

**IN THE MATTER**

of the Fast-track Approvals Act 2024 (“**FTAA**”)

**AND**

**IN THE MATTER**

of an application for approvals by Fulton Hogan Land Development Ltd to develop and authorise Stages 10-13 and Stage 4C of the Milldale development, together with a supporting temporary wastewater treatment plant. Collectively Stages 10-13 and Stage 4C will provide capacity for approximately 1,155 detached and terraced dwellings and supporting commercial services. Project **FTAA-2503-1038** – Milldale (“**Milldale Application**”)

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**SUPPLEMENTARY MEMORANDUM OF PLANNING MATTERS FOR AUCKLAND COUNCIL**

**Dated: 5 September 2025**

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1. Auckland Council have received an email from Daya Thomson, Application Lead - Environmental Protection Authority on 29 August 2025. This has stated:

*The Panel would like to clarify whether the outstanding matters you've mentioned could be appropriately addressed during the opportunity to comment on the proposed conditions of the application (under [section 70](#) of the Fast-track Approvals Act).*

*If there are any new matters you'd like to raise that haven't been previously discussed, the Panel kindly requests that you submit a short memorandum outlining the nature of these issues. This will help the Panel consider them and also determine whether it would be appropriate to exercise its functions—such as issuing a Request for Information.*

2. Auckland Council have received Applicant's responses on 6 August and 22 August 2025. These have been reviewed by the Council Specialists together with Auckland Transport, Healthy Waters and Watercare.
3. Following the review of the Applicants responses, there are a number of outstanding matters and information gaps that Auckland Council consider cannot be appropriately addressed during the opportunity to review consent conditions.

4. These have been identified in the key Auckland Council Specialists Memorandum are:
- Healthy Waters – Hillary Johnston (**Annexure 1**)
  - Freshwater Ecology – Antoinette Bootsma (**Annexure 2**)
  - Parks – Cas Hannink (**Annexure 3**)
5. These are Appended to this Supplementary Planning Memo. It is noted that there are ongoing internal Auckland Council discussions with Parks and Healthy Waters in respect to the consent conditions and vesting of land.
6. All supplementary Council Specialist Memorandums have been shared with the Applicant. This was to ensure the Applicant was aware of the outstanding Council issues and identified information gaps. The Memorandums have also identified changes (and additional) consent conditions, which have informed further discussions on the Applicants Draft Proposed Conditions.
7. The following table identifies in red highlight the residual information gaps that remain having reviewed the Applicant's response, and explains their significance for decision-making. Council considers that this information is necessary prior to determination and the Panel should request these are provided by the Applicant:

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created	Council 5 Sept 2025 Comment
<b>Stages 10-13</b>				
1. <b>Building Coverage Study</b>	A Building Coverage Study of existing development within Milldale is required to understand the existing built form, building coverage and the impact this has on neighbourhood character and streetscape character/amenity.	To assess whether the proposed blanket consents sought for building coverage in the Residential: Mixed Housing Suburban and Single House zones are appropriate.	Uncertainty of future design outcomes.	Information provided.  This does not address examples of 45% or greater building coverage.
2. <b>Residential Design Outcomes and Controls</b>	Updated RDOC is required to assess the design outcomes and controls for the super lots.	RDOC is required to inform consent conditions and consent notices.	Uncertainty of intended design outcomes and controls for the super lots.	Updated RDOC is acceptable.
3. <b>Updated Design of OLFP</b>	The design of overland flow paths (OLFPs) within public road	The design is required to ensure roads are	The design is required to ensure roads are safe for	This can be addressed through consent conditions and

