Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure D:

Coastal Hazards

Dr. Tola Omidiji

06 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Coastal Hazard Specialist

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Dr. Tola Omidiji
Qualifications & Relevant Experience:	I hold the qualification(s) of Bachelor of Science in Geography, Master of Science in Geography and Planning and Doctor of Philosophy in Physical Geography. I have 11 years of experience in coastal geomorphology and coastal management. I have over 2 years of experience working under the RMA, including the preparation of technical assessments and expert evidence for resource consent applications and plan changes.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	6 October 2026

3.0 Executive Summary / Principal Issues

N/A

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- AEE titled*: "Beachlands South, Fast-track Approval Substantive Application Assessment of Environmental Effects and Statutory Analysis,* prepared by UNIO Environmental, 26 June 2026
    - BEACHLANDS SOUTH – RULES ASSESSMENT, prepared by UNIO Environmental, dated 26 June 2026
- Report titled*: Beachlands South Fast Track Application Coastal hazard NPS-NH and AUP risk assessment, Job Number 1014358.2501 v1.2 CHA,* prepared by Tonkin & Taylor Limited, dated June 2026.
- Appendix A: *Coastal Hazard Assessment (**CHA**) Beachlands South Private Plan Change Prepared for Beachlands South Limited Partnership*, Prepared by Tonkin & Taylor Ltd Date January 2022, Job Number 1014358.v4.
- Report titled: *Beachlands South Fast-track Application Open Space Strategy*, by Jasmax and Studio Pacific, dated 12 August 2026.
- Application Plans:
    - *Overall Resource Consent Scheme Plan*, Rev A, Harrison Grierson, 29 May 2026
    - Architectural Drawings, prepared by Jasmax and Studio Pacific, Revision A, dated 15 June 2026.
    - *Stormwater and Wastewater Overall Layout Plan*s, Rev B, prepared by Harrison Grierson, August 2026.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

5.1 Additional reasons for consent

The area of proposed development is within the coastal erosion hazard area (CEHA) as per the part (a), b (i) and CEHA 1, 2 and 3 definitions in Chapter J and J1.4 (definitions) of the AUP and Plan Change 120 respectively.

- The proposed development and subdivision at the above site trigger the various consents below which were not identified in the AEE Report:

5.1.2 Auckland Unitary Plan (AUP)

The proposed works trigger resource consents for the following reasons:

Activities:	**Rules:**
Parts of the new coastal walkway structure within the coastal erosion hazard area.	E36.4.1 (A4): All other buildings and structures on land in the coastal erosion hazard area, is a **Restricted Discretionary Activity**.
Stormwater pipe and outfall infrastructure within the coastal erosion hazard area.	E36.4.1 (A5): On-site septic tanks, wastewater treatment and disposal systems, effluent disposal fields, underground storage tanks, water tanks (including rainwater tanks) or stormwater pipes or soakage fields on land in the coastal erosion hazard area, is a **Restricted Discretionary Activity.**
Subdivision of land within the coastal erosion hazard area.	E38.4.1 (A11): Subdivision of land within the coastal erosion hazard area, is a **Restricted Discretionary Activity.**

5.1.3 AUP - Plan Change 120

The proposed works trigger resource consents for the following reasons:

Activities:	**Rules:**
Parts of the new coastal walkway structure within **CEHA 3**	**Use** – E36.4.1A (A59): Activities where natural hazard risk is acceptable in accordance with Table E36.3.1B.1 in coastal hazard areas, is a **Permitted Activity**. **Development –** E36.4.1A (A69): Construction of private roads, roads intended to be vested, and accessways in coastal hazard areas, in coastal hazard areas, is a **Restricted Discretionary Activity.** E36.4.1A (A77): All other buildings and structures, including retaining walls and earth bunds, in coastal hazard areas, is a **Restricted Discretionary Activity.**

