REPORT

Tonkin+Taylor

Auckland Regional Landfill - Transition Project

Referral Application

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WM New Zealand
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1 Introduction

1.1 Context

WM New Zealand (**WMNZ**) has engaged Tonkin + Taylor Ltd (**T+T**) to provide planning and other technical services for the consenting and design of the landfill expansion at Redvale Landfill (Redvale).

This report sets out the requirements within the 'Referral application form to use the Fast-track process' (**application form**) pursuant to sections 13 and 22 of the Fast-track Approvals Act 2024 (FTAA).

This report (and appendices) should be read in conjunction with the completed application form made by WMNZ, included in **Appendix A**.

1.2 Background

WMNZ owns and operates Redvale landfill and several land parcels in the surrounding area at Dairy Flat, north of Auckland. The total land area is approximately 168 ha and is shown on Figure 2 in **Appendix E**.

Redvale is located on the site of a former limestone quarry and has been operating as a waste disposal facility since 1993. It is one of only two landfill sites (the other being Hampton Downs located in the Waikato Region) that can currently receive >350,000 tonnes of waste annually under existing consents to service the approximately 1.5 million tonnes of waste that the Auckland Region produces each year. Redvale is currently scheduled to cease accepting waste on 31 December 2028 as required by Condition 8 of its existing consent (REG61341, REG61342, REG61343, and REG61544).

Auckland Regional Landfill (ARL) is proposed by WMNZ as a permanent replacement for Redvale. However, due to a delay in the authorisation and establishment of the replacement, ARL if approved, is not expected to be operational until the mid-2030s. Therefore, a transition plan is required to address this potential gap in critical landfill infrastructure for residual waste disposal in the Auckland region.

Based on the current solid waste deposition rate at Redvale, there will be approximately 600,000 tonnes per annum (tpa) or approximately 50% of Auckland's waste, that must be accommodated from the end of 2028 until ARL becomes operational.

In order to provide critical temporary landfill infrastructure for residual waste disposal in the Auckland region, WMNZ proposes to extend the operation of Redvale to the end of 2036 and develop 4.56 Mm^3 additional airspace at the existing facility. This includes approximately 3.13 Mm^3 in additional Class 1 Landfill expansion on top of the existing Class 1 refuse placement area and 1.43 Mm^3 of Class 2 Landfill extension. The proposed works include the following:

- **Revised final surface profile of the existing landfill:** The current final design landfill ground profile varies but is less than 1V:3H across the footprint. That ground profile will be steepened up to a maximum grade of 1V:3H, to allow placement of additional waste within the existing landfill footprint. Bunds, varying in height between 2 and 6 m, will be constructed along the eastern and southern boundaries to accommodate the required additional waste volumes.
- **Class 2 extension:** The landfill is proposed to be extended to the south-west of the current landfill boundary, within the area currently occupied by the now decommissioned Managed Fill and Pond 6. The extension will comprise the excavation and lining of a new landfill cell, allowing the acceptance of waste that meets the Class 2 waste acceptance criteria, which will be constructed in a manner similar to the already constructed cells within the current landfill.

- **Relocation of ancillary activities:** the relocation of ancillary activities to allow for the placement of waste.
- **Sediment Retention Ponds:** The removal and filling in of Sediment Retention Pond 6 and the Office Pond while enlarging Pond 1 to capture and treat the stormwater from these catchments.

The project will enable the continued functioning of existing regionally significant infrastructure by providing additional landfill airspace capacity between 2028 and 2036. Specifically, the continued operation of Redvale will support the resilience and security of solid waste management across the Auckland Region. The project will maintain landfilling activities at the existing facility without adding to the overall intensity of external traffic movements.

This application is limited to resource consents, required under the Resource Management Act 1991. No other approvals are currently considered required for the works.

1.3 Applicant and property details

Table 1.1 below sets out the details of the applicant and application site, as required by Section 1 of the application form. Evidence of authorisation to make the application on behalf of the applicant is included in **Appendix B**.

Table 1.1: Applicant and property details[1]

Applicant	Waste Management NZ Limited
Owner and occupier of application site	
Council / Plans	Auckland Council (AC) Auckland Unitary Plan - Operative in Part (AUP)
Agent acting on behalf of applicant	Tonkin & Taylor Limited Attention: s 9(2)(a) Phone: s 9(2)(a) Email: s 9(2)(a)
Applicant (including finance)	Waste Management NZ Limited Attention: s 9(2)(a) Phone: s 9(2)(a) Email: s 9(2)(a)

1.4 Compliance and enforcement history

The compliance and enforcement history, as required by the FTAA[2] and the application form[3], is attached as **Appendix D**.

[1] FTAA, s 13(4)(s).
[2] FTAA, s 13(4)(x).
[3] FTAA, s 1.4.1.

2 Proposal

2.1 Project name

The project name by which the project will be known publicly is *Auckland Regional Landfill – Transition Project* (ARL-TP).

2.2 Project description and location

2.2.1 Project description

The following description is proposed to be used for the publication of this project on the Fast-track website:

> *Expansion and extension of Redvale Landfill to provide for additional landfill capacity until Auckland Regional Landfill becomes operational.*

2.2.2 Overview of project description and location

This section provides an overview of the proposed development at Redvale to provide critical temporary landfill infrastructure, this is also described in the Landfill Engineering Technical Memo included in **Appendix H**.[4] The proposal comprises the provision of approximately 4.6 Mm^3 in additional airspace at the existing facility. This will include 3.2 Mm^3 in additional Class 1 landfill expansion and 1.4 Mm^3 of Class 2 extension.

The proposed site layout is shown in **Appendix EE**, Figure 4.1.[5]

2.2.3 Class 1 landfill expansion

The profile of the existing Class 1 area, as shown on Figure 4.1 in **Appendix E**, is proposed to be altered to accommodate additional waste. The proposed final surface profile will comprise a steepened wedge of airspace around most of the landfill perimeter. Preliminary design of the works indicates that it will include the following components:

- Steepening of the post-settlement cap to a maximum gradient of 1V:3H (from the existing 1V:4H) within the existing consented landfill footprint.
- Construction of a perimeter bund along the eastern and southern sides of the landfill that is between 2 and 6 m high, including an access road to support single lane traffic. This will allow the edge of the waste mound to be elevated, increasing the available airspace.
- Progressive temporary removal of existing landfill cap to allow for the placement of additional fill within the reprofiled area. Material removed from the final cap will be stockpiled within the landfill for re-use as a final cap
- The pre-settlement cap of the reprofiled area will have a maximum elevation of RL 106.7 m.
- The existing leachate collection system will be enhanced as required to accommodate the revised waste profile. The existing leachate collection sump and leachate cleanout riser access ports will be covered by the perimeter bund to the southern side of the landfill. These will extend through the perimeter bund to new access ports on the outer side of the perimeter road. Additional leachate collection will be provided within the perimeter bund construction and within the waste mass as required.
- Landfill gas extraction wells will be extended through to the final surface profile.

