

To: Melita Raravula – EPA
From: Karl Cook – Barker & Associates Limited
Date: 20 February 2026
Re: Responses to Panel Minute 14 (13 February 2026) – Planning Matters

1.0 Introduction

My name is Karl Cook. My qualifications and experience are as set out in section 3.1 of the Ayrburn Screen Hub Planning Report dated 18 November 2025.

This memorandum provides planning responses to particular matters in Panel Minute 14 (13 February 2026) as follows:

- (1) Paragraph [9], relating to the interrelationship between proposed conditions and specifications for the proposed acoustic barriers; and
- (2) Paragraph [13], relating to an analysis of the amended and new National Policy Statements that took effect on 15 January 2026.

Each of these matters is address in the sections that follow and attachments to this memorandum.

2.0 Acoustic Barrier Specifications and Conditions

Paragraph [9] in Panel Minute 14 states:

[9] Secondly, Document 17 supplied in response to comments provides specifications for the proposed acoustic barriers. We are particularly interested in the minimum thickness of the timber palings suggested (20mm) and whether this will deliver the required acoustic dampening. Can Mr Styles please comment on the issue. It may be that Mr Cook can add useful commentary on the inter-relationship with the proposed conditions.

Mr Styles confirms (in section 2.0 of his response dated 19 February 2026) the appropriateness of the specifications of the acoustic barrier in Document 17.

The requirements for acoustic barriers to be constructed in two locations are contained in Conditions 37J and 37K. As confirmed in the note to Condition 1 in Document 26, I anticipate that the acoustic barrier specification document would be included in the list of documents/plans which form part of the consent.

I consider that the inter-relationship between Conditions 37J and 37K and the acoustic barrier specification could be reinforced through inclusion of a cross-reference in Conditions 37J and 37K to Condition 1. For example: “...a 2.4m high Acoustic Barrier as specified in the Acoustic Barrier Specification plan by Marshall Day date 21 January 2026 and listed in Condition 1 is to be constructed...”.

3.0 Analysis of New National Policy Statements

Paragraph [9] in Panel Minute 14 states:

[13] We have also noted the amended and new National Policy Statements that took effect on 15 January. Can Mr Cook please provide us with an analysis of any relevant new national direction.

On 17 December 2025, the Government issued a number of new national directives¹ and amendments to existing ones, which took effect on 15 January 2026. Those considered to be relevant to the Ayrburn Screen Hub are:

(1) New NPSs:

(a) National Policy Statement for Natural Hazards 2025 (NPS-NH).

(2) Amended NPSs and NESs:

(a) National Policy Statement for Indigenous Biodiversity Amendment 2025 (NPS-IB).

(b) National Policy Statement for Freshwater Management Amendment 2025 (NPS-FM).

My analysis of each of the relevant amended and new National Policy Statements that took effect on 15 January 2026 identified above follows. For completeness, I do not consider that other parts of recent national direction reform are particularly relevant for the proposal, as further explained at 3.4 below.²

3.1 National Policy Statement for Natural Hazards 2025

The NPS-NH is a new NPS that aims to standardise the approach to assessing and managing natural hazards risk on a national basis, through a 'risk based proportionate approach'. The NPS-NH applies to all activities with the exception of infrastructure and primary production, to all zones and environments and to the following natural hazards:

- (a) Flooding;
- (b) Landslips;
- (c) Coastal erosion;
- (d) Coastal inundation;
- (e) Active faults;
- (f) Liquefaction; and
- (g) Tsunami.

The key outcomes arising from the NPS-NH are as follows:

- (1) Natural hazard risks must be assessed using a risk matrix taking into account mitigation (Policy 1) and managed in proportion to the assessed level of risk (Policy 2). Natural hazard risk must be assessed by evaluating the likelihood and consequences of hazard events. In doing so, decision-makers must

¹ National Policy Statements (NPSs) and National Environmental Standards (NESs).

² Including those as listed in the public notice found here: <https://environment.govt.nz/assets/201125-Full-Public-Notice-for-national-direction.pdf>

take into account any existing or proposed mitigation measures and the residual risk that remains if design limits are exceeded (Clause 3.2).

