55 dB LAmax.

Comments:
This proposed title covenant may stop people complaining about the shooting, but will not physically mitigate the noise. MDA report has advised that the shooting can be audible and annoying and particularly noise of over 65 dB LAmax is likely to cause serious annoyance. So further mitigation should be considered for the proposed properties where the shooting noise is predicted to be at or over 55 dB LAmax.

Furthermore, it is not sure whether the Waitemata Gun Club has existing use rights for all its current operations. If not, their activities will need to comply with the noise standards of AUP E25.6.17 (see table below) as the club's land is zoned Open Space – Sport and Active Recreation Zone under AUP.

The noise (rating) level and maximum noise level arising from any recreational activity in the Open Space – Sport and Active Recreation Zone measured within the boundary of a site in a residential zone or notional boundary of a site in a rural zone must not exceed the levels in Table E25.6.17.1 Noise levels at the Open Space – Sport and Active Recreation Zone interface below:

Table E25.6.17.1 Noise levels at the Open Space – Sport and Recreation Zone interface

Time	Noise level
Monday to Saturday 7am-10pm	55dB L_{Aeq} Except that for a cumulative pe (i) 3 hours per day between 7am a Monday to Friday; and (ii)6 hours between 7am and 10pm o the noise level must not exceed 6
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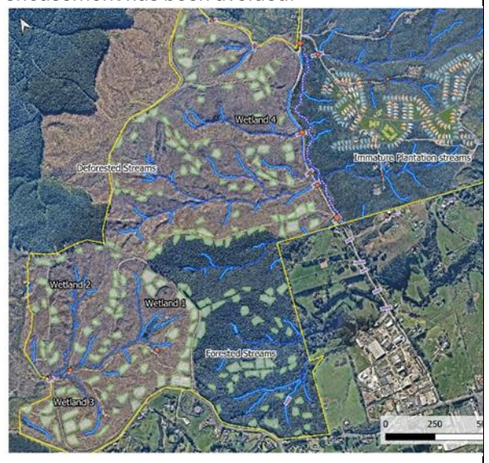
Sundays and Public Holidays 8am to 7pm during the daylight saving period	55dB L_{Aeq} Except that for a cumulative period between 10am and 3pm Sundays th must not exceed 60dB L_{A}
All other times	40dB L_{Aeq} 55dB L_{eq} at 63 Hz 50dB L_{eq} at 125 Hz 75dB L_{AFmax}

Subject to adherence with the recommendations of the Earcon Acoustics report, it is considered that the proposal will not result in significant reverse sensitivity effects on the Waitematā Clay Target Club, nor create countryside living lots that experience unacceptable levels of noise from the existing environment.

Conditions:
Thank you for the comments on the draft conditions, these are noted and will be incorporated into an amended set. We have also proposed a draft conditions workshop with the Council.

					This rule E25.6.17 specifies noise levels in LAeq only, no LAmax at day time. MDA has not assessed the gun club noise in LAeq, it is not sure whether the shooting noise can meet the AUP noise limits or not. Regardless the appropriateness of using LAeq for assessing shooting noise, these noise standards in above table are more lenient than the proposed trigger level of 55 dB LAmax. It is likely that the shooting noise that complies with the AUP noise limits may still exceed the proposed trigger level of 55 LAmax. Given the above comments, I consider that, to address the reverse sensitivity issue, further noise mitigation measures should be considered for the proposed development. COMMENT ON PROPOSED CONDITIONS • Condition 34: the construction hours sets out Condition 34 (a) are slightly different from the hours assumed in MDA report, I suggest the construction hours be amended to 7:30am to 6:00pm Monday to Saturday. • Condition 170: the lot numbers listed to be subject to a land covenant are less than that identified in MDA report which include Lots 1. 2. 3. 4. 5, 6. 7. 8, 9, 12, 13, 23,, 24, 50, 51, 52, 53 and 54.	
Domenico De Vincentis	Lighting	No S67	No	No		
Martin Meyer	SWWITTA Stormwater	**<u>Description of Missing Information</u>** *Clearly describe the specific information or assessment that is missing from the application.* **1.** Please provide further information on the proposed level of water quality treatment within the retirement village area, for 'private accessways with less than 10 units', and no treatment for car parking areas with less than 30 car parks. This does not align with standard E8.6.3.1(2). This is noted for review as the retirement village area will be sufficiently densely developed outside of rural character and in an 'urban' style development. **2.** Hydraulic model required to assess and changes in pre-development to post-development. **3.** Stormwater Management works in proposed conditions do not include flood attenuation assets. **<u>Why is this Information Essential?</u>** **1.** Urban developments typically require treatment of all contaminant generating areas under standard E8.6.3.1(2). While due to the fast track process the site is currently not zoned residential, the fast track process is being utilised to allow a dense development in a rural area and typical urban	TBC	No		1. We remain of the view that the level of treatment provided is fit for purpose, and smaller carparks are lesser trafficked accessways should not require treatment. We don't believe they require treatment under the AUP either. The section / rule of the AUP noted (E8.6.3.1.(2) relates to impervious areas greater than 1000m2 and up to 5000m2 within an urban area. As the site is not in an urban area this appears to be incorrectly referenced. AT has asked for the treatment to be removed from Forestry Road (which we will do as part of formal RFI). 2. Refer HWs comments. A flood model has been provided as part of the application, and a summary of which is provided in the Infrastructure Report, with a full breakdown provided in the Flood Modelling Report. 3. Noted. Conditions will be updated to include this.

		requirements may be appropriate. Urban developments with over 1,000m^2 impervious surface would be expected to supply contaminant removal for all contaminant generating areas (all accessways, all carparks). Noting the applicant has provided SMAF retention/detention to match the requirements of E8.6.3.1(1). I would note that E1 also has provisions requiring water quality that may apply in this regard. **2.** The applicants rules assessment states that no downstream erosion, scouring or flooding will occur, however the model is required to confirm this. **3.** Stormwater attenuation assets should be within a management works table, and part of operation and maintenance plans associated with the proposed developments. This is essential to ensure ongoing attenuation is met and therefore effects on flooding are prevented into the future (noting on lot rain tanks are included in the countryside living management works table).				
Grant Fleming	SWWITTA Wastewater	**Missing Info** 1. Water treatment plant waste – it is likely that the water treatment plant will create a liquid waste stream (from softener) which might need to be disposed of within the on-site wastewater system. This needs to be confirmed and, if discharging to the system, the volume, concentration, and effects of this stream needs to be reviewed and commented on. 2. Odour management plan – a portion of the northwestern retirement village is in close proximity to the gravity sewer outlet and treatment plant. The application discusses the treatment plant as being unlikely to generate odours, but it does not provide any details on the sewer outlet and whether an odour monitoring or management plan is proposed to monitor and mitigate any potential odours from the entire system. 3. Discharge Field Construction – The design presented for the discharge field construction indicates a total of two sector each with 6 zones. This creates the requirement to construct 12 zones each of an equal size (~0.48 ha). The site plan provides three discharge areas each of an unknown size (not indicated on plans). More details should be provided on the plans showing the extent and size of each zone and which zones are to be installed as part of the three identified system installation stages. 4. The proposed discharge system is located entirely within existing or historically production forest land which, as part of the logging process, has resulted in land that is stripped of topsoil (as identified in the ground investigations presented). Wastewater irrigations systems are reliant on topsoil to provide appropriate lateral dispersion of wastewater and prevent point accumulation and	TBC	Yes	**Potential Identified Issues** The proposed discharge system is located entirely within existing or historically production forest land which, as part of the logging process, has resulted in land that is stripped of topsoil (as identified in the ground investigations presented). Wastewater irrigations systems are reliant on topsoil to provide appropriate lateral dispersion of wastewater and prevent point accumulation and subsequent runoff during normal operation. No details have been provided within the application which provide any discussion on the following (other than a brief discussion on the removal of unsuitable surface materials): • The impact of the historical activity on the soil profile and its ability to receive treated effluent (primarily focussing on hydraulic acceptance, retention and minimising runoff). • Proposed remediation of soils (if required). • Proposed planting or maintenance of vegetation with the irrigation area.	Responses to these questions are provided in the attached technical memorandum (dated 19 August 2025) prepared by Patrick O'Riordan (Technical Director, GWE Consulting Engineers).

