

Auckland Prison Capacity Increase

Substantive Application

Volume 3 – Appendix 3I Statutory Assessment

Prepared for the Department of Corrections

1 April 2026



AUCKLAND PRISON

Table 1: List of National Policy Statements and whether they are applicable to the proposed watercourse works (described in Volume 3 report)

National Policy Statements	Applicable to proposed works	Comment
National Policy Statement for Freshwater Management 2020 (amended 2025)	Yes	The proposal includes reclamation of watercourses and impeding fish passage.
National Policy Statement for Indigenous Biodiversity 2023 (amended 2025)	Yes	The proposal involves removal of riparian vegetation and lizard salvage and relocation.
New Zealand Coastal Policy Statement 2010 (amended 2025)	Yes	All stormwater discharges are to tributaries of Pāremoremo Creek which connects to the Waitematā Harbour.
National Policy Statement for Infrastructure 2025	Yes	The proposal is an infrastructure project. 'Additional infrastructure' includes correction facilities operated by the Department of Corrections to meet its obligations under the Corrections Act 2004. 'Additional infrastructure' is included within the definition of 'infrastructure'.
National Policy Statement for Natural Hazards 2025	Yes	The Site is identified as flood prone, flood sensitive and within the 1% AEP floodplain.
National Policy Statement for Highly Productive Land 2022 (amended 2025)	No	The Site is mapped as LUC Class 2 and 3 land from Auckland Council Geomaps. LUC Class 2 and 3 soils meet the AUP(OP) definition of 'land containing prime soil', and the definition of Highly Productive Land from the National Policy Statement for Highly Productive Land (NPS-HPL). The restrictions on the use and development of Highly Productive Land do not apply under the NPS-HPL where, as is the case here, it is for an activity by a requiring authority in relation to a designation or notice of requirement (clause 3.9).

National Policy Statements	Applicable to proposed works	Comment
National Policy Statement for Urban Development 2020 (amended 2022)	No	The Site and surrounds are zoned Rural – Countryside Living Zone. The NPS-UD is not directly relevant to the proposed watercourse works, but an assessment against the NPS-UD for the Auckland Prison Capacity Increase proposal is provided in Volume for the capacity increase proposal and Section 6.3.6 of Volume 3.
National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023	No	The proposal does not involve Industrial Process Heat.
National Policy Statement for Renewable Electricity Generation 2011 (amended 2025)	No	The proposal does not involve renewable energy.
National Policy Statement for Electricity Networks 2008 (amended 2025)	No	The proposal does not involve electricity transmission.

National Policy Statement for Freshwater Management 2020 (amended 2025)

Objectives and Policies		Comment
Objective 1	<p>The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:</p> <ul style="list-style-type: none"> (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. 	<p>The health and well-being of the water bodies and freshwater ecosystems have been prioritised in the design of the proposed reclamations. The proposal involves a comprehensive package of mitigation, offset and compensation measures to manage potential adverse effects as a result of loss of stream extent. Key features of that comprehensive package include pipe design and construction methodology designed to minimise disturbance of water courses and groundwater levels to the extent possible; maintaining water velocities and alignment with the watercourse beds where practicable; erosion and sediment control in accordance with GD05; a native fish capture and relocation plan; riparian planting around watercourses and wetlands within the site; upgrades to existing culverts at watercourse 6 to significantly improve fish passage (including for Longfin eel which is At Risk -declining) and landscape planting to mitigation effects on natural character as a result of the reclamations.</p> <p>Overall, subject to the implementation of pipe design and construction in accordance with recommendations and the Landscape Mitigation and Ecology Enhancement Plan (LMEEP) and Landscape and Ecological Implementation Management Plan (LEIMP), it is considered that adverse ecological effects and effects on freshwater natural character will be less than minor and that overall there will be no net loss.</p> <p>Overall, it is considered that the proposal is consistent with Objective 1.</p>
Policy 1	<p>Freshwater is managed in a way that gives effect to Te Mana o te Wai.</p>	<p>Te Mana o Te Wai is a concept that refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. It protects the mauri of the wai.</p>

