



Comments on a Substantive Application under section 53 of the Fast-track Approvals Act 2024: Erosion and Sediment Control

Fast-track project name	Waikanae North
Fast-track application number	FTAA-2603-1194
GW file number	FTA260420

Technical area	Erosion and Sediment Control
Date	17 July 2026
Author	Gregor McLean, SouthernSkies Environmental Limited
Statement of expertise	I am a Director of SouthernSkies Environmental Limited and have over 29 years' experience in environmental management focussed on erosion and sediment control, managing a variety of multi-disciplinary environmental projects on behalf of clients in both the private and public sectors. I hold a Bachelor of Arts (Planning/ Geography) from Massey University and a Post Graduate Diploma in Resource Studies from Lincoln University. I am a Certified Professional in Erosion and Sediment Control (7628) and a Registered Soil Practitioner: Erosion and Sediment Control.
Code of conduct	I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical memorandum has been prepared in accordance with that Code. Unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.
Documents considered	• Substantive Application Under the Fast-Track Approvals Act For A Residential Subdivision, Application For Resource Consents And Wildlife Approval, 169-171 Peka Peka Road, Waikanae, Waikanae North Developments Limited; dated March 2026, prepared by Building Bock Planning Limited. • Appendix 06A, Earthworks ESCP (Phase 1B), • Appendix 06B, Earthworks Overview & Crossing Structures Part 1, 2 & 3.



	• Appendix 06C, Earthworks Phasing Plans Part 1, 2 & 3. • Appendix 14, Engineering & Infrastructure Report • Appendix 18, Erosion and Sediment Control Plan • Appendix 19, Construction and Environmental Management Plan • Appendix 21A, Geotech Assessment Part 1
--	---

Comments

Summary

The application proposes approximately 1.2 million cubic metres of cut and 1.1 million cubic metres of fill over an area of 93ha. The earthworks are proposed to be undertaken over 10 phases, with civil infrastructure following earthworks. The indicative staging of the civil works is 17 stages.

The application proposes to undertake various streamworks components, comprising nineteen stream culverts, five new pedestrian bridges and the realignment and enhancement of a section of the Ngarara Stream.

The Draft Construction and Environmental Management Plan (**DCEMP**) and Erosion and Sediment Control Plan (**ESCP**) seek to provide the overarching principles for the management of earthworks, dust, dewatering and streamworks.

The DCEMP and ESCP proposes to manage the effects of earthworks, dust, dewatering and streamworks by the implementation of Erosion and Sediment Control devices designed, constructed and maintained in accordance with Greater Wellington Regional Council's "*Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region*" (the **Guidelines**).

The DCEMP proposes that management plans for each phase of works are prepared prior to construction commencing to address streamworks, chemical treatment (Chemical Treatment Management Plan) and erosion and sediment control.

Monitoring through construction would be undertaken to ensure that the sites mitigation measures (erosion and sediment controls) are operating as designed and to ensure that the potential effects on the receiving environments are managed.

Agreement with the applicant

1. I agree with the applicant that all erosion and sediment controls should be designed, constructed and maintained in accordance with the Guidelines.

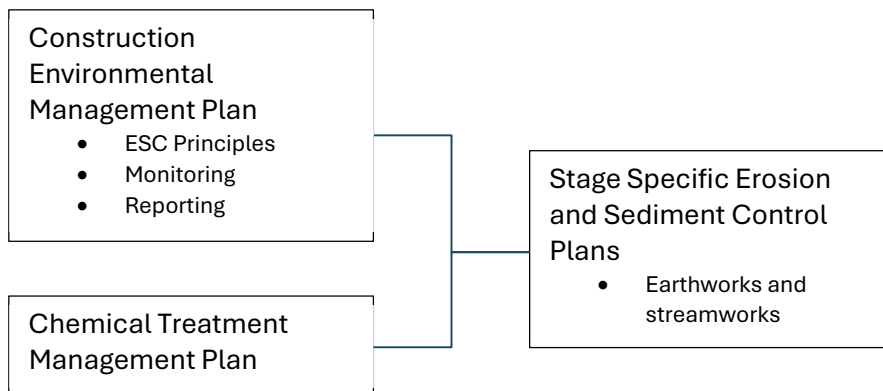


2. I agree that management plans can be an effective mechanism to manage the potential effects of sediment discharges during the construction phase of large projects.
3. I agree with the applicant that the sites soil characteristics require targeted erosion and sediment controls.
4. I agree with the applicant that staging of earthworks is necessary given the large area of earthworks.
5. I agree with the applicant that winter works can be appropriately managed through a winter works management plan (to be certified).

