

# Memo

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|-----------------|------------------------------------------------------------------------------------------------------|----------------|---------------|
| <b>To:</b>      | Westhaven Residential Limited Partnership                                                            | <b>Job No:</b> | 1098609.2000  |
| <b>From:</b>    | Richard Reinen-Hamill                                                                                | <b>Date:</b>   | 4 August 2026 |
| <b>cc:</b>      | Caitlin Cairncross                                                                                   |                |               |
| <b>Subject:</b> | FTAA-2604-1205   BUN60464683<br>188 Beaumont Street: Response to Auckland Council Annexure 11 and 19 |                |               |

This memo responds to Auckland Council's comments that it considers there are two Section 67 Information Gaps relating to coastal hazard risks, being that the Coastal and Flood Risk Assessment (CFRA) assumes the roads surrounding the Project will be raised in the future and that there is insufficient justification for the appropriateness of safe refuge as a primary long-term response to coastal hazard risk. I do not consider these are information gaps as both points have been adequately assessed in the CFRA but further clarification is provided below.

## **Assumption that surrounding roads to Project will be raised**

Vaishali Sankar identified in his specialist memo dated 21 July 2026 a concern that the CFRA was prepared on an assumption that the roads surrounding the Project may be raised at some point in the future and that on this basis, Auckland Transport will have to raise road levels to provide safe egress.<sup>1</sup>

I disagree that there is an information gap. The assessment of the Project has not been undertaken as being contingent on road raising over the economic life of the building. The assessment of coastal hazard and rainfall-induced flood hazard and the associated risks in relation to the Project has been undertaken using the existing roads levels (which are between 2.6 – 2.7 mRL).

## **Appropriateness of safe refuge as a long-term response to coastal hazard risk**

Inthan Azzor raised an information gap in his specialist memo that further technical justification is required regarding the appropriateness of safe refuge as a response to coastal hazard risk and why safe egress is not necessary for the site.<sup>2</sup> The CFRA explains both safe refuge and safe egress are part of the response to coastal hazards. The egress from the property can be permitted for a number of decades, however, there will likely be a point in time when egress is unsafe for a period of hours. The CFRA identified that egress becomes a very high risk with the SSP5-8.5 scenario at year 2130 due to the current road elevations and this resulted in the transition between safe egress (which is possible in the short to medium term) to safe refuge when flood depths on the existing road network makes this unsafe (flood waters reaching 3.1 m RL).

I consider safe refuge is an appropriate response to potential coastal hazard risk, if at some point in the future, safe egress is not possible. This is because when safe refuge is required the building is appropriately designed to ensure there is no risk to life, injury or significant property damage. Specifically:

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<sup>1</sup> Annexure 19 at [6.0].

<sup>2</sup> Annexure 11 at [4.5].

- a) All residential development is at least on level 1 or higher, well above all possible coastal inundation and flood levels. On the ground floor, there is only commercial development, and vertical evacuation from the ground floor to higher levels is possible via the stairs and vehicle ramps.
- b) The ground floor is constructed from durable materials, and the building can sustain basic human needs for the expected short-term duration of the hazard exposure with all residents having accessibility to basic human needs, and occupants of the commercial areas able to relocate to the podium. With the provision of appropriate guidelines and advice, the proposed residential development can accommodate a safe refuge strategy (when safe egress is not possible) and has sufficient space at elevated levels to accommodate guests and others and does not need to rely on safe egress.

While future road raising could extend the period during which safe egress remains available, it is not relied upon by the Project and is not necessary to manage risk to life for the reasons described above (Policy E36.4.3.5I(a)). Safe refuge is the primary long-term risk-management response which is appropriate for the reasons set out above.

4-Aug-26

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