		subsequent runoff during normal operation. No details have been provided (for the Integrated Māori Development or rural subdivision) within the application which provide any discussion on the following (other than a brief discussion on the removal of unsuitable surface materials): •The impact of the historical activity on the soil profile and its ability to receive treated effluent (primarily focussing on hydraulic acceptance, retention and minimising runoff). •Proposed remediation of soils (if required). •Proposed planting or maintenance of vegetation with the irrigation area.				
Shanelle Robinson	Regional Earthworks and Streamworks	What is required 1. A map showing all existing vs proposed culverts and total culvert lengths to illustrate the progressive encasement (total metres) of each stream reach. No assessment has been provided against E3.4.1(A23) and (A44) given the standards in E3.6.1.14(1)(c) cannot be met where total length of all structures would exceed 30m. *Note: the ecological report states 16 culverts, the streamworks management plan states 11 culverts*. 2. Please provide evidence that in all locations in which culverts are proposed (either replacement or new) that bridges are not able to be constructed instead. It is noted per general policies in E3.3 that avoidance should be first considered for streamworks activities and bridges mostly avoid the need for in-stream modification and provide for better fish passage outcomes. 3. The fish passage level of effect is stated to be low, however, the culvert replacements are required to be at a steeper gradient than those currently in place – creating additional fish passage barriers. Given the moderate ecological values of streams, and the expected moderate magnitude of effect, it is considered the overall level of effect for fish passage would also be moderate. Please explain how the 'very low' to 'low' level was assumed. 4. Please provide the overall level of effect for stream bed modification from the culverts and all lengths of aprons and rip rap. 5. Given the culvert engineering plans state that the proposed wingwall and apron sizes as connected to the culverts will be confirmed at the detailed design stage. Without detailed designs, please confirm how fish passage will be achieved if there is a 'drop' between the apron and rip rap. Any change in water level will result in the consideration of a weir under the NESF and require assessment against the Conditions in Regulation 72(2). 6. Each culvert has not been assessed against the permitted activity conditions in Regulation 70(2) of the NESF. It is acknowledged that the gradients are steeper in the replacement culverts, however, it is unclear whether the sizing is appropriate per Regulation 70(2)(d) the culvert's width where it intersects with the bed of the river or connected area (**s**) and the width of the bed at that location (**w**), both measured in metres, must compare as follows: where w ≤ 3, s ≥ 1.3 × w:	Yes	No	Await response to S67 information request.	1. Applicant Ecologist Response: All existing culverts will be removed or replaced during the implementation of the culvert. All culverts to be installed are less than 30 m in length, with only one culvert placed within each individual stream reach (i.e. streams which contain culverts will have a maximum length of 29 m) (refer attached figure). Therefore, progressive encasement has been avoided.  1. Maven Response: The culvert plans provided at lodgement indicate that all culverts are less than 30m in length. Some additional details have been provided to Culvert 1-1 (CSL) and Culvert 6 (CSL) where these adjoin existing mapped wetland areas. Additional detail to the culvert drawings can be provided at formal RFI stage, and we note the final design will be subject to Building Consent approval from AC. Whilst there are more than 11 culverts, only 11 culverts are located within the stream, and thus included in the streamworks management plan, which does not apply to OLFPs only.

		where w > 3, s ≥ (1.2 × w) + 0.6 Stream bed width at each location along with the culvert sizing and dimensions should be provided to demonstrate compliance with the above. 7. The culvert engineering plans also do not demonstrate at least 25% embedment for each culvert. Please provide clear cross sections to show embedment percentage. 8. One bridge shown in the engineering plans which is not discussed in the AEE or ecological assessment. The bridge design and rip rap beneath the bridge (within the stream bed) does not appear to meet the permitted activity rules for new bridges in E3.4.1(A29) and standards in E3.6.1.16. Please provide an assessment against the standards and detailed design drawings. In other cross-section plans, a culvert is shown beneath the bridge structure – please advise why both a culvert and bridge are required. 9. The total earthworks areas are unclear/inconsistent across the reports. The AEE states 100 ha total, the engineering report states 110 ha. Please confirm. 10. The Countryside Subdivision earthworks are adequately staged to ensure that the open area can be suitably managed and controlled (in conjunction with an Adaptive Management Plan). However, it is considered that the total area for the Retirement Village (40.26ha) has not similarly been proposed in Stages and should be revised to limit the open area. Please confirm staging for the Retirement Village and the maximum open area proposed at any given time and update the earthworks plans to reflect the staging. 11. It is not understood where the forestry road extension works fall into the overall staging and should and if the works are captured in the overall earthwork's areas, volumes and extent. 12. Earthworks Plan Drawing No. C210-1 appears to show the Forestry Road extension into the Natural inland wetland (circled in yellow below). Please confirm that wetland reclamation will be avoided per ecological assessments provided and update the earthworks plan to show the setbacks/closest point of works from the natural inland wetlands.  13. Please advise whether wetland fencing (at the closest set-back) can be installed for all wetland areas (across both Lot 1 and 2) that fall within 20m of the proposed earthworks. This will ensure that earthworks and machinery do not accidentally encroach on wetland areas. Wetlands should be labelled on the earthworks plans to clearly distinguish which wetland areas require fencing in each stage. 14. What is the approach to 'accidental discovery' or additional areas of wetland located once works commence (given the site assessments were undertaken over January and February 2025				2. Maven response: All culverts (aside from Culvert 1-1 and Culvert 6 comply with the fish passage provisions of the AUP and NES, therefore the additional cost for bridge structures is not justified. The areas which have significant flooding and/or engineering constraints have bridges proposed. In other instances, we need to retain the culverts to provide our flood mitigation solution, which a bridge cannot provide. Culverts are suitable elsewhere, especially where there are existing culverts already in the stream, and asking for bridges would essentially say that we cannot undertake a permitted activity, which would become cost prohibitive throughout the development. AT would likely not accept culverts being replaced my bridges along Forestry Road, as this adds cost/maintenance to their asset (road to vest). 3.Applicant Ecologist Response: Steeper gradients of culverts may be placed to avoid changes in stream bed level upstream and downstream of the culvert, avoid progressive encasement of streams by minimising culvert length to be less than 30 m, and avoid increased fall heights on the inlet and outlet of the culvert. Whilst the gradient will be increased, low flow channels throughout the culvert will be constructed to replicate instream conditions. This would include fixing of rocks to act as baffles and fish ladders to create low-velocity areas and resting pools to ensure passage is provided for. 4. Applicant Ecologist Response: Level of effect for the culvert placement and rip-rap is considered to be overall Low – majority of culverts will be replaced, which would increase connectivity throughout the reach, and overall result in no significant shift in existing stream bed conditions. Rip-rap provides erosion and scour controls, which is currently absent whilst providing interstitial space for macroinvertebrates. Culvert installation avoids significant disturbance to the stream bed, such as raising stream bed level. 5. Maven response: Some additional detail within culvert drawings for Culvert 1-1 and Culvert 6 has been provided. These culverts adjoin the mapped wetland areas, and the invert level and location of the inlet must therefore be maintained otherwise we can/could drain the wetland. In some of these instances, the downstream stream level is lower (as the culverts are perched). The only solution is to have a steepened culvert and/or modify the height of the stream bed. As the later creates effect, we have tried to provide a sensible solution. This means that fish passage will not be possible

		– outside of the recommended wet season for watercourse and wetland classifications). 15. The streamworks methodology plan 'proposed typical streamworks methodology' drawing No.C245 states that the upstream dam will include steel road plates driven into stream bed. This is not supported, and damming should occur by way of sandbags or coffer dams (not steel). Please advise and amend to an ecologically sensitive/working within a watercourse design. 16. Please explain why a draft Adaptive Management Plan has not been prepared as part of the application documents. The AMP is referenced in the proposed conditions; however, an AMP has not been submitted. As detailed in the AMP Guidance document, particularly section 3, the baseline monitoring is very much site specific and should be tailored to the proposed activity. The purpose of this section of the AMP is to provide a description of the receiving environment, and to provide the methodology (e.g. location and type) of pre-construction baseline monitoring and during-works monitoring, applicable to the proposed earthwork activities. Please refer to section 7.2 of the AMP guidance document for the large sites (>15 ha) and ensure any draft AMP is consistent with the guidance. 17. New stormwater infrastructure is proposed to the streams and wetlands. Please provide detailed design of the proposed outfalls and rip rap in relation to the stream/wetland environments including setbacks, and angle of discharge. Typical designs have been provided; however, it appears some discharge points (from roadside swales etc) will be directly to the streams rather than to land first. As such, an assessment against E3.4.1(A39) and standards in E3.6.1.14 will be required. What is required 18. Replanting proposal on the road berm of Forestry Road has not been confirmed. 19. Overall level of effect about trees to be cleared from the 20m set back (riparian margin) of the streams and wetlands within the site have not been assessed by arborist to determine if the overall tree impacts on the riparian margin have been avoided and warrant specific mitigation or offsetting. 20. Alternatives to encroachment within the riparian margin of streams and wetlands within the site that will result in modification and implications on the riparian margin to be explored. 21. Understanding the baseline condition of the riparian margin after removal of exotic plantation in Oct 2025 to be assessed, to identify the potential impacts from the development on the retained trees within the riparian margin and facilitate specific mitigations. 22. With detail breakdown on the vegetation clearance (trees) in the riparian margin of streams and wetlands to facilitate our understanding on the relationship in between tree impacts and mitigation replanting being proposed. Requirement to understand overall proposed earthworks areas and consistency for assessment and reporting.				as culvert cannot be placed flat in the stream bed otherwise we would drain/effect the wetland. For the remaining culverts which do not have the same issue (i.e. wetlands upstream), we can ensure that the culvert is suitably placed in the stream; and that the 25% embedment rule is provided. 6. Maven response: The culverts have been sized where possible (unless we need to restrict 1% flows) to provide for the required NES (100-yr flows). This has created very large culverts which easily exceed the existing culverts within the stream reaches. Given the positive effects created, we are not of the view that all streams needed to be surveyed. If a formal assessment is deemed necessary. A survey can be done, and the culverts can be sized against Regulation 70(2) of the NES FW, and this can form part of our formal RFI response. 7. Maven has included standard detail showing that culvert will need to be 25% imbedded in the stream level, this will be possible for all culverts which do not adjoin upstream wetlands (Culvert 1-1 and Culvert 6). We don't believe that full detailed design plans are needed, as we remain confident that the culverts can be constructed to ensure compliance, and would welcome a condition to that effect. 8. Maven response: We believe that we comply with E3.6.1.14 for the construction of the bridge. The bridge is designed to allow 100-yr flows to pass beneath, the rip rap / armouring of the embankment is not located within the stream itself but will be on the side of the stream (which is not currently riparian) as this is where the existing culvert sits. The extent of riprap within the stream can be directed via ecologist and would be detailed in the final streamworks management plan prior to construction. If riprap is needed in the stream itself; we can confirm that it would be less than the permitted 40m of Standard E3.6.1.14. Finally, assessment against E3.6.1.16 is provided below E3.6.1.16. New structures and the associated bed disturbance or depositing any substance,