[4] FTAA, s 13(4)(a).
[5] FTAA, s 13(4)(d).

2.2.4 Class 2 extension

An extension within the south-western property, adjacent to the existing landfill, is proposed to accommodate waste meeting the Class 2 waste acceptance criteria and provide additional airspace volume of 1.43 Mm^3. This area is currently occupied by the Managed Fill site and Pond 6. The proposed Class 2 extension will involve the following:

- Decommissioning and removal of the majority of soils in the existing Managed Fill Site.
- Decommissioning and removal of Pond 6. Surface water that is currently captured by Pond 6 will be rediverted to Pond 1. The existing pond dam will be retained and reconfigured to act as a toe bund for the waste fill.
- Construction of a Class 2 lining system, with sidewalls formed and graded at a slope of approximately 1V:3H. The height of the sidewalls will vary, ranging from approximately 30 m at the north-western part of the site to around 2 m at the eastern corner.
- Construction of a leachate collection system that will collect leachate and direct it to the leachate collection sump for extraction. A leachate drainage blanket is proposed above the lining system in the Class 2 Footprint to allow leachate to drain towards the leachate pipes. Leachate will be collected in a series of perforated high-density polyethylene (HDPE) leachate collector and header pipes.
- The final capping system and landform of the Class 2 extension will remain consistent with the existing landfill design and consenting requirements of 150 mm of topsoil overlying 1,000 mm of clay with a maximum permeability of 1 x 10^{-8} m/s.
- Construction of an access road around the perimeter of the extension.

Class 2 Landfill design, including lining system, leachate collection and drainage system will be confirmed at the detailed design stage.

2.2.5 Landfill construction and phasing

As with the existing landfilling operations, the extension of Redvale Landfill will be undertaken using a phased approach. The phasing will be developed and detailed for the lodgement of any substantive application and will include phasing for the Class 1 putrescible waste, Class 1 non-putrescible waste and the Class 2 area. In general the construction of the project is anticipated to be undertaken following on from 31 December 2028. The details of transitioning from the existing landfilling to the extension will be developed further as part of any further applications.

2.2.6 Additional materials

Additional materials, including soil and clay, are required for various activities at the landfill, including cover (daily, intermediate and final) and liner material. This material will be sourced from both on-site, where materials have been previously stockpiled, and off-site, where required.

In particular, there is an existing resource consent (Ref: LUC60383492, WAT60400235, and DIS60400103) that allows for the undertaking of earthworks associated with the removal of earth for use in association with landfill activities in the Stockpile 4 area, including the diversion and discharge of sediment-laden water within 100 m of a natural wetland. This existing resource consent expires on 31 December 2028. Therefore, WMNZ proposes to seek a new consent for this stockpile to allow for the ongoing operation of the Redvale site beyond 2028, in line with the other resource consents sought at the landfill (refer to section 4.1 below).

2.2.7 Relocation of ancillary activities

To enable the creation of additional landfill space, some of the ancillary activities to landfilling operations are proposed to be relocated, including:

- Light engineering workshop
- ATF pad
- Wash bay
- Water tanks

The proposed revised locations are shown on Figure 4.1 in **Appendix EE**.

Changes will also be required to the perimeter roads to allow for the reforming of the landfill areas. The location of these accessways will be confirmed once the design is progressed.

2.2.8 Sedimentation ponds

To undertake the proposed works, several changes will be required to the existing sedimentation ponds on the site, including:

- Expansion of Sedimentation Pond 1 within the existing channel and balance pond. Surface water from the existing Pond 6 catchment and ancillary areas (previously serviced by the office pond) is proposed to be diverted to Sedimentation Pond 1.
- Surface water from the catchment previously diverted into Sedimentation Pond 1 will be diverted into Sedimentation Pond 2.
- Office pond and Pond 6 are proposed to be decommissioned to enable the development of the proposed Class 2 extension area.

2.2.9 Bond

As part of the original consent that was granted for the operation of Redvale, a financial bond (Bond) was put in place and has been maintained in favour of the Auckland Council. The Bond was set up to provide for costs associated with early closure, environmental remediation, post-closure care, and other activities associated with compliance with performance and monitoring standards as required by resource consents in the very unlikely event that the consent holder defaulted on their obligations.

The Bond was reviewed in 2013 as part of the reconsenting process and was considered appropriate at that time. An initial review of the current bond taking into account this proposal has indicated that this remains appropriate. However, a detailed assessment will be done at the time of a substantive application (if the referred application is accepted).

2.2.10 Existing landfilling operations

Existing landfilling operations are undertaken in accordance with the Redvale Landfill Management Plan. It is proposed that the construction and operation of the landfill will continue in accordance with an update to the plan, which will cover:

- **Excavation**: Undertaken in accordance with the site's erosion and sediment control management plan. Excavated soils are generally stockpiled on site for subsequent reuse.
- **Haul roads**: Built and maintained for safe access, considering gradient, traction, and dust control.
- **Construction**: New landfill phases, typically 1 to 2 hectares, are constructed each summer using heavy machinery to install earth fills, basal lining, and leachate drainage systems.

