# Memorandum

To: Listed Projects Team – Ministry for the Environment

From: Rebecca Sanders/Nick Roberts – Barker & Associates Limited

Date: 13 November 2025

Re: Planning Memorandum for Waimauku West

## 1.0 Introduction

### 1.1 Waimauku West

Halberd Holdings Limited (**HHL**) engaged Barker & Associates (**B&A**) to provide planning services for the master planning, consenting and design of ***Waimauku West. Waimauku West*** is located approximately 31.5 kilometres north-west of Auckland CBD and 4km west of Huapai. ***Waimauku West*** is a proposed new residential community that will form an extension of the existing Waimauku settlement. The ***Waimauku West*** masterplan has five key components:

1) Approximately 1,500 – 2,020 dwellings ranging in density from Large Lot Residential (approximately 50-120 dwellings), Standard Residential (approximately 1,100-1,400 dwellings) to Medium Density Residential (approximately 350-500 dwellings). A range has been identified to account for adjustments as part of detailed design undertaken for a substantive application should the project is successfully referred. To ensure that any increase in dwellings at detailed design is viable the engineering report has been based on 1,800 dwellings the median point;
2) A neighbourhood centre to provide for residents day to day needs;
3) A green network incorporating existing ecological areas and features, stormwater management and public open spaces;
4) A light industrial area to the west surrounded by Countryside Living (approximately 5 dwellings); and
5) Associated infrastructure.

The Masterplan is shown below in **Figure 1**.

The masterplan involves an extensive green network which incorporates open space, stormwater management and ecological features. The green network will accommodate extensive areas of native revegetation to enhance the riparian margins of streams and wetlands. The revegetation within the green network in combination with buffer planting along State Highway 16 will also assist to mitigate the visual effects of the development from a landscape perspective.


**Figure 1: Waimauku West Masterplan. Source: Barker & Associates.**

### 1.1.1 Transport

The proposed roading and access arrangement is set out within the Transport Memorandum (**Attachment 7**). Two new intersections with State Highway 16 are proposed to provide access to the development. The likely vehicle connections will be:

- A western connection at the approximate location of an existing metal driveway accessing the Site, which will be upgraded to provide access to the light industrial area and the western side of the site; and
- An eastern connection to the eastern side of the residential site and the neighbourhood centre.

At this stage, the precise form of access has not been determined, but it is likely that some form of intersection control such as roundabouts will be provided, which will be designed in coordination with NZTA. Given that SH16 is a limited access road NZTA's agreement will be required for the crossings and discussions have commenced regarding the proposal.

In addition, the applicant is exploring the opportunity to gain pedestrian and cycle access through 93 Waimauku Station Road. This would provide an alternative access through Waimauku Village.

Within the site, a network of safe and convenient streets will be formed including active mode provision.

### 1.1.2 Three Waters

The proposed three-waters strategy for the Site is set out in the Infrastructure Memorandum (**Attachment 11**). By way of summary, the follow strategies are proposed.

## Stormwater

There is currently no public stormwater infrastructure within the Site. The preliminary Stormwater Management Plan (SMP) prepared by GHD proposes a water-sensitive design approach to maintain hydraulic neutrality to improve water quality, protect downstream environments such as the Kaipara River and not exacerbate flooding effects upstream.

Post-development stormwater will be managed through a treatment train of raingardens, and retention/detention systems, with infrastructure designed to accommodate 10% and 1% AEP flood events. Contaminated land areas identified under HAIL guidelines will be further investigated, with stormwater systems designed to avoid infiltration in these zones. Development activities are located away from identified SEA and natural wetlands for protection of natural processes, flora and fauna.

## Water supply

Watercare Services Ltd has provided feedback that the development needs to be serviced with a fully private water supply solution. The Infrastructure Memorandum (Attachment 11) specifies that Waimauku West is estimated to require an average demand of 15 l/s, up to 22.4l/s during peak periods. Assessments have been undertaken by Aquatronic Solutions (Attachment 15) and WGA (Attachment 17) to confirm that this demand can be met through a combination of groundwater and surface water take:

- As set out in the letter from Aquatronic Solutions the aquifer scanning of the site has demonstrated that there are three very well-developed aquifer systems present under the site. The results of the modelling from Aquatronic Solutions have informed the pegging of nine drilling locations which are each estimated to have sustainable water production yields ranging from 10.2 litres per second to 7.5 litres per second, and therefore cumulatively can meet the estimated demand for Waimauku West.

- In addition, the Surface Water Supply Assessment concludes that the Kaipara River should be able to be used as the primary source of water to Waimauku West during the period from June to November annually, while operating within the objectives of the AUP. Outside these months the reliability of supply is expected to decline, and the river should be considered as a back-up to the available groundwater supply.

Groundwater or streamwater will be treated onsite within a water treatment plant. A substantive water supply and effects assessment report will be produced in the future to support the substantive consent application however, these additional assessments confirm the feasibility and viability of servicing Waimauku West with a groundwater and surface water take.

Collection and storage of roof runoff (from inert materials) for purpose of retention and re-use for non-potable uses will be implemented across the site. It is estimated non-potable water use makes up to 30% of a household's water use.

## Wastewater

There is currently no public wastewater connection available at the Site.

There are two suitable options proposed for disposal of wastewater offsite including:

- Option 1 – Public Network Connection: This involves installing a new pump station within the development area, and a new 6.55km public rising main to the Huapai Pump Station.

- Option 2 - Onsite Treatment and Disposal: Install a private treatment plant located in the northwest corner of the site. Treated effluent discharge options include discharge to stream (pending detailed design and approvals), or onto the landowners residual farm for irrigation. The engineering memo confirms that there is sufficient land allocated within the masterplan to accommodate an on-site wastewater treatment option, subject to more detailed design work occurring at the resource consent stage.

### 1.1.3 Power and Telecommunication

Power, telecommunications and gas are available along State Highway 16 to supply the development. Network upgrades will be required to meet the increased demand.

# 2.0 Site Context

## 2.1 The Site

The site is a large rural site (approximately 796 hectares) located on the edge of the Waimauku settlement at 1080 State Highway 16 (State Highway 16) as shown in **Figure 2**. Of this, 573 hectares sits north of the North Auckland Railway Line and can be accessed from an existing level crossing within the site or via Davidson Road. The balance of the site, south of the North Auckland Railway Line, encompasses approximately 196 hectares and is accessed via multiple points along State Highway 16.

The subject site is irregular in shape and is bound by State Highway 16 to the south, Waimauku township to the east and rural land to the north and west. The subject site has a road frontage of 1.9km along Great North Road. The North Island Main Trunk also traverses the Site.

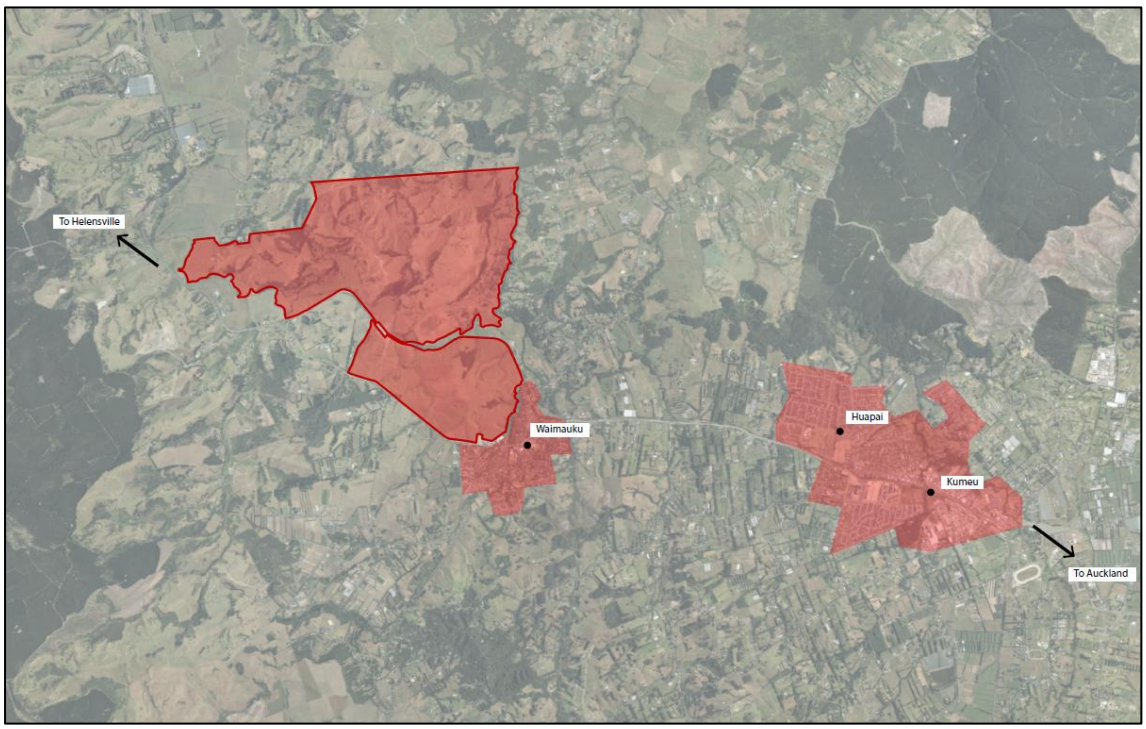


**Figure 2: Site Locality Plan. Source: Emaps.**

The Site is well connected being located directly adjacent to State Highway 16 which provides quick and convenient access to Auckland CBD to the southeast via Huapai and Riverhead, and Helensville toward the north.

