

Delmore Fast-Track

25/06/2025 – Auckland Council Response

Annexure 32:

Rodney Local Board

Michelle Carmichael and Louise Johnston

Rodney Local Board feedback BUN60444768 - Delmore Fast-track Application

1. The Rodney Local Board are concerned that:
 - a) This fast-track application is out of sequence with Auckland Council's Future Development Strategy (FDS) 2023, which has this area development ready by 2050 plus.
 - b) That there is no funding in council's 10-year budget for the required infrastructure prerequisites for this area to be development ready i.e. North Shore Rapid Transit (extension to Milldale).
 - c) The Hibiscus Coast Park n Ride station is at capacity and carparks are full by 7am and this proposed development will add to the already congested State Highway 1 between Orewa and Albany.
 - d) This proposed development is in an area of high hazard with both land instability and flood risk and we are concerned that engineered mitigations may fail during extreme weather events as experienced in 2023 in Auckland.
 - e) This development will increase the flood risk for neighbouring properties including 180 Upper Orewa and 226 Grand Drive.

2. If this development is approved, the Rodney Local Board request the following:
 - a) That this development is charged a financial contribution or development levy so that they pay their share of the transport infrastructure, reserves and community facilities that will be needed to be constructed/acquired sooner than planned.
 - b) That the proposed 3,200m² Neighbourhood Park allotment i.e. a balance lot 5020, is transferred to council at no cost
 - c) The developers fund a regular feeder bus service from this development to the Hibiscus Coast Bus Station at Silverdale until the rapid transport network through to Milldale has been constructed or Auckland Transport agrees to funding the interim feeder bus service.
 - d) Auckland Council is not liable for buying out future residents if properties experience land instability or flooding.
 - e) Road widths including on-street parking and do not impede emergency or heavy vehicle access as experience at the Milldale development.
 - f) All lots have off-street parking or garaging to enable electric vehicle charging

3. Understand *"the development will involve the construction of approximately 1,250 dwellings, one unserviced residential superlot, open space areas, areas of protected vegetation, roads including the NoR 6 road, supporting infrastructure and other*

associated works” (AEE pg 9), however, note that only the section of NoR6 through this development is to be constructed.

4. Express concern that the proposal includes extensive *“bulk earthworks over an area of 58.4 hectares total 2,225,000 m³”* (AEE pg 27), including *“relocating the cut material for engineered fill along the periphery of the streams”* (AEE pg 27); and requires earthworks within *“riparian margins across the site ... existing natural wetlands, and areas of vegetation subject to consent notice conditions”* (AEE pg 27).
5. Express concern *“construction works are anticipated to exceed the applicable maximum 75dB LAeq long-term construction noise limits”* (AEE pg 41); and *“permitted activity standards for construction noise (E25.6.27) cannot be met at a small number of surrounding properties due to their proximity and the nature of the required works”* (AEE pg 59).
6. Request robust mitigation methods and monitoring of earthworks to minimise adverse nuisance effects (dust, noise, vibration etc) on neighbouring properties, and avoid risk to property or people from any unexpected earth movement.
7. Request robust mitigation methods and monitoring to minimise environmental impacts of earthworks and clearance activities within and surrounding the site, in particular relating to the protection of freshwater habitat and ecology of the existing streams, wetland areas, and other waterbodies within the catchment including the Orewa River and coastal marine area as potential receiving environments.
8. Request vehicle wash down is a requirement when needed to avoid the tracking of dirt onto the surrounding roading network.
9. Request if consented, construction hours of operation are determined in consultation with affected parties, and with consideration of increases in risk due to seasonal environmental conditions.
10. Express concern *“there are two recorded archaeological sites within the subject site [and] ... the potential for other sites associated with Māori settlement to be present”* (AEE pg 22), and *“Whilst works will avoid both recorded sites, an authority to modify or destroy from Heritage NZ is sought under this application”* (AEE pg 13). We request that authority to modify or destroy should be assessed on a case-by-case basis to determine the level of protection and preservation to be applied dependent on the values discovered, and should include consultation with all affected mana whenua parties
11. Support accidental discovery protocols are included in resource consent conditions.
12. Express concern the site contains a *“network of streams with some adjoining natural inland wetlands”* (AEE pg 14), and the development proposal requires *“reclamation of a natural inland wetland”* (AEE pg 39), *“discharge of treated wastewater into water from a wastewater treatment plant”* (AEE pg 40); *“diversion of groundwater caused by excavation”* (AEE pg 40).
13. Request if consented, infrastructure avoids wetlands and waterways on the site and within associated distance setbacks
14. Express extreme concern *“the site is subject to a series of flood hazards in the form of flood plains, overland flow paths, flood prone areas and flood sensitive areas”* (AEE pg 18).