- **Leachate management**: Leachate is collected via a series of extraction pipes across the base of the waste mass to four leachate collection sumps (LCS) at the southern end. Extracted leachate is treated in the leachate evaporator system (BeneVap), which is located close to the LCS locations, or trucked off-site to a relevant trade waste location authorised to accept this material.
- **Landfill gas**: The existing landfill gas collection system includes a network of vertical and horizontal extraction wells. The collected landfill gas is beneficially used to thermally treat vapours from the leachate evaporator units or generate electricity. There are three fully enclosed ground flares which destroy any remaining landfill gas that is not beneficially used. With the exception of a small amount of electricity required on-site, all electricity generated is exported to the national grid.
- **Waste placement**: Waste is placed on a phased basis within cells and covered with daily cover at the end of each working day. This daily cover will be at a minimum of 300 mm thickness (from the existing 150 mm). The next working day, daily cover is stripped and stockpiled alongside the tip face for reuse. When a cell is completed, this is closed and capped with final cover material. Intermediate cover with a minimum of 450 mm thickness (from the existing 300 mm) after compaction would be applied where an area is not to be utilised for a period of six months.
- **Waste transport**: WMNZ operates a large fleet of waste collection and compactor vehicles. Other collection companies are also able to utilise the landfill, provided they comply with WMNZ requirements and resource consent conditions. These vehicles are used to transport residential waste from transfer stations and commercial waste directly from commercial operators. Vehicles carrying waste must be fully enclosed to gain access to the landfill. This is to prevent the escape of waste, litter and excessive odour from the vehicles. Vehicles enter the active landfill area via a weighbridge. Existing resource consents limit the number of vehicle movements to and from the landfill to 650 per day (e.g. a return trip is comprised of two vehicle movements).
- **Ancillary activities**: In addition to the active tipping operation there are a number of ancillary landfilling activities that support the overall operation as detailed in Section 3.1.4 above. Ancillary activities on site are required to enable the landfill to run effectively and efficiently. This includes works related to access and haul roads, weighbridge, energy centre, BeneVap, staff facilities, wheel wash, water supply and stormwater ponds.

2.3 Description of project area

2.3.1 Site location

The site is located at 66 Landfill Access Road, Dairy Flat, north of Auckland, as shown in Figure 1 in **Appendix EE**. The Site is currently accessed from the south-east along Landfill Access Road off Dairy Flat Highway, with Horseshoe Bush Road running along part of the northern boundary of the Landfill area. The existing main entrance off Landfill Access Road will continue to be used to service the ongoing operation of Redvale.

Immediately surrounding the site is a mix of land uses, including:

- Various lifestyle blocks
- Rural production activities
- Dairy Flat Country Club
- Massimo's Italian Cheeses
- Dairy Flat School

The zoning in the surrounding area under the Auckland Unitary Plan – Operative in Part (AUP) is Rural – Mixed Rural Zone. To the east of Dairy Flat Highway zoning includes the Future Urban Zone. The Auckland Council Spatial Land Use Strategy notes that the structure plans for these zones are not anticipated for a number of years. These structure plans are required prior to official zoning changes, and therefore this area is also currently subject to the provisions of the Rural – Mixed Rural Zone.

2.3.2 Site description

In accordance with section 2.2.2 of the application form, Table 2.1 and Figure 2 in **Appendix E** includes details on the address, Records of Title and site area. Additionally, a further detailed description[6] of the site is included below in Table 2.1.

Table 2.1: Property description

Site address	66 Landfill Access Road, Dairy Flat 0794
Site area	168 ha
Current landfilling area	59 ha
Legal description	• Lot 1 Deposited Plan 446482, • Lot 1 Deposited Plan 353568, • Lot 1 Deposited Plan 322777, • Lot 2 Deposited Plan 446482 and Lot 1 Deposited Plan 155355, • Section 1 Survey Office Plan 68946, • Lot 1 Deposited Plan 125471 and Lot 2 Deposited Plan 353568, • Lot 1 Deposited Plan 117463 and Lot 2 Deposited Plan 452672
Record of Title reference	• 562514, • 90886, • 562515, • NA118B/596, • 218905, • 578978

For ease of reference, the site has been split into five areas, as shown in Figure 2 in **Appendix EE**, namely:

- **Northern property**: comprises of Stockpile 6 and Sedimentation Pond 3;
- **Eastern property**: comprises mainly of a wider landfilling area, Sedimentation Pond 1 and 2 and the BeneVap;
- **Western property**: comprises mainly of the wider landfilling area, which accommodates the majority of Class 2 waste and Sedimentation Pond 4;
- **South-western property**: comprises of Stockpile 4, the current Managed Fill area and Sedimentation Ponds 5 and 6; and
- **South-eastern property**: comprises of ancillary landfilling activities such as the offices, energy part and offices, Stockpile 6, vacant land and the Trotting Track.

[6] FTAA, s 13(4)(d).

2.3.3 Existing environment

For this application, the existing environment at Redvale is assumed to be what it will be at the expiry of the existing regional discharge consents in 2028 and cessation of waste acceptance on 31 December 2028 in accordance with the land use consent. That is, the environment as it stands with the existing resource consents for Redvale Landfill implemented. While the resource consent for an operating landfill accepting waste will have expired, the landfill in its closed state will continue to generate discharges and require aftercare. Any consents required for aftercare activities would be sought at this time. Therefore, the existing environment as of the 31 December 2028 would be expected to include:

- Waste placement ceased with the final capping system construction still to be completed.
- Use of Stockpile 4 is ongoing for the purpose of closure works, with the existing proposed buffer planting and wetland buffer remaining in place.
- A final landform to the approved profile, up to 120 m RL with side steepness at 1V:3H.
- Management of leachate generated from the landfill, likely through a BeneVap system and trucked off site.
- Landfill gas continued to be managed through the energy centre at the site.

The relevant AUP maps with zoning and key planning notations that apply to the site are identified in Table 2.1 below.

2.4 Ineligible activity

The criteria of ineligible activities has been assessed in the relevant section of the application form[7] (refer **Appendix A**). The project, when assessed against the criteria is not deemed to be an (or involve any) ineligible activity.

[7] Application form, section [XX]; FTAA, ss 5 and 13(4)(c).

3 Appropriateness for Fast-track approvals process

3.1 Significant regional and national benefits of the project[8]

3.1.1 Overview

The purpose of the FTAA is to '*facilitate the delivery of infrastructure and development projects with significant regional or national benefits*'.[9] An essential component of assessing a referral application is to determine whether the project is an infrastructure or development project that would have significant regional or national *benefits*. Overall, referring the project would:

1 Align with the purpose of the FTAA and referral application criteria[10] as waste infrastructure that has significant regional or national benefits[11] (detailed in sections [3.1.2]-[3.1.3] below).

2 Enable the project to be processed in a more timely and cost-effective manner under the FTAA[12] (in contrast with standard consenting processes[13]), as detailed in section [XX].