In terms of existing infrastructure, the subject Site is primarily in rural productive use and is not currently served by any primary wastewater or water infrastructure networks.

The topography of the Site is generally gently to moderately graded with isolated steeper areas particularly along the northern boundary and in western areas of the site. The elevated part of the hill landform is subject to a Modified Ridgeline Protection Overlay (MRPO) under the AUP(OP).

The Site currently consists of large areas of pasture which reflects the current use of the Site for rural productive grazing. There are several stands of remnant native vegetation on the site. Three of these areas have been classified as Significant Ecological Area (SEA) within the AUP(OP). Another two areas have been identified as being of SEA quality because of factors relating to representativeness and their proximity and connectivity to the other areas of SEA vegetation, and wetland and stream habitats.

Mixed native and exotic vegetation occurs mainly along the boundaries of the Site. These areas are generally long and narrow in shape or small fragmented patches. Low value exotic vegetation is also present around the two dwellings on the site.

There are some areas of weedy vegetation and rank grass on the site. These are mainly associated with fenced areas around ecological features such as wetlands and native forest remnant patches, although there are a few small patches associated with steeper stream / gully banks.

The Site provides some potential habitat for bats and lizards. There is also habitat for a number of exotic and native bird species that are abundant in the wider Auckland region. It is possible that the Nationally Critical Australasian bittern may occur within the wetland areas from time to time as it has been observed occasionally at nearby sites.

The Kaipara River flows east to west, north of the site before heading north to discharge into the Kaipara Harbour north of Helensville. Several tributaries of this river run through the site and close to the western and eastern boundaries. The permanent stream flowing through the central western part of the site is degraded with little riparian vegetation and stock access. Other streams on the site are generally small with some level of modification. There is often wetland associated with their margins or they grade between defined channel and wetland. The streams running through the SEA classified areas of bush are small in nature, well shaded and with limited or no stock access. In their lower reaches they grade into wetland habitat.

There is a network of wetlands present across the site within the low-lying valley areas. Most of the wetlands are along the base of modelled overland flow paths, are grazed, long and narrow in shape, with no or little riparian vegetation. There are some wetlands more substantial in size, with a greater diversity of hydrological conditions and an increased range of flora species. In the east and north-east of the site there are wetlands connected to or within SEA classified areas which are of high ecological value.

## 2.2 Auckland Unitary Plan – Zoning, Overlays, Controls and Designations

The subject Site is primarily zoned Rural Production Zone with a relatively small area of Strategic Transport Corridor Zone applying at the northwestern edge adjoining the North Auckland Railway Line. The following additional restrictions apply to the site under the AUP:

- Overlays: Significant Ecological Overlay

- Overlays: Natural Stream Management Areas Overlay
- Overlays: High Use Stream Management Areas Overlay
- Overlays: Quality Sensitive Aquifer Management Areas Overlay (Kaipara Sand Aquifer)
- Overlays: Ridgeline Protection Overlay
- Overlays: Sites and Places of Significance to Mana Whenua (Tauwhare Pa)
- Controls: Coastal Inundation 1 per cent AEP Plus 1m Control – 1m sea level rise
- Controls: Macroinvertebrate Community Index – Rural, Urban, Exotic, Native
- Designations: 6300 North Auckland Railway Line
- Designations: 6766 State Highway 16
- Designations: 6766 Airspace Restrictions Designations (Whenuapai Air Base)

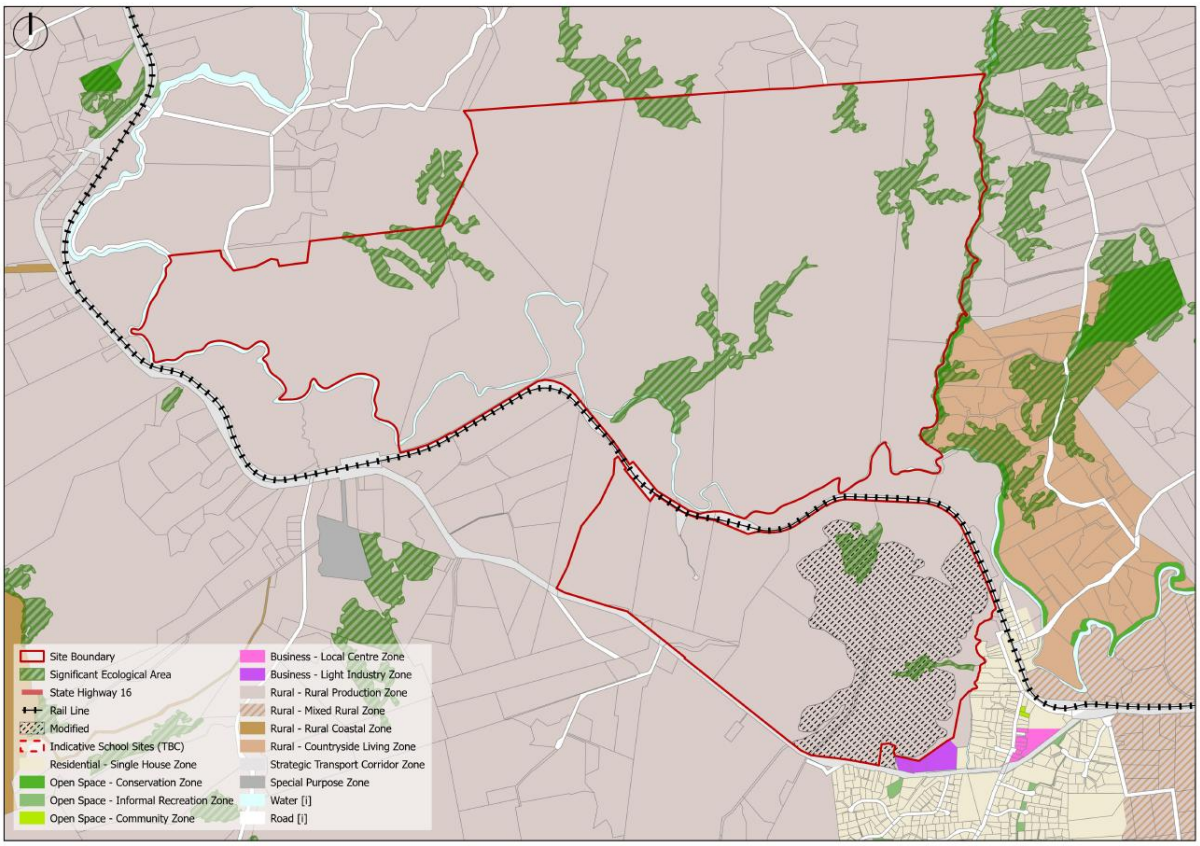


**Figure 3: Auckland Unitary Plan**

# 3.0 Reasons for Consent

## 3.1 Auckland Unitary Plan (Operative in Part)

At this stage, we understand that resource consent will be required under the AUP 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.

### Rural Production Zone

- Pursuant to Rule H19.8 new buildings have the same activity status and standards as applies to the land use activity, new dwellings are a **non-complying activity** pursuant to H19.4.1(A78)
- Pursuant to Rule H19.4.1(A78), the construction of approximately 1,500 – 2,020 dwellings across 1 title areas is a **non-complying activity.**
- Pursuant to Rule C1.7(1), the proposal to establish retail, commercial and light industry activities is a **discretionary activity**.

### Strategic Transport Zone

- Pursuant to Rule H22.4.1 (A17) activities not otherwise provided for and provided within an adjoining zone as a non-complying activity are a **non-complying activity**.

### Subdivision

- The proposal involves the subdivision of land within the 1% AEP floodplain. This is a **restricted discretionary activity** pursuant to E39.4.1(A8).
- The proposal involves subdivision which does not meet the standards in E39.6.1. This is a **discretionary activity** pursuant to E39.4.1(A9).
- The proposal involves subdivision for open spaces, reserves and roads in the Rural Production zone. This is a **discretionary activity** pursuant to E39.4.2(A11).
- The proposal involves subdivision which does not meet the standards in E39.6.5.1. This is a **non-complying activity** pursuant to E39.4.2(A13).
- The proposal involves subdivision in the Rural Production Zone not provided for in Tables E39.4.1 or E39.4.2. This is a **non-complying activity** pursuant to E39.4.2(A27).