National Policy Statement for Freshwater Management 2020 (amended 2025)		
Objectives and Policies		Comment
		<p>The adoption of the measures detailed in the Erosion and Sediment Control Plan (ESCP) and the construction methodology (both provided in Appendix 3G) will significantly reduce the risk of sediment laden water entering the streams and minimise disturbance to the bed of the watercourses, thereby ensuring water quality management consistent with the policy direction of the NPS-FW and Te Mana o Te Wai. The project has been designed in a way to avoid effects on freshwater where at all possible, while mitigating and then off-setting where mitigation is not possible and compensating where off-setting does not address all residual adverse effects.</p> <p>Overall, the proposal is considered consistent with Policy 1.</p>
Policy 2	Tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for.	<p>The Māori Consultation and Cultural Values Assessment report (Appendix 1F of Volume 1) identifies a shared cultural value to include Restoration and Protection of Waterways.</p> <p>The report makes a number of recommendations including continued engagement with four Mana Whenua in the Auckland Prison project, enabling the role of Kaitiaki in management plans and participation in the enhancement and restoration of landscape and terrestrial ecology (see Volume 1 Table 5).</p> <p>The proposal includes a comprehensive mitigation, offset and compensation package to be implemented via the EcMP and the LEIMP. Mana Whenua have been provided with the opportunity to be involved in appropriate plant and species selection. There are also opportunities for involvement in the overall implementation, maintenance and monitoring of landscape and ecological measures, including those relating to the offset and compensation of freshwater ecological effects.</p> <p>Overall, the proposal is consistent with the recommendations in the Māori Consultation and Cultural Values Assessment report and will provide</p>

National Policy Statement for Freshwater Management 2020 (amended 2025)		
Objectives and Policies		Comment
		<p>opportunities for the recognition of the identified cultural values relating to the Restoration and Protection of Waterways (refer to Table 5 in Volume 1).</p> <p>Overall, the proposal is consistent with Policy 2.</p>
Policy 4	Freshwater is managed as part of New Zealand's integrated response to climate change.	<p>Climate change is a factor that has been considered in the sizing and design of the proposed pipes at watercourses 1 and 2. The proposed works will have a negligible impact on on-site and off-site flooding as modelled in the Engineering Design Report and the proposed pipes are considered sufficient to provide for run-off from future development (with upgrades to the wider stormwater management system required once development is confirmed).</p> <p>Overall, the proposal is considered consistent with Policy 4.</p>
Policy 5	Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.	<p>The proposed compensation works at watercourse 6 will improve fish passage, including for the At Risk-declining Native Longfin Eel. The proposed salvage and relocation of fish from both watercourse 1 and 2 will provide benefits for those fish populations as currently neither watercourse provides adequate upstream habitats. The open and given there are no increases to impervious areas as a result of the proposed reclamations, water quality in watercourses 1 and 2 will be maintained.</p> <p>Overall, it is considered that the proposal is consistent with Policy 5.</p>
Policy 6	There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.	<p>The proposal does not result in the loss of extent of natural inland wetlands and no adverse effects are considered likely to occur as a result of the proposed works, thereby protecting natural values of any natural inland wetlands present on the subject site. The proposal involves wetland compensation planting, which will contribute to enhance their values and promotes restoration.</p>