3 Unlikely affect the efficient operation of the FTAA process.[14]

3.1.2 Significant national and regional benefits[15]

Municipal landfills are essential infrastructure in New Zealand, allowing for the safe management and disposal of waste across the country, as they are the final destination for solid waste that cannot be reused or recycled. Their status as essential infrastructure has been validated by a number of Council's around New Zealand, including Auckland Council who have included municipal landfills in their definitions of infrastructure within their planning documents, as demonstrated in Chapter J Definitions of the Auckland Unitary Plan – Operative in Part (AUP). Modern landfills, such as Redvale, are designed so that the actual and potential effects of the disposal of waste are appropriately managed through the implementation of engineered lining and capping systems and proactive on-site management of landfill gas, leachate and stormwater.

The Auckland Region currently depends on three Class 1 landfills, Redvale in the north of Auckland, Whitford in the east of Auckland, and Hampton Downs to the south in the Waikato, with an additional small amount of waste sent to Puwera Landfill, located south of Whangarei in Northland. As identified in the NERA Economics Assessment (**Appendix FF and Appendix G)** landfill capacity is constrained and if Redvale were to cease accepting waste in December 2028, this would further constrain capacity.

Given the essential role municipal landfills play in providing a core community service, having insufficient capacity to service New Zealand's largest region is not desirable. The benefits gained by the economy and the community within Auckland from having reliable and sufficient landfill space from 2028 to 2036 cannot be underestimated and will result in significant regional benefits.

As a secondary benefit, Redvale also fulfils a role in supporting and enabling the construction and development of nationally significant projects and infrastructure as well as primary industries, as these projects require a location to dispose of their waste streams as part of development and operation. This includes projects associated with the national transport network, marine and port infrastructure, and electricity transmission infrastructure, to name a few. According to Auckland

[8] FTAA, s 22(1).
[9] FTAA, s 3.
[10] FTAA, s 22(1)(a).
[11] FTAA, s 22(1)(a).
[12] FTAA, s 22(1)(b)(i).
[13] RMA.
[14] FTAA, s 22(1)(b)(ii).
[15] FTAA, s 22(1)(a).

Council's Technical Report 2019/009[16] (Rohani et. al., 2019), there was a significant increase of approximately 0.5 million tonnes in commercial waste (including C&D waste) between 2010 and 2016, which accounts for about 80% of all waste sent to landfill. Almost a third of this increase was attributable to C&D waste.

C&D waste from large infrastructure projects, particularly concrete and timber, is a significant component of the waste stream going to Redvale. While a large portion of C&D waste can be sent to controlled fill and managed fill sites, a portion, including mixed builders' waste, and their packaging, ends up in landfills like Redvale. Increases in economic activity often directly reflect in increased tonnage to landfill. This reflects the direct relationship between the development of important projects and infrastructure and their reliance on landfill capacity. The extension of Redvale therefore enhances infrastructure and production capabilities, providing for the overall national economy by enabling connections and logistics with New Zealand's largest city.

Under Chapter B1 'Issues of regional significance' of the Regional Policy Statement contained within the AUP, it is identified that the significant resource management issues for the Auckland region encompass urban growth, infrastructure, transport and energy. According to Stats NZ (2021)[17], Auckland's population is predicted to surge to approximately two million people in early 2030, up from approximately 1.7 million in 2021. Given this rate of population growth and the anticipated shortfall of landfill capacity in the region due to the delay of ARL's opening, the proposed extension of operational life and capacity at Redvale will effectively address these identified regional issues until ARL is available. The temporary extension of landfilling services at Redvale for up to a maximum of 8 years, between 2028 and 2036, will sustain a high standard of living for Auckland communities by enabling safe, ongoing waste collection and disposal. This is also anticipated in reducing illegal dumping and associated environmental and health risks within the Auckland region.

Furthermore, the proposed development at Redvale will continue to facilitate energy recovery. This involves using landfill gas, which is approximately 50% methane gas, from the landfill to fuel a number of renewable energy initiatives. These include electricity generation and providing a source of heating and carbon dioxide to a neighbouring Aubergine greenhouse complex. On average, WMNZ extracts approximately 36 Mm^3 of methane from the landfill per annum, converting this into clean, green energy, which contributes to the reduction of greenhouse gas emissions and supports climate change mitigation and adaptation. As the landfill is progressively filled, the generation of landfill gas will continue to increase. In 2019, Redvale's energy generation had the capacity to power 14,000 homes on the local grid, making it Auckland's largest renewable energy source. It is estimated that the landfill can power up to 18,000 homes.[18] The continued operation of Redvale, with its renewable energy generation capabilities, directly supports electricity supply to Aucklanders, thereby contributing to housing needs and ensuring a well-functioning and resilient urban environment[19], consistent with the outcomes sought by policy 1 of the National Policy Statement on Urban Development 2020. In this way, the project will contribute to a well-functioning environment through its provision of essential waste infrastructure and renewable energy generation that supports housing development, population growth and access to services necessary for communities' social, economic and cultural wellbeing.

[16] Rohani, M., Huang, T., Hoffman, L., Roberts, M., & Ribeiro, B. (2019). *Cost Benefit Analysis of Construction and Demolition Waste Diversion from Landfill A case study based on HLC Ltd development in Auckland*. Retrieved from Cost benefit analysis of construction and demolition waste diversion from landfill. A case study based on HLC Ltd development in Auckland.

[17] Retrieved from Auckland population may hit 2 million in early 2030s | Stats NZ

[18] Office of the Prime Minister's Chief Science Advisor (2019). Retrieved from Modern landfill – a waste-to-energy innovation | Office of the Prime Minister's Chief Science Advisor

[19] FTAA, s 22(a)(iii).

Landfills also play a critical part in natural hazard and disaster recovery.[20] Material and debris from events such as the Auckland Anniversary Floods in 2023 must be disposed of, as they cannot be reused. This response also needs to be reactive, and landfills are required to have adequate capacity to manage this material at short notice, as it cannot be planned for in advance. Ensuring this capacity is available in Auckland through the extension at Redvale, is considered to be essential for resilience at a national and regional level.

3.1.3 Economic benefits[21]

The project is projected to deliver significant regional and national economic benefits. These are detailed in the Economics Assessments, included in **Appendix F** and **Appendix G**. These benefits are primarily realised through the avoidance of substantial adverse economic impacts that would occur if Redvale was to cease accepting waste after December 2028, prior to the new ARL becoming operational. The continuation of waste acceptance at Redvale maintains stability in the region's waste management infrastructure, preventing significant cost increases and market disruption for Auckland and surrounding regions.