### Lakes, Rivers, Streams and Wetlands

- Any new structures and associated diversion of water not complying with the general permitted activity standard E3.6.1.14 is a **discretionary activity** pursuant to E3.4.1(A44).
- Pursuant to Rule E3.4.1(A49) the reclamation of streams is a **non-complying activity**.

### Taking, Using and Diversion of Water and Drilling

- Temporary diversion of surface water for urban development purposes not otherwise listed is a **discretionary activity** pursuant to E7.4.1(A13).
- The diversion of groundwater caused by excavation that does not meet the permitted activity standards is a **restricted discretionary activity** pursuant to E7.4.1(A28).

### Wastewater Network Management

- Pursuant to Rule E6.4.1(A6) the discharge of wastewater on-site is a **discretionary activity.**[1]

[1] Resource consent is already obtained for wastewater discharge for Stage 1 and most of Stage 2. Consent will be required to increase the treated wastewater from an MBR plant to cater for approximately 58-458 further dwellings for Stage 2.

### On-site and Small-Scale Wastewater Treatment and Disposal

- Pursuant to Rule E5.4.1(A6) the discharge of wastewater on-site disposal is a **discretionary activity.**

### Discharge and Diversion

- Pursuant to Rule E8.4.1(A10) the diversion and discharge of stormwater runoff from impervious areas not otherwise provided for is a **discretionary activity.**

### Stormwater Quality

- Pursuant to Rule E9.4.1(A6) development of a high contaminant generating carpark is a **controlled activity.**

### Earthworks

- Pursuant to Rule E11.4.1(A5), earthworks greater than 50,000m$^2$ where land has a slope of less than 10 degrees outside a Sediment Control Protection Area is a **restricted discretionary activity.**
- Pursuant to Rule E11.4.1(A8), earthworks greater than 2,500m$^2$ where land has a slope of equal to or greater than 10 degrees is a **restricted discretionary activity.**
- Pursuant to Rule E11.4.1(A9), earthworks greater than 2,500m$^2$ within the Sediment Control Protection area is a **restricted discretionary activity.**
- Pursuant to Rules E12.4.1(A6) and (A10) the proposal to undertake cut / fill greater than 2,500m$^3$ is a **restricted discretionary activity**.

### Vegetation Management and Biodiversity

- The proposal involves the removal of vegetation within 20m of rural streams. This is a **restricted discretionary** activity pursuant to E15.4.1(A16).
- The proposal involves the removal of vegetation within 20m of a natural wetland and in the bed of a stream. This is a **restricted discretionary** activity pursuant to E15.4.1(A18).

### Noise and Vibration

- Construction works are anticipated to exceed the applicable maximum 75dB LAeq long-term construction noise limits under Standard E25.6.27. This is a **restricted discretionary activity** under E25.4.1(A2).

### Infrastructure

- Aboveground pipelines and attached ancillary structures for the conveyance of wastewater are a **restricted discretionary activity** pursuant to E26.2.3.1 (A50).
- Wastewater treatment plants are a **restricted discretionary activity** pursuant to E26.2.3.1(A54).
- Pursuant to Rule E26.2.3.1(A55), stormwater detention/retention ponds/wetlands are a **controlled activity.**

### Transport

- Pursuant to Rule E27.4.1(A3), the generation of more than 100vph is a **restricted discretionary activity**.

- Pursuant to Rule E27.4.1(A5), the construction or use of a vehicle crossing where a Vehicle Access Restriction applies is a **restricted discretionary activity**.

### Contaminated Land

- Pursuant to Rule E30.4.1(A6), the potential discharge of contaminates onto the land not meeting Standard E30.6.1.2 but meeting Standard E30.6.2.1, is a **controlled activity**.

### Flooding and Natural Hazards

- The proposal involves infrastructure on land subject to overland flow paths and the 1% AEP floodplain. This is a **restricted discretionary activity** pursuant to Rule E36.4.1(A56).
- The proposal involves piping an overland flow path. This is a **restricted discretionary activity** pursuant to E36.4.1(A41).
- The proposal involves infrastructure on land subject to overland flow paths and the 1% AEP floodplain. This is a **restricted discretionary activity** pursuant to Rule E36.4.1(A56).
    - Subject to Plan Change 120 the proposal involves the development of urban activities which are identified as 'Activities sensitive to natural hazards' (residential dwellings) 'Activities potentially sensitive to natural hazard' (being industry, retail, office and commercial uses) and Activities less sensitive to natural hazards (informal recreation and parks infrastructure). The proposal is exposed to flood hazard areas classified as very high, high, medium and low associated with floodplain, overland flow and flood prone areas on the Site. Subject to Policy E36.3(1B)(b) the default risk level associated with activities included as components of the proposal are identified as 'significant' and 'acceptable'. The following matters for consent are identified:
        - The Proposal involves 'activities sensitive to natural hazards' (residential dwellings) and 'activities potentially sensitive to natural hazard' (being industry, retail, office and commercial uses) which with a default risk classification of 'significant'. Where located within the very high, high or medium Flood Hazard Area they are classified under E36.4.1A (A79) as a **non-complying activity**.
        - The Proposal involves surface parking and above ground parking areas (including vehicle entry and exit points) in flood hazard areas, subject to E36.4.1A (A81) where parking areas area and entry and exist points are subject to very high or high flood hazards they are classified as a **discretionary activity**.
        - The Proposal involves surface parking and above ground parking areas (including vehicle entry and exit points) in flood hazard areas, subject to E36.4.1A (A81) where parking areas area and entry and exist points are subject to very moderate hazards they are classified as a **restricted discretionary activity**.
        - The Proposal involves the development of roads and accessways located within flood hazard areas, subject to E36.4.1A (A88) are classified as a **restricted discretionary activity**.
        - The Proposal involves the development of on-site septic tanks, on site wastewater treatment and disposal systems and effluent disposal fields subject to E36.4.1A (A89) are classified as a **restricted discretionary activity**.

- The Proposal involves the construction of stormwater management devices or flood mitigation works in the 1 per cent annual exceedance probability ("**AEP**") floodplain and flood prone areas is classified as a **restricted discretionary activity**.
- The proposal involves the development of new buildings and structures, being the development of the Site subject to E36.4.1A(A98) All other structures and buildings (including retaining walls) in the 1 per cent AEP floodplain and flood prone areas are classified as a **discretionary activity**.

- Subject to Plan Change 120 the Proposal involves the development of urban activities which are identified as 'Activities sensitive to natural hazards' (residential dwellings) 'Activities potentially sensitive to natural hazard' (being industry, retail, office and commercial uses) and Activities less sensitive to natural hazards (informal recreation and parks infrastructure). The proposal is potentially exposed to high, medium or low landslide hazard risk area:
  - The Proposal involves the development of on-site septic tanks, on site wastewater treatment and disposal systems and effluent disposal fields subject to E36.4.1A (A113) are classified as a **discretionary activity**.
  - The Proposal involves new structures and buildings with a gross floor area more than 20m2 associated with activities less sensitive to natural hazards in medium and high landslide hazard risk areas that do not comply with Standard E36.6.A1. Subject to E36.4.1A (A121) this is classified as a **restricted discretionary or controlled activity**.
  - The Proposal involves new structures and buildings with a gross floor area more than 20m2 associated with activities potentially sensitive to natural hazards in medium and high landslide hazard risk areas that do not comply with Standard E36.6.A1. Subject to E36.4.1A (A123) this is classified as a **discretionary or restricted discretionary activity**.
  - The Proposal involves new structures and buildings with a gross floor area more than 20m2 associated with activities sensitive to natural hazards in landslide hazard risk areas that do not comply with Standard E36.6.A1. Subject to E36.4.1A (A125) this is classified as a **non-complying, discretionary or controlled activity**.
- Subject to Plan Change 120 the proposal is potentially exposed to high, medium and low landslide susceptibility areas.
  - The proposal involves infrastructure in landslide susceptibility areas not otherwise provided for which subject to E36.4.1C (A133) is a **restricted discretionary activity**.

### Temporary Activities

- The proposed construction activity associated with the proposed development will exceed 24 months. This is a restricted discretionary activity pursuant to E40.4.1(A24).

### Ridgeline Protection Overlay

- The proposal buildings not provided for as a permitted activity. This is a **restricted discretionary activity** or **non-complying activity** depending on whether the buildings are visible in front of the sea or above the ridgeline or skyline when viewed from a public place. pursuant to Rule D15.4.1 (A3) or (A4).

Overall, under the Auckland Unitary Plan, the proposal would require consent as a **Non-Complying Activity.**

## 3.2 National Environmental Standard – Freshwater

Resource consents will likely be required for a range of reasons under the National Environmental Standards: Freshwater (**NES:F)**, including earthworks within 10m and 100m of a natural inland wetland, vegetation clearance and diversion of water within 100m of a natural inland wetland. Reclamation of some streams and wetlands with lower ecological values may be required to facilitate urban development.