		23. Staging and maximum open area per the matters of discretion in Chapter E11 to assess whether the extent of land disturbance can be minimised by staging to ensure adverse effects are avoided. 24. Unclear total area/volumes and staging information in relation to the Forestry Road extension earthworks. 25. The AEE and ecological report state that earthworks are to occur within 100m of natural inland wetlands, but the exact setbacks have not been provided. Any proposed reclamation of wetlands will require assessment against the NESF pathways (potentially a prohibited activity) and otherwise require specific offsetting. 26. To ensure that accidental encroachment and wetland reclamation does not occur and for compliance monitoring purposes, wetlands are clearly numbered/labelled for reference. 27. As above, any additional areas of wetland discovered upon the commencement of works (given in some places, watercourses were not accessed during the ecological impact assessment) – providing protection for new areas and ensuring avoidance of wetland works. 28. Streamworks methodology not supported as it would have adverse effects on the stream bed and likely create additional sediment discharges. Driving steel plates into stream bed to assist with damming during streamworks is not supported as it will adversely affect the stream bed environment. 29. Adaptive Management required to maintain consistency with GD05 where it is a back up to identify where effects exceed the level anticipated by the consent. Council provides exemplar AMP which can be used as a template. A draft should be provided and pre-construction baseline monitoring undertaken prior to the earthworks commencing. 30. Stormwater outfalls must comply with the standards in E3.6.1.14 (particularly for angle of discharge, location of any erosion and scour works (i.e. rip rap) protruding into stream bed to demonstrate that there will be no more than minor erosion at the point of discharge and/or any stream bed modification from the erosion and scour works is appropriately assessed.				diversion of water and incidental temporary damming of water for bridges or pipe bridges (*1) The activity must comply with the standards in E3.6.1.14 above.* *Maven is of the view that we comply, refer above summary.* *(2) Piles must not be located in, on or under the bed of the lake, river, stream or wetland.* The piles are not located in the stream, as the piles are going to be outside of the current culvert which extends under the road. The bridge is also much wider then then existing culvert. 9. The AEE states 100.6ha (section 6.7). This is consistent with the Maven Infrastructure report (Appendix J, Section 2). 10. Maven response: The RV requires bulk cut to fill and thus makes it more difficult to limit the exposed area. The MSE wall needs to be constructed in lifts, and this requires larger areas of the site to be earthworked at anyone time. Therefore, sediment control for the full RV catchment should be in place throughout, However, total exposed area would be limited within reason as part of the contractors methodology during construction, and final EScP as per final condition of consent / pre start. 11. Maven response: These are included in the RV earthworks, and contained within the total RV volumes. This will be done as part of the RV, as required for access, but not for CSL, as no connections to Forestry Road. 12. Raingardens will be removed. We can confirm that no earthworks within the wetland, however, consent is sought for earthworks within 10m for road upgrade. The raingardens will be removed and the proposed boundary can be straight lined. The dark line is a property boundary and is not earthworks; the lodged documents did not include any earthworks within the stream. Applicant Ecologist Response to item 12:

						Table 13 of the EcIA clearly states the closest distance of earthworks to the wetland boundary. No wetland reclamation proposed per EcIA. Black line refers to legal boundary not extent of works. 13. Maven: Fine, happy for this to be conditioned as part of the final EScP to be issued at prestart. 14. A comprehensive wetland assessment has been undertaken for the site and is included in the Environmental Impact Assessment (EIA). The assessment was completed by suitably qualified specialists and confirms the extent of wetlands and watercourses within the project area. Given the thoroughness of this assessment, and the absence of indicators suggesting other wetland areas are present, there is no reasonable likelihood of "accidental discovery" of additional wetlands once works commence 15. Maven response: We can update, please note, the streamworks management methodology will be subject to final approval from AC as per standard condition, and methodology included wihtin was an example of an option for coffer dam, not the only option. We are happy to exclude this option, however, the steel plates would not be driven into the steam bed, they would be driven into the adjoining area, and is an appropriate solution of which we have used on various culvert installations overseen and approved by AC. Final methodology subject to contractor and AC approval within streamworks management plan which will need to be endorsed before any streamworks can occur. 16. Maven response Our EMP essentially is an AMP. Given the overall approach in the EMP, we don't believe this is needed. We also note that whilst the CSL covers a large area, the total exposed earthworks area will be less than 15ha, as the site will be earthworked in stages. As such, an adaptive plan is not needed; and a revised/final EMP would be sufficient prior to the commencement of earthworks. This would provide specific details for the stages in which earthworks are sought; and can/will be updated prior to the commencement of any earthworks within an additional stage(s).

						17. Maven Response: We note the conversation that was had onsite last week; and some additional detail relative to the request will be provided as part of our formal response. Additional detail for Culvert 1-1 and Culvert 6 (which adjoin wetlands; and was the primary cause of concern during the site visit; have been provided in this interim response). 18. Applicant Planner Response: Refer to arborist comments responses. 19-20: Applicant Ecologist Response: Riparian margins will transition from deforested pine or immature pine plantation to indigenous riparian yards in a forested ecosystem with a minimum of 94% of riparian yards revegetated. This is clearly a better ecological outcome compared to baseline conditions. 21: Applicant Ecologist Response: As stated in the EcIA, post-harvest conditions will be post-harvest conditions. Harvesting undertaken by commercial forestry independent of the Applicant (i.e. applicant will not be harvesting the pine plantation). 22. Applicant Ecologist Response: Table 12 of the EcIA clearly shows the % of vegetation removal compared to riparian yard size. Table 15 of the EcIA then clearly shows the % of riparian yard infringement in comparison to riparian yard area. 25: Applicant Ecologist Response : Table 13 of the EcIA clearly states the closest distance of earthworks to the wetland boundary. 26:Applicant Ecologist Response: Figures in the EcIA clearly show wetland names and numbers. 27:Applicant Ecologist Response: Whilst field surveys were undertaken in the warmer months, classifications were undertaken in a highly conservative manner, where if there was the potential for natural inland wetlands, these were assessed. It is assumed the topography and current state of the site (covered in extensive slash) would restrict wetland growth to areas that have been identified. Accidental discovery of wetlands during earthworks – contact project ecologist to determine whether wetland is a natural inland wetland. Options on how to avoid the wetland to be discussed

Regine Leung	Arborist	<u>Information Gaps</u> 1. It is noted that the arboricultural assessment by The Tree Consultancy Company dated on 1st May 2025 provides assessment about tree impacts from the upgrade of Forestry Road. There is no specific replanting proposal to mitigate the loss of protected trees being removed from upgrade of Forestry Road and need to be supplemented to support this application to demonstrate that the loss of protected trees on road berm can be adequately mitigated. 2. It is noted that there are numerous streams and natural inland wetlands within the project site and the proposed works including earthworks and removal of vegetation on the riparian margin of streams (20m) and natural inland wetlands (20m) that trigger resource consents under E15 of AUP. Please provide detail assessment by qualified arborist according to assessment criteria under E15 to quantify the tree impacts from the loss of riparian margin of streams and wetland. Please demonstrate that alternative scenarios of development have been considered to avoid the encroachment within the 10m/20m riparian margin of streams and wetlands in the first instance. 3. It is noted that the existing plantation forest will be removed in Oct 2025 prior to the development of the site. Please provide detail methodology of tree felling to avoid the impacts from the tree felling on the understory (in particular the trees over 3m high) of the riparian margin of the streams and wetlands. 4. It is noted that the existing plantation forest will be removed in Oct 2025 prior to the development of the site. Please provide detail assessment about the trees being retained on the riparian margin (20m) of the streams and wetlands after removal of plantation, as baseline information. 5. It is noted from the Ecological Assessment Report that there is about 30% of the vegetation (including trees) within the overall riparian margin of the site shall be removed due to the proposed development. Please provide detail breakdown and advise on whether the vegetation (trees) loss is temporary or permanent within the riparian margin and provide detail breakdown on the replanting proposal to demonstrate the loss of vegetation (trees) within the riparian margin of the stream and wetlands can be adequately mitigated. 6. It is noted that riprap outlets and pipes of stormwater will be installed on the riparian margin of streams. Please provide details of the installation to demonstrate the tree impacts from the proposed works can be avoided, reduced and minimised in the first instance.	Yes			1. Applicant Arborist Response: The Council Urban Forest Specialist has requested 225 medium to large growing trees to mitigate the loss of existing trees and vegetation along the length of Forestry Road. A replanting plan can be a condition of consent. It may also be more pragmatic to provide replacement trees within the site rather than solely within the road reserve, as larger growing trees are better incorporated within the site. 2: Applicant Arborist Response: Only the trees within Forestry Road have been surveyed. Please refer to the Ecologist responses and EcIA for the relevant assessment. 3. Applicant Ecologist Response: Not applicable to the Applicant. 4.Applicant Ecologist Response: Answered in previous responses. 5.Applicant Ecologist Response: Table 12 of the EcIA clearly shows the % of vegetation removal compared to riparian yard size (temp) compared to Table 15 of the EcIA then clearly shows the % of riparian yard infringement in comparison to riparian yard area (permanent loss). Minimum of 94% of riparian yards revegetated post development – refer to planting and landscape plan. 6.Applicant Ecologist Response: Revegetation will avoid planting trees in rip rap zone. Pre-revegetation, riparian margins are deforested pine plantation (i.e. realistically no trees present) or small pine and gorse, which will be replaced with indigenous vegetation. 7. Applicant Ecologist Response: Answered in previous responses, WW disposal fields appropriately planted to ensure groundcover in riparian margins.