Matters in contention and suggested response

Management Plans

6. The DCEMP proposes that management plans are prepared for each phase of earthworks to manage the effects, these include:
 - DCEMP;
 - Erosion and Sediment Control Plans;
 - Flocculation Management Plan.
7. I am of the opinion however that the management plan structure could be



8. Appropriate consent conditions should be imposed to ensure that the management plan structure is clear and that the purpose of the plans is defined. The consent conditions should also ensure that the information required in each of the plans is specified.



Erosion and Sediment Control Plans

9. The draft Erosion and Sediment Control Plans for Phase 1B provide an overarching view of the erosion and sediment control. The information provided as part of Phase 1B is at a conceptual level and it generally demonstrates that appropriate ESC could be designed and constructed. They do not at this stage provide the level of detail that would be required for Council certification or construction.
10. Although the plans do not provide the level of detail, in my opinion there is no apparent reason why erosion and sediment controls could not be designed, installed and maintained in accordance with the Guidelines.
11. The ESCP's show that in some areas that the haul roads are to be maintained as stabilised and therefore have no erosion and sediment controls. In my experience, haul roads are generally not maintained in a stabilised manner given the heavy vehicle use and therefore should have appropriate erosion and sediment controls installed.
12. Consent conditions should be imposed which require Stage Specific Erosion and Sediment Control Plans (SSESCP's) be prepared in accordance with the Guidelines and be submitted to council for certification prior to earthworks commencing. The condition should also list the information which needs to be included in the SSESCP's.

Water Quality Monitoring

13. The ESCP describes the proposed water quality monitoring of the sites sediment retention devices is based on routine site inspections, rainfall triggered inspections visual assessment of discharge points and targeted monitoring of high risk discharge locations.
14. High risk locations are defined as:
 - (a) Discharges from large contributing catchments
 - (b) Peat excavation and stockpile areas
 - (c) Discharge points to sensitive receiving environments, including the Ngarara Stream
15. The ESCP includes performance triggers which include:
 - (a) Visible sediment discharge beyond expected levels
 - (b) Sediment controls not functioning as intended
 - (c) Tracking of sediment onto public roads
 - (d) Rainfall event $\geq 10\text{mm}/24$ hours



16. The proposed monitoring lacks specifics and does not provide measurable performance triggers.
17. I agree that targeted monitoring could be undertaken at high risk locations. However, both the definition of high risk and what targeted monitoring would be undertaken needs to be sufficiently defined through the consent conditions.
18. In terms of monitoring the sites ESC I consider that at a minimum this should include:
 - (a) Weekly inspections
 - (b) Rainfall triggered inspections (7mm/hr and 20mm/24hours)
 - (c) Sediment retention device discharge triggers
 - (i) pH 5.5 – 8.5
 - (ii) NTU 170
19. Where a water quality trigger is exceeded then actions are implemented to investigate, make amendments and report to Greater Wellington Regional Council.
20. Sediment retention device triggers are considered necessary to ensure that poor performing devices can be appropriately identified and managed. It is important to note that these triggers are not performance limits, compliance standards or related to effects.
21. I consider that the standard monitoring and reporting conditions of consent should be imposed.

Staging

22. The area of earthworks is large (93ha). The earthworks are proposed to be undertaken over 10 phases ranging from 1.6ha (Phase 1A) – 14.2ha (Phase 5).
23. Staging of earthworks is essentially a risk management approach whereby limiting the exposed area limits the potential for sediment generation, and therefore sediment yield and transport off-site. Staging reduces the risk of large scale, one-off erosion events causing significant detrimental effects. It is important that the earthworks are staged to reduce the potential sediment related effects. Consent conditions should be considered to limit the maximum exposed area. In lieu of a sediment yield estimate and comments from the applicants' experts in relation to effects and earthwork staging, I consider that conditions should be imposed limiting the exposed area to the proposed stage sizes.



24. Stabilisation is also a critical component to reduce effects. It is critical that stabilisation occurs progressively throughout the project and that a range of stabilisation techniques are implemented that are suited to the time of the year, climatic conditions and soil types as identified in the ESCP.
25. Consent conditions should be considered requiring the progressive stabilisation of the site and to ensure that the stabilisation techniques implemented are suitable for the soil types, time of year and climatic conditions.