More detailed work will confirm if work around wetlands triggers a prohibited activity status by way of Regulation 53 of the NES:F. Regardless, s21(7) of the Fast-track Approval Act enables the Minister to accept a referral application for an activity that is prohibited under the Resource Management Act 1991. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

## 3.3 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('**NES:CS'**) sets a nationally consistent set of planning controls and soil contaminant values.

Given the historical rural uses of the site it is likely that provisions of the NESCS will apply to future residential development at the locations where HAIL activities are likely to have occurred. A detailed site investigation (DSI) involving a targeted soil sampling will be undertaken at the site in support of the substantive application. This will ascertain whether NESCS and/or AUP:OP contaminated land resource consents are required to be sought in support of the development.

## 3.4 Other Approvals

### 3.4.1 Wildlife Act Authority (Permit)

A Wildlife Approval is required under the Wildlife Act from the Department of Conservation for the relocation of lizards within the site, in case the number of lizards that require relocation is greater than 20. This threshold is important as the region wide wildlife permit held by herpetologists is usually limited to 20 individuals. In this case, as the site is large, it is prudent to apply for this permit just in case the numbers that need to be relocated when suitable vegetation is cleared (e.g. weedy vegetation / rank grass) exceed this.

No other permits are requested. Other indigenous terrestrial fauna such as birds and bats can be avoided, and freshwater fauna can be relocated, if necessary, under existing permits.

# 4.0 Consultation

In preparing this application consultation has been undertaken with Ministry for the Environment, Auckland Council, Department of Conservation, New Zealand Transport Agency, Auckland Transport, Watercare Services Ltd and Iwi. An overview of the consultation undertaken and the feedback received is outlined in **Attachments 3** and **4.** This memorandum provides a response to the feedback received within the relevant

sections. The Consultation and Iwi Engagement Report (**Attachments 3** and **4**) provide a more detailed overview in response to feedback received.

# 5.0 Statutory Framework

This section is provided in accordance with subclause 2(1)(a)(i) – (iii) of Schedule 5. This requires that applications include an assessment of the activity against the relevant provisions and requirements of the following statutory documents:

a) any relevant national policy statements:

b) any relevant national environmental standards:

c) If relevant, the New Zealand Coastal Policy Statement:

## 5.1.1 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 ('**NPS-FM**') seeks to manage natural and physical resources to prioritise firstly, the health and well-being of water bodies and freshwater ecosystems, secondly, the health and needs of people, and thirdly the ability to provide for the social, economic, and cultural well-being of people and communities.

An ecological assessment has been prepared by Viridis and is included at **Attachment 13**. Based on this analysis, in our opinion, the project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- The proposed masterplanning of Waimauku West has taken into account the location of wetlands and waterways identified by Viridis to design the development around these features.
- The proposal provides opportunity for ecological restoration of an area including the establishment of planted and protected riparian margins of waterways, and the exclusion of cattle, which will improve the overall quality of freshwater environments on site.
- Engagement with Iwi is ongoing for this project.
- Maximising the opportunities within the proposed reserve and open space areas for future enhancement, particularly within the buffer areas including ecological restoration and enhancement, replanting and offsetting.
- There are significant opportunities for ecological restoration and enhancement across the Site, including through the maintenance of habitat and vegetation cover where possible.
- Ongoing monitoring will take place to ensure the condition of water bodies and freshwater ecosystems is not degraded.
- Vidiris has concluded that potential significant adverse effects for future development will be able to be appropriately avoided, minimised, remedied or offset under the effects management hierarchy and will be able to meet the relevant standards of the NES-FM.

**Based on the assessment above, it is considered that the project is consistent with the NPS-FM.**

### 5.1.2 National Policy Statement Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 ('**NPS-HPL**') ensures the availability of New Zealand's most favourable soils for food and fibre production, now and future generations. It is noted the NPS-HPL recently came into effect on 17 October 2022 and was amended in August 2024.

The New Zealand Land Resource Inventory (NZLRI) maps have classified approximately a third of the site as LUC classes 2 and 3, with Class 2 limited to northern parts of the site not proposed to be urbanised. There are some Class 3 soils on the western portion of the site which will be urbanised *refer Figure 4 below*. The more detailed mapping undertaken by Hanmore Land Management has found that the Class 3 soils on the western portion of the site are significantly more fragmented than the NZLRI mapping *refer Figure 5*.

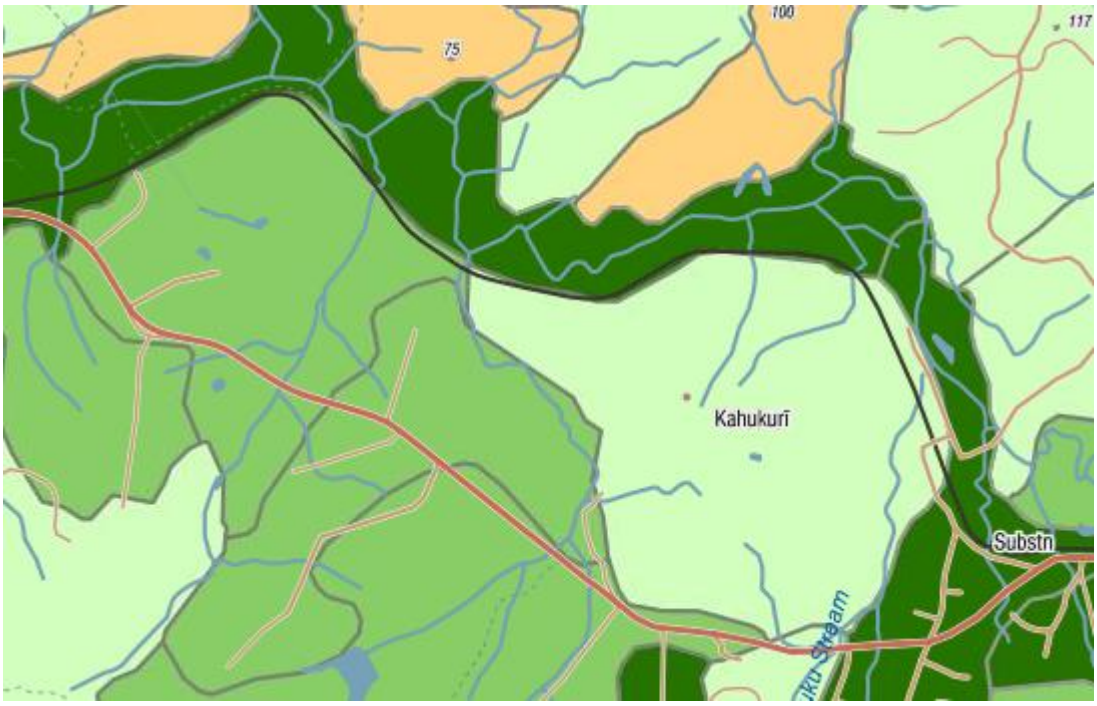


**Figure 4: New Zealand Land Resource Inventory Map Source: Our Environment**

The objective of the NPS-HPL is to protect highly productive land for use in land-based primary production, however, there are exceptions to this in particular circumstances.

Under Clause 3.10, Auckland Council may allow highly productive land to be subdivided, used or developed if satisfied that:

a. *there are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years; and*

b. *the subdivision, use, or development:*

   i. *avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district; and*

   ii. *avoids the fragmentation of large and geographically cohesive areas of highly productive land; and*

*iii. avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development; and*

*c. the environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*

The proposal may not strictly meet these criteria, however:

- The Land Use Capability Classification Assessment undertaken by Hanmore Land Management has found that LUC units 3e 3, 3e 5, 3w 1 and 3s 4, cover 19.5ha or 10% of the southern portion of the site proposed to be urbanised. These areas are fragmented occurring largely on the western portion of the site. The remaining area of the site consists of LUC classes 4 to 7 and unproductive areas and are therefore outside of the HPL classification.
- According to the Economic Assessment undertaken by Insight Economics the Housing Capacity Assessment [2] identified a housing demand in the Rodney Local Board District, where the site is located, of 845 households per annum over the 30 years to 2053. On that basis, the 1,500 – 2,020 dwellings enabled by the proposal equate to at least 22 months of supply for the area.
- The viability of the Kumeū–Huapai and Riverhead Future Urban Area (FUA) was reassessed in the Auckland Future Development Strategy, which highlights flooding and other natural hazards as significant risks to development. As a result, the FUA has been scaled back, with some areas removed and the remainder delayed and 'red-flagged' to indicate the critical need for an integrated catchment-based approach to future development. Insight Economics considers that the proposal offers an opportunity to offset some of this lost capacity by absorbing growth that would otherwise have been directed to the FUA. It does so in a nearby location that also enables the logical and orderly expansion of the existing Waimauku urban area.
- Through the technical analysis in support of this application the site has been identified as appropriate and practicable for future urban development.
- As aforementioned, the productivity of the land is limited, as outlined in the *Land Use Capability Classification Assessment* with the LUC 2 soils subject to the NPSHPL contained north of the North Auckland Railway Line remaining in productive use.
- The supply proposed by ***Waimauku West*** will justify a small reduction of fragmented LUC 3 soils within the district as it provides the necessary supply to meet demand in an appropriate and practicable location in Waimauku.
- The site avoids the fragmentation of highly productive land with the clear delineation resultant from the North Auckland Railway line and proposed industrial land uses.
- Viridis prepared an *Ecology Memorandum* that concludes that the benefits from ecological restoration on the site proposed as part of ***Waimauku West*** will provide a significant positive contribution in relation to the regional indigenous biodiversity loss Auckland has historically experienced.