		7. It is noted that the wastewater will be disposed of via the disposal fields and some of the disposal fields are within the riparian margin of the streams and wetlands. Please provide details of the installation about the wastewater pipes to demonstrate the tree impacts from the proposed works can be avoided, reduced and minimised in the first instance. **<u>Why is this Information Essential?</u>** *Explain why the absence of this information significantly limits your ability to assess the project or its effects.* 1. Replanting proposal on the road berm of Forestry Road has not been confirmed. 2. Overall level of effect about trees to be cleared from the 20m set back (riparian margin) of the streams and wetlands within the site have not been assessed by arborist to determine if the overall tree impacts on the riparian margin have been avoided and warrant specific mitigation or offsetting. 3. Alternatives to encroachment within the riparian margin of streams and wetlands within the site that will result in modification and implications on the riparian margin to be explored. 4. Understanding the baseline condition of the riparian margin after removal of exotic plantation in Oct 2025 to be assessed, to identify the potential impacts from the development on the retained trees within the riparian margin and facilitate specific mitigations. 5. With detail breakdown on the vegetation clearance (trees) in the riparian margin of streams and wetlands to facilitate our understanding on the relationship in between tree impacts and mitigation replanting being proposed.				
Hester H	Groundwater – Diversion	None	No	Yes – suggested amends to offered conditions	***Specific conditions – Groundwater Take and Diversion WAT60449801*** Words in the ground dewatering (take) and groundwater diversion consent conditions have specific meanings as outlined in the table below. Bulk Excavation — Includes all excavation that affects and piling less than 1.5 m in diamete Commencement of Dewatering — Means commencement of Bulk Exca taking or diversion of groundwater, o purposes.	Thank you for the suggested conditions. We will incorporate these within the draft condition set.

					Commencement of Construction Phase Excavation	Means commencement of Bulk Excavation and/or the commencement of the taking of any groundwater from the tunnel, trench or shaft excavation and/or any dewatering prior to excavation.	
					Completion of Dewatering	Means in the case of a drained site, the stage when all earthworks has been completed and site infrastructure (roads, stormwater and other services) is able to be installed or in the process of being installed and the permanent drainage system(s) are in place and no further groundwater is being taken for site development.	
					Commencement of Excavation	Means the stage when all Bulk Excavation has been completed and all foundation/footing excavations within 10 meters of the perimeter retaining wall have been completed.	
					Completion of Excavation	Means the stage when all Bulk Excavation has been completed and all foundation/footing excavations within 10 meters of the perimeter retaining wall have been completed.	
					Damage	Includes Aesthetic, Serviceability, Stability, but does not include Negligible Damage. Damage as described in the table below.	
					RL	Reduced Level.	
					Services	Include fibre optic cables, sanitary drainage, stormwater drainage, gas and water mains, power and telephone installations and infrastructure, road infrastructure assets such as footpaths, kerbs, catch-pits, pavements and street furniture.	
					SQEP	Suitably Qualified Engineering Professional	
					Standard Conditions **Activity in accordance with plans** **Condition 1:** The take (dewatering) of groundwater associated with the construction of the proposed development must be carried out in accordance with the plans and all information submitted with the application detailed below, and all referenced by council as consent number WAT60449801, including the documents listed in **Schedule 2.** **Duration of Consent** **Condition 2:** The take (dewatering) and groundwater diversion consent WAT60449801 must expire on 31 July 2060 or on	

					completion of dewatering, whichever comes first, unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA. **Provide for a review under section 128** **Condition 3:** Under section 128 of the RMA, the conditions of this consent WAT60437910 may be reviewed by the Manager Resource Consents at the Consent Holder's cost: Within six (6) months after Completion of Construction Phase Dewatering and subsequently at intervals of not less than five (5) years thereafter in order: • To deal with any adverse effects on the environment which may arise or potentially arise from the exercise of this consent and which it is appropriate to deal with at a later stage. • To vary the monitoring and reporting requirements, and performance standards, in order to take account of information, including the results of previous monitoring and changed environmental knowledge on: 1) ground conditions 2) aquifer parameters 3) groundwater levels 4) ground surface movement. **Ground Dewatering (Take) Conditions** **Notice of Commencement of Construction Phase Dewatering** **Condition 1:** The council must be advised in writing at least ten (10) working days prior to the date of the Commencement of Bulk Excavation. **Excavation Limit** **Condition 2:** The design and construction of the proposed Bulk Excavation must be undertaken in accordance with the	

					specifications contained in the relevant geotechnical reports and earthwork drawings within **Schedule 2** **<u>Performance Standards</u>** **Damage Avoidance** **Condition 3:** All excavation, dewatering systems, retaining structures, basements and works associated with the diversion or taking of groundwater, must be designed, constructed and maintained so as to avoid Damage to buildings, structures and Services on the site or adjacent properties, outside that considered as part of the application process unless otherwise agreed in writing with the asset owner. **Contingency Actions** **Condition 4:** If the Consent Holder becomes aware of any Damage to buildings, structures or Services potentially caused wholly, or in part, by the exercise of this consent, the Consent Holder must: a) Notify council and the asset owner within two (2) working days of the Consent Holder becoming aware of the Damage. b) Provide a report prepared by a SQEP (engaged by the Consent Holder at their cost) that describes the Damage; identifies the cause of the Damage; identifies methods to remedy and/or mitigate the Damage that has been caused; identifies the potential for further Damage to occur and describes actions that will be taken to avoid further Damage. c) Provide a copy of the report prepared under (b) above, to council and the asset owner within ten (10) working days of notification under (a) above. **Advice Note:** *It is anticipated that the Consent Holder will seek permission of the damaged asset owner to access the property and asset, to*	

					enable the inspection/investigation. It is understood that if access is denied the report will be of limited extent. **Notice of Completion** **Condition 5:** Council must be advised in writing within 10 working days of when excavation and dewatering has been completed. **Advice Note:** *The Consent Holder is advised that the discharge of pumped groundwater to a stormwater system or waterbody will need to comply with any other regulations, bylaws or discharge rules that may apply.*	
Nicola Jones	Water Take and Bore	**<u>Description of Missing Information</u>** *Clearly describe the specific information or assessment that is missing from the application.* 1. Bore Location(s) The position of the proposed bore has not been provided. Please provide: (a) Proposed production bore location in NZTM format to within 20m. (b) Proposed secondary bore location (if required, as noted in "Groundwater Abstraction: Desktop Study" prepared by ENGEO) in NZTM format to within 20m. 2. Groundwater Take The applicant has provided a preliminary assessment of potential effects associated with the proposed water take. However, given the large size of the subject site, the effects assessment is not sufficiently specific. Therefore, at confirmation of the bore location(s), an updated assessment of the effects of the proposed groundwater take on the surrounding environment covering the policies and rules under AUP(OP) E2 and E7 should be completed, including assessment and comment on: - potential recharge effects to other aquifers - potential aquifer consolidation and surface subsidence - potential effects on surface water				An application for a water bore and groundwater abstraction was granted to the applicant on 6 August 2025. The consent (LUC60449108) allows for the abstraction of up to 200m^3 of groundwater per day within an overall annual quantity of 29,000m^3.

		- potential for saline intrusion or other contamination - potential adverse effects on terrestrial and freshwater ecosystems - potential adverse effects on neighbouring bores / other groundwater users - potential capabilities of the proposed bore(s) extracting the quantity of groundwater applied for. 3. Firefighting – Confirmation of provisions of fire fighting from rainwater or groundwater supply. If provided by groundwater, is there sufficient contingency in place for an event is the proposed tanks do not provide enough coverage and the proposed bore is incapable of providing the required yield. **<u>Why is this Information Essential?</u>** *Explain why the absence of this information significantly limits your ability to assess the project or its effects.* 1. Bore location(s) – in order to undertake an assessment of effects on the environment and relevant neighbouring water users, the proposed location of the bore/ abstraction point must be known. 2. Groundwater take – With confirmation of the abstraction point, the provided assessment may need to be updated and adjusted to address all relevant policies and rules which are fundamental in assessing the associated effects on the environment and neighbouring groundwater users, as current assessment is insufficiently specific. 3. Firefighting - Without a mains reticulated supply, security of supply for firefighting is fundamental in the event of a catastrophic fire. Uncertainty of bore yield may limit provisions of firefighting in an emergency. Note: The application has not provided proposed conditions of consent for the proposed drilling of the bore or the associated water take. The applicant may want to provide such conditions.				
Don Tate & Oscar Barrett-Garnier	Dam	1. Assessment against E7 Dam Provisions As identified in the tracker of 's67' matters a number of questions have been raised regarding culverts (and potential Dam classification in two instances) across the sites in respect to matters including ecological effects, fish passage, effects on stream network, resilience and flood risk, maintenance, ownership and asset vesting. In our correspondence we identified that two of these culverts in their stated function and design required assessment for potential dam classification. Council after review including specialists consider that these structures require consent with the following explanation: While the applicant states that "there are no dams within the site, all existing and/or proposed attenuation areas do not	No	No		Whilst it is acknowledged that we have two dam structures designed and being consented, neither of these structures meets the definition of a dam under the Building (Dam Safety) Regulations (2022). The spillway of both attenuation culverts has been specifically designed to ensure that the catchment cannot support/detain more than 20,000m3 of water which would otherwise create the classification of the dam. We have reviewed the provisions of E7 for dams. As the culverts provide flow of water, we are not creating permanent dams. The damming of water would only occur during larger storm events,