	corridors must be updated to demonstrate compliance with Auckland Council's safety criteria for depth, velocity, and hazard rating.	safe for vehicles and pedestrians.	vehicles and pedestrians.	Engineering Approval.
4. <b>Vesting of Land</b>	The Applicant should provide justification for the extent and location of land proposed for vesting, including evidence that the land delivers essential stormwater function as well as wider public benefit. Areas proposed for vesting must be offered as 'Land in Lieu of Reserve – for Drainage Purposes' and will remain subject to Auckland Council's standard asset acceptance and acquisition processes	Cannot ascertain the extent of land for drainage purposes. Required to ensure accurate information is identified on the scheme plans. Scheme plans will need to be updated once this is confirmed.	Uncertainty around the extent of vesting of land.	<b>Outstanding. Refer to Healthy Waters Memo (Annexure 1) and Parks Memo (Annexure 3).</b>
5. <b>Geomorphic Risk Assessment</b>	To aid in establishing effective riparian setbacks a Geomorphic Risk Assessment should be undertaken to evaluate the current condition, sensitivity, and likely adjustment of the proposed and existing stream networks in response to urbanisation. This must include assessment of soil strength and resistance characteristics, flow energy, and long-term geomorphic evolution	Cannot accurately assess the necessary riparian setbacks for dwellings/ buildings.	The riparian setbacks may result in insufficient space for the intended building platforms on residential lots.	Addressed.
6. <b>Flood Management and Modelling</b>	The Applicant must provide the full stormwater model to Healthy Waters, including both pre- and post-development scenarios, to enable verification of modelling assumptions and assessment of downstream effects.	The flood modelling is required to ensure downstream effects are avoided.	The flood modelling is required to ensure downstream effects are avoided.	<b>Outstanding. Refer to Healthy Waters Memo (Annexure 1).</b>

	This should include the Wainui Road bridge, properties downstream between the bridge and Lysnar Road, and 147 Argent Lane.			
7. <b>Additional characterisation of geohazards required for Stage 10-13 works.</b>	Slope stability analyses are required to be updated for relevant sensitivity assessment and missing design parameters. Including clarification on how the stockpile location will be affecting the site stability.	Additional clarification is required for how stability will be maintained throughout the different substages of the work.  Inconsistencies in the reports and drawings to be revised for clarity.  Missing laboratory testing to verify applied parameters to geohazards.	Geohazard risks not fully captured in current assessment  Potential for inadequate assessment of affecting geohazards.	Updated Geotech assessments required to capture all updates/responses; and to ensure these are consistent.  Additional geotechnical condition wording required.
8. <b>No assessment of the effects on five of the six natural inland wetlands at 147 Argent Lane</b>	No assessment of effects of the groundwater-related activity	Unable to assess whether or not the effects of dewatering and groundwater diversion on the five off-site natural wetlands is potentially adverse.	Potential for significant effect destruction / of these five wetlands which will require mitigation.	<b>Remains outstanding and an area of disagreement between the Applicant and Council's Freshwater Ecologist.. Refer to Council Freshwater Ecology Memo (Annexure 2).</b>
9. <b>Missing reasons for consent for permanent groundwater dewatering.</b>	Permanent dewatering has not been included or assessed in the Application.	Ensuring inclusion of appropriate consent conditions.	Potential for adverse dewatering effects to not be robustly assessed.	Addressed.
10. <b>No specific methodologies or effects assessment are provided in the AEE for the surface water diversion activity.</b>	No assessment of effects of the proposed surface water effects including peak velocities through the watercourses during flood conditions and whether appropriate measures have been	Ensuring inclusion of appropriate consent conditions and mitigation measures.	Potential for adverse environment effects relating to surface water diversion including whether appropriate measures have been considered to	Addressed – with additional consent conditions.