National Policy Statement for Freshwater Management 2020 (amended 2025)		
Objectives and Policies		Comment
		Overall, the proposal is considered consistent with Policy 6.
Policy 7	The loss of river extent and values is avoided to the extent practicable.	<p>Section 6.3.4.2 of Volume 3 sets out the functional need for the reclamation of watercourses 1 and 2 as proposed.</p> <p>The development areas of the designation alteration (A and B) have been specifically identified to avoid significant ecological areas and limit the loss of watercourse extent as much as practicable.</p> <p>Overall, the proposal is considered consistent with Policy 7.</p>
Policy 8	The significant values of outstanding water bodies are protected.	The works do not involve or impact on the significant values of any outstanding water bodies.
Policy 9	The habitats of indigenous freshwater species are protected.	<p>As set out in the Ecological Assessment Report (the 'Ecological Assessment') prepared by Boffa Miskell (Appendix 3B), native shortfin eels are present in watercourses 1 and 2. The Ecological Assessment also finds that there are no suitable upstream habitats available for identified fish in either of those watercourses. Accordingly, a Native Fish Capture and Relocation Plan is proposed to relocate fish either further downstream where more suitable habitats are present, or to watercourse 6 where off-set and compensation works will provide improved habitat.</p> <p>Overall, the proposal is consistent with Policy 9.</p>

National Policy Statement for Indigenous Biodiversity 2023 (amended 2025)

National Policy Statement for Indigenous Biodiversity 2023 (amended 2025)	
Objectives and Policies	Comment
<p>Objective 1</p> <p>The objective of this National Policy Statement is:</p> <ul style="list-style-type: none"> (a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and (b) to achieve this: <ul style="list-style-type: none"> (i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and (ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and (iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and (iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future. 	<p>The proposal involves the removal of 3,945m² of indigenous riparian vegetation surrounding watercourse 1. While the vegetation removal associated with watercourse 2 is exotic vegetation, the Ecological Assessment (Appendix 3B) notes that this mature vegetation may be suitable for native bat roosting and nest of some native birds and possible lizard habitat.</p> <p>However, the proposal includes a comprehensive package of mitigation measures including:</p> <ul style="list-style-type: none"> • extensive riparian vegetation planting around wetlands and watercourses (described in detail in Volume 3 and Appendix 3B). • landscape mitigation planting around the boundaries of the Site and an extensive weed and pest management plan (see the LMEEP and the LEIMP); and • an Ecological Management Plan which addresses the following: <ul style="list-style-type: none"> ○ a Lizard Management Plan for the salvage and relocation of lizards, including enhancement works for the onsite relocation site; ○ a Native Bird Management Plan outlining protocols for assessing the presence of native bird nests and tree felling protocols and buffer requirements for when nests are detected; and ○ a Bat Management Plan outlining assessments and protocols regarding bat roost habitats. <p>As set out in section Volume 3, subject to the implementation of these mitigation measures, the proposal is anticipated to have less than minor adverse ecological effects. Accordingly, it is considered that the proposal will result in at least overall no loss of indigenous biodiversity.</p>

National Policy Statement for Indigenous Biodiversity 2023 (amended 2025)		
Objectives and Policies		Comment
		<p>The implementation of the LEIMP will ensure that Corrections provide for the weed and pest management for the new planted areas on site.</p> <p>The Māori Consultation and Cultural Values Assessment report (Appendix 1F of Volume 1 of the Substantive Application) identifies shared cultural values and interests and sets out a number of recommendations including continued engagement with four Mana Whenua in the Auckland Prison project, enabling the role of Kaitiaki in management plans and participation in the enhancement and restoration of landscape and terrestrial ecology.</p> <p>The proposal includes a comprehensive mitigation, offset and compensation package to be implemented via the EcMP and the LEIMP. Mana Whenua have been provided with the opportunity to be involved in appropriate plant and species selection.</p> <p>Corrections has actively considered the values, interests and recommendations identified in the Cultural Assessment report (including including the Ngaati Whanaunga report and the draft report prepared by Te Rūnanga o Ngāti Whātua), and where appropriate and relevant, have sought to provide for them in the proposal as explained in Section 9.3 and Table 5 of Volume 1.</p> <p>Overall, the proposal is consistent with the recommendations in the Māori Consultation and Cultural Values Assessment report and will provide opportunities for the recognition of the identified cultural values and interests.</p> <p>Overall, the proposal is consistent with Objective 1.</p>
Policy 1	Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi	The Māori Consultation and Cultural Values Assessment report (Appendix 1F of Volume 1 of the Substantive Application) identifies a shared cultural value to include Enhance and Protect Native Flora and Fauna (Terrestrial Biodiversity).
Policy 2	Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:	The report makes a number of recommendations including continued engagement with four Mana Whenua in the Auckland Prison project, enabling

