

Milldale Fast-Track

29/07/2025 – Auckland Council Response

Annexure 26:

Environmental Monitoring

Milldale, Wainui Fast Track Application

Consent Number:	BUN60446761
Related Applications / Consents:	<p><u>Greenfield Stages 10-13 (Section 2.0)</u></p> <ul style="list-style-type: none">• LUC – Land Use (s9)<ul style="list-style-type: none">○ LUC201 – Bulk Earthworks and Land Use• SUB – Subdivision (s11)<ul style="list-style-type: none">○ SUB 201• WAT – Water Permits (s14)<ul style="list-style-type: none">○ WAT 201 - Permanent Stream Diversion○ WAT 202 – Groundwater Diversion○ WAT 203 – Diversion of Water in proximity to wetlands• LUS – Streamworks (s13)<ul style="list-style-type: none">○ LUS 201 – Streamworks• DIS – Discharge (s15)<ul style="list-style-type: none">○ DIS 201 – Discharge of Contaminants• BUN – Bundled<ul style="list-style-type: none">○ BUN 200 <p><u>Stage 4C Phase 1 & 2: (Section 3.0)</u></p> <ul style="list-style-type: none">• LUC – Land Use (s9)<ul style="list-style-type: none">○ Phase 1: LUC 301 – Civil Works Phase 1○ Phase 2: LUC 302 - Comprehensive Residential Development Phase 2• SUB – Subdivision (s11)<ul style="list-style-type: none">○ Phase 1: SUB 301 – Subdivision Phase 1○ Phase 2: SUB 302 – Residential Subdivision Phase 2• BUN – Bundled<ul style="list-style-type: none">○ BUN 300

	<p><u>Temporary Wastewater Treatment Plant (Section 4.0)</u></p> <ul style="list-style-type: none"> • LUC – Land Use (s9) <ul style="list-style-type: none"> ○ LUC 401 • DIS 401 – Discharge (s15) <ul style="list-style-type: none"> ○ DIS401 – Wastewater Discharge ○ DIS 402 – Air Discharge • BUN – Bundled <ul style="list-style-type: none"> ○ BUN 400
Site Address:	Wainui Road, Upper Orewa
Proposal:	Stages 4C, 10 - 13 of the Milldale development together with a supporting subsidiary temporary wastewater treatment plant. These stages will collectively accommodate around 1,155 detached and terraced dwellings, along with supporting commercial services in a compact Neighbourhood Centre.
Applicant:	Fulton Hogan
(External) Planner:	Dylan Pope from DCS
Link to lodged documents:	<p><u>Milldale Lodged Documents</u></p> <p>U:\COO\Resource Consents\Digital Consents - New\Premium\W\Wainui Road Upper Orewa, Null - Milldale Fast Track (all)</p>

From: Cheryl Pai, Senior Environmental Monitoring Officer – Region Wide and Sierra Gordon, Senior Earthworks and Streamworks Monitoring Officer – Region Wide

Date: 27/05/2025

Overall Summary: Reviewed Proposed Consent Conditions. Provided the following comments:

General Comments:

- **Approval/Certification of Management Plans:** Auckland Council's approval or certification of management plans is necessary to ensure proper implementation of controls and mitigation measures. This helps protect the surrounding environment and enables early agreement on methodologies. It also reduces the risk of incurring additional costs from modifying controls or mitigation measures post-installation.
- **Pre-Commencement Meetings/Condition Triggers:** Clarification is needed on whether a single pre-commencement meeting is sufficient at the earthworks stage, or if separate meetings are required for 'both' the commencement of earthworks and building works. Developers often get confused and think that 1 meeting prior to earthworks is sufficient.

- It is recommended that pre-commencement meetings be held prior to both the earthworks and building phases. This is particularly because individual lots are likely to be sold off to individual build partners after subdivision.
- Separate pre-starts at the beginning of each individual stage (both earthworks, civils and build) would be preferable due to the change in contracting companies, Woods representatives, etc, between the various stages.
- **Condition Titles – Reference to “Plans”:** It is recommended that certain conditions be retitled to include reference to “Plans” for consistency with terminology used under the Pre-Start Conditions section.
- **Consistent Use of “Certify” vs “Approve”:** Conditions should consistently refer to Auckland Council either “certifying” or “approving” documents. This consistency helps avoid confusion over which documents are subject to formal certification or approval, and ensures clarity that these processes are distinct from Building Consent sign-offs.
- **Condition Formatting and Order:** All conditions should follow Auckland Council’s standard formatting to support effective compliance monitoring. For example, the “Table of Reports and Drawings” should be placed earlier in the document, ideally before the general conditions, rather than at the end.
- **Grouping of Conditions by Phase:** It is recommended that conditions be grouped in chronological order, starting with Pre-Start Conditions, followed by During Construction, and then Post-Construction requirements. Currently, some pre-start requirements are located toward the end of some consents, which may cause confusion and should be reorganised accordingly.
- **Correction to Emails:** The email address for Auckland Council’s monitoring team throughout the consent/s is currently written as monitoring@aucklandCouncil.govt.nz. Please amend the capital “C” to lowercase for accuracy.