	considered to ensure the diversion does not cause scour, erosion or other instability of any land or waterbody.		ensure the diversion does not cause scour, erosion or other instability of any land or waterbody.	
11. <b>Additional reasons for consent relating to culverts not included in application.</b>	Culverts have not been included as reasons for consent or assessed.	Assessing associated adverse effects including as it relates to fish passage.  Ensuring inclusion of appropriate consent conditions	Potential for adverse freshwater related effects including aquatic species to not be robustly assessed	Fish passage included as consent condition.
12. <b>Consolidated wetland delineation data which includes vegetation, soils and hydrology as specified by the Ministry for the Environment's Wetland Delineation Protocols</b>	Significant inconsistencies in the hydric soils and hydrology assessment provided by WWLA, together with an absence of plant species information for sample plots where hydric soils and hydrology were assessed alone result in deficient wetland delineation data.  Since the soil affinity for hydrology on this site is known to be complex, inconsistent and incomplete data leads to statements regarding permanent loss of wetland areas and proposed offsetting that are not supported by objective assessment in accordance with published requirements.	The absence of objective and rigorous wetland delineation data precludes my assessment against Appendix 6 of the NPS-FM – Principles for Aquatic Offsetting.	I am unable to assess whether permanent loss of natural wetland will be adequately offset in accordance with the NPS-FM.	<b>Issue remains outstanding. Refer to Council Freshwater Ecology Memo (Annexure 2).</b>
13. <b>Hydrology assessment (particularly the size of the catchment and water volume)</b>	<b>No hydrology assessment is provided to support the proposal that a new offset wetland will be able to be</b>	The lack of assessment precludes my assessment against Appendix 6 of the NPS-FM	No supporting evidence is provided that the proposed offset of permanent wetland loss will be able to	Can be addressed through consent conditions – noting the changes/ updates required to conditions

	demonstrating the proposed offset wetland can be supported by sufficient water so that wetland habitat will form as proposed by the applicant.	created to form a stable, permanent aquatic habitat.	– Principles for Aquatic Offsetting.	be achieved.	including timeframes
14.	<b>Infrastructure upgrade timeline as it relates to road upgrade works.</b>	While the ITA recommends infrastructure upgrade required for the proposed Fast-track development, it does not discuss any timeline for it (e.g. before or after dwellings threshold is reached).	Without a clear timeline or a condition, unable to assess if the intersection in question/road performs without having operation and safety issues.	Operation and safety of road network and the timeline for infrastructure upgrades, which can be dealt with through conditions.	Updated condition required.
15.	<b>Long-section drawings and vehicle tracking diagrams</b>	<ul style="list-style-type: none"> <li>Long-sections drawings identifying roading gradients; including vertical curves; and</li> <li>Tracking drawings identifying vehicles manoeuvre safely through roads and intersections.</li> </ul>	<p>Unable to assess whether the proposed development accommodates vulnerable users or meets visibility and safety requirements for road users. Vertical curves may pose visibility risks, and without these plans, road suitability cannot be confirmed.</p> <p>Additionally, vehicle tracking diagrams are essential to evaluate safe vehicle operation within proposed roads and intersections. If safety or operational issues arise during the Engineering Approval stage and cannot be</p>	Auckland Transport cannot assess the adequacy of roads and changes including to scheme plans may be required.	We envisage this can be addressed as part of Engineering Approval.

		resolved, the applicant may need to revise their plans. Therefore, both long-section drawings and tracking diagrams are critical for assessing accessibility, safety, and operational viability.		
16. <b>No visibility assessments have been provided for the proposed intersections</b>	Visibility assessments for intersections have not been provided in accordance with Auckland Transport's engineering guidelines.	Unable to confirm whether the intersection treatments are adequate to ensure safe traffic operations. If visibility issues are identified at the EA stage and cannot be resolved without altering the scheme plan or lot boundaries, a consent variation may be necessary.  Implications for locations in respect to lighting poles.	Lack of adequate sightlines adversely impacts the safety of the intersections. This creates risks on all type of road users, including pedestrians and cyclists; this is a significant safety risk.  Unable assess the adequacy of visibility at critical locations and changes including to scheme plans may be required.	Can be addressed as part of Engineering Approval.
17. <b>Safety assessment for T-intersections in close proximity along Waiwai Drive between Stages 10 and 11, being close to bus stops and points where pedestrians cross the intersections.</b>	<ul style="list-style-type: none"> <li>Assessment for operations and the safety of the intersections in close proximity to each other while also taking into consideration the proposed bus stops;</li> <li>Assessment for safety of pedestrians near the intersections' zebra crossings, particularly when looking left. This</li> </ul>	The configuration may lead to conflicts between turning vehicles, and unable to assess the risks without assessment.	The intersections may need to be relocated on scheme plans if not proper mitigation has been found; this runs the risks of further changes to the scheme plan.	Can be addressed as part of Engineering Approval.