A critical economic benefit of this project is the prevention of a material increase in landfill gate prices. As detailed in **Appendix F** and **Appendix G**, if Redvale have to cease accepting waste in 2028, this would create a scenario where Auckland's demand for waste disposal significantly exceeds the available capacity of the remaining landfills in the region. This supply shortfall is projected to increase gate prices by 30%, which would impose an additional cost of approximately $42.6 million per year on waste disposal services. Furthermore, the closure would create a significant capacity shortfall for waste disposal annually, which would need to be managed through other costly means. This project directly avoids these significant price shocks and capacity constraints, providing cost certainty for residents and businesses.

A sensitivity analysis was also undertaken to assess the economic impacts if Hampton Downs landfill could accept an additional 500,000 tonnes of waste per year following Redvale's closure. This analysis concluded that even with this additional capacity, closing Redvale would lead to a substantial lessening of competition, and a material increase in market concentration. With the other landfill within the region having a limited acceptance rate, Hampton Downs would effectively become a monopolist for a significant portion of Auckland's demand. Consequently, this would still be expected to result in a price increase of at least 10-15% (**Appendix F** and **Appendix G**).

The project also delivers economic benefits by maintaining the most cost-effective and efficient transport logistics for a large portion of Auckland's waste. Economic modelling demonstrates that the status quo, with Redvale operational, is the lowest-cost option for waste transportation. Diverting waste to more distant landfills, such as Whitford or Hampton Downs, would substantially increase annual transport costs, in some scenarios by over $21 million per year. This diversion would also lead to increased traffic congestion across the Auckland road network, which carries indirect economic costs through reduced productivity and disrupted supply chains. By continuing operations at Redvale, the project avoids these direct and indirect costs.

The project supports the stability for Auckland's economy by supporting essential waste infrastructure. It averts a substantial lessening of competition in an already highly concentrated market that would otherwise result from Redvale's closure. The significant economic benefits are therefore delivered through the avoidance of multi-million dollar annual increases in gate prices and transport costs, the prevention of negative impacts on regional productivity from increased congestion, and the maintenance of a stable and competitive market for essential waste services.

[20] FTAA, s 22(a)(viii).
[21] FTAA, s 22(a)(iv).

These benefits will be realised not only by Auckland but also by the neighbouring Waikato and Northland regions, making this a national benefit.

3.2 Efficiency of the Fast-track approvals process

3.2.1 Facilitation of the project under the FTAA

Fast-tracking this application is crucial due to the time constraints that are presented by requirements to cease accepting waste on 31 December 2028 and the gap between this and ARL opening. The resource consenting process for ARL has taken significantly longer than anticipated, with the original consents lodged with the Auckland Council in 2019, the consents granted by Auckland Council in 2021 are still subject to Environment Court and Court of Appeal appeal processes. To ensure that another waste facility is available to address any shortcomings during this transition period, it is imperative to obtain approvals in a timely manner. Additionally, receiving these before closure will ensure that ancillary activities and infrastructure can remain in place and operational beyond 2028.

Due to the tight timeframes that the extension is required to be consented in (i.e. before Redvale would otherwise be required to cease accepting waste on 31 December 2028), the use of the FTAA is considered to be the most appropriate process. Similar resource consenting processes have taken in the order of five or more years, which exceeds the time available to consent the work at Redvale.

3.2.2 Likelihood of the efficient operation of the Fast-track approvals process being materially affected by referring this project

Referring the ARL-TP to the Fast-track approvals process is unlikely to materially affect the efficient operation of the Fast-track approvals process for the following reasons:

- Relevant experts have been engaged to assess the proposal to confirm potential adverse effects on the environment, as detailed in **Appendix I** to **Appendix Q**. Based on the project proposal to date, with suggested mitigation in place, there are no specific concerns on the proposal from technical experts.
- Consultation undertaken to date has been extensive, as detailed in **Appendix S**. Feedback from this process has been reviewed with preliminary mitigation measures proposed based on feedback.
- WMNZ has engaged a project team comprising of lawyers, planners and technical specialists to progress the substantive application so it can be lodged promptly if the referral application is accepted to ensure the efficient operation of the Fast-track process.
- The project does not affect any of the Māori related considerations which are required to be considered and addressed. Consultation with the relevant Māori groups who have interests in the proposal has been undertaken with the feedback included in **Appendix S**.

3.3 Addressing significant environmental issues

Environmental issues of the project have been assessed within the Technical Referral Memorandums included in **Appendix I** to **Appendix Q**. It is considered that these have been adequately addressed.

3.4 Consistency with local or regional planning documents

The ARL-TP is consistent with the following local and regional planning documents:

- **AUP Chapter B Regional Policy Statement:**

  - **Chapter B3 Infrastructure:** The project seeks to ensure that the waste infrastructure within Auckland is resilient, efficient and effective while appropriately managing the potential effects on the environment. Any provision for additional landfilling operations as part of the transition to ARL is required to be within an existing landfill facility due to the already established infrastructure at the site, as the timeframes to develop such a site would exceed the period of time required for the transition.
  - **Chapter B9 Rural Environment:** The project is located within an existing landfill facility, not impacting on elite soils that may be within the area. The proposal will be in keeping with the landscape and visual character through the establishment of final cover and mitigation planting, meaning that this will appear within context of the wider rural environment. This proposal also includes a number of mitigation measures to manage the impacts on amenity values of the rural area, particularly in regard to odour concerns that have been raised by the local community.
  - **Chapter B10 Environmental risk**: The project seeks to expand a current facility meaning that the impacts of any contaminated land are localised to one site within the area. Impacts from this are managed through the engineered design to ensure that this does not pose a significant risk to human health and appropriately manages all contaminants.
- **AUP Regional Chapters**
  - **Chapter E1 Water quality and integrated management and Chapter E8 Stormwater – Discharge and diversion**: Landfilling activities, including the construction of any extension, will be managed to protect the water quality of the surrounding area, including from any potential increased sediment loads. This will be through the implementation of appropriate landfill practices and water management as outlined in the Landfill Management Plan and any relevant resource consent conditions.
  - **Chapter E11 Land disturbance:** All earthworks on site will be managed appropriately to avoid any impacts on the environment through best practice erosion and sediment controls, a comprehensive sediment pond system and managing any potential stability issues through geotechnical design.
- **Chapter E13 Cleanfills, managed fills and landfills** – the existing Redvale Landfill and any proposed extension will be designed and operated so that adverse effects on the environment from leachate are avoided, remedied or mitigated through design and operation. Impacts on human health effects from the landfill have been assessed, and there are no current concerns for those offsite or works onsite (provided correct Personal Protective Equipment (PPE) is utilised.
  - **Chapter E14 Air quality**: the air discharges from the existing and proposed landfilling operations are undertaken in a way that appropriately manages impacts on the air quality within the area. Impacts on human health from air discharges have been assessed and it is considered that there are no offsite concerns relating to air quality effects beyond potential for odour out to 500 m from the landfill footprint.
  - **Chapter E30 Contaminated land:** As noted in the commentary on the RPS above the site is appropriately managed in relation to the contaminated land that it contains.
- **Chapter E33 Industrial and trade activities**: The proposal seeks to extend the use and move the location of some of the ITA on-site. These areas are considered to be appropriately managed through stormwater capture within a bunded area, appropriate management of substances and a stormwater treatment network to ensure that these are not discharged from the site.
- **AUP District Chapters**