National Policy Statement for Indigenous Biodiversity 2023 (amended 2025)

Objectives and Policies		Comment
	<p>(a) managing indigenous biodiversity on their land; and</p> <p>(b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and</p> <p>(c) actively participating in other decision-making about indigenous biodiversity.</p>	<p>the role of Kaitiaki in management plans and participation in the enhancement and restoration of landscape and terrestrial ecology.</p> <p>The proposal includes a comprehensive mitigation, offset and compensation package to be implemented via the EcMP and the LEIMP. Mana Whenua have been provided with the opportunity to be involved in appropriate plant and species selection and will be provided with opportunities to provide input into detailed planting plans (refer to Volume 1, Table 5).</p> <p>Overall, the proposal is consistent with the recommendations in the Māori Consultation and Cultural Values Assessment report and will provide opportunities for the recognition of the identified cultural values associated with enhancing and protecting native flora and fauna (terrestrial biodiversity).</p> <p>Overall, the proposal is consistent with Policy 2.</p>
Policy 3	A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	<p>While no surveys have been undertaken to determine the presence of bats or native bird nests on site, the Ecological Effects Assessment (Appendix 3B) notes that bats and native birds may be present in certain areas due to vegetation types. Accordingly, a precautionary approach is applied and a Native Bird Management Plan and Bat Management Plan are proposed which set out the methodologies for assessing the presence of native birds and bats, and outlines tree felling protocols and other mitigation measures that should be applied in the instance bats or listed birds are identified as being present.</p> <p>Overall, the proposal is considered consistent with Policy 3.</p>
Policy 7	SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.	<p>The proposed watercourse works are primarily located within Area A of the proposed designation alteration to provide for capacity increase at Auckland Prison. The designation areas have been identified for a number of factors, including the ability to avoid development within SNAs.</p> <p>Overall, the proposal is considered consistent with Policy 7.</p>

National Policy Statement for Indigenous Biodiversity 2023 (amended 2025)		
Objectives and Policies		Comment
Policy 8	The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	<p>The proposal includes a comprehensive landscaping and ecological mitigation, offset and compensation package which includes</p> <ul style="list-style-type: none"> • extensive riparian vegetation planting around wetlands and watercourse 1, 3 and 6; • landscape mitigation planting around the boundaries of the site and an extensive weed and pest management plan (see the LMEEP and the LEIMP); and • an Ecological Management Plan which addresses the following: <ul style="list-style-type: none"> ○ a Native Bird Management Plan outlining protocols for assessing the presence of native bird nests and tree felling protocols and buffer requirements for when nests are detected; and ○ a Bat Management Plan outlining assessments and protocols regarding bat roost habitats. ○ Native Fish capture and relocation plan which provides for the relocation of native fish prior to watercourse works occurring. • A Lizard Management Plan for the salvage and relocation of lizards, including enhancement works for the onsite relocation site; <p>Overall, it is considered the proposal is consistent with Policy 8.</p>
Policy 10	Activities that contribute to New Zealand’s social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.	<p>The significant regional and national benefits associated with the proposed Auckland Prison capacity increase are outlined in detail in Volume 1 of the substantive application. The proposed watercourse works are necessary to enable that development to occur and for those regional and national benefits to be realised. These benefits improve public safety and the maintenance of a just society.</p>

National Policy Statement for Indigenous Biodiversity 2023 (amended 2025)