	issue may be exacerbated by buses stopped at adjacent bus stops. Additional assessment is required and this remains a safety concern.			
18. <b>Safety assessment for operation and safety of intersections on Collector Road 01 in Stage 12, where T-intersections are located too closely.</b>	Assessment for operation and safety of intersections on Collector Road 01 in Stage 12, where T-intersections are located too close and could pose safety risks for all modes of transport.	The configuration may lead to conflicts between turning vehicles, and Auckland Transport cannot assess the risks without assessment.	The intersections may need to be relocated on scheme plans if not proper mitigation has been found; this runs the risks of further changes to the scheme plan.	Can be addressed as part of Engineering Approval.
19. <b>Lack of long-section drawings for Auckland Transport to check the suitability of overland flow path mitigation measures.</b>	Long section of the roads to check the slope of the roads to be vested in relation to Overland Flow Path (OLFP) calculations. Some of the drawings for OLFP calculations show a slope of 27%, which is not legal.	Auckland Transport requires this information to assess whether the asset proposed for vesting adequately addresses safety concerns in relation flooding hazard, and it does not cause potential damage to property.  This information is required to assess whether the asset proposed for vesting adequately addresses safety concerns in relation flooding hazard, and it does not cause potential damage to property.	OLFP poses a safety risk to life and property if not mitigated adequately through road design.	Can be addressed as part of Engineering Approval.
20. <b>OLFP calculations provided show the</b>	OLFPs calculations for the 1% AEP + climate	This information is required to	OLFP poses a safety risk to life	Can be addressed through consent



	depth x velocity products significantly exceed the maximum value for safety of pedestrians.	change within roads to be vested to AT are required to meet the minimum safety requirements specified in Table 3 of the Road Drainage chapter of Auckland Transports Transport Design Manual. The Assessment provided does not show this.	assess whether the asset proposed for vesting adequately addresses safety concerns in relation flooding hazard, and it does not cause potential damage to property.	and property if not mitigated through road design.	conditions.
21.	<b>Design of shared driveways (JOALS).</b>	No Loading bay proposed at JOALS. No speed management measures proposed at JOALS as per PC79DV. Intervisibility issues and vehicle tracking issues at intersections.	These are matters that could be conditioned and addressed at Engineering Approval Stage, however this may result in changes to the application that require a variation.	These are important to ensure a safe and functional development.	Can be addressed by consent conditions and at EA – noting this may result in changes to the scheme plans.
22.	<b>Lighting plans for shared driveways</b>	No Lighting plans have been provided for the shared driveways.	Lighting Plans for the shared driveways are required to ensure pedestrian and traffic safety.	These can be included as consent conditions, however Council preference is to review lighting plans as part of the application process to ensure these are fit for purpose.	This can be addressed by conditions.
23.	<b>Duplication of bridge structures between bridge 4 and 5. Parks and Community Facilities does not seek ownership or vesting of bridge 4 and 5.</b>	Bridge 5 appears to duplicate access noting the location of Bridge 4, which connects to the same collector road through the reserve path.  Operational concerns for future maintenance have been raised.	Vesting decision of Bridge 5 is with Auckland Transport based on the Appendix 2N Transport Assessment (Figure 3).	Uncertainty around the appropriate vesting process, ownership, and whether local board approval is required.  Unclear functional intent and subsequent vesting ownership.	<b>Unresolved Parks matter. Refer to Council Parks Memo (Annexure 3).</b>
24.	<b>The intended function of Bridge 5 is unclear — whether it serves</b>	Conflicting documentation - Appendix 2N (Transportation	If part of the active mode connection, AT will be	Unclear functional intent. If dual-use (e.g. stormwater or wastewater, active	<b>Unresolved Parks matter. Refer to Council Parks Memo (Annexure 3).</b>

