Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure W:

Freshwater Ecology

Antoinette Bootsma

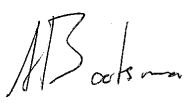
07 October 2026

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 – Freshwater Ecology

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Antoinette Bootsma (Senior Freshwater Specialist, Earth, Streams & Trees Team, Auckland Council)
Qualifications & Relevant Experience:	I hold the qualification of: Master of Science in Environmental Science and have 19 years of experience in freshwater ecological assessments. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications and have appeared as an expert witness before consent authorities and the Environment Court.
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:	07/10/2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- *Beachlands South Fast-track Approval Substantive Application - Assessment of Environmental Effects and Statutory Analysis.* Prepared for Beachlands South Limited Partnership. 26 June 2026. Prepared by Unio Environmental Limited (AEE).
- *Beachlands South Fast Track - Ecological Impact Assessment.* Prepared for Beachlands South Limited Partnership. Prepared by Viridis Limited. September 2026. (EcIA).
- *Beachlands South Fast Track - Biodiversity Management Plan.* Prepared by Viridis Limited. 23 June 2026.
- *Beachlands South – Rules Assessment.* Prepared by Unio Environmental Limited, dated 26 June 2026.

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

My assessment does not identify additional reasons for consent not included in the AEE

5.0 Specialist Assessment

6.1. Effects on stream extent and value

The proposed development will result in the reclamation and permanent loss of 646 m of intermittent stream length (330.3 m² of streambed area).

Through the section 67 process, the applicant's ecologist confirmed that the installation of four new culverts associated with a new accessway in the southeastern part of the site at 712 Whitford-Maraetai Road will not reduce stream extent or adversely affect stream values through impeded fish passage.

Culverts 1 and 2, shown on Drawing A2515591.00-4260-B, include riprap extending beyond the 5 m length permitted under the relevant Permitted Activity Standard. However, these culverts are located at the transition between ephemeral and intermittent flow. As a conservative measure, the culverted sections of intermittent stream were treated as stream reclamation in this assessment and were included in the Biodiversity Compensation Model (BCM) calculations.

In addition, Culverts 1, 3, and 4 exceed a grade of 10%, which is steeper than that recommended for fish passage. However, I agree with the ecologist's assessment that the ephemeral nature of the upstream habitat limits its value as fish habitat and that the culverts will not form a barrier to fish migration. I also

note that the applicant has proposed conditions requiring plans detailing all instream structures relevant to fish passage to be certified by Council prior to the commencement of works.

Further clarification provided through the section 67 process confirmed that no stormwater infrastructure will be located within intermittent streams. I note that the applicant has proposed a condition requiring all stormwater infrastructure located within 5 m of a stream to be designed in consultation with a suitably qualified and experienced ecologist (SQEP) and submitted to Council for certification prior to construction.

Proposed conditions relating to temporary stream diversions, erosion controls, and sediment management are addressed through the requirement for an Erosion and Sediment Control Plan to be certified by Council. I defer to Council's earthworks specialist regarding these matters.

In relation to offsetting or compensating for the permanent loss of stream extent and value resulting from the development, the ecological assessment identifies limited opportunities to create new stream habitat on site and provides justification for aquatic compensation in accordance with Appendix 7 of the NPS-FM, including the principle of "trading up". I consider the enhancement of 2.943 ha of wetland habitat within the site and the wider Waikōpua Creek catchment to be a positive ecological outcome that adequately compensates for the loss of stream habitat.

6.2. Effects on wetland extent and value

The proposed development will result in the reclamation and permanent loss of 2,907 m² of wetland habitat, including direct reclamation and a conservatively assessed hydrological loss resulting from catchment modification. As compensation for this loss, 2.943 ha (29,430 m²) of wetland habitat within the site and the wider Waikōpua Creek catchment will be enhanced, based on calculations set out in the Biodiversity Compensation Model (BCM) assessment. This enhancement area includes compensation for the loss of both stream extent and ecological values, as well as wetland habitat.