STAGES 10-13

(LUC 201, WAT 201, WAT 202, WAT 203, LUC 201, DIS 201, SUB 201, BUN 200) pgs 13-73

Pre-Commencement Conditions:

- Pre commencement meeting (C4) wording feels confusing.
 - A little confusing with "earthworks construction season." Recommend remove "construction?" or amend to "Prior to the each earthworks season and each sub stage of civil works?"
 - "Prior to the commencement of each earthworks stage and each sub-stage of construction" may be more appropriate to ensure all relevant stages of works are covered. Current wording is confusing and realistically, each stage will progress at different times, so a pre-commencement meeting at the start of each individual "stage" would be more effective.
- CMP (C5) – Recommend to just be titled Management Plans. Recommend we just include the relevant plans required for the prestart (points c-h) and move the rest (points a-b) into Condition 4?
 - If a CMP is required, it should be its own standalone condition.
 - The condition ideally needs to be entitled “management plans” and the existing bullet points under this condition can be highlighted for submission, and/or the

requirements of a construction management plan need to be outlined in this condition.

- “A Construction Management Plan must be made available at the pre-start meeting...” dependant on what is being requested here, may need to be reworded to ensure the document(s) are submitted prior to the pre-start meeting to ensure consistency with the subsequent conditions and allow Monitoring time to review the documents.
- DMP (C6), CTMP (C7), ESCP (C8), ChTMP (C9), SMP (C12), FMP (C41) NFCRP (C58), SWMP (C62) - Needs to be approved by Auckland Council.
- DMP (C6) – Given the frequency of dust-related complaints received by Council on similar sites, it is recommended that the conditions or associated management plans provide clear and detailed requirements for dust mitigation measures. Eg: Dust mitigations, monitoring frequencies, and responses to complaints etc? Dust has been a common issue with a lot of complaints come through to council. A well-defined DMP can support the site in implementing effective controls and demonstrate a proactive approach to minimising nuisance effects during construction.
- CTMP (C6) – The wording “Prior to the commencement of “any earthworks or construction activity” should be clarified. Recommend we change to “any works” or just “earthworks?” Site can make amendments to the CTMP at construction phase if required.
- CTMP (C7) – Recommend we include contractors vehicle parking locations to ensure they are not blocking private road/footpaths, or beside protected trees (if any)?
- ESCP (C8) - Retitle to "Erosion and Sediment Control Plan" to align with the Management Plans referenced under the pre start conditions (C5).
 - Reword “earthworks construction season” in line with earlier comments. “Each earthworks stage” may be more appropriate.
- SMP (C12) – clarification around the wording “prior to the commencement of earthworks onsite” is required or needs to be reworded. Can this be reworded more along the lines of “x days prior to the commencement of earthworks onsite” to allow time for monitoring to receive and send the document off for review – the current wording only requires them to send through a document.
- Due to the amount of works happening, recommend CH provide a CNVMP.
 - Excavation works are noted to commence under WAT 102. Would having a CNVMP be of benefit? CNVMP is requested under LUC 301 for Stage 4C but not Stages 10-13.

During Works Conditions:

- AMP (C17) - Should include the need for certification/reapproval.
- ESCs (C19) – Reword to condition 8. ESCP is being submitted for review and acceptance under condition 8, so erosion and sediment controls should be installed and maintained as per this plan rather than the plan from condition 1.
- Geotechnical Supervision (C26) - Recommend the “Certification” word to be removed from the title as Condition 43-44 already requests certification as a post completion requirement.
- C35 missing a title – Construction Storage?

- Lizard Findings (C42) – Query around “Ecologist” title – does this need to be more specific (ie: herpetologist). Condition does not have a title but requires documentation for lizard salvage and then discusses fish capture. Reads like this could be broken up into two separate conditions but it is unclear as to what the fish capture aspect is requiring (ie: must they submit a methodology or some report to confirm there is no habitat for fish?)?
- I didn’t sight any during earthworks generic sediment control conditions except for progressive stabilisation as per C18 and sediment control onto public road as per C20. Recommend adding a condition for this:
 - General sediment control conditions: All earthworks must be managed to minimise any discharge of debris, soil, silt, sediment or sediment-laden water is discharged beyond the subject site to either land, stormwater drainage systems, watercourses or receiving waters. In the event that a discharge occurs, works must cease immediately and the discharge must be mitigated and/or rectified to the satisfaction of Council.