as part of the active mode/shared path network or as a recreational path.	Assessment) identifies Bridge 5 as part of the shared path/active mode network, while Appendix 2K (Engineering Drawings Part 4) describes it as a recreational path.	responsible for vesting decisions.  The vesting decision of Bridge 5 is with Auckland Transport based on the Appendix 2N Transport Assessment as a network loop.  Uncertainty around the appropriate vesting process, ownership, and whether local board approval is required.	cycling node) is intended, this could result in delays during handover, operational confusion, or need for redesign and local board approval.	
25. <b>Large retaining wall structures without clear mitigation for retaining wall 9 (Neighbourhood Park) and Retaining wall 14 (Drainage Reserve).</b>	The landscape plans and Urban Design Statement do not adequately demonstrate how retaining walls exceeding 2.0m (up to 3.2m including fencing) will be visually softened. Previous meetings with the applicant did indicate 1.5m maximum retaining wall heights (Retaining wall 9 & 14). No clear demonstration of mitigation measures.	Limits ability to confirm acceptability of interface treatment between public open space and private lots.	High retaining may result in poor visual amenity and reduced passive surveillance. Unclear responsibility for mitigation adds uncertainty.	Can be conditioned with additional wording as proposed by parks.
26. <b>Vesting classification of neighbourhood parks</b>	<b>Neighbourhood park lots are detailed as land in lieu of reserves.</b>  <b>Applicant is requested to alter the classification to 'Land in Lieu of Reserve (for the purpose of recreation)' to avoid confusion with the drainage reserve vesting classifications.</b>	Intention of park lot references are unclear which may impact acquisition	Potential for inaccurate vesting references.	Can be conditioned. Refer to parks Memo

27.	<b>Riparian planting species lists have not been provided.</b>	<p><b>While dry basins include general species lists, the planting lists for the wider drainage reserve network has not been provided.</b></p> <p>Inhibits the ability to assess ecological and maintenance suitability of proposed planting species.</p>	Offsetting on reserves to vest is not advisable as it would require an encumbrance, in conflict with s239, for its maintenance in perpetuity. This is for Healthy Waters to consider.	Risk of non-compliant or unsuitable species being used, leading to long-term maintenance issues.	Can be conditioned.
28.	<b>Planting species changes are required.</b>	<p><b>Specific species in key locations must be reconsidered:</b></p> <ul style="list-style-type: none"> <li>○ Accessway slope planting selection of Phormium tenax requires an alternative.</li> <li>○ Larger growing trees on the stream side of Stream Road, as there will be no conflict with dwellings</li> <li>○ Dry basin details are very general.</li> <li>○ Planted berms and any reference to planted strips within roads and accessways to vest will not be accepted by Council.</li> </ul>	Prevents a robust assessment of future operational suitability and maintenance.	Species changes can be suitably addressed at future detailed design and engineering plan approval.	Can be conditioned.
<b><u>Stage 4C</u></b>					
29.	<b>Lack of site-specific investigation information to support the geotechnical reporting, assessment and recommendations</b>	<b>Relating previous investigation information that was referenced, and geological long section is to be provided to justify how the assessment outcome was</b>	Cannot accurately assess the appropriateness on how the provided assessment were undertaken due to lack of	Potential for inadequate assessment of affecting geohazards.	<p>Updated Geotech assessments required to capture all updates/responses; and to ensure these are consistent.</p> <p>Additional geotechnical condition wording</p>