	New stormwater pipe and outfall infrastructure within **CEHA 3.**	**Use** – E36.4.1A (A59): Activities where natural hazard risk is acceptable in accordance with Table E36.3.1B.1 in coastal hazard areas, is a **Permitted Activity**. **Development** – E36.4.1A (A68): On-site septic tanks, wastewater treatment and disposal systems, effluent disposal fields, underground storage tanks, water tanks (excluding above-ground domestic rainwater tanks) or stormwater pipes or soakage fields on land in the coastal hazard areas, is a **Restricted Discretionary Activity**.
	New wastewater treatment plant outfall infrastructure within CEHA **1.**	**Use** – E36.4.1A (A59): Activities where natural hazard risk is acceptable in accordance with Table E36.3.1B.1 in coastal hazard areas, is a **Permitted Activity**. **Development** – E36.4.1A (A68): On-site septic tanks, wastewater treatment and disposal systems, effluent disposal fields, underground storage tanks, water tanks (excluding above-ground domestic rainwater tanks) or stormwater pipes or soakage fields on land in the coastal hazard areas, is a **Restricted Discretionary Activity**.
	Subdivision of land within the coastal erosion hazard area.	E38.4.1 (A11): Subdivision of land within the coastal erosion hazard area, is a **Restricted Discretionary Activity.**

6.0 Specialist Assessment

Council's Regulatory Review:

6.1 Hazard Assessment

As the application is a **Restricted Discretionary activity**, I have considered the matters below:

1. the matters of discretion in E36.8.1(1),
2. the matters of discretion E38.7.3.4,
3. risk assessment requirements in E36.3 (4A) (a - e),
4. E36.9 special information requirements,
5. The Council's Areas Susceptible to Coastal Instability and Erosion (ASCIE) are a s104(1)(c) matter.

The National Policy Statement for Natural Hazards (NPS-NH) is also relevant. I have considered the NPS-NH and taken this into account in my recommendations.

The RMA, and Policy 25 of the New Zealand Coastal Policy Statement (NZCPS) require avoiding increased risk of development in areas affected by coastal hazard over at least the next 100 years. In addition, Policy 24 of the NZCPS requires parties to undertake coastal hazard assessments using the best available information.

Coastal Erosion Hazard Area – Site Specific Assessment

Tonkin & Taylor, on behalf of the applicant, has undertaken a site-specific coastal hazard assessment in accordance with Council's technical report, TR2020/021 and the MfE Coastal Hazards and Climate Change Guidance (2017) that incorporates sea level projections and Vertical Land Movement (VLM).

Tonkin & Taylor provided the current, 50-year and 100 year ASCIE values for Cells A[1] to H[2] for the site (Figure 1). They further presented a map (Figure 2) which indicates that the site-specific 50- and 100-year ASCIE lines, when measured from the cliff toe, sits within the parent site. However, sections of the proposed coastal walkway structure and (stormwater and wastewater) infrastructures are located seaward of the 100 year ASCIE line (Figure 2). The 100-year ASCIE line does not impact any of the proposed new building platforms at the above site.

I have reviewed the input parameters used by Tonkin & Taylor in their ASCIE calculations. I note that the MfE (2017) guidance used in their 2022 assessment has since been updated in 2024. The assessment adopts an effective sea-level rise (eSLR) scenario of 1.23 m per 100 years from the present-day baseline, compared with 1.64 m per 100 years under the updated guidance. This represents a difference of ~0.4 m in eSLR over 100 years. Based on my review, I consider that this difference in the eSLR input would not materially alter the areas identified as being potentially affected by coastal erosion and associated instability.

It should be noted that the assessment is based on a formula that uses geology, topography, projected sea level rise and vertical land movement figures. Whilst it results in a calculated number, this is simply a projection to be used for planning purposes to manage risk.