Post Construction Conditions:

- SWMP Completion Confirmation (C65) – Are any memo/reports required?
- FPMMP (C67) – Needs to be approved.
 - Recommend we include additional points around follow up actions including the preparation of as-built plans and supporting information, further steps, and remediation measures?
 - Condition needs to specify what is expected to be included in the FPMMP.

Subdivision Conditions (SUB 201):

- SVR (C88) – Recommend this be provided under the LUC?
 - This needs to be approved by Auckland Council.
- Landscape Plan (C100) – Recommend this be provided under the LUC. Or keep under SUB?
 - This needs to be approved by Auckland Council.
- Ensure capital “C’s” in monitoring@aucklandcouncil.govt.nz are lowercase. – There are a few within General Advice Notes on page 58.

STAGE 4C

(LUC 301 & LUC 302, SUB 301 & 302, BUN 300) pgs 74 - 143

Pre-Commencement Conditions (LUC301 – Phase 1):

- Pre commencement meeting (C4) wording feels confusing.
 - A little confusing with "construction and earthworks." Recommend we amend to "Prior to the each/both earthworks and construction phase."
- CMP (C5) – Recommend this to just be titled Management Plans. Recommend we just include the relevant plans required for the prestart (points c-h) and move the rest (points a-b) into Condition 4?

- If a CMP is required, it should be its own standalone condition.
- DMP (C6), CTMP (C7), ESCP (C8), CNVMP (C9), ChTMP (C11), SMP (C14) - Needs to be approved by Auckland Council.
- DMP (C6) – Given the frequency of dust-related complaints received by Council on similar sites, it is recommended that the conditions or associated management plans provide clear and detailed requirements for dust mitigation measures. Eg: Dust mitigations, monitoring frequencies, and responses to complaints etc? Dust has been a common issue with a lot of complaints come through to council. A well-defined DMP can support the site in implementing effective controls and demonstrate a proactive approach to minimising nuisance effects during construction.
- CTMP (C6) – The wording “Prior to the commencement of “any earthworks or construction activity” should be clarified. Recommend we change to “any works” or just “earthworks?” Site can make amendments to the CTMP at construction phase if required.
- CTMP (C7) – Recommend we include contractors vehicle parking locations to ensure they are not blocking private road/footpaths, or beside protected trees (if any)?
- ESCP (C8) - Retitle to "Erosion and Sediment Control Plan" to align with the Management Plans referenced under the pre start conditions (C5)

During Works Conditions:

- Geotechnical Supervision (C22) - Recommend the “Certification” word to be removed from the title as Condition 29 already requests GCR as a post completion requirement.
 - The wording of the title of conditions are not consistent. Eg: C26 under LUC201 says: “Geotechnical Works - Supervision and Certification” but C22 under LUC 301 says “Supervision and Certification of Geotechnical Works.”

Post Construction Conditions:

- GCR (C29) – Needs to be approved by Auckland Council.

Subdivision Conditions (SUB 301):

- OMM (C52) – References to a “Plan”, however abbreviation is referencing a “Manual.” – Typo?
- Ensure capital “C’s’ in monitoring@aucklandcouncil.govt.nz are lowercase. – There are a few within General Advice Notes on page 96.
- Hyperlink may not have been accurately pasted within General Advice Notes on page 96.
- Wording re EPA within General Advice Notes on page 96 may not make sense.

(LUC302 – Phase 2) pgs 102-112:

Pre-Commencement Conditions:

- Pre commencement meeting (C4) wording feels confusing.

- A little confusing with "construction and earthworks." Recommend we amend to "Prior to the each/both earthworks and construction phase?"
- CMP (C5) – Recommend this to just be titled Management Plans. Recommend we just include the relevant plans required for the prestart (points c-h) and move the rest (points a-b) into Condition 4? Should a CMP also be its own standalone condition?
 - If a CMP is required, it should be its own standalone condition.
- CTMP (C6), ESCP (C7) – Needs to be approved by Auckland Council.
- CTMP (C6) – The wording “Prior to the commencement of “any earthworks or construction activity” should be clarified. Should we change to “any works” or just “earthworks?” Site can make amendments to the CTMP at construction phase if required.
- CTMP (C6) - Recommend we include contractors vehicle parking locations to ensure they are not blocking private road/footpaths, or beside protected trees (if any)?
- ESCP (C7) - Retitle to "Erosion and Sediment Control Plan" to align with the Management Plans referenced under the pre start conditions (C4)

During Works Conditions:

- Geotechnical Supervision (C15) - Recommend the “Certification” word to be removed from the title as Condition 29 already requests GCR as a post completion requirement.
 - The wording of the title of conditions are not consistent. Eg: C26 under LUC201 says: “Geotechnical Works - Supervision and Certification” but C22 under LUC 301 says “Supervision and Certification of Geotechnical Works.”