15. Request that a conservative approach is applied when assessing the effectiveness of proposed stormwater management within a flood hazard environment, noting modern mitigation methods are not always successful in offsetting negative effects of flooding on residents, housing and the ecological environment within and on surrounding land and housing areas, including those downstream. This is particularly important due to recent storm events (Auckland Anniversary and Cyclone Gabriel) which resulted in associated risks to life and property, and the subsequent costs to council for purchasing category 3 flood affected properties.
16. Express concern at the increased flood risk associated with substantially increasing impervious surfaces within a flood hazard environment, noting modern mitigation methods in other modern development areas have not prevented flood damage or risk within or surrounding those developments.
17. Express concern the AEE report includes an illustration of a *“typical stream within the subject site. Source: B&A site visit, 21/11/2024” (AEE pg 18)*, as we note November 2024 “rainfall was below normal (50-79% of normal) or well below normal (<50% of normal) for much of the country” and “soil moisture levels were below normal for northern, inland, and eastern parts of the North Island” (<https://niwa.co.nz/climate-and-weather/monthly/climate-summary-november-2024>). We request that for decision-making purposes all environmental effects reporting should more accurately reflect what would be ‘typical’ on site given expected normal environmental conditions.
18. Express concern that *“numerous localised instability features are present across the site” (AEE pg 20)*. We request that a conservative approach is applied when assessing the effectiveness of mitigation methods during earthmoving activities, and the appropriateness of the proposed retaining structures and stability improvement measures and their effectiveness for the life of the development. This is particularly important due to recent storm events which resulted in associated risks to life and property, and the subsequent costs to council for purchasing category 3 properties subjected to earth movement risks. If consented, we request consent conditions that consider seasonal risks and enforce robust monitoring of consent compliance.
19. express concern the site contains *“relatively large areas of native vegetation ... associated predominately with areas subject to consent notice conditions and a Significant Ecological Area – Terrestrial (‘SEA-T’) Overlay” (AEE pg 15)*, including vegetation areas assessed as having moderate and high ecological values.
20. Request if consented the infrastructure avoids Significant Ecological Areas on the site.
21. Express concern *“some vegetation removal will be required within the riparian margins and within 20 metres of a natural inland wetland;... [and within] three bush areas protected by consent notice conditions”, (AEE pg 28)*
22. Request that if consented environmental experts consider whether a covenant condition restricting the ownership of domestic cats on the proposed development lots is required to protect ecological values in the SEA areas. As there are currently issues with being able to provide handlers certified to trap domestic cats, even for our areas in Rodney with high ecological birdlife values where coastal endangered birds are at risk.