Objectives and Policies		Comment
Policy 13	Restoration of indigenous biodiversity is promoted and provided for.	<p>The proposal includes a comprehensive landscaping and ecological mitigation, offset and compensation package which includes riparian planting along watercourses and wetlands and augmentation planting within the SNA and ONL where required. The proposed measures will contribute to enhancing and restoring existing indigenous biodiversity values within and around the subject site.</p> <p>Overall, the proposal is considered consistent with Policy 13.</p>
Policy 14	Increased indigenous vegetation cover is promoted in both urban and non-urban environments.	<p>While the proposal involves the total loss of 6,124m² (0.612ha) of vegetation removal, the proposal will provide approximately 28ha of landscape mitigation planting (which is predominately indigenous, but does contain some exotics where appropriate) and 2.9ha of ecological offset and compensation planting.</p> <p>Overall, the proposal increases indigenous vegetation cover at the site.</p>
Policy 15	Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.	<p>An ecological management plan is proposed which includes a Native Bird Management Plan and Bat Management Plan. The management plans set out methodologies for assessing the presence of nesting / roosting birds or bats, tree felling protocols in the event specified birds or bats are identified on site and the monitoring and reporting requirements in each instance.</p> <p>Overall, the proposal is considered consistent with Policy 15.</p>

National Policy Statement for Highly Productive Land 2022 (amended 2025)		
Objectives and Policies		Comment
Objective	<i>Highly productive land is protected for use in land-based primary production, both now and for future generations.</i>	<p>The Site is mapped as LUC Class 2 and 3 land from Auckland Council Geomaps. LUC Class 2 and 3 soils meet the AUP(OP) definition of 'land containing prime soil', and the definition of Highly Productive Land from the National Policy Statement for Highly Productive Land (NPS-HPL). The restrictions on the use and development of Highly Productive Land do not apply under the NPS-HPL where, as is the case here, it is for an activity by a requiring authority in relation to a designation or notice of requirement (clause 3.9).</p> <p>A use or development of highly productive land is inappropriate except where it is for an activity by a requiring authority in relation to a designation (Policy 8). The Site is designated under the Minister of Corrections.</p> <p>The land at Auckland Prison, including the area proposed for watercourse works, is not suitable for productive land use because:</p> <ul style="list-style-type: none"> • As stated above, the Site is already subject to Designation 3900 for use by the Department of Corrections as a prison facility, and most of the Site has already been developed for this use • The Auckland Prison site has been used for prison purposes since 1968 and designated as a "Penal Institution" or "Auckland Prison" since the formation of the Waitemata County District Scheme in 1973 • The site and surrounding properties are zoned Rural – Countryside Living which anticipates a range of rural lifestyle developments, characterised as low density rural lifestyle dwellings on rural land (rather than productive rural land use) <p>The balance land (Area C) is proposed to be planted with 28 hectares of planting to mitigate visual effects and provide ecological offsetting and</p>
Policy 1	<i>Highly productive land is recognised as a resource with finite characteristics and longterm values for land-based primary production.</i>	
Policy 2	<i>The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.</i>	
Policy 4	<i>The use of highly productive land for land-based primary production is prioritised and supported.</i>	
Policy 8	<i>Highly productive land is protected from inappropriate use and development.</i>	

National Policy Statement for Highly Productive Land 2022 (amended 2025)	
Objectives and Policies	Comment
	compensation, and its size, topography and configuration is not conducive to productive land use.

New Zealand Coastal Policy Statement 2010 (amended 2025)	
Objectives and Policies	Comment
<p>Objective 1</p> <p><i>To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by:</i></p> <ul style="list-style-type: none"> <i>maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature;</i> <i>protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand's indigenous coastal flora and fauna; and</i> <i>maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity.</i> 	<p>All existing stormwater discharges at the Auckland Prison site enter tributaries of Paremoremo Creek, which flows into the Upper Waitemātā Harbour.</p> <p>The proposed watercourse works will not increase impervious areas. Accordingly, the proposed pipe sizes and designs, coupled with the wider stormwater management system (particularly Pond 2) are considered sufficient to ensure the quality of water being discharged to the coastal environment is maintained. It is noted that future development at the site may require upgrades to the wider stormwater management network, but that the proposed pipes and reclamations are considered sufficient. Future upgrades will either be undertaken as permitted activities or assessed via the resource consent process.</p>
<p>Objective 2</p> <p><i>To preserve the natural character of the coastal environment and protect natural features and landscape values through:</i></p>	<p>Watercourse 2 is approximately 500m from the coast and is the closest watercourse subject to the proposed works. The proposal does not involve works within the Outstanding Natural Landscape (ONL) present within site and the watercourses proposed to be</p>