of Stage 4C works.	reached.	information.		required.
30. <b>Infrastructure upgrade timeline and condition.</b>	While the ITA recommends infrastructure upgrade required for the proposed Fast-track development, it does not discuss any timeline for it (e.g. before or after dwellings threshold is reached).	Without a clear timeline or a condition, Auckland Transport is unable to assess if the intersection in question/road performs without having operation and safety issues.	Operation and safety of road network.; however, it is medium because there is no need to change scheme plans, and the works have been contested. The bigger issue is the timeline for infrastructure upgrades, which can be dealt with through conditions.	Can be conditioned. Refer to AT Memo/
31. <b>The application lacks long-section drawings and vehicle tracking diagrams</b>	<ul style="list-style-type: none"> <li>Long-sections drawings which could show roading gradients; including vertical curves; and</li> <li>Tracking drawings which could show that vehicles manoeuvre safely through roads and intersections.</li> </ul>	<p>Without long-section plans, unable to assess whether the proposed development accommodates vulnerable users or meets visibility and safety requirements for road users. Vertical curves may pose visibility risks, and without these plans, road suitability cannot be confirmed.</p> <p>Additionally, vehicle tracking diagrams are essential to evaluate safe vehicle operation within proposed roads and intersections. If safety or operational issues arise during the Engineering Approval stage and cannot be resolved, the applicant may</p>	Unable to assess the adequacy of roads and changes including to scheme plans may be required.	Can be addressed as part of EA process and conditions.

		need to revise their plans. Therefore, both long-section drawings and tracking diagrams are critical for assessing accessibility, safety, and operational viability.		
32. <b>No visibility assessments have been provided for the proposed intersections</b>	Visibility assessments for intersections have not been provided in accordance with Auckland Transport's engineering guidelines.	Unable to confirm whether the intersection treatments are adequate to ensure safe traffic operations. If visibility issues are identified at the EA stage and cannot be resolved without altering the scheme plan or lot boundaries, a consent variation may be necessary.	Lack of adequate sightlines adversely impacts the safety of the intersections. It creates risks on all type of road users, including pedestrians and cyclists; this is a significant safety risk - Auckland Transport cannot assess the adequacy of visibility at critical locations and changes including to scheme plans may be required.	Can be addressed at EA stage however this may result in changes to scheme plans
33. <b>Waste management collection &amp; reverse manoeuvring</b>	JOALs consist of no turnaround area/ D-area or loading bay and require reverse manoeuvring	Unable to confirm if the JOAL design is acceptable from a functionality and safety perspective.	Needs to be reviewed by AC upon receipt of the updated documents	Partially outstanding. Could be addressed as part of Waste Management Plan, with additional consent condition wording required.
34. <b>Lack of tracking drawings for 10.3 meters rubbish trucks for all JOALs, showing that these types of vehicles exit the JOALs in forward direction.</b>	Tracking drawings are missing for all JOALs for rubbish Council rubbish trucks: Traffic Assessment states that rubbish collection will be Council Kerb-side collection either from public roads or the JOALs.	If no tracking drawings are provided for all JOALs, Auckland Transport cannot assess if the trucks will be exiting the JOALs in forward direction and this is considered as a safety risk on pedestrians and	It could be that the owners shared JOAL can decide among themselves to change the rubbish collection method to private, which would require smaller truck, although it is better that tracking for smaller trucks are provided because	As above.

		other road users.	lack of adequate space may entail that even smaller trucks need to reverse out.	
35. <b>Lighting plans for shared driveways</b>	No Lighting plans have been provided for the shared driveways.	Lighting Plans for the shared driveways are required to ensure pedestrian and traffic safety.	These can be included as consent conditions, however Council preference is to review lighting plans as part of the application process to ensure these are fit for purpose.	Can be conditioned.
<b><u>Wastewater Treatment Plant</u></b>				
36. <b>WWTP Reverse Osmosis (RO) Waste Stream</b>	<p>There is outstanding information in respect to the Reverse Osmosis (RO) Waste Stream.</p> <p>Watercare would only consider conditionally accepting this to the existing Army Bay plant, subject to:</p> <ol style="list-style-type: none"> <li>1. Review and acceptance of proposed flow volumes, discharge rates, and quality parameters;</li> <li>2. Assurance that the RO waste stream would not compromise the operation, integrity, or regulatory compliance of the Watercare network or the Army Bay WWTP (; and</li> <li>3. Execution of a formal agreement defining all technical, operational, and commercial terms.</li> </ol>	Details are of RO Waste Stream are required to ensure discharge consents have been applied for and have been assessed including appropriateness of consent conditions	<p>Potential for discharge effects including water quality.</p> <p>Reverse Osmosis (RO) Waste Stream not being accepted at the Army Bay Wastewater Treatment Plant.</p>	Can be conditioned, noting changes/ additional consent conditions are required.