Post Construction Conditions:

- GCR (C29) – Needs to be approved by Auckland Council.

Subdivision Conditions (SUB 302):

- OMM (C42) – References to a “Plan”, however abbreviation is referencing a “Manual.” – Typo?

TEMPORARY WASTEWATER TREATMENT PLANT

(LUC 401, DIS 401, DIS 402, BUN400) pgs 144 - 175

Pre-Commencement Conditions:

- Pre commencement meeting (C6) wording feels confusing.
 - A little confusing with "construction and earthworks." Recommend we amend to "Prior to the each/both earthworks and construction phase?"

- Ensure capital “C’s’ in monitoring@aucklandCouncil.govt.nz are lowercase.
- CMP (C7) - Should just be titled Management Plans. Recommend we just include the relevant plans required for the prestart (points c-h) and move the rest (points a-b) into Condition 4?
 - If a CMP is required, it should be its own standalone condition.
- CTMP (C8), DMP (C9), ESCP (C10a), ChTMP (C10b), SMP (C11), FMP (C12), OMP (C69), ERP (C70), OMP (C73) – Needs to be approved by Auckland Council.
- CTMP (C8) – The wording “Prior to the commencement of “any earthworks or construction activity” should be clarified. Recommend we change to “any works” or just “earthworks?” Site can make amendments to the CTMP at construction phase if required.
- CTMP (C8) – Recommend we include contractors vehicle parking locations to ensure they are not blocking private road/footpaths, or beside protected trees (if any)?
- DMP (C9) – Given the frequency of dust-related complaints received by Council on similar sites, it is recommended that the conditions or associated management plans provide clear and detailed requirements for dust mitigation measures. Eg: Dust mitigations, monitoring frequencies, and responses to complaints etc? Dust has been a common issue with a lot of complaints come through to council. A well-defined DMP can support the site in implementing effective controls and demonstrate a proactive approach to minimising nuisance effects during construction.
- Commencement Notice – Should the title be “Performance Monitoring” as it doesn’t align with what is referenced within C54. Recommend amending to “Notice of Commencement.”
 - The current condition states *“The Consent Holder must give the Council no less than 10 working days’ notice of the commencement this consent.”* Recommend amending to *“The Council must be advised in writing at least ten (10) working days prior to the date of commencement.”* This ensures the conditions written aligns with similar conditions referenced in other consents. Eg: Please refer to WAT 202 C68.
- ESCP (C10) - Retitle to "Erosion and Sediment Control Plan" to align with the Management Plans referenced under the pre start conditions (C4)
- ChTMP (C10b) – Should be its own individual condition.
- Lizard Findings (C13) as per feedback for conditions 42 of LUC 201.
- ESCs (C17) – reference back to condition 8 instead of condition 1.
- OMM (C95) – Recommend moving this condition up (before C82). C82 talks about being in general accordance with this document. As this is also a pre start condition, it makes more sense to be moved up.

During Works Conditions:

- Construction Park and Loading: - Would be beneficial to refer back to approved CTMP (C8).
 - Should “Park” be “Parking?”
- Recommend adding a condition that the CH shall monitor the daily total discharge and report to the Council shall any exceedance within 24 hours of the exceedance occurs.
- Dust and odour (C24) – 24(d) should not restrict top-soiling and grass stockpiling to only being undertaken if no works are occurring for more than 1 month – does not need to be so specific. Advice note to be reviewed as this refers to noise rules.

Post Construction Conditions:

- GCR (C27) – Needs to be approved by Auckland Council.
- Acoustic Assessment (C36) – Should “evidence” required be clarified?
- Environmental Management Plan (C40) – States the plan must be submitted as a part of the building consent application process but makes no reference to this needing to be submitted and certified by Environmental Monitoring. It is a resource consent requirement needs to be submitted to Environmental Monitoring (not left to BC process).
- EMP (C41) – An Operation and Maintenance Plan is requested as per “point h” requirements. Recommend this be its own condition.
- Do we need a post construction meeting?
- Annual Report (C74) – Recommended to mention that the report should be prepared by a suitably qualified person experienced in wastewater engineering and wastewater treatment?
 - Recommend “point b” also reference any incidents received. Or this could be another separate point.
 - Could “point e” be elaborated? Are we asking for just the reports or should CH also include an assessment of monitoring results and environmental effects of the discharges based on the results of the monitoring completed? This is to include assessment of any trends in the monitoring results an comparison of results to consent limited and related environmental standards.
 - Could also include any description of any other system performance, maintenance and general compliance issues and remedial measures taken and proposed to ensure compliance over the coming year?

ARCHAEOLOGICAL AUTHORITY – pgs 176-179

- Council should also be notified of works starting and accidental discoveries for works happening under the Archaeological Authority?