(2) Subdivision, use or development:

- (a) With very high natural hazard risk must be avoided (Policy 3); or
- (b) That creates or increases significant risk to other sites (that do not have 'very high natural hazard risk), must be avoided or appropriately mitigated in a manner that is proportionate to the level of risk (Policy 4).

(3) Decision-makers must match the amount of information required to assess the risk to the expected level of risk. These risks must be managed by avoiding very high risks, and by avoiding or proportionately mitigating high and medium risks, and avoiding or proportionately mitigating the creation of or increase significant natural hazard risk on other sites. In doing so, the cost-effectiveness of mitigation measures relative to the level of risk must be considered (Clause 3.3).

(4) Decisions must be based on the best available information, even where there is uncertainty or the information is incomplete (Policy 5). Decisions cannot delay action due to uncertain or incomplete information (Clause 3.4).

(5) Decision makers must consider the effects of climate change over at least the next 100 years (Policy 6).

In my analysis of the NPS-NH:

- The application is supported by expert assessments on matters raised by the NPS-NH. In particular, the Geotechnical Report by Geosolve at Appendix 13 to the application and the Stormwater Management and Flood Assessment by CKL at Appendix 9.
- These expert assessments address, as relevant to the subject site and proposal, flooding, landslip, liquefaction and active fault risks. While the assessments were prepared before the introduction of the risk matrix in the NPS-NH, the assessments include evaluation of likelihood and consequences of these natural hazard risks and mitigation measures. No residual risks are identified. In relation to flooding risk, the effects of climate change are assessed in both the 20yr and 100yr ARI peak flow. I consider this is materially similar to the NPS-NH method / matrix which essentially looks at both how likely a hazard is and how serious the consequences of the hazard could be for that development. The potential impacts of climate change have also been considered in the Geosolve Report (see 7.10).
- Further, no very high natural hazard risks are identified and, based on measures included in the proposal, the development will not create or increase significant risk to other sites such that avoidance, or further mitigation measures, are required (in accordance with policies 3 and 4 and associated clauses).
- In summary, I consider that the Applicant's geotechnical and flooding assessments included with the Application remain robust and fit for purpose in the context of the new NPS-NH, and further analysis is not required. Conditions of consent appropriately reflect these reports and I also do not consider that further amendments are required.

3.2 National Policy Statement for Indigenous Biodiversity Amendment 2025

The amendments to the National Policy Statement for Indigenous Biodiversity 2023 are concerned with consenting rules for quarrying and mining.

The amendments do not affect the assessment of the NPS-IB provided in section 2.7 of the Planning Assessment memorandum dated 23 January 2026, provided as Document 2 to the Applicant's s55 response.

3.3 National Policy Statement for Freshwater Management Amendment 2025

The amendments to the National Policy Statement for Freshwater Management 2020 ("NPS-FM") are concerned with consenting rules for quarrying and mineral extraction.

The amendments do not affect the assessment of the NPS-FM provided in section 10.2.3 of the AEE dated 18 November 2025, provided with the application.

3.4 National Policy Statements Not Considered Relevant

The following NPSs and NESs are not considered to be relevant, with brief reasons provided:

- National Policy Statement for Electricity Networks Amendment 2025, on the basis that there are no electricity networks affected by the proposal.
- National Policy Statement for Renewable Electricity Generation Amendment 2025, on the basis that the proposal does not involve renewable electricity generation.
- National Policy Statement for Infrastructure 2025, on the basis that the proposal addresses the infrastructure requirements of the proposed development and in other respects does not engage with the national framework for the development and management of infrastructure provided for under the NPS-I.
- New Zealand Coastal Policy Statement Amendment 2025, on the basis that the proposal is not within the coastal environment.
- National Policy Statement for Highly Productive Land Amendment 2025, on the basis that WBRAZ applying to the site under the PDP does not primarily serve land-based primary production activities and is excluded from the definition of "highly productive land" under Clause 3.5(7) of the NPS-HPL.
- Resource Management (National Environmental Standards for Freshwater) Amendment Regulations 2025, on the basis that amendments to the NPS-F are concerned with consenting rules for quarrying and mineral extraction and are therefore not considered relevant to the proposal.