	Refer also <b>item 40.</b>			
37. <b>Impact on Orewa Estuary</b>	Scale of impact on the estuary hasn't been addressed.	It is unlikely that there will be more than a minor impact on the estuary, based on the findings of the Upstream waters. However, as new discharge it is important to understand any additional stress that it may be putting the Estuary under in terms of contaminant loads.		Can be conditioned, noting changes/ additional consent conditions are required.
38. <b>Details of emergency storage for WWTP.</b>	WWTP does not propose/ include provision of emergency storage.	WWTP design including emergency storage details are required to be provided with the application to ensure operational risk to be public network is avoided.	Watercare does not support this approach, as it effectively shifts operational risk to the public network. The absence of onsite storage or containment increases the likelihood of unplanned discharges impacting network performance. Watercare recommends that the applicant reconsider the inclusion of buffer storage and develop a contingency plan that ensures operational failures can be managed without relying on Watercare's infrastructure	Can be conditioned, noting changes/ additional consent conditions are required.
39. <b>Partially missing information to</b>	Relating previous investigation	Geohazard risks not fully captured	Potential for unforeseen risks in	Resolved.

<p><b>justify the geohazard assessment outcome of the WWTP.</b></p>	<p>information that was referenced to be provided to justify the accuracy of the provided geological long section.</p> <p>Slope stability analyses to demonstrate stability of proposed permanent batters.</p>	<p>in current assessment.</p>	<p>underlying geohazards and impacting serviceability for wider developments.</p>	
<p><b>40. Further Details / Assessment within Wastewater Treatment Plant Design Report</b></p>	<p>Refer to Section 6 of the Watercare Memo (Annexure 3). In Summary:</p> <ul style="list-style-type: none"> <li>The composition and variability of the RO waste stream, including concentrations of salts, nutrients, trace contaminants, and any emerging pollutants.</li> <li>The expected flow volumes of the RO waste stream and how these may interact with or impact the hydraulic performance and treatment processes within the existing Watercare network.</li> <li>The potential operational impacts on the Army Bay WWTP and the integrity of downstream infrastructure.</li> <li>The monitoring, control, and fail-safe mechanisms proposed to manage this waste stream prior to and during</li> </ul>	<p>The lack of sufficient detail creates a high degree of uncertainty around the quality and impact of the discharge, making it difficult to assess potential effects on Watercare's assets, operations, and compliance obligations.</p>	<p>Potential risks associated with this discharge to make an informed decision regarding acceptance of the waste stream.</p>	<p>Can be conditioned, noting changes/ additional consent conditions are required.</p>



	<p>discharge into the Watercare network.</p> <ul style="list-style-type: none"> <li>The testing regime required to verify the quality of the RO waste stream, including baseline sampling, target parameters, frequency, and testing responsibilities.</li> </ul>			
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8. The identified outstanding information gaps (detailed above) create uncertainty in the assessment of adverse impacts, and the Council is not able to assess the extent and degree of the adverse impacts, and specifically whether the Application meets the section 85(3) threshold.
9. I would note that discussions/ meetings between the Applicant and Auckland Council have taken place. The purpose of these discussions and meetings have been to discuss the Applicants Draft Consent Conditions and the identified information gaps. This has included discussions where Auckland Council do not consider information gaps can be addressed by the consent conditions. A Joint Statement may be able to be issued to the Panel in due course.
10. Further to this, separate and ongoing discussions in respect to the Wastewater Treatment Plant are being undertaken with Auckland Council, Watercare and the Applicant.
11. I would finally note to the Panel that I am on leave from 22 September – 3 October (inclusive), and will not be able to participate in any conferencing on conditions during this period.

**DATED** the 5<sup>th</sup> day of September 2025

**Dylan Pope**

Planning Consultant for Auckland Council