6.2 Matters of discretion – AUP

6.2.1 E36.8.1 (1) (a): the type of activity being undertaken and its vulnerability to natural hazard events including the consequences of a natural hazard event in relation to more or less vulnerable activities

Coastal walkway

Part of the applicant's proposed new coastal walkway (Figure 3) is seaward of the 100-year ASCIE line. While the seaward portion of the walkway may be affected by coastal erosion and instability over time, it is a non-habitable, low-risk structure.

Any future damage would not be expected to pose a significant risk to people. If damaged, the structure could be repaired, rebuilt, relocated or removed.

New infrastructure

The proposed stormwater pipe and outfall and wastewater treatment plant outfall (Figure 4) are located within the site-specific 100-year CEHA.

As non-habitable infrastructure, they are less sensitive to coastal erosion and instability hazards compared to residential buildings, and any future damage would primarily affect asset performance rather than public safety.

The wastewater outfall is to be installed by directional drilling, as such it will be subsurface and unlikely to be affected by erosion.

Subdivision

The proposed subdivision (Figure 5) is an integral component of the intensification of the application site.

Following the Tonkin & Taylor Limited Coastal Hazard Assessment Report, it is agreed that the site specific 100-year future ASCIE extends into the parent subject site.

6.2.2 E36.8.1(1)(b): The likelihood of the event occurring and the likely extent of any damage to people, property or environment.

The likelihood of coastal erosion occurring is considered to be ongoing but generally localised, reflecting the site's exposure to coastal processes during high tides and, particularly, during storm surge conditions.

In the 2022 CHA Report, Tonkin & Taylor Limited notes that the shoreline is relatively sheltered, with generally low wave heights and limited wave exposure due to the site's orientation, surrounding coastal morphology and the shelter provided by the Pine Harbour Marina. They further comment that coastal wave interaction with the shoreline is largely restricted to higher tide levels, with the potential for increased erosion during periods when elevated water levels coincide with energetic wave conditions.

In assessing the coastal erosion and instability hazards at the site, the applicant has provided a site-specific erosion calculation and map which indicates that sections of the proposed coastal walkway and associated stormwater and wastewater infrastructure are located seaward of the 100-year ASCIE line. These elements have the potential to be affected by coastal erosion over the 100-year assessment period, with the extent of potential effects dependent on the rate and spatial distribution of shoreline retreat (Figures 1 and 2). In contrast, the 100-year ASCIE line does not intersect any of the proposed new building platforms. The proposed buildings are therefore located landward of the site-specific 100-year ASCIE line.

I note that an existing esplanade reserve fronts much of the site. The applicant proposes to vest an additional esplanade reserve and provide a coastal pathway that runs along the coastline as part of the subdivision proposal. In a coastal context, the esplanade reserve provides separation between development and the coastal margin and allows for public access and space within which future coastal hazard effects can be accommodated. This is a relevant factor given the potential for coastal erosion and future cliff hazards to affect the site. The proposed esplanade reserve will provide an additional measure for managing future coastal erosion and cliff hazard risk by maintaining land between the proposed development and the coastline. Council considers this to be an appropriate additional erosion risk

management approach, particularly in combination with the site-specific erosion assessment and the location of the proposed building platforms landward of the site-specific 100-year ASCIE.

6.2.2 E36.8.1(1)(c): Effects on public access, landscape, and environmental values

The proposed coastal walkway structure will be located on private land. As such, there are no public access matters of concern.

Parts of the proposed stormwater infrastructure are located within private property and within the public esplanade reserve. The proposed wastewater infrastructure is similarly located within private property, the public esplanade reserve and the Coastal Marine Area (CMA).

The sections of the stormwater pipe and outfall and wastewater treatment plant outfall located within the esplanade reserve will be installed below ground.

The stormwater pipe and wastewater treatment plant outfall have a functional need to be located in this position to enable discharge to the CMA.

The proposed works will not affect existing public access through the esplanade reserve.

Overall, there are no proposed erosion hazard mitigation works associated with the development that would cause effects on public access and landscape values.