[2] Housing Capacity Assessment 2023, Auckland Council [October 2023].

- The Insight Economics Memorandum that identifies that ***Waimauku West*** can achieve social and economic benefits and that the proposal will enable the land to be put to its highest and best use.
- It is considered through design, particularly with cultural and ecological input, ***Waimauku West*** can deliver a development that provides environmental, social, cultural and economic benefits that outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land.

**Based on the assessment above, it is considered that the project is generally consistent with the NPS-HPL.**

### 5.1.3 National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity ('**NPS-IB**') ensures the protection, maintenance and restoration of New Zealand's most threatened indigenous species. It is noted that the NPS-IB came into effect, gazetted on 4 August 2023.

An ecological assessment has been prepared by Viridis and is included at **Attachment 13**. Based on this analysis, in our opinion, the project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- This project seeks to maintain and enhance indigenous biodiversity including the identified SEAs and no overall loss in indigenous terrestrial biodiversity is anticipated as a result of the urbanisation of the site.
- The applicant has regularly engaged with local iwi to recognise and provide for Hutia Te Rito in the management of indigenous biodiversity.
- The proposal provides the opportunity to improve the site's terrestrial biodiversity through protection and enhancement activities, which will improve the overall diversity, native species habitat and quality of the site's terrestrial features.
- The restoration actions proposed prioritise the restoration of SEAs, threatened ecosystems, areas that offer connectivity and buffering functions, and natural inland wetlands on site.
- The proposed restoration actions, including the planting of riparian margins and wetland buffers, will greatly increase indigenous terrestrial ecological values by increasing ecological connectivity, indigenous plant species diversity and abundance, and habitat values.
- Viridis conclude that the benefits from ecological restoration on the site will provide a significant positive contribution in relation to the regional indigenous biodiversity loss Auckland has historically experienced.

**Based on the assessment above, it is considered that the project is consistent with the NPS-IB.**

### 5.1.4 National Policy Statement on Urban Development 2020

The NPSUD came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPSUD includes a focus on achieving well-functioning urban environments, promoting intensification within urban environments, such as Auckland, as a means of increasing housing supply, supporting competitive land markets and improving affordability. There is now a much greater focus on:

a) Introducing and defining the concept of well-functioning urban environments with a key component being the provision of a variety of homes that meet the needs of different households in terms of type, price and location. (Objective 1 and Policy 1);

b) A greater emphasis on enabling more people to live in and more business to locate in areas that are near centres, planned public transport and where there is high demand (see Objective 3);

c) A greater emphasis on improving housing affordability (see Objective 2);

d) A greater emphasis on robust strategic planning and the need to integrate urban development with infrastructure (see Objective 6);

e) Changing the policies from providing sufficient development capacity to providing at least sufficient development capacity (see Policy 2). This is coupled with other changes that direct Councils to provide more development capacity, and replacing 'minimum targets' with 'housing bottom lines';

f) Being more directive about what it means for Councils to be 'responsive' in the urban environment with respect to Plan Changes (Policy 8); and

g) Ensuring New Zealand's urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change (Objective 8, Policy 1(e)).

The proposal is consistent with the NPS-UD for the following reasons:

- The proposal will establish a master planned community which enables a variety of homes and business/employment opportunities with a focus on accessibility via active transport modes. The provision of local employment opportunities will reduce the number of private traffic movements out of Waimauku on the road network;.
- The project will deliver an accelerated supply of dwellings to the market, which will be serviced by infrastructure and roading (including provision of active transport facilities) infrastructure. The dwellings are considered to support competitive land and development markets.
- The proposal enables approximately 28,650 $m^2$ of industrial floorspace, which will help keep pace with demand over time, thereby helping to ease land supply constraints and supporting a more responsive industrial market and providing great local employment opportunities.
- The proposal will deliver a range of typologies and sizes which will contribute to the emergence of a diverse and vibrant community. This will also assist in responding to the changing needs of people, communities and future generations.
- The proposal will be coordinated with the delivery of private infrastructure (including roading and active transport facilities, stormwater, wastewater, water supply, electricity, gas and telecommunications).
- The proposal provides a range of open spaces, all of which are within walking or cycling distance from proposed residential dwellings.
- The proposal will involve a change to the amenity and character of the area, with the landscape shifting from rural to urban. However, the Landscape Assessment undertaken by Bridget Gilbert confirms the Site's ability to absorb urban development from a landscape perspective.
- The proposal will support an overall reduction in greenhouse gas emissions across the Auckland region by enabling Waimauku to grow to a sizeable community which can support local employment opportunities, community facilities and other amenities locating within the settlement itself, reducing the need for car trips out of Waimauku.

The feedback from Auckland Council raises concerns regarding whether the proposal will result in a well-functioning urban environment. Their concerns relate to whether the proposal can integrate with

infrastructure, stormwater management and whether the proposal will result in a commuter suburb reliant on private car trips. The following comments are made in response to this feedback:

- In relation to the ability of the development to integrate with infrastructure the feedback from Watercare Services Ltd is that the development will require private servicing. As outlined within the Infrastructure Memorandum from Crang Civil the development can be serviced by groundwater or streamwater that will be treated onsite within a water treatment plant. A wastewater servicing solution is identified that is fully private. As demonstrated within the Infrastructure Memorandum from Crang Civil the proposed development is integrated with infrastructure.
- The proposed development areas of the site are elevated and not subject to flooding and development is not proposed in lower lying areas. Initial engineering advice indicates that all upstream and downstream flood effects can be appropriately mitigated. Further flood modelling is required during the final Stormwater Management Plan (**SMP**) stage and SMP will prioritise minimising post-development impacts on overland flow by adopting a hydraulic neutrality approach. The preliminary SMP indicates that there are options for this.
- The NPS-UD does not require all development of scale to be serviced by a rapid transit network in particular:

  *Objective 3 district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment well-serviced by* ***existing or planned public transport****; and*

  *Policy 1(c) requires planning decisions to contribute to well-functioning urban environments that "have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces,* ***including by way of public or active transport****."*

The proposal is consistent with this policy direction as the existing public transport service provides future residents with accessibility to a Metropolitan Centre and subregional employment, entertainment and service hubs. As the population of Waimauku grows there is significant opportunity to improve the efficiency of these connections and the relative accessibility via public transport. Further, as noted above, Policy 1(c) states that good accessibility is achieved "including by way or public or active transport". This is acknowledgment of the different modes of transport that contribute to accessibility, with both private transport and public transport options, which must be considered for achieving good accessibility under this policy.

**Based on the assessment above, it is considered that the project is consistent with the NPSUD.**

### 5.1.5 New Zealand Coastal Policy Statement

The NZCPS sets out a number of objectives and policies for achieving the purpose of the RMA in relation to the coastal environment of New Zealand. As the proposed development is not located within close vicinity to the coastal environment, the NZCPS is not relevant to this project.

## 5.2 National Environmental Standards for Air Quality

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 ('**NES:AQ'**) sets standards to guarantee a minimum level of health protection for people living in New Zealand.

An Air Discharge consent may be required for the Wastewater Treatment Plant. This will be confirmed as part of the detailed design.

The potential for effects on air quality in relation to the Project relate primarily to dust during the construction phase. Measures are proposed to manage potential effects in response to the air quality objectives and policies.

The management of dust and odour will be addressed in the Construction Management Plan and an Erosion and Sediment Control Plan. As such, ambient air quality will be maintained once constructed.

## 5.3 National Environmental Standards for Freshwater

The **NES:F**sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which prohibit works in and around natural wetlands, and works affecting rivers and streams. Resource consent will be required under the NES:F as we have outlined above.

Feedback from Auckland Council has raised concern that the development may potentially result in wetland reclamation which in their view is a prohibited activity by way of Regulation 53. The masterplan is relatively high level to support the referral application with more detailed design occurring to support the substantive application if successfully referred. This more detailed work will confirm if work around wetlands triggers a prohibited activity status. Regardless s21(7) of the Fast-track Approval Act enables the Minister to accept a referral application for an activity that is prohibited under the Resource Management Act 1991. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

## 5.4 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('**NES:CS'**) sets a nationally consistent set of planning controls and soil contaminant values.