  - **E25 Noise and vibration**: The proposed works, including construction and landfill operation, are anticipated to comply with the relevant noise standards within the AUP. Compliance with these standards indicates that the objectives, including people being protected from unreasonable noise and vibration levels, are managed.
  - **H19 Rural zones**: Impact on rural areas is assessed under the RPS above.
- **Plan Change 120:** Plan Change 120 was notified on 3 November 2025. It proposes rezoning residential land for greater intensification, increased building heights and densities (where appropriate) and strengthen management of natural hazard risks. Parts of the plan change took immediate legal effect, including the Flood Plains layer (shown in the Plan Change 120 maps), which overlaps with the existing WMNZ property footprint. In relation to these overlays, new objective and policies have been introduced to address the risks from natural hazards to people, property, infrastructure and the environment, while allowing continued use and adaptation of infrastructure to manage these risks. The proposed landfill development includes stormwater management measures to ensure risks are adequately mitigated through the site's stormwater ponds.

It is considered that, based on the assessment above, the proposal is consistent with the local and regional planning documents.

4 Project details

In accordance with Section 3.1 of the Fast Track Referral Application Form, the approvals required to authorise the proposed works outlined in Section 3 above are detailed below.

4.1 Approvals required

4.1.1 Resource Management Act 1991

Based on the current understanding of the proposal approvals are required under the following:[22]

- Auckland Unitary Plan – Operative in Part (AUP)
- Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F)
- Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-Soil)
- Resource Management (National Environmental Standards for Air Quality) Regulations 2004

At this stage, we understand consent will be required under the rules listed below. This list is not exhaustive and is based upon the information available to date. Further consent triggers may be identified as the proposal develops.

4.1.1.1 Auckland Unitary Plan – Operative in Part

The requirements for resource consents are determined by the rules in the AUP. The rules which apply are determined by the zoning of the site, any identified notations in the plan and the nature of the activities proposed. The planning notations for the site are included in Table 4.1 below and an assessment of the rules under the AUP are in Table 4.2 below.

Table 4.1: Planning notations

Zoning / Overlay or other planning limitation	Comment
Zone	
Rural – Mixed Rural Zone	The Mixed Rural Zone is the underlying zone of the whole site.
Overlays	
Natural Resources – Significant Ecological Areas Overlay – SEA_T_2194	The SEA overlay is identified within a small portion on the south-western side of the Redvale Landfill. No works are proposed within the SEA overlay onsite.
Infrastructure: Airport Approach Surface Overlay – North Shore Airport	Majority of the Redvale Landfill is located within the Airport Approach Surface Overlay of North Shore Airport. This overlay restricts activities that can occur in the Airport Approach path and places height restrictions on activities located within 2.6 km of North Shore Airport to 45 m above the average runway ground level or 106.7 m RL. While the existing consent design of the landfill exceeds the 106.7 m RL the proposed expansion will be formed at a maximum height on 106 m RL post settlement to comply with the Airport Approach Surface Overlay..

[22] Section 13(4)(y)(i).

Zoning / Overlay or other planning limitation	Comment
Highly productive land – Transition definition from the National Policy Statement for Highly Productive Land 2022	Majority of the Class 1 Landfill site at Redvale falls within the transition definition of 'highly productive land' in the NPS-HPL. References to 'highly productive land' mean land that is zoned general rural or rural production and meets LUC 3 class with moderate limitations.
Controls	
Controls: Macroinvertebrate Community Index – Exotic	This control applies to the exotic plantation forest at the Stockpile 4 site located on the south-western side of Redvale Landfill. The Macroinvertebrate Community Index (MCI) is a guideline for freshwater ecosystem health associated with different land uses within catchments. Surface water and sediment from the Landfill discharges into Rangitopuni Stream that runs eastwards close to the northern boundary and eastern site boundary towards Dairy Flat Highway.
Controls: Macroinvertebrate Community Index - Native	This control applies to the vegetation area that is subject to the SEA overlay located at the south-western side of the Redvale Landfill.
Controls: Macroinvertebrate Community Index – Rural	This control applies to majority of the Redvale Landfill.
Auckland Council GeoMaps and other relevant notations[23]	
Overland flow paths	Auckland Council GeoMaps shows a number of overland flow paths within the Redvale Landfill footprint and across the WMNZ landholdings.
Flood Hazard Areas: Very High to Low Hazard Areas	Plan Change 120 includes updated Flood Hazard Areas, identifying areas of Very High to Low hazard area over Redvale Landfill. There is one larger extent of a Very High hazard area to the north-west of the landfill, within the current Class 2 area with other areas focused around existing ponds. Other areas of Flood Hazard areas are concentrated around the area of the ancillary activities associated with the landfill to the south.
Statutory acknowledgment area	The Redvale site is a statutory acknowledgment area for Te Kawerau ā Maki.
Mana whenua areas of interest	The Redvale site is an area of interest to the following mana whenua groups: • Ngāti Paoa; • Ngāti Whanaunga; • Ngāti Maru • Ngāti Manuhiri; • Ngāti Whātua o Kaipara; • Ngāti Whātua Ōrākei; • Ngāi Tai ki Tāmaki; • Ngātiwai; • Te Ākitai Waiohua; • Te Rūnanga o Ngāti Whātua; • Ngāti Te Ata; and • Te Kawerau ā Maki.