6.2.3 E36.8.1(1)(d): Ability to relocate buildings or structures within a hazard area

The proposed coastal walkway is not designed as being relocatable, but is a public access structure, relatively low cost and could be removed if necessary.

The proposed stormwater pipe and wastewater treatment plant outfall are within the CEHA. These structures are non-inhabitable structures. Any impact on the infrastructure will be a low risk to lives or property.

Presuming if erosion hazard becomes imminent, the infrastructure can be relocated to reduce the risk in the future.

6.3 Assessment against Matters of Discretion E38.7.3.4 - Subdivision

(a) a specified building area that meets the requirements of Standard E38.8.1.

This is a matter for the planner to consider.

(b) access to all proposed building platforms or areas

Access to all building platforms is located outside the future 100-year ASCIE.

(c) on-site private infrastructure required to service the intended use of the site.

The proposed Lots will be serviced by new private stormwater infrastructure.

Parts of the proposed stormwater pipe and wastewater treatment plant outfall are seaward of the 100-yr ASCIE line.

Should this infrastructure be affected by coastal erosion over time, they can be modified and still perform their functions.

6.4 Subdivision assessment under PC 120

The proposed subdivision is a **restricted discretionary activity** under Rule E38.4.1 (A11). The relevant matters of discretion are in E38.7.3.3. These have been modified over those in the same section in the AUP (1)(a)

(1)(b) will be met if the proposal is granted.

(1)(c) this is a matter for the planner to consider.

(1)(d) the proposal meets this criterion; as access to all building platforms is located outside the future 100-year ASCIE.

(1)(e) (i) the proposal does not meet this criterion because parts of the stormwater and wastewater infrastructure are within the CEHA. Should coastal erosion affect this infrastructure, it could be modified to maintain its intended function.

(ii) Not Applicable.

Summary:

- The applicant has proposed sections of a new coastal walkway, new stormwater pipe and outfall, wastewater treatment plant outfall and subdivision within a coastal erosion hazard area.
- These proposed development and subdivision trigger resource consent under the CEHA provisions of Chapter E36 and E38 of the AUP and AUP Plan Change 120.
- The applicant has undertaken a site-specific hazard assessment in terms of determining the potential extent of coastal erosion over a 100-year period. This erosion calculation and assessment have been reviewed and is acceptable.

- The proposed stormwater and wastewater infrastructure are non-habitable, low risk structures.
- The proposal will not impact public access, landscape and other environmental values.
- The proposal does not exacerbate erosion at the site or adjacent sites.
- The proposal does not warrant any conditions of consent to manage coastal erosion hazard effects.

7.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps.

8.0 Recommendation

I support the application based on the available information.

9.0 Proposed Conditions

I have no amendments / recommended additional conditions for this application.

10.0 Supporting Documents

References

Roberts, R., N Carpenter and P Klinac (2020). Predicting Auckland's exposure to coastal instability and erosion, Auckland Council, technical report, TR2020/021. https://www.knowledgeauckland.org.nz/publications/predicting-auckland-s-exposure-to-coastal-instability-and-erosion/

Figures

Table 5.2: ASCIE for all cells

Cell	Current ASCIE (m)	2080 ASCIE (m)	2130 ASCIE (m)
A[1]	-9	-19	-32
B[2]	-5	-10	-15
C[1]	-9	-19	-32
D[2]	-27	-33	-38
E[2]	-52	-62	-72
F[2]	-52	-58	-64
G[2]	-5	-10	-15
H[2]	-5	-10	-15

1 calculated using the beach method, see Section 5.1.2.

2 calculated using the cliff method, see Section 5.1.1.

Figure 1: Table showing the site-specific ASCIE distances for the current, 2080 and 2130 assessment periods across Cells A[1]-H[2]. Negative values indicate landward erosion distances measured from the 2017 shoreline or baseline position. Values marked[1] were calculated using the beach method, while values marked[2] were calculated using the cliff method.