23. Express concern *“native birds, bats, and lizards have been identified as potentially affected”* (AEE pg 53). We request robust assessment of the potential negative impacts to ecology from this proposal, and the effectiveness of proposed mitigation to protect ecological values present in all onsite and receiving environments, as our natural environment and biodiversity is highly valued by our communities.
24. Note *“much of the site in between the waterbodies is land which could be best described as rolling, with a general fall to the south-east towards the Ōrewa River. Neighbouring sites to the west and south share similar topographical characteristics”* (AEE pg 14). We request robust assessment of the potential negative impacts of this proposal to ecology, freshwater, and all receiving environments downstream including river and marine areas, and the effectiveness of proposed mitigation to protect ecological values present in these receiving environments, as our natural environment is highly valued by our communities.
25. Express concern *“preliminary groundwater monitoring to date ... confirms that the proposed bulk earthworks are expected to encounter the groundwater table. It is anticipated that permanent dewatering will be required”* (AEE pg 28). We request that dewatering results in no impact to the hydrological values of the existing wetlands and no net loss of their ecological values present. Additionally, that dewatering does not affect other users who have access to groundwater take within the associated catchment.
26. Wupport *“approximately 43.7 hectares (approximately 40% of the entire site) is proposed to be retained, protected, preserved or enhanced through the protection of vegetation and revegetation planting”* (AEE pg 31).
27. Request that suitable species are used for planting near riparian margins, so they are resilient in waterways, do not reduce drainage functions, or result in the long-term flood risks and damage caused by tree loss/debris in waterways.
28. Express concern that in general the council compliance team has difficulties in responding in a timely manner when compliance concerns are raised in the Rodney area, we therefore request that a mechanism that allows regular remote monitoring of condition compliance by council officers is considered, as a preventative measure to non-compliance or complaints.
29. Express concern the applicant has not considered sustainable development options such as the use of solar energy on all house lots, and any limited capacity in power supply to service this development may in turn contribute to the increasing proposals for greenfield solar farms we are currently experiencing in the Rodney area.
30. Request that consultation with local residents is undertaken to determine the potential effect on visual amenity values and any reverse sensitivity issues for existing recreational, rural or business activities in the area.
31. Request that streetscape and landscaping trees on site do not restrict access for emergency and heavy vehicles, create safety risks for motorists or pedestrians through impeded visibility, increase flood risk through deciduous leaf matter in roading drainage (proposed as overland flow path receivers), or in the long-term cause issues for overhead or underground infrastructure through their root systems or tree canopy size.
32. Note *“an alternative wastewater solution for the site has been designed and is to be consented as part of the proposal. This solution is to be used for either of both of*

Stages 1 and 2 if it transpires connection to the Watercare network is not possible when construction is completed. This sees provision of an on-site wastewater treatment plant ... [which] would be in place until such time Army Bay has been upgraded.” (AEE pg 32). We request that the use of onsite systems and disposal fields poses no environmental risk to the waterways, wetland or ecological areas on, near or downstream of the site, or odour nuisance risks to surrounding properties, in the event of misuse of the system, or failure of the proposed methods and maintenance requirements. Our preference would be for all stages of the development to instead be timed with the Watercare facility upgrades.

33. Do not support *“the removal of treated wastewater off-site, via trucking or other means” (AEE pg 64).*
34. Note the site includes a designated arterial road (NOR 6), and support the applicant funding and delivering the road within the subject site, however request that Auckland Transport has final decision-making regarding all design components to ensure road network consistency and note there is no funding available in the 10 year plan for completion of NOR 6 outside of this development.
35. Request all providers of associated infrastructure and amenities are consulted with regarding this proposal, to ensure that future residents can be fully supported by local amenities and services that are not proposed as part of the development, including but not limited to water supply, wastewater, power, communications, schools, retail, emergency services and medical providers.
36. Request that walking and cycling connections within the proposed development link up with the Rodney West Local Paths (Greenways) Plan 2019, Map 1 of 6: Waitoki and Wainui <https://www.aucklandcouncil.govt.nz/about-auckland-council/how-auckland-council-works/local-boards/all-local-boards/rodney-local-board/Documents/rodney-west-greenways-plan.pdf>.

Prepared by: Michelle Carmichael and Louise Johnston 21 April 2025.