SLR Consulting New Zealand (**SLR**) have undertaken a combined Preliminary Site Investigation (**PSI**) for the site, as appended to the referral application. The key findings of the PSI are:

Following a desktop review, the following Hazardous Activities and Industries List ('**HAIL**') activities were identified as having potentially occurred on the site:

- *A17: Storage tanks or drums for fuel, chemicals or liquid waste* – associated with drum storage and the potential for discharge of contaminants (hydrocarbons) to ground; and
- I: Any other land that has been subject to the intentional or accidental release of a hazardous substance in sufficient quantity that it could be a risk to human health or the environment – associated with:
    - The fence post storage, and the potential for discharge of timber treatment chemicals to shallow soil.
    - Burn pit, and discharge of contaminants (metals, hydrocarbons) to ground.
    - Deteriorated buildings, specifically potential for discharge of lead from lead-based paint to soil.

SLR has concluded that provisions of the NES:CS will apply to future residential development at the locations where HAIL activities have been identified. They have recommended that a detailed site investigation (DSI)

involving a targeted soil sampling is undertaken at the site in support of the substantive application. This will ascertain whether NESCS and/or AUP:OP contaminated land resource consents are required to be sought in support of the development.

## 5.5 Treaty Settlements

Section 7 of the FTAA requires all persons performing and exercising functions, powers, and duties under the Act must act in a manner that is consistent with the obligations arising under existing treaty settlements, while Section 16 sets out the requirements for the Minister.

Treaty settlements with the following iwi/groups are therefore of relevance to the project area:

- Ngāti Whātua o Kaipara
- Te Kawerau a Maki

Neither the Ngāti Whātua o Kaipara or the Te Kawerau a Maki settlements create any new co-governance or co-management processes which would affect decision-making under the RMA for this project. No areas covered by a statement of association, statutory acknowledgement or any other form of cultural or commercial redress provided in the Ngāti Whātua o Kaipara or the Te Kawerau a Maki settlements would be directly affected by the project. As a general principle, an absence of specific settlement redress does not indicate the absence of an iwi's cultural association with ancestral lands, sites, wāhi tapu or other taonga within an area. Therefore the applicant has acknowledged the cultural relationship of Ngāti Whātua o Kaipara and Te Kawerau a Maki within its rohe, and have ongoing engagement with both Iwi on this project.

## 5.6 Auckland Regional Policy Statement

The Urban Growth and Form objectives and policies are the heart of the Regional Policy Statement (**RPS**) and set the policy framework for managing Auckland's growth. The RPS seeks to achieve a quality compact urban form by:

a) Promoting urban growth and intensification within the urban area, towns, and rural and coastal towns and villages, and avoiding urbanisation outside these areas (B2.2.2(4));

b) Promoting quality compact urban form (B2.2.2(4) – (9));

c) Enabling higher residential intensification in and around centres and close to public transport (B2.2.2(5));

d) Ensuring that employment, commercial and industrial opportunities meet current and future demands (B2.5.1(1); and

e) Enabling growth and development of existing or new rural and coastal towns and villages in a way that avoids scheduled resources, elite and prime soils, and significant natural hazards; and is consistent with local character, enables mana whenua wellbeing and can be serviced by infrastructure (B2.6.1).

Plan Change 80 (**PC80**) sought to align the with the objectives and policies of the NPSUD. PC80 is now operative. The RPS seeks to achieve a "quality compact urban form" to urban development in Auckland, by applying a centres-based approach (B2.2.2(7)), and promoting residential intensification in and around centres, corridors and close to public transport, social facilities and employment (B2.2.2(6)). This approach is broadly consistent with the NPSUD concept of well-functioning urban environments.

Auckland Council have provided feedback raising concerns that the RPS does not anticipate urbanisation of the rural environment that is not identified within the Future Urban Zone. We disagree with this interpretation of the RPS. The proposal will form an extension of Waimauku rural town. The RPS anticipates the growth of rural and coastal towns (B2.6.1). The technical reporting and subsequent masterplanning of the site demonstrates that the elements of B2.6.1 are given effect to including whether enabling growth of existing rural towns occurs in a way that avoids scheduled resources, elite and prime soils, and significant natural hazards; and is consistent with local character, enables mana whenua wellbeing and can be serviced by infrastructure. The technical reporting and subsequent masterplanning of the site demonstrates that the proposal to urbanise the plan change area, and provide for the expansion of Waimauku, is consistent with B2.6.1.

### 5.7 The Auckland Future Development Strategy 2023-2053

The Auckland Council feedback raises concerns that the subject site is not identified within the Future Development Strategy (FDS) for urban development in the next 30 years. The purpose and content of the FDS set out in clause 3.13 of the NPSUD however, is important. This states that its purpose is to promote long-term strategic planning, within which it must identify broad locations in which development capacity will be provided over the long term. The FDS does not specifically identify Waimauku as a growth area nor does it appear to have been ever considered by the Council in its evaluation of the spatial scenarios. The FDS spatial response for rural areas acknowledges more work needs to be done to specifically address growth in existing rural towns and settlements such as Waimauku. There is a supporting action to update information on rural settlements, environments, productivity and employment and develop a Rural Strategy (prioritising the southern rural area) to inform the future approach to rural areas. A Rural Strategy has been released for southern Auckland however, a similar strategy has not yet been released for the northwest. Therefore, in the interim, merit-based development in areas adjacent to existing towns and settlements will be considered through relevant subsequent planning processes.

## 6.0 Assessment of Effects

This section is provided in accordance with s13(4)(h) of the FTAA. This requires that applications include a description of the anticipated and known effects of the project on the environment.

The proposal will not generate significant adverse effects on the environment, and any adverse effects on the environment will be appropriately avoided, remedied or mitigated to be minor or less than minor in nature. The key potential adverse effects are addressed in general below and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

### 6.1 Economics

An Economic Assessment of the proposal has been undertaken by Insight Economics. This assessment finds that Northwest Auckland's population is growing rapidly, and a steady supply of new homes is needed to accommodate this growth. According to the report from Insight Economics this proposal addresses that need directly and:

a) Makes a significant contribution to regional housing supply; and
b) Generates significant regional economic benefits including:
    - A one-time boost in GDP of around $650 million;

- Employment for over 4,500 FTE-years (or 305 people employed full-time for 15 years); and
- Additional household incomes of $385 million.

c) The proposal's non-residential areas could sustain the following activity at full build-out:
   - Full-time employment for 284 people;
   - Annual GDP of $57 million; and
   - $24 million paid annually in salaries / wages.

In respect of the economic benefits particularly associated with the proposed urbanisation the Economic Report finds that the proposal enables approximately an estimated 1,500 – 2,020 dwellings new dwellings, which will help the market be more responsive to growth in demand and foster competition in the land market. The proposal caters to a variety of needs and preferences by providing for a range of dwelling typologies, including standalone homes of various sizes and configurations as well as terraces / duplexes. It enables the delivery of larger homes than are currently being provided in other greenfield areas in Auckland's northwest.

Importantly, the Economic Report notes that the proposal offers a nearby alternative to the Kumeū–Huapai and Riverhead Future Urban Area, where large portions of land have recently been red-flagged due to flooding and natural hazard risks and are now expected to revert to rural zoning.

Additionally, Insight Economics concludes that enabling approximately 28,650 $m^2$ of industrial floorspace, which will help keep pace with demand over time, thereby helping to ease land supply constraints and supporting a more responsive industrial market.

Insight Economics concludes that the fast-track process ensures these benefits are realised sooner than traditional development pathways would otherwise normally allow. In their expert view the proposal meets criteria 22(2)(a)(iii) and 22(2)(a)(iv) of the FTAA and is supportable on economic grounds.

In terms of wider economic effects, while Waimauku is not currently planned for growth at this scale Insight Economics note that the supply in housing from this development satisfies the definition of "significant" in Policy 8 of the NPS-UD, which requires authorities to be responsive to significant unplanned or out-of-sequence proposals that would contribute meaningfully to a well-functioning urban environment. Insight Economics has also considered whether the proposal might impose unwarranted costs on the wider community via the infrastructure required to service it. Insight have concluded that this is minimal given the applicant will fund the infrastructure to service the development.

## 6.2 Transport

A Transportation Memorandum has been prepared by CKL which outlines the transportation context, anticipated effects, and future assessment needs, and concludes that there are no transportation issues that would prevent the proposal from progressing to the Fast Track consenting stage.

Importantly, the transport memorandum states that the wider effects of traffic generated from the development is unlikely to have a significant effect and the suite of future upgrades being planned and implemented within the northwest Auckland strategic area will ensure continual improvement of transport conditions. Further to this the transport memorandum states that a greater prevalence of working from home and hybrid working is evident and has stabilised, which has reduced residential trip rates.

The transport memorandum also notes that the site is currently serviced by the 125 bus service which operates past the site along State Highway 16 between Helensville and Westgate, with 30-minute frequencies in both directions from 5:30am to 8pm eastbound and 6:22am to 8:52pm westbound. At Westgate, connections including rapid transit routes are available to much of Auckland, including the CBD. Such a service and frequency are considered good for a currently rural location, which provides a good public transport service for existing and future residents in the area to readily access employment, education, and entertainment. It is also noted that the Government has recently announced that the Northwest Rapid Transit Busway could begin by 2027, with work already underway on a new station at Westgate[3]. The transport assessment also notes the long-term potential for reactivation of the North Auckland Line if growth pressures in northwest Auckland continue to intensify.