[23] It is noted that these are not statutory layers included in the AUP as those above and are provided for context only

Table 4.2: AUP resource consent requirements

Proposed works	Rule reference	Activity status
Discharge of contaminants to land and water	Rule E4.4.1 (A15) [rp] Discharge of water and contaminants (including washwater) onto or into land and/or into water not complying with the relevant standards or not otherwise provided for by a rule in the Plan.	**Discretionary**
Groundwater diversions for the construction and ongoing operation of the landfill	Rule E7.4.1 (A20) [rp] Dewatering or groundwater level control associated with a groundwater diversion authorised as a restricted discretionary activity under the Unitary Plan, not meeting permitted activity standards or is not otherwise listed.	**Restricted discretionary**
	Rule E7.4.1 (A28) [rp] Diversion of groundwater caused by any excavation (including trench) or tunnel that does not meet the permitted activity standards or is not otherwise listed.	**Restricted discretionary**
Diversion and discharge of stormwater from impervious surfaces following treatment in sedimentation ponds	Rule E8.4.1 (A10) [rp] All other diversion and discharge of stormwater runoff from impervious areas not otherwise provided for.	**Discretionary**
Earthworks for construction and ongoing operation of the landfill	Rule E11.4.1 (A8) [rp] Land disturbance greater than 2500 m^2 where the land has a slope equal or greater than 10 degrees.	**Restricted discretionary**
	Rule E11.4.1 (A9) [rp] Land disturbance greater than 2500 m^2 within the Sediment Control Protection Area (SCPA).	**Restricted discretionary**
	Rule E12.4.1 (A6) [dp] Land disturbance of greater than 2500 m^2	**Restricted discretionary**
	Rule 12.4.1 (A10) [dp] Land disturbance of greater than 2500 m^3	**Restricted discretionary**
Landfill discharges	Rule E13.4.1 (A10) [rp] Discharges from an operative landfill.	**Discretionary**
Leachate evaporation associated with the use of the BeneVap	Rule E14.1.1 (A2) [rp] Activities not meeting the permitted activity standards and not provided for by any other rule.	**Discretionary**
Combustion of leachate within the leachate evaporator unit (BeneVap)	Rule E14.1.1 (A54) [rp] Combustion activity not meeting the permitted, controlled or restricted discretionary activity standards.	**Discretionary**
Air discharges associated with the ongoing operation of the landfill	E14.4.1 (A) [rp] Discharge of contaminants into air from landfills that do not comply with restricted discretionary or discretionary activity standards.	**Non-complying**
Vegetation removal	Rule E15.4.1 (A17) [rp/dp] Vegetation alteration or removal within 10 m of rural streams in the Rural – Mixed Rural Zone.	**Restricted discretionary**
	Rule E33.4.1 (A7) [rp] Use of land for an existing industrial or trade activity listed as high risk in	**Controlled**

Proposed works	Rule reference	Activity status
Landfill as a high-risk industrial trade activity.	Table E33.4.3 (after the Table E33.4.3 timeframe expires).	
	Rule E33.4.1 (A8) [rp] Use of land for a new industrial or trade activity listed as high risk in Table E33.4.3.	**Controlled**
Discharges from areas which have been assessed as ITA, including access road, gas energy plant, wheel wash and workshops.	Rule E33.4.1 (A9) [rp] Any industrial and trade activity in Table E33.4.1 that does not meet the relevant permitted or controlled land use standards.	**Controlled**
Discharge of contaminants associated with ITA	E33.4.2(A12) [rp] Discharge of contaminants from an existing or new ITA area not listed in Table E33.4.3 where the permitted discharge standards are not met.	**Controlled**
	E33.4.2(A23) [rp] Discharge of contaminants from an existing ITA listed as high risk in Table E33.4.3 (after the Table E33.4.3 timeframe expires)	**Discretionary**
Construction and operation of the landfill and the relocation of ancillary activities within Very High and High Flood Hazard Areas	Activity Table E36.4.1A (A107) All other infrastructure in flood hazard areas not otherwise provided for	**Restricted Discretionary**
Landfilling activities	Rule H.19.8.1 (A67) [dp] Landfill in the Rural – Mixed Rural Zone.	**Non-complying**

Overall, the proposal requires resource consent as a **Non-complying** activity under the AUP.

4.1.2 National Environmental Standards (s13(4)(y)(i) and clause 2 of Schedule 5)

Proposed works	Regulation reference	Activity status
Resource Management (National Environmental Standards for Freshwater) Regulations 2020[24]		
Earthworks and vegetation within Stockpile 4	**Regulation 54B (3)** Earthworks or land disturbance outside a 10 m, but within a 100 m, setback from a natural inland wetland is a discretionary activity if it— (a) is for the purpose of constructing or operating a landfill or a cleanfill area; and (b) results, or is likely to result, in the complete or partial drainage of all or part of the wetland.	**Discretionary**
	Regulation 54B(4) The taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland is a discretionary activity if—	**Discretionary**

[24] It is unknown at this stage whether there is a hydrological connection between any natural inland wetlands or whether the works will result in partial drainage of these. Therefore, the NES-F has been conservatively assessed for this referral application.

Proposed works	Regulation reference	Activity status
	(a) the activity is for the purpose of constructing or operating a landfill or a cleanfill area; and (b) there is a hydrological connection between the taking, use, damming, or diversion and the wetland; and (c) the taking, use, damming, or diversion will change, or is likely to change, the water level range or hydrological function of the wetland.	
	Regulation 54B(5) The discharge of water into water within, or within a 100 m setback from, a natural inland wetland is a discretionary activity if— (a) the discharge is for the purpose of constructing or operating a landfill or a cleanfill area; and (b) there is a hydrological connection between the discharge and the wetland; and (c) the discharge will enter the wetland; and (d) the discharge will change, or is likely to change, the water level range or hydrological function of the wetland.	**Discretionary**
Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011		
Activities on a 'piece of land' with identified activities under the HAIL and exceeding 2 months in duration and is without a Detailed Site Investigation	Regulation 11 This regulation applies to an activity described in any of regulation 5(2) to (6) on a piece of land described in regulation 5(7) or (8) that is not a permitted activity, controlled activity, or restricted discretionary activity.	**Discretionary**

4.2 Other approvals sought

No approvals under any other legislation are sought as part of this application.