		exceed 4m in maximum height and 20,000m^3 of volume". It appears that the application includes construction of two dams (attenuation structures associated with Culverts 1-1 and 7), as defined within the AUP(OP). Furthermore, it appears that these dams both would be classifiable in the context of the Building (Dam Safety) Regulations (2022). We consider that the proposed structures meet the definition of dams in the context of the AUP (OP) as they have been designed to temporarily impound (attenuate/throttle) surface water (i.e. a flood control function). While there is a culvert and headwall that is associated with the structures, we consider that they do not qualify for the culvert or headwall exclusion, as a culvert is not designed to hold back water. We note that the dams also appear to exceed 4m in maximum height (when measured from the lowest level of natural ground, to the highest point on the crest) and 20,000m^3 of volume (when measured to the highest point on the dam crest). We therefore request that the applicant provides a detailed assessment against the relevant permitted activity criteria of Chapter E7, including an appropriate assessment of effects should any consents be determined to be required. We recommend that this should include: a. Potential Impact Classification (PIC) Assessment referencing the New Zealand Society on Large Dams (NZSOLD), New Zealand Dam Safety Guidelines (NZ Dam Safety Guidelines, 2024), for each dam. We note that hydraulic modelling of downstream effects appears likely to be required (as opposed to a more simplified qualitative assessment). b. Dam Safety Assessment, with reference to the NZSOLD New Zealand Dam Safety Guidelines(2024) and the PIC: • Geotechnical aspects - dam site specific investigations, including recommended future investigations for detailed design (if relevant). Note: it appears the existing investigation may already have included a single machine borehole near to the dam associated with culvert 1-1. • Hydraulic aspects – with a focus on spillway safety • Dam safety management aspects - dam specific construction recommendations, and long term dam safety management c. Further ecological assessment in relation to the dam structures including overall level of effect due to stream bed modification and fish passage. Please confirm whether additional reason(s) for consent are required under the NESF and Chapter E3 of the AUP(OP) including standards in E3.6.1.1, and E3.6.1.14 to E3.6.1.23.				which is consistent with all the existing culverts located within the site, which are not sized to cater for the larger rainfall events. On this basis, we would question if consent is needed under E7; and if so, assessment would be more aligned with E76.1.11(7) noting that the purpose of that standard is consistent in what is being achieved. We also note that Maven has prepared a flood model for the catchment; and has run various scenarios to ensure no downstream effect. The box culverts which act as the primary spillway are 1.5m (smallest dimension) to ensure these don't get blocked. In the very unlikely event that the low flow and box culverts become blocked, the spillway would be activated which would allow for the passing of the flows during the peak of a storm event

		d. Clarification on the ownership of the structures and long-term maintenance obligations and responsibilities, including ideally a Draft Maintenance Plan. The overall aim is to confirm the feasibility of the proposed dams, in terms of management of effects.				
Mica Plowman	Archaeology	None	No	Yes	**1. Documents reviewed:** *Rangitoopuni Application under the Fast Track Approvals Act. Assessment of Environmental Effects and Statutory Analysis*. Prepared for: Rangitoopuni Developments Limited Partnership (Te Kawerau ā Maki and Avant Property Development Limited) by Campbell Brown Planning and Resource Management Specialists Limited, 5th May 2025. *List of Appendices* *Appendix A, Proposed Conditions* *Appendix B, Cultural Impact Assessment* *Appendix G, Archaeological Report* *Appendix H, Geotechnical Reports* *Appendix I, Preliminary Site Investigation* *Appendix L, Proposed Auckland Unitary Plan Documents* *Appendix N, Scheme Plans* *Appendix V, Earthworks Management Plan* **2. Reasons for Consent** 2.1 The proposed works, as described in the FTAA application and supporting document, do not affect scheduled archaeological sites in Schedule 14.1 (Schedule of Historic Heritage) in the Auckland Unitary Plan operative in part (13 June 2025) [AUP OIP]. No consents are required under Chapter D.17 Historic Heritage [AUP OIP]. **3. Subject Matter** 3.1 The proposal is for a listed project under Schedule 2 of the Fast-Track Approvals Act 2024 ('FTAA') by Te Kawerau ā Maki in partnership with Avant Property Development Limited ('Avant') under Rangitoopuni Developments Limited Partnership ('RDLP'). 3.2 Rangitoopuni proposes to develop two properties (Lot 1 DP 590677 and Lot 2 DP 590677) at Old North Road and Forestry Road, Riverhead ('the	No response required.

					site') for a proposed countryside living subdivision and retirement village referred to collectively as 'Rangitoopuni'. The site is Treaty Settlement Land that was returned to Te Kawerau ā Maki as part of their settlement with the Crown, through the Te Kawerau ā Maki Claims Settlement Act 2015. 3.3 Rangitoopuni represents a unique opportunity to develop Treaty Settlement Land and provide a master-planned community for Riverhead that will enable the provision of approximately 500 homes through the proposed countryside living subdivision (Lot 1 DP 590677) and a retirement village (Lot 2 DP 590677), in addition to a range of infrastructure, open space and public facilities.[1] • The proposed subdivision will be made up of 208 lots with community facilities including a community building, residents carpark, bush trail and outdoor recreation areas, such as a basketball and tennis court. • The retirement village is also proposed for a portion of Lot 2 DP 590677. This retirement village will be made up of 296 units (260 villas and 36 care units), as well as a café, wellness centre, and amenity building. 3.4 The location and components of the Rangitoopuni development are illustrated in Figure 1. 3.5 In accordance with clause 2(1)(h)-(i) of Schedule 8 of the Act, the applicant has provided an assessment by a Subject Matter Expert as Appendix G[2] in the application documents. 3.6 The methodology used for this SME assessment (ibid) is a desk top evaluation. No field survey was undertaken to test and verify research data through visual survey or subsurface testing. The research undertaken follows normal professional practice, that is, data collection and analysis from acknowledged professional sources (e.g. relevant	

[1] *Rangitoopuni Application under the Fast Track Approvals Act. Assessment of Environmental Effects and Statutory Analysis.* Prepared for: Rangitoopuni Developments Limited Partnership (Te Kawerau ā Maki and Avant Property Development Limited) by Campbell Brown Planning and Resource Management Specialists Limited, 5th May 2025.

[2] *Rangitoopuni: Archaeological Assessment.* Report to Te Kawerau ā Maki and Avant. Prepared by CFG Heritage Limited (Leela Moses), March 2025.

reports, archives) as well as the New Zealand Archaeological Association site record files (ArchSite) and Auckland Council public data sets (GeoMaps and Cultural Heritage Inventory/Tūtangi Ora). The assessment notes the limitations of a desk top study and states that *"this study is not intended as a full archaeological assessment... where there is a likelihood of archaeological evidence being disturbed further archaeological assessment may be required."*[3]

3.7 This memo provides an analysis of risk to the potential archaeological and historic heritage sites for the Rangitoopuni development areas.

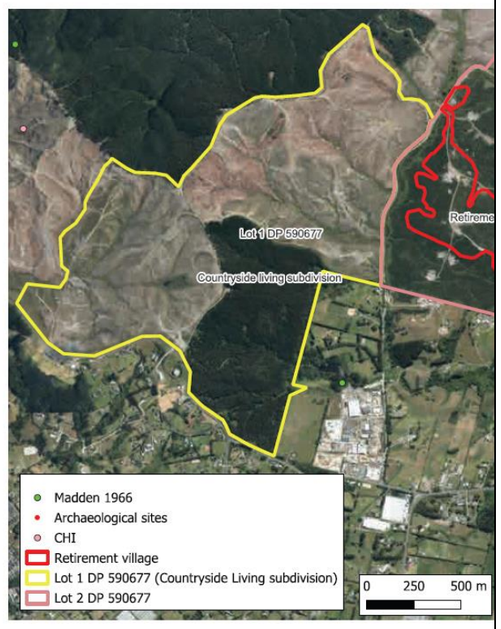


Figure 1. Overview of Rangitoopuni proposed development areas. Source: CFG Heritage, March 2025.

4. **Summary of key issues**

4.1 There are no recorded historic heritage or archaeological sites within the proposed Rangitoopuni proposed development areas.