In addition to public transport NZTA has recently confirmed that additional funding has been approved for Stage 2 of the SH16 Brigham Creek to Waimauku safety improvements project which runs between Brigham Creek interchange and Kumeū town centre,[4] with Stage 1 already under construction. Key features of this project include the four laning of SH16 between Brigham Creek and Taupaki roundabout and a new roundabout at the SH16/Coastesville Riverhead Highway intersection to help traffic flow and make it safer to turn.

## 6.3 Earthworks

During construction, erosion and sediment control measures will be utilised to avoid an adverse environmental effect. All proposed sediment and erosion control measures will be designed in accordance with the Auckland Council's GD05.

Any adverse dust effects can be appropriately managed with standard conditions of consent.

A Geotechnical Report has been undertaken by CMW. In respect of stability, the Site is dominated by a steep generally north/south trending ridgeline. As such there are areas of deep-seated slope instability however these are fully contained within the site and/or are outside residential development areas. CMW is satisfied that remediation of these features to reduce the risk of potential slope instability to acceptable levels can be achievable through appropriate earthworks engineering and design.

Earthworks comprising creation of cut/fill platforms to reduce slope angles to below 1(V):4(H) will be required to reduce soil creep hazard to acceptable levels. It is likely that low to moderate height retaining walls will be required between residential lots in these areas.

On the basis of the above, it is considered that any adverse effects associated with earthworks can be managed in that they will be less than minor.

## 6.4 Contamination

A Preliminary Site Investigation (PSI) has been undertaken by SLR. The PSI concludes that it is likely that an activity listed on the HAIL has been or is being undertaken within discrete areas across the western and southern portion and centrally within the Site. Consequently, the provisions of the NESCS will apply to future residential development at the locations where HAIL activities have been identified.

[3] Northwest Rapid Transit: Busway construction to start by 2027- Transport Minister Chris Bishop - NZ Herald

[4] Stage 2 of SH16 safety improvements project to move forward to construction | NZ Transport Agency Waka Kotahi

The PSI further concludes that it is unlikely that the potential HAIL activities have impacted soil to an extent which would preclude the future residential land development of the site. It is recommended that a Detailed Site Investigation is undertaken in support of the substantive application.

## 6.5 Soils

A Soils and Resource Report has been undertaken by Hanmore Land Management. This report has provided a detailed classification of the soils present on the southern part of the Site. This report finds that LUC units 3e 3, 3e 5, 3w 1 and 3s 4, cover 19.5ha or 10% of the southern portion of the site that is proposed to be urbanised (shown in green in Figure 5 below). These same LUC units meet the definition of the prime soils classification. The remaining area of the southern portion of the site consists of LUC classes 4 to 7 and unproductive areas and are therefore outside of the HPL classification and both the prime and elite soils categories. Figure 5 below provides a map of the soils classification.

Notwithstanding the requirements of the NPSHPL, the actual productive capacity of the land shows that there is very little prime soil on the southern part of the site and it is poorly connected and is the lowest soil classification. On this basis, in our opinion, the potential adverse effects associated with the loss of this technically defined prime soil are less than minor.

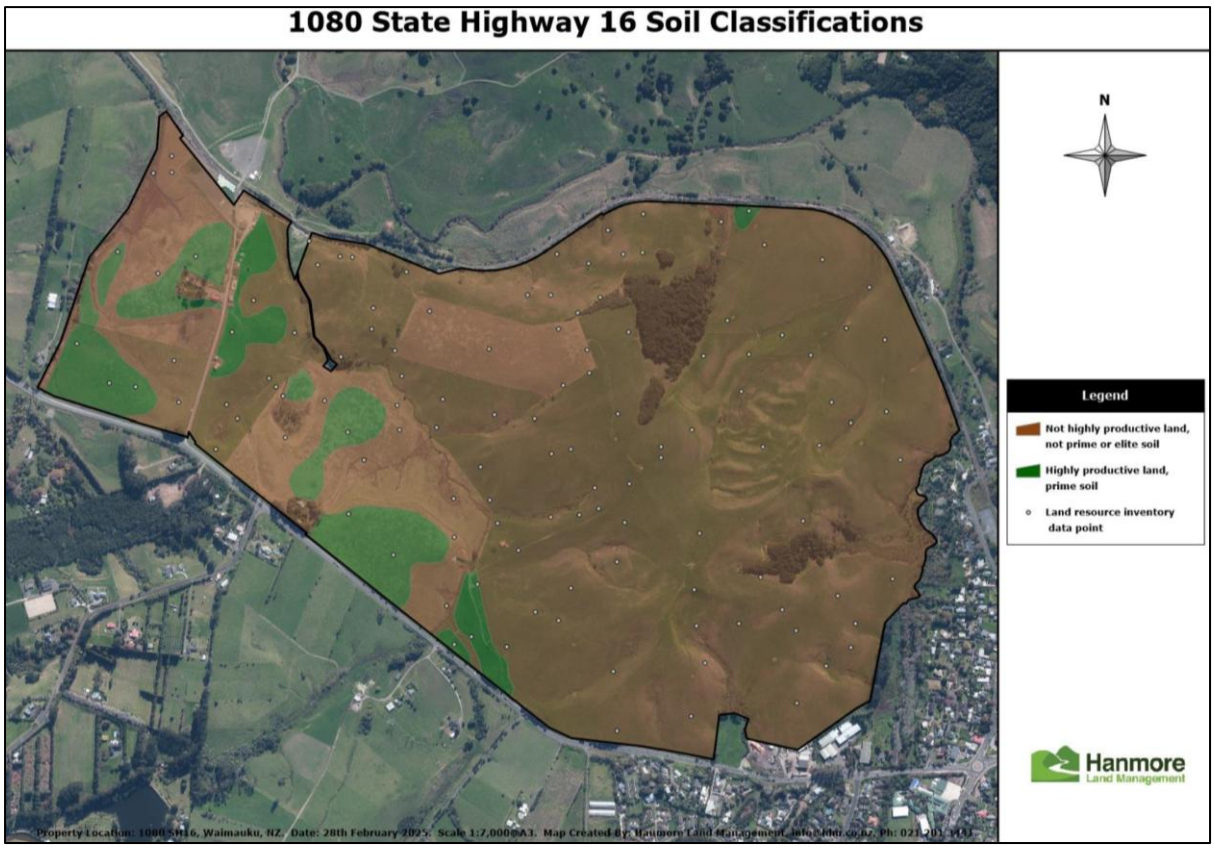


**Figure 5: Soil Classifications. Source: Hanmore Land Management**

## 6.6 Infrastructure

Details of the proposed infrastructure services such as stormwater, wastewater, water supply and utilities are outlined above and further detailed within the Infrastructure Memorandum from Crang Civil.

There is currently not public wastewater or water supply connection available at the Site however, the engineering reports along with the groundwater survey and Surface Water Supply Assessment confirm that the Site is able to be adequately serviced. Hence there is not considered to be any significant adverse effects in relation to infrastructure and servicing.

## 6.7 Flooding

In respect of flooding, A preliminary SMP has been undertaken by GHD. Flows from the site reaches the Kaipara River, then flows into the Kaipara Harbour and discharges to the ocean. The site is located mid-catchment of the Kaipara River. The northern, eastern and western boundaries of the site are either within or adjacent to flood prone areas with high risk of inundation. Flooding requires further investigation through a flood modelling during the final Stormwater Management Plan (SMP) stage. Given the identified flood hazard, the SMP swill minimising post-development impacts on overland flow by adopting a hydraulic neutrality approach. The preliminary SMP indicates that there are options available to achieve this.