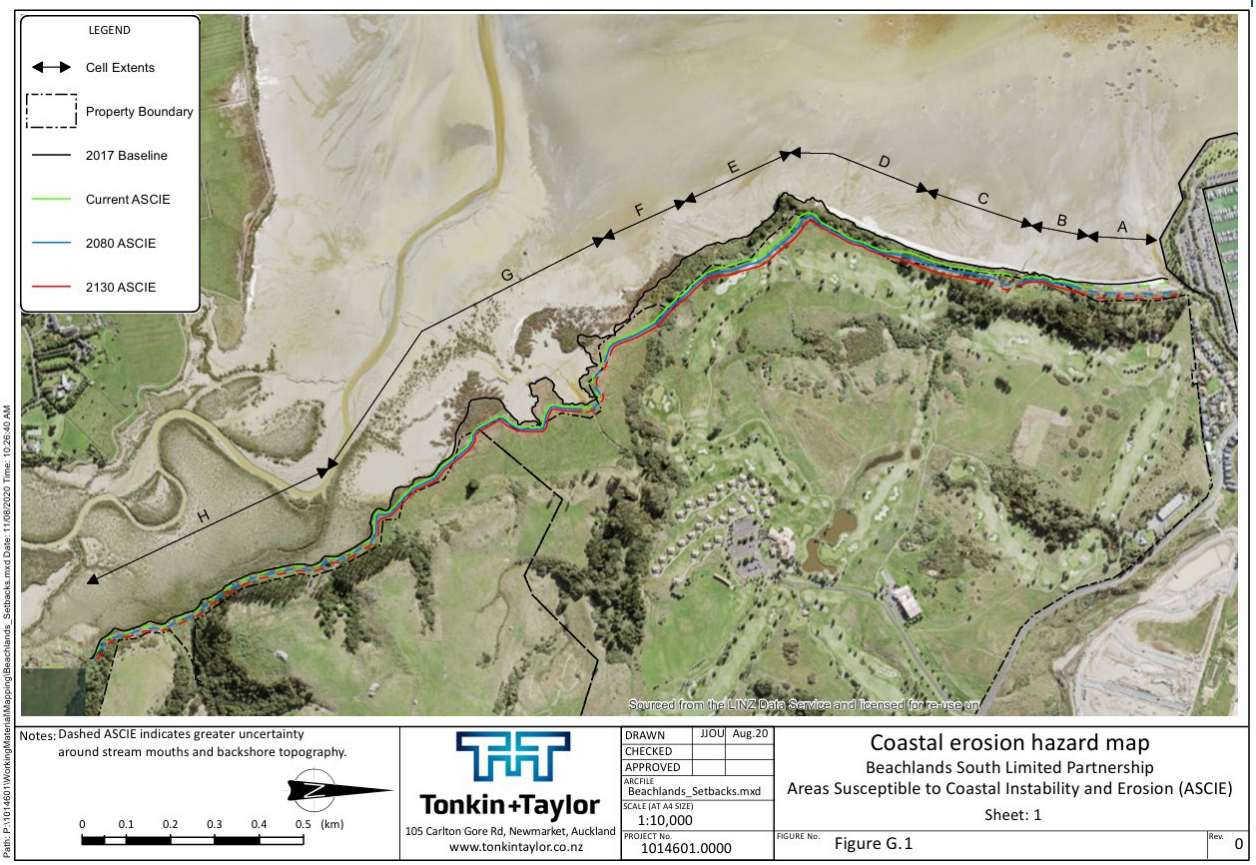


Figure 2: Map showing the site-specific 2017 baseline, current ASCIE (green line), 50-year ASCIE (blue line) and 100-year ASCIE (red line) that could impact the site (Coastal Hazard Assessment Report, Tonkin & Taylor Limited, 2022).