4.2 There are a number of recorded historic heritage sites and archaeological sites located within 1 km of the proposed works. These are all related to 19th

[3] *Rangitoopuni: Archaeological Assessment.* Report to Te Kawerau ā Maki and Avant. Prepared by CFG Heritage Limited (Leela Moses), March 2025.

					and early 20th century European settlement and industry activities including a 19th century timber mill (R10/1376) and the Riverhead Mill (R10/721), which are both located on waterways around the southeast corner of Lot 2 of the proposed works.[4] 4.3 Within the Riverhead Forest itself are a number of recorded 19th and early 20th century gum digging sites; including a recorded camp (Pukeatua Depot (R10/695)) and gum digging holes (CHI items 17228 and 17234). An additional two sites, including a bridge (Fridays Bridge) and a timber mill (Carters Mill) are illustrated by Madden (1966). None of these sites are located within the proposed project area. 4.4 There are no pre-European Māori sites recorded within 1 km of the proposed works. 4.5 Although no field survey has been carried out as part of the archaeological assessment a review of 20th century aerial photography demonstrates that the development area has been through at least three forestry rotations with no apparent evidence of archaeological sites. There are also no indication of archaeological sites visible in hill shade models derived from LiDAR. 4.6 The CFG Heritage assessment concludes that there is no reasonable cause to suspect that archaeological sites will be negatively impacted by the proposed works. 4.7 To mitigate the risk of subsurface archaeological discovery within the project area CFG Heritage advise that works are undertaken under the Accidental Discovery Rule in Chapter E11.6.1 of the Auckland Unitary Plan.[5] 4.8 The AEE confirms that Accidental Discovery Protocols will be followed should unrecorded archaeological remains be encountered during development earthworks.[6] **5. Overall comment** 5.1 The archaeological assessment makes two	

[4] *Rangitoopuni: Archaeological Assessment.* Report to Te Kawerau ā Maki and Avant. Prepared by CFG Heritage Limited (Leela Moses), March 2025.
[5] *Rangitoopuni: Archaeological Assessment.* Report to Te Kawerau ā Maki and Avant. Prepared by CFG Heritage Limited (Leela Moses), March 2025.

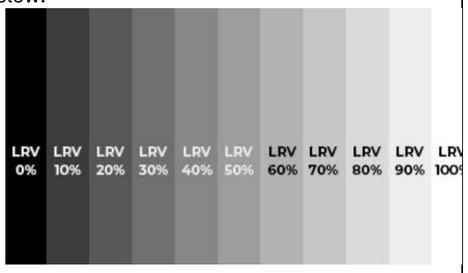
[6] *Rangitoopuni Application under the Fast Track Approvals Act. Assessment of Environmental Effects and Statutory Analysis.* Prepared for: Rangitoopuni Developments Limited Partnership (Te Kawerau ā Maki and Avant Property Development Limited) by Campbell Brown Planning and Resource Management Specialists Limited, 5th May 2025.

					recommendations[7]; as follows: • That works are undertaken under the Accidental Discovery Rule in Chapter E11.6.1 of the Auckland Unitary Plan; • Since archaeological survey cannot always detect sites of traditional significance to Māori, or wāhi tapu, the appropriate tangata whenua authorities should be consulted regarding the possible existence of such sites, and the recommendations in this report. 5.2 I agree with and support the CFG Heritage assessment of the potential risk to previously unidentified archaeological/historic heritage features within the development area. I also agree that it is appropriate for the development earthworks to proceed under the provision of the AUP Accidental Rule in Chapter E11.6.1 of the Auckland Unitary Plan. **6. Comment on proposed conditions** 6.1 The application nominates the following condition (AEE Appendix A) to mitigate effects on historic heritage as follows: **Earthworks** **Accidental discovery protocol** **Condition (51)** If, at any time during any earthworks authorised by these consents, any archaeological features (including human remains, archaeology and artefacts) are uncovered on the subject site, works must cease and the Council and Heritage New Zealand Pouhere Taonga (09 307 9920) must be notified immediately, and the following accidental protocol must be followed: a) All earthworks must cease in the immediate vicinity (at least 10m from the site of discovery) while a suitably qualified archaeologist is consulted on the type of remains; b) If the material is identified by the archaeologist as human, archaeology or	

[7] *Rangitoopuni: Archaeological Assessment.* Report to Te Kawerau ā Maki and Avant. Prepared by CFG Heritage Limited (Leela Moses), March 2025.

					artefact, earthworks must not be resumed in the affected area (as defined by the archaeologist). The consent holder must immediately advise the Council, Heritage New Zealand Pouhere Taonga and NZ Police (if human remains are found) and arrange a site inspection with these parties immediately after discovery. c) If the discovery contains koiwi, archaeology or artefacts of Māori origin, representatives from Te Kawerau ā Maki are to be provided information on the nature and location of the discovery. d) The consent holder must not recommence works until approved by the Council.[8] 6.2 I also support the inclusion of an Accidental Discovery Protocol in the Rangitoopuni application conditions (Condition 51). 6.3 However, in the Auckland Region, earthworks must comply with the standard specified in the Accidental Discovery Rule (ADR) in the Auckland Unitary Plan (AUP) operative in part (updated June 13 2025) (Chapter E11.6.1 and E12.6.1). 6.4 Although proposed Condition 51 is based on the AUP ADR, it is abbreviated. For consistency with standard consent conditions issued in the Auckland region, it is recommended that the specific wording of the Accidental Discovery Rule provided for in Chapters E11 and E12 in the Auckland Unitary Plan Operative in part (updated 13 June 2025) is retained. 6.5 I recommend that the wording for proposed condition 51. should be replaced with the following –. *If, at any time during site works, sensitive materials (koiwi/human remains, an archaeology site, a Māori cultural artefact, a protected NZ object), contamination or a lava cave greater than 1m in diameter) are discovered, then the protocol set out in standards E11.6.1 and E12.6.1 of the Auckland Unitary Plan (Operative in Part) shall be followed.*	

					7. Recommendations 7.1 I have assessed the effects of the proposed Rangitoopuni application on the historic heritage resource, the magnitude of these effects, and whether adverse effects are avoided, minimised or mitigated. 7.2 There is no National Policy Statement on Historic Heritage to assess this application against. 7.3 In reviewing the application documentation, the condition nominated by the applicant is sufficient to mitigate the potential risk of archaeological/historic heritage discovery and give effect to s6 (f) of the RMA. 7.4 For consistency and brevity, it is recommended that the wording of Condition 51 in the proposed application (AEE Appendix A) relating to Accidental Discovery Protocols is replaced with the wording provided in paragraph 7.5.	
Peter Kensington	Landscape and Visual Impact	1. Visibility of Retirement Village - Opportunity for the applicant to provide further information to address the following preliminary feedback: *Currently unconvinced by the application material that the easternmost retirement villas will not be visible from the existing Riverhead Village settlement. I note that the Boffa Miskell Urban Design and Landscape Effects Assessment (Application Appendix HH), at pages 27 and 33, states categorically that this will be the case, but from my review of the application drawings, it is difficult to be so certain.* 2. Activities outside the Lot 2 boundary – opportunity for the applicant to provide comment in respect to the following matters: *I would like confirmation as to what land use activity will occur on Lot 2 outside the retirement village 'boundary' (i.e. will this land continue as pine forest?). While a copy of the current Forest Harvest Plan has been appended to the Boffa Miskell assessment, there is no explanation of this document and/or confirmation as to what the future forest replanting and harvesting regime will be following construction and occupation of the retirement village.* 3. LRV – provide response to this comment *I suggest that the 40% LRV (Light Reflectance Value) in the proposed Design Guidelines for future buildings in both the rural residential subdivision (Lot 1) and retirement village (Lot 2) should be lesser and potentially different for exterior walls and roofs. The LRV*	Yes	Yes 17.06.25	1. I'm currently unconvinced by the application material that the easternmost retirement villas will not be visible from the existing Riverhead Village settlement. I note that the Boffa Miskell Urban Design and Landscape Effects Assessment (Application Appendix HH), at pages 27 and 33, states categorically that this will be the case, but from my review of the application drawings, it is difficult to be so certain. 2. I would like confirmation as to what land use activity will occur on Lot 2 outside the retirement village 'boundary' (i.e. will this land continue as pine forest?). While a copy of the current Forest Harvest Plan has been appended to the Boffa Miskell assessment, there is no explanation of this document and/or confirmation as to what the future forest replanting and harvesting regime will be following construction and occupation of the retirement village. 3. I suggest that the 40% LRV (Light Reflectance Value) in the proposed Design Guidelines for future buildings in both the rural residential subdivision (Lot 1) and retirement village (Lot 2) should be lesser and potentially different for exterior walls and roofs. The LRV requirement should also not apply for timber materials, which can often have a light appearance, but be appropriate because the material is natural. 4. Is the proposed track between the retirement village (Lot 2) and Riverhead Village part of the current	Boffa Miskell response: 1. We understand that Mr Kensington has now undertaken a site visit which may have clarified his understanding in this respect. We reinforce that design measures including earthworks, building setbacks, and foreground planting have been incorporated to ensure that the top, easternmost villas, which are single storey buildings, will not be seen from the existing Riverhead Village settlement, which is at a substantially lesser elevation. These are described on page 27, paragraph 4, of the UDLVEA as copied below. "A planted ridgeline will be maintained, with the top row of villas set back a minimum of 10m from the face of the ridge." The combination of planting, 10m building set back and single storey buildings will prevent visibility from the village. 2. Activities outside of the Lot 2 boundary are explained in the UDLVEA paragraph 1 page 31 – see relevant paragraph copied below. "In total approximately 32.3ha of the 173.6ha Lot 2 area will be recontoured for the retirement village, the excess cut, as for Lot 1, will be redistributed in the fill area to the north of the