4.3 Project stages

There are no project stages to consider as part of this application.

4.4 Alternative project

No part of this project is proposed as an alternative project for the purposes of section 13(4)(g) of the FTAA.

4.5 Adverse effects

An initial assessment of the project and the adverse effects have been undertaken in the relevant Technical Referral Memorandums (**Appendix I** to **Appendix Q**). This includes the following technical areas:

- Air Quality
- Geotechnical

- Hydrogeology
- Stormwater and industrial trade activities
- Landscape and visual
- Noise
- Traffic
- Aviation Safety
- Ecology

Based on the current proposal, effects under each of the above technical areas are anticipated to be appropriately mitigated.[25]

4.6 Persons affected

The FTAA does not include a specific definition of affected parties, but notes a list of those likely to be affected to include:

i Relevant local authorities

ii Iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements

iii Other relevant iwi authorities

iv Relevant Treaty settlement entities

v Relevant protected customary rights groups and customary marine title groups

vi Ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou

vii Relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011

viii Persons with a registered interest in land that may need to be acquired under the Public Works Act 1981

The definition contained in the RMA has also been used to inform the basis for the consideration of potentially affected parties. A conservative approach has been taken in identifying potentially affected persons. In accordance with Section [3.5], the persons likely to be affected by the project have been listed and described below:

- Auckland Council as the local authority
- Relevant mana whenua groups, as described in the Cultural Values Technical Memorandum (**Appendix R**)
- Neighbouring properties within 500 m of site edge of the waste footprint at the site: potentially subjected to adverse effects such as noise, dust, visual, odour or general landfilling operations.
- Dairy Flat School: due to traffic impacts from the site.

4.6.1 Consultation

A summary of the consultation undertaken for this referral application is included in **Appendix S**. This consultation has been undertaken in three Phases, as described with Phase 3 being focused on the statutory requirements regarding consultation under the FTAA. National policy statements

[25] FTAA, s 13(4)(h).

An assessment against the relevant national policy statements is below. It is noted that an assessment against the National Environmental Standards is provided separately in Section 4.1.2 above.

4.6.2 National Policy Statement for Renewable Electricity Generation 2011

The National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG) provides for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities throughout New Zealand. It recognises the importance of renewable energy and its contribution to achieving the target of 90% of electricity from renewable energy sources by 2025.

Redvale has a Landfill Gas Energy Plant with 15 existing generators, which utilise the landfill gas extracted from the landfill to generate electricity and feed it back to the grid. It is considered that the ARL-TP is consistent with the relevant objective and policies of the NPS-REG for the following reasons:

- WMNZ generates electricity using existing generators to fuel several renewable energy initiatives, including electricity generation and providing a source of heating and carbon dioxide to a neighbouring Aubergine greenhouse complex. As the Landfill is progressively filled, the generation of landfill gas will continue to increase. In 2019, Redvale's energy generation has the capacity to power 14,000 homes on the local grid making it Auckland's largest renewable energy source. It is estimated that each generator can power up to 1,000 homes.
- The proposal helps increase the security of electricity supply at local and regional levels by diversifying the type and location of electricity generation while reducing greenhouse gas emissions.
- The proposal will support the national target for the generation of electricity from renewable resources for the duration of the project; and
- Appropriate mitigation measures are proposed around the generators, specifically in relation to reverse sensitivity, with landscaping and noise barriers incorporated around the Landfill Gas Energy Plant site to mitigate the noise and ensure their integration with the wider Landfill site and surrounding environment.

Based on the above assessment, it is considered that the ARL-TP is consistent with the objective and policies of the NPS-REG.

4.6.3 National Policy Statement for Freshwater Management 2020 (NPS-FM)

The NPS-FM seeks to manage the natural and physical resources in a way that prioritises: firstly, the health and well-being of water bodies and freshwater ecosystems; secondly, the health needs of people; and thirdly, the ability of people and communities to provide for their social, economic and cultural well-being, now and in the future. The NPS-FM has particular relevance to the proposal as the ongoing operation at Redvale Landfill ultimately results in ongoing discharges to the Rangitopuni Stream as part of its operational practices and some amendments to the existing ponds at the site which have limited freshwater species present.

It is considered that the ARL-TP is consistent with the relevant objective and policies of the NPS-FM for the following reasons:

- Ongoing monitoring has been undertaken at several locations along the Rangitopuni Stream to ensure the health condition of the water bodies and freshwater ecosystems is maintained and not degraded. All current management will remain in place to ensure that this remains in good health. Water quality has not been degraded by the existing landfill operations. The

appropriateness of this management is discussed within the Stormwater and ITA Technical Memorandum and the Ecology Technical Memorandum, specifically the freshwater section of this memo.

- Tangata whenua have been involved in the freshwater management of the Rangitopuni Stream. Ongoing consultation will be undertaken during the detailed design, as discussed in the Cultural Values Technical Memorandum (**Appendix R**), and construction and operational phases of the landfill to ensure cultural values are appropriately incorporated into the project;
- No further loss of extent of natural inland wetlands is anticipated as a result of this project.
- A number of mitigation measures will be proposed to continue and be implemented to ensure the water quality and sediment discharges to the Rangitopuni Stream will be appropriately managed in a way that gives effect to Te Mana o te Wai and the habitats for freshwater macroinvertebrate and native fish species are protected. This is currently proposed to be in the form of current and developed management plans which will be fit for purpose for the project.

Based on the above assessment, it is considered that the ARL-TP is consistent with the objective and policies of the NPS-FM.

5 Applicability

This report has been prepared for the exclusive use of our client WM New Zealand, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

We understand and agree that WMNZ will submit this report to the Environmental Protection Authority in support of a referral application under the Fast-track Approvals Act 2024 for the works described herein, and that the Environmental Protection Authority will use this report for the purpose of assessing that application.

Tonkin & Taylor Ltd
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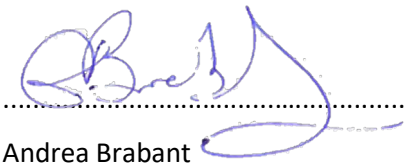

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