Figure 3: Proposed coastal walkway (Rev A, Architectural Plans, Studio Pacific Architecture, 15 June 2026)

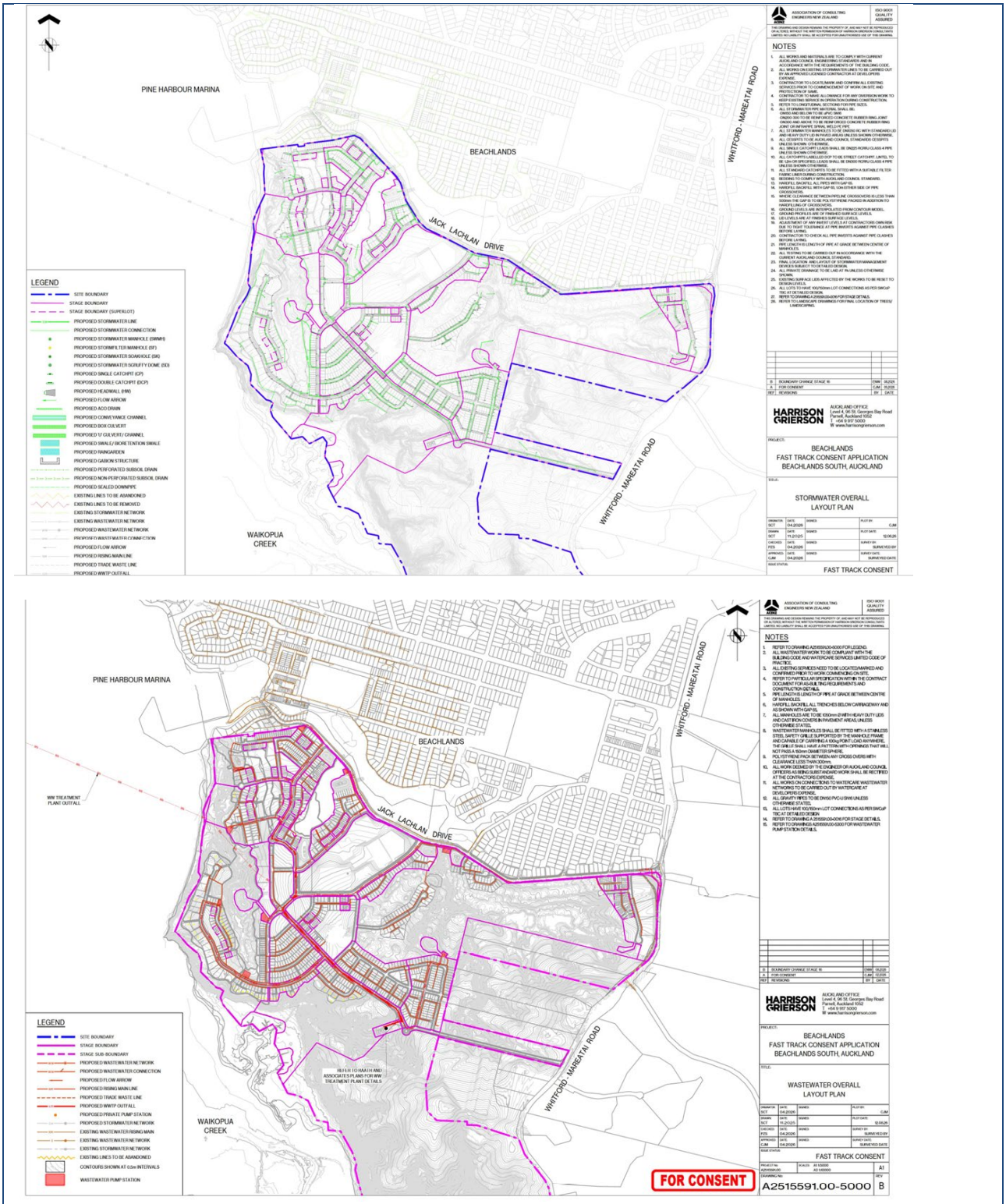


Figure 4: Proposed stormwater and wastewater infrastructure plans (Rev B, Harrison Grierson, August 2026).