		requirement should also not apply for timber materials, which can often have a light appearance, but be appropriate because the material is natural. 4. Track – provide clarification to this question *Is the proposed track between the retirement village (Lot 2) and Riverhead Village part of the current application? The Boffa Miskell assessment makes reference to this as a positive aspect of the proposal, but the application AEE suggests this would be for a future application.*			application? The Boffa Miskell assessment makes reference to this as a positive aspect of the proposal, but the application AEE suggests this would be for a future application. 5. Suggested condition amends Rangitoopuni Proposed Conditions	Village in Lot 2. Whilst the retirement village site as a whole will be modified to enable the development, the landform will be tied to the established pattern of waterways with the riparian corridors fingering up into the village, revegetated and enhanced. The village will be contained within an extensive curtilage of indigenous vegetation (30.9ha) with the balance area of Lot 2, comprising some 81.78ha, retained under its current regime of production Pine forest. The wider retirement village 'Lot' will incorporate the primary and secondary wastewater disposal fields, which will be revegetated with a cover of indigenous species planting, as well as the fill area accommodating excess cut from Lots 1 and 2 which will be grassed. These two areas, located to the north of the retirement village will have a context of production Pine forest, also within the 89.8ha retirement village 'Lot'." 3. 40% is already a low light reflectance value (LRV) resulting in dark, earthy tones, as illustrated below.  Houses in the rural residential / countryside living environment will be enclosed by vegetation and have very limited off site visibility, darker wall and roof colours than the 40% specified are not considered necessary. Buildings within the retirement village will not be seen from a wider off site context. The 40% LRV is considered appropriate. 4. Yes, the proposed track between the retirement village (Lot 2) and the eastern edge of Lot 2 adjoining Riverhead Village is included as part of the current application. The track will, in the future, connect to the existing walkway at the end of Mill Grove, which crosses the Wautaiti Stream tributary into the Mill Grove cul-de-sac and then links into the Riverhead township. The Mill Grove bridge crossing the Wautaiti Stream was damaged during recent weather events. The applicant has been in contact with the Local Board, who has confirmed that the bridge is scheduled to be replaced within the coming year.

						If, for any reason, the bridge replacement does not proceed, the applicant intends to apply for the necessary consents to ensure its reinstatement.
Rob Mainwaring	Urban Design	**Access** 1. It would be good if the proposals at the head of the vested Forestry Road (Lot 3) can be clarified. a. Residential Lot 1 is gated to vehicles on Old North Road. Please confirm if there is to be a controlled gate at the head of Forestry Road/beginning of Barlow Road? (*otherwise, the other gates can be bypassed*) b. Please confirm the path along the Retirement Lot 2 spine road continues to the vested road. (*landscaping and roading plans differ*) 2. Please provide a plan for the Riverhead end of the eastern path, and confirm if there will be any signage, lighting, or cart parking etc. If the path is outside of this application (as Peter's comment), it will still be helpful to understand the intention. 3. The proposed retirement village is surrounded by pine plantation. Please clarify how this will be accessed (particularly the southern and eastern sections). **Water and Waste Treatment plants (Lot 2)**: 4. The retirement village includes on-site fresh and wastewater plants either side of the entrance road. Schematic layouts are included in the engineering information, and I note that the water treatment plant will be in 2 x 40' containers, and the wastewater plant includes a 4 x 5m control shed. It will be helpful to understand how the treatment plants integrate with the scheme by confirming: ○ What structures are above/below ground ○ If all tanks will be completely buried, or if tops will be visible ○ Any access / hard standing requirements ○ Any security / fencing / screening / planting ○ How tanks are integrated within 1:3 batters ○ Any restrictions on planting Similarly, paired 22,500L firefighting tanks are required across both lots. Locations are indicative at this stage but will need to be coordinated with tree planting.	Yes	Yes	Information sought in s67 response key, subject to that no overall concerns at this point.	Boffa Miskell response: 1(a). All points of vehicular access to Lot 1 countryside living residential will be gated 1(b). This road will private. Forestry Road is the only road proposed to be vested. 2. Lighting will not be provided, nor will there be cart parking areas. Signage will be provided as appropriate 3. These areas will be accessed by the forestry operator independently and not through the retirement village. Access can be taken from the north, and the applicant will work with the operator to establish suitable alternative routes to reach these areas. 4. Only infrastructure above ground is a small pump shed. Lids of the system will be at ground level. The area is to be planted and the shed will be screened by that vegetation.
Jennifer Jack	Waste Solutions	No S67	No	No	The applicant has provided a comprehensive waste management plan for the development. This is generally suitable. I would advise to defer to the traffic engineer for any additional assessment as required for any truck tracking or manoeuvring assessment.	Noted.

Rue Statham	Ecology - Terrestrial	1. The applicant has not confirmed that the exotic forest harvesting is / will be compliant with NES-CF 2017, notably Schedule 4 and Schedule 6 a. Both schedules require consideration of threatened fauna species, including regionally threated species (lizards, birds, and bats). b. Would be useful for completeness to submit both those plans for consideration in the application, including the fauna management plans as required by those Environmental Regulations. c. Application lacks the harvest cycle plan, as referred to in Section 1.3 of the EcIA. 2. The application is based on subjective analysis. a. No formal fauna surveys were undertaken (see EcIA section 3.3) b. The EcIA can place little weight on effects assessment on fauna; noting that fauna assessments and management is required for NES-CF c. I suggest that formal fauna surveys are carried out to inform the development, notably on birds and bats. 3. Request management plans suggested to be submitted as part of the application, these include a. Detailed planting and maintenance plans (not concepts), noting that the conditions of consent require planting and implantation plans to be updated and certified. b. Weed eradication and pest animal control c. Draft fauna management plans are provided, prior, during and post development (notably birds, bats, and lizards), but are not specific to each staging area. Conditions of consent have been provided to update these management plans. 4. Lot 2 has the potential to create higher ecological outcomes than Lot 1 CSL a. Applicant has not addressed the specific pre-app feedback concerning increasing the clustering of house sites to reduce edge effects and habitat fragmentation created by the spread-out form. Please provide response. *Planner Note – Ecological input provided from that perspective. Overall planning comments to follow but a response to the decisions and reasoning that informed the approach and*			9. The lodgement feedback does not differ significantly from the feedback provided pre-lodgement, for application PRR00042504	<u>Applicant Ecologist Response to item 1 (a-c):</u> NES-CF not relevant. Forest harvest not undertaken by the Applicant. See section 7.8 of the AEE. <u>Applicant Ecologist Response to item 2 (a-c):</u> Lizards- systematic searches were undertaken- refer section 3.3. Bats- refer to bat survey report. Wetland birds- visual assessment- not formal surveys. But note that all wetland habitats will be subject to restoration with a minimum 20m setback (but often well in excess of this. The EcIA applies a post-harvest baseline that considers that there is no vegetation cover. This is described throughout the report and explained within the context of habitat for indigenous fauna. Note we emphasise that indigenous revegetation is extensive and will not be subject to future harvest regimes, therefore long-term outcomes will be positive (including pest control, domestic cat restrictions resulting in greater benefits for biodiversity that would be expected to recolonise this area, as they would following rotation harvest, but with longer term habitat stability. Refer bat survey report, and note post harvest baseline conditions that describe no vegetation cover. <u>Applicant Planner Response to item 3 (a-c):</u> These are all matters that are or can be managed by consent conditions. <u>Applicant Ecologist Response to item 4(a):</u> Agree that clustering would reduce edge effects. However in the context of the proposal, which assumes that the baseline condition is similar to 'scorched earth', and that the fauna and flora values identified and potentially present are more likely to benefit from the ecological outcomes (permanent revegetation, pest control, domestic cat restrictions), than be adversely affected. <u>Applicant Planner Response to item 6:</u> The overall planting/revegetation strategy, landscape plans, landscape elements and plant types provided as part of the application provides a clear picture of the planting concept for the site. Detailed planting/landscaping plans can be managed by consent conditions. <u>Applicant Planner Response to item 7:</u> The Residents Association will manage and maintain the planting. An annual levy providing for

		distribution including matters beyond ecological considerations encouraged. 5. The wetlands are likely to provide habitat for threatened wetland avifauna (notably bittern). a. The proposed walkways are located next to the largest of wetlands which is likely to disturb these birds. b. Applicant has not considered or provided comments on Council Ecologist suggestion of relocating walkways away from the most sensitive habitats (noting the lack of specific fauna assessment). Please provide response. *Planner Note – Ecological input provided from that perspective. Overall planning comments to follow but a response to the decisions and reasoning that informed the approach and location of the walkways including ecological effects and other considerations encouraged.* 6. The planting concept is incomplete according to Ecologist. a. Does not include wetland or wetted edge riparian restoration. b. Unclear if the planting is ecosystem derived and contains some species that are not appropriate for the location or are naturally uncommon and not recommended. c. The planting plan does not reflect the current and expected site conditions, e.g. ex-forestry which has significant management and access constraints. d. 'General revegetation', 'riparian planting' specifications are incomplete and not consistent with Appendix 16 (or Te Haumanu Taiao) e. Low planting concept is not clear if this is for restoration or amenity. If the latter, it should not be considered forest or ecosystem restoration. f. Suggested change is to provide for greater setback from development to the forest restoration and remove 'low planting' entirely. 7. A residents society will be responsible for ongoing management of the forest restoration and public access (e.g. walkways). a. If outstanding issue, is who funds the ongoing management and legal mechanism to ensure compliance? Will an initial fund be set up to ensure success of the planting or will this be left to the Residents association?				the upkeep of the planting, among various other assets/infrastructure, will be required. The proposed walkways/tracks will be subject to Condition 1. <u>Applicant Planner Response to item 8:</u> The conditions of consent will be refined as the application progresses.

		b. Former forestry site and revegetation of this land will result in greater management constraints and costs c. Walkways do not appear to be subject to conditions of consent as to their construction and location. 8. Conditions of consent. a. None of the conditions of consent relate to the implementation of revegetation planting and the standards to which the planting must reach prior to 224(c). b. Many of the conditions do not provide for specific timing or staging as to when the works will be undertaken, meaning that many of the outcome proposed by the development are subjective and unenforceable by Council. c. Conditions 72 and 73 relate to landscaping for visual, landscape and amenity purposes only, not revegetation. i. Condition 76 refers to revegetation, but only as far as the location of the building platforms. ii. Condition 76 does not include the public access trails, and to whom the responsibility of construction lies; or timing / staging. iii. Condition 169 refers to identifying covenant areas, including revegetation, however, as noted above, this is not tied to the implementation of planting. d. As above; the revegetation planting is not tied to any specific timeframe or outcomes (e.g. canopy closure and weed & animal pest management), meaning that the planting. e. Bonding surety figure is not reflective of the complexities of undertaking revegetation. Given the above comments where the revegetation is not tied to the subdivision, it is unclear if either condition 192 or 193 is related to ecological restoration planting. f. It appears that the residents society will be wholly responsible for restoration planting and the weed and pest animals control, even though none of these specific ecological outcomes is required to be undertaken by the consent holder. Council will have no enforcement ability under the RMA for works that are not required, or areas subject to conditions of consent. g. The applicant does not provide sufficient details on cat restrictions and to whom the enforcement will lie.				