Based on my review, I confirm that the potential value of the affected wetlands was considered in the BCM calculations. I largely agree that the aquatic compensation principles set out in Appendix 7 of the NPS-FM have been demonstrated to have been met.

6.0 Section 67 Information Gap

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

7.0 Recommendation

My assessment of freshwater ecological matters concludes that the permanent loss of 646 m of intermittent stream (330.3 m² of streambed area) and 2,907 m² of natural inland wetland has been adequately addressed through the proposed aquatic compensation measures.

The aquatic compensation includes enhancement of retained riparian corridors within the site and the EPAN area, as well as restoration of 2.943 ha of coastal fringe wetland at the ecotone between tidal flats, saltmarsh, wetland, stream, and terrestrial vegetation along the southern extent of the site. This area is contiguous with the EPAN and is located adjacent to saltmarsh, tidal flats, and coastal habitats that support threatened and at-risk indigenous fauna.

The Biodiversity Management Plan sets out the proposed planting species, planting densities, planting zones, site preparation requirements, weed and pest management measures, and a five-year monitoring programme.

Based on the information available, I support the application.

8.0 Proposed Conditions

Table 1 below contains the stream and wetland works related conditions proposed by the applicant that I consider should be amended. I have indicated proposed changes and have followed the numbering of Draft Conditions as presented in *Beachlands South Fast Track Application - Draft Resource Consent Conditions,* dated 26 June, 2026.

Table 1 – Applicants Proposed Consent Conditions.

Condition	Proposed Conditions	Comment or suggestion
137	**Native Fish Management Plan (NFMP)** The Consent Holder must prepare and submit a NFMP to the Council at least 15 Working Days prior to the planned commencement of stream works on the site, for certification in accordance with Conditions [XX to XX]. The objective of the NFMP is to avoid, remedy or mitigate the potential adverse effects of the Project on native fish. The NFMP must be prepared by a SQEP and must include:	I recommend the following amendment: The Consent Holder must prepare and submit a NFMP to the Council at least 15 Working Days prior to the planned commencement of stream <u>or wetland</u> works on the site, for certification in accordance with Conditions [XX to XX]. The objective of the NFMP is to avoid, remedy or mitigate the potential adverse effects of the Project on native fish. The NFMP must be prepared by a SQEP and must include: a) The outcomes of consultation with

	a) The outcomes of consultation with Ngāi Tai ki Tāmaki. b) Methodologies to capture fish within any impacted stream habitat or justification there is no habitat for native fish present at the time of construction. c) Fishing effort anticipated. d) Details of the relocation site. e) Storage and transport measures including the best practice for prevention of predation and death during capture. f) Euthanasia methods for diseased or pest species (if relevant); and *g)* An assessment on the habitat availability of the relocation site to support fish at the time of streamworks.	Ngāi Tai ki Tāmaki. b) Methodologies to capture fish within any impacted stream<u>, wetland, or pond</u> ~~habitat~~ or justification there is no habitat for native fish present at the time of construction. c) Fishing effort anticipated. d) Details of the relocation site. e) Storage and transport measures including the best practice for prevention of predation and death during capture. f) Euthanasia methods for diseased or pest species (if relevant); ~~and~~ g) An assessment on the habitat availability of the relocation site to support fish at the time of streamworks<u>, and</u> h) <u>An accidental discovery protocol for aquatic fauna which require specialised handling and relocation effort that is not otherwise covered in the standard methodologies (i.e. regionally threatened species as per the Conservation Status of Freshwater Fishes in Tamaki Makaurau / Auckland). This includes a protocol to implement the following actions:</u> i) <u>Immediately cease reclamation (including dewatering) upon accidental discovery of any unexpected aquatic fauna and notify the Council.</u> ii) <u>Ensure aquatic fauna are left in a</u>

		suitable environment where they will be unharmed while the NFCRP is updated. iii) Update the NFCRP to address handling and relocation of the unexpected aquatic fauna to be submitted to Council for re-certification. i) Only re-commence the capture and relocation upon re-certification of the NFCRP