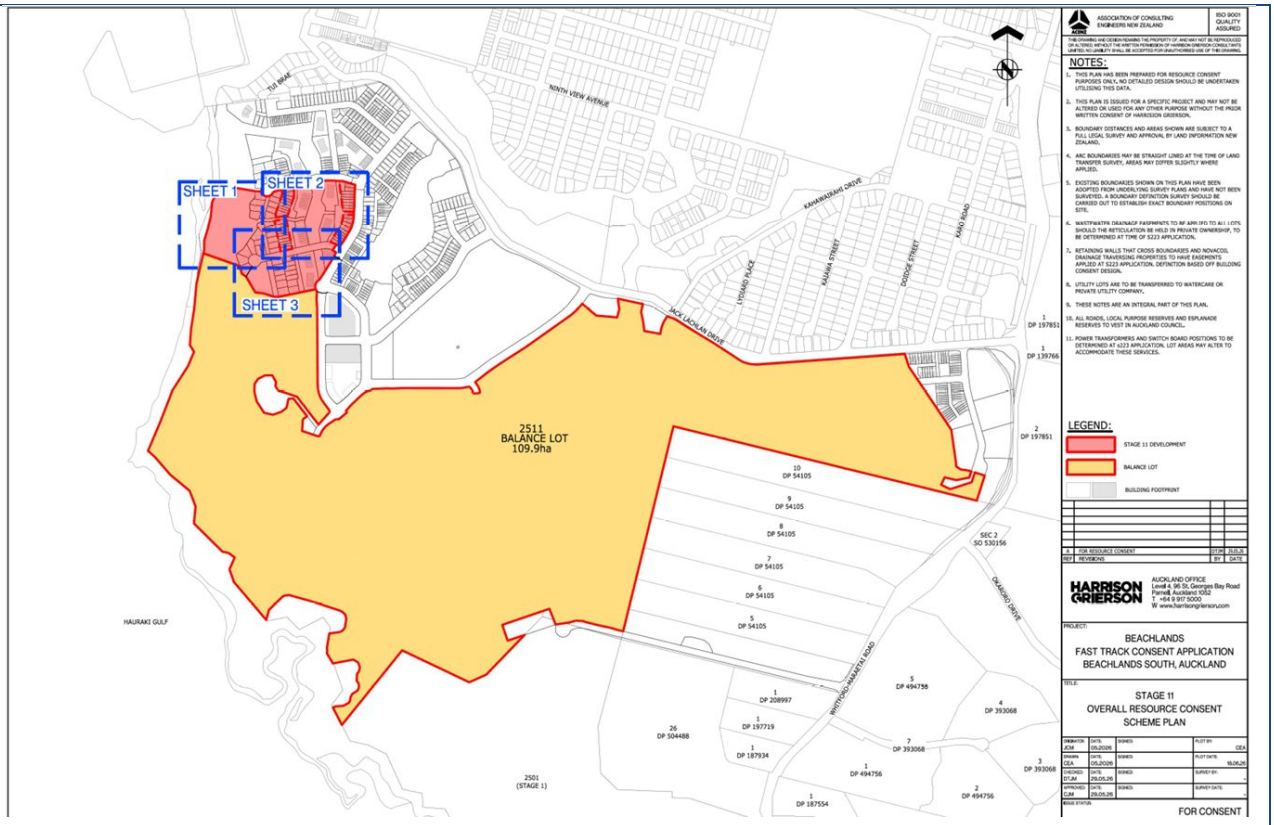


Figure 5: Proposed scheme plan (Rev A, Harrison Grierson, 29 May 2026).