		Whilst the initiative is welcome, it comes without specific detail. Council does not have any by-laws relating to this site restricting cat ownership, and there are no regional restrictions on cat ownership. The applicant does not provide specifics as to how this can be enforced, the penalties, and by whom. Auckland Council does not have resource to enforce this consent notice. h. Fauna management conditions do need revising to be up-to-date with Auckland Council's best practice / enforceability requirements; and do not provide for staging. I can provide appropriate recommendations. *Planners Comments: Review underway in respect to the matters and suitability of the proposed conditions raised in item 8 and 9 above. This response is shared but suggested applicant team await that clarification.*				
C/O Rebekah Devonshire	Rodney Local Board	Opportunity provided to the applicant to respond to matters and concerns identified in points 7-26.	Not requested.	Yes	1. The Rodney Local Board supports the development of Treaty Settlement Land and the integrated Māori Development of the proposed retirement village. We support Te Kawerau ā Maki's goal of *promoting and providing for their cultural, economic, social and environmental wellbeing.* 2. We support the proposed construction of the new public carpark and the network of public walking and cycling tracks that connect to the existing tracks in the Riverhead Forest. 3. We support the new pedestrian connection from the proposed development to the Riverhead township via Duke Street 4. We support the environmental upgrades proposed within the development including the riparian and revegetation planting and pest control. 5. We support the proposed construction of the resident's community centre including the basketball and tennis courts. 6. However, we have several concerns relating to flood risk, traffic safety and infrastructure constraints that are detailed below **Natural Hazard Risk** 7. We express concern that the proposed development is within an area with identified flood hazards and includes the diversion of overland flow paths, and land that has been identified with localised 'shallow instability' issues. 8. We express concern that the scale of the proposed development will significantly increase the impervious surfaces and may result in flood waters being diverted to	Refer responses below to items 7-26. **Item 7** – comprehensive assessment of flooding and ground stability has been undertaken by specialists. There are no identified issues of significance. **Item 8** – flooding in the downstream catchment has been managed through on-site mitigation that

					lower lying neighbouring properties especially in flood prone areas of Duke Street during extreme weather events. 9. We express concern that not all roads within the development will be able to provide safe vehicle passage during flood events. We note that per expert evidence provided by the applicant, that the level of *Forestry Road will be lifted to ensure that the maximum ponding depth within the road does not exceed 200mm*. However, we are concerned that *one area of the road (50 and 100 Forestry Road) there is no ability to avoid a minor increase in flood levels*. 10. We are concerned that the proposed engineered mitigations, retaining walls and changing of the landform with the extensive earthworks proposed may fail during extreme weather events and this will impact low lying areas such as properties adjacent to the Riverhead Forest. These properties experienced widespread flooding during the 2023 extreme weather events with flooding and slips in Mill Flat Road near Boundary Road. This development may exacerbate these issues. 11. We request a full hydrological impact assessment and an integrated stormwater planning for the Rangitopuni stream, Riverhead and Kumeū River catchments including all drainage sub-catchments is completed before this proposed development is approved. **Traffic Safety and Congestion** 12. We have concerns about the proposed development near Old North Road and how this will impact regional and interregional traffic using Old North Road between Kumeu and Helensville / Kaukapakapa. Both holiday traffic and freight use this route as an alternative to the State Highway network due to this being a short cut that avoids Helensville township when driving from Auckland to Northland. 13. We are concerned about the adverse effects on traffic safety along Old North Road with the proposed multiple new vehicle access ways onto this road. There have been serious crashes along Old North Road in 2025, and this is a high-speed road environment and due to the geometry of the road there is often limited visibility. We request that these new vehicle accessways are reviewed by Auckland Transport for safety and any recommendations/upgrades are included in the conditions of consent. 14. We are concerned that the increase in vehicle traffic generated by this development will impact traffic safety at the following intersections, Deacon and Forestry Road and Deacon and the Riverhead Road. Both high-speed intersections have limited visibility, and we request that these are upgraded as part of the conditions of consent.	maintains stormwater leaving the site to no more than pre-development flows. **Item 9** –the depth of existing flooding on public roads will, overall, be reduced. **Item 10** – all retaining and earthworks will be designed by suitably qualified engineers to ensure long-term stability. **Item 11** – appropriate flood modelling has been undertaken to confirm no significant effects in the downstream catchment beyond the site. **Item 12** – the transport aspects of the proposal have been carefully considered by the project transport engineer who confirms that there will be no significant adverse effects arising. **Item 13** – refer above comment. **Item 14** – the level of trip generation associated with the proposal is enabled as a permitted activity under the AUP, given that the land is live zoned. There is no ability to impose broader transport network upgrading on the applicant in these circumstances.

					15. We are concerned that the existing road infrastructure in and around Riverhead is already under significant pressure, with Old North Road frequently experiencing congestion, particularly during peak commute times. Congestion on SH16 from Kumeu into the city is a complete bottleneck and this causes massive driver frustration and motorists to take additional risks. The bus service through Riverhead is only every hour and there is no funding to increase the frequency, therefore future residents will be reliant on their cars for transportation.	**Item 15** – refer above comment.
					16. Riverhead has limited access to public transport services, which may not meet the increased demand generated by this development, particularly from a retirement population who may rely more heavily on accessible transport. We request that consideration must be given to the integration of this project into the regional public transport network. 17. We are concerned about the cumulative effects on road safety and congestion, if Private Plan Change 100 (PPC100) is consented together with this development. 18. We request that if consent is granted for this development, then before any construction starts, the Stage two of SH16 safety upgrades including the new roundabout at the Coatesville Riverhead Highway intersection and the four laneing between Kumeu and Brigham Creek Roundabout are completed. 19. Other projects that need to be delivered if PPC100 is approved along with this development include the construction of the Northwest Rapid transport network from Brigham Creek into the city and the Kumeu alternative State Highway bypass.	**Items 16-19** – comments noted.
					Infrastructure 20. We express concern about the school capacity as nearby primary and secondary schools are already experiencing high roll numbers. The addition of over 200 countryside living households may bring new families to the area, potentially exacerbating current capacity constraints. Forward planning with the Ministry of Education is necessary to ensure adequate provision. 21. We express concern about the healthcare and medical facilities; Riverhead currently has limited local medical services. The proposed aged care and retirement village component will increase demand for GPs, emergency response, and specialist care. Clarity is needed on how this will be addressed, including funding and integration with the regional health services. 22. We express concern that with private roads forming the majority of the development's internal access network, there must be assurance that emergency vehicles	**Item 20** – provision for sufficient capacity in schools is a matter for the Ministry of Education. **Item 21** – provision for public health services is a matter for the Government. Likewise, the applicant cannot control private sector investment in health facilities in the area. **Item 22** – appropriate emergency vehicle access is achievable and will be enabled.

					(ambulance, fire, police) can adequately and efficiently access all properties. **Other** 23. We express concern that the development is being serviced by a private waste provider not the Council refuse and recycling service and this may impact on Council's waste minimisation plans going forward. 24. We express concern that the retirement village will not be serviced by Watercare for water and wastewater and there will be an increased risk to the environment during extreme weather events if this onsite wastewater system fails. We request that conditions of consent include strict monitoring by both the applicant and the Council compliance team. 25. We express concern about the significant earthworks proposed by this development and the impact that this will have on surrounding neighbours with regards to noise, dust and odour especially with the proposed operating hours of construction *expected to be between 7AM-7PM Monday to Saturday*. We suggest that operating hours are amended to 8am to 6pm during the weekdays and Saturdays 8am to midday. 26. We support the principle of enabling housing that aligns with Treaty Settlement outcomes, we urge the EPA and the applicant to ensure that critical infrastructure and community services are planned, funded, and delivered in tandem with the development.	**Item 23** – a public collection service is not practical on a development of this nature. **Item 24** – Watercare was approached to discuss servicing the development. However, Watercare made it clear that it would not provide servicing for either water supply or wastewater. Appropriate conditions will be applied to the on-site wastewater treatment plant. **Item 25** – construction noise will be controlled by AUP standards. **Item 26** – the support of the Local Board is noted and appreciated.