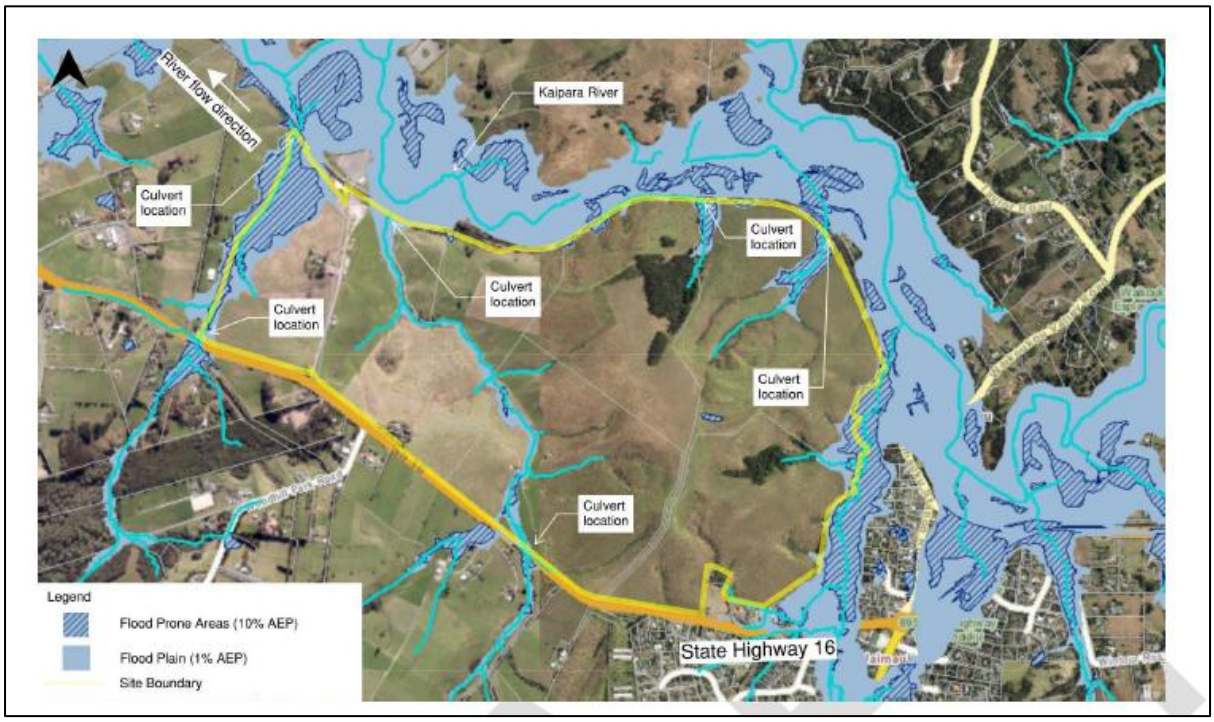


**Figure 6: Flood Hazards. Source: GHD.**

Healthy Waters have indicated in preliminary feedback that they cannot support the development. In response we note that the Site is largely elevated and free of flood hazard. This is very different to Kumeu, Huapai and much of the Waimauku settlements which are directly impacted by flooding hazards. The final SMP and flood modelling will determine the detailed design of mitigation that needs to occur within the development to ensure the development does not result in worsening of flooding effects upstream or downstream of the Site. The preliminary comments from Healthy Waters are addressed in the table below.

| Healthy Waters Feedback | Response |
|---|---|

| | |
|---|---|
| Just upstream of the proposed development, there are houses which have been bought out by Council due to flood risk. | These houses referred to are situated in Waimauku Village on the eastern boundary of the subject site within the existing floodplain. The preliminary SMP indicates that the majority of the site discharges to the north and therefore should not further impact flooding in this area. Where the eastern side of the site discharges into a tributary the preliminary SMP states that where flooding is evident and attenuation may be required on this side of the development to not increase the local flood hazard in that area. This will be worked through as part of the detailed design when flood modelling has been undertaken. |
| The existing flood map is based on the assumption that this land remains zoned as Rural Production. Rezoning and developing this area for residential use would alter runoff characteristics and potentially expand the floodplain. | Flooding requires further investigation through a detailed flood modelling exercise at the resource consent stage. Given the identified flood hazard, the final SMP will minimise post-development impacts on overland flow by adopting a hydraulic neutrality approach. The preliminary SMP indicates that there are options for achieving this.<br><br>In particular, with the majority of the site discharging to the north and with the site located mid-catchment for the Kaipara Stream then a pass forward approach could be possible (no attenuation). As discussed above attenuation may be required on the eastern side of the development to not increase the local flood hazard in that area. Similarly, the culverts underneath the North Auckland Railway Line to the north are likely to be constrained, and attenuation of site runoff may still be necessary to not increase the extent of flooding associated with those culverts. |
| The current floodplain mapping in the regionwide model assumes rural land use in this location. Converting this to residential development introduces uncertainty into flood predictions and undermines the reliability of the model. Placing 1,567 dwellings in this context would significantly contribute to cumulative effects across the catchment. | |
| This is upstream of a catchment and can create impacts downstream. Development in the upper catchment will increase imperviousness, resulting in higher and faster runoff volumes. This reduces the time of concentration and eliminates natural attenuation provided by existing vegetation and soil, placing added pressure on downstream channels and infrastructure. These hydrological changes can increase peak flows, flood depths, and frequencies downstream particularly concerning in a catchment already experiencing flood-related issues. It also introduces sedimentation and water quality risks during construction and post-development. | |
| If this land within a Rural Production zone can proceed through the fast-track process, there is | Disagree that an application through the fast track process creates a precedent for future applications. |

| | |
|---|---|
| concern about how we will manage future out-of-sequence proposals in other rural zones. It may set a precedent that undermines current growth management and flood resilience planning. | Future applications will need to be assessed on catchment specific effects and mitigation proposed. This is not a relevant engineering matter in any case. |

## 6.8 Ecology

An Ecological Memorandum has been prepared by Viridis which identifies the extent of terrestrial and aquatic ecological features across the site and provides an overview of these values. In summary, the botanic and terrestrial fauna ecology values include areas of high-value indigenous vegetation and a network of low to high value streams and wetlands.

Viridis considers that the proposal's initial design avoids the removal of the vast majority of these existing features and along with mitigation measures for indirect effects (e.g. suitable stormwater and wastewater management) will prevent loss of the site's biodiversity values. Viridis notes that the project presents a good opportunity to continue the significant enhancement and protection of the key ecological features. On this basis, Viridis considered the developments contribution to environmental values to be positive.

For the reasons set out above, any potential ecological effects on the environment will be less than minor.

## 6.9 Visual / Landscape

As set out above, the Site is subject to a Modified Ridgeline Protection Overlay (MRPO). A Landscape Memo has been prepared by Bridget Gilbert Landscape Architecture which provides a preliminary assessment of the capacity to absorb urban development from a landscape perspective. The conclusion reached within the Landscape memo is that the southern part of the site can absorb the landscape effects of urban development through such measures as:

- Delineation of any new township boundary via a strong natural boundary;
- Retention and protection of existing noteworthy trees, bush and wetland features;
- Requiring the restoration planting of steep slopes, gullies and stream corridors;
- Retention of the impression of Renall's Hill as a more natural landscape backdrop to Waimauku settlement in views from the north, east and south, and as a more natural landscape gateway in views from the west; and
- Incorporating lower density development and/or landscape buffers along site edges (including road frontages) on the western portion of the site to assist the integration of development into its broader rural landscape setting.

These measures will assist the retention of Renall's Hill as a more natural landscape backdrop and gateway will safeguard the landscape intentions of the MRPO that applies to the area.

The Landscape Memo concludes that the proposed masterplan is supportable from a visual landscape perspective.

## 6.10 Cultural Values

A summary of consultation undertake with iwi through the life of the proposal will be included with the final application.

The project will not occur on land returned under a Treaty Settlement. The Site is also not located within a Treaty Settlement Statutory Acknowledgement area. It is anticipated that engagement and consultation with all iwi groups that have registered their interest in this project will continue throughout the life of the project.

## 6.11 Positive Effects

***Waimauku West*** will deliver a number of positive effects, including but not limited to:

- Increasing housing supply in Auckland's North West and Rodney Local Board area.
- Making efficient use of significant Government investment in transport infrastructure in Auckland's North West, including safety and capacity improvements to State Highway 16, a new Road of National Significance and planning for the North West Busway. This is particularly important in the context of Auckland Council rolling back capacity that would have otherwise been provided in Future Urban areas in Kumeu and Huapai.
- Delivery of a diverse mix of housing typologies to suit families of various sizes and different lifestyle choices to address housing needs.
- Creation of a well-functioning urban environment with a neighbourhood centre and light industrial employment area, which will support the local economy beyond the construction of the project.
- Enhancement of the natural environment through the design which seeks to weave natural space through the development via the green network that incorporates existing ecological features.
- Generation of a wide range of economic benefits, such as providing a direct boost in housing supply to meet growing demand, meeting the needs of an evolving population, and contributing significant regional economic benefits.
- Providing the opportunity to establish critical social infrastructure, including two school sites.

## 6.12 Mitigation

This memorandum, and the supporting memorandums from the technical experts, identify a range of measures to address potential adverse effects and ensure that those adverse effects are avoided, remedied or mitigated. This includes the application of standard and well-established mitigation measures and more bespoke approaches to manage the particular effects of this proposal. These can be addressed through design, conditions of consent, and monitoring.

# 7.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning-related reasons why ***Waimauku West*** could not proceed under the Fast-Track Approvals Act 2024. Through strong design and technical input, ***Waimauku West*** can achieve a built form, environment and community that

positively impact future residents and the wider Waimauku community, without having an adverse effect on the environment.

It is acknowledged that a full and comprehensive Assessment of Environmental Effects will be undertaken as part of the resource consent application, however at this stage, no more than minor adverse effects have been identified that preclude the development from occurring.

Additionally, it is noted that the Government is currently investing significant funding into transport infrastructure to service the northwest. There is a need to maximise the efficient use of this infrastructure which this proposal will assist with.