New Zealand Coastal Policy Statement 2010 (amended 2025)		
Objectives and Policies		Comment
	<ul style="list-style-type: none"> • <i>recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution;</i> • <i>identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and</i> • <i>encouraging restoration of the coastal environment.</i> 	<p>reclaimed are not within or immediately adjacent to the Coastal Marine Area (CMA).</p> <p>The Site is not identified as having high or outstanding natural character. As identified in the Landscape and Natural Character Assessment (Appendix 3C) and Volume 3, once established the 28ha of proposed landscape planting will overall improve the natural character of the Site and wider context, including coastal edges and will enhance the existing low levels of natural character.</p> <p>The proposal is consistent with Objective 2.</p>
Objective 3	<p><i>To take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment by:</i></p> <ul style="list-style-type: none"> • <i>recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources;</i> • <i>promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the Act;</i> • <i>incorporating mātauranga Māori into sustainable management practices; and</i> • <i>recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua.</i> 	<p>Tangata whenua has been consulted with throughout the formation of the proposal as outlined in the Māori Consultation and Cultural Values Assessment report (Appendix 1F, Volume 1).</p> <p>The report identifies a range of shared cultural values and interests and includes a number of recommendations including continued engagement with four Mana Whenua in the Auckland Prison project, enabling the role of Kaitiaki in management plans and participation in the enhancement and restoration of landscape and terrestrial ecology.</p> <p>Corrections has actively considered the values, interests and recommendations identified in the Cultural Assessment report (including including the Ngaati Whanaunga report and the draft report prepared by Te Rūnanga o Ngāti Whātua), and where appropriate and relevant, have sought to provide for them in the proposal as explained in Section 9.3 and Table 5 of Volume 1.</p> <p>Overall, the proposal is consistent with the recommendations in the Māori Consultation and Cultural Values Assessment report and will</p>

New Zealand Coastal Policy Statement 2010 (amended 2025)

Objectives and Policies		Comment
		<p>provide opportunities for the recognition of the identified cultural values and interests.</p> <p>The proposal is considered consistent with Objective 3.</p>
Objective 5	<p><i>To ensure that coastal hazard risks taking account of climate change, are managed by:</i></p> <ul style="list-style-type: none"> • <i>Locating new development away from areas prone to such risks;</i> • <i>Considering responses, including managed retreat, for existing development in this situation; and</i> • <i>Protecting or restoring natural defences to coastal hazards.</i> 	<p>The proposed reclamation works are not within any areas likely to be subject to coastal hazard risks. Climate change has been taken into account in background modelling undertaken to determine the appropriate sizing and design of the proposed pipes.</p> <p>The proposal is considered consistent with Objective 5.</p>
Objective 6	<p><i>To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that:</i></p> <ul style="list-style-type: none"> • <i>the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits;</i> • <i>some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities;</i> • <i>functionally some uses and developments can only be located on the coast or in the coastal marine area;</i> • <i>the coastal environment contains renewable energy resources of significant value;</i> 	<p>The functional need for the proposed watercourse works is set out in section 6.4.3.2 of Volume 3. The Auckland Prison site is an existing site, designated for that purpose. Area A of the proposed designation alteration has been identified as the most appropriate location for development as it avoids wetlands, historic areas, significant ecological areas and outstanding natural landscapes.</p> <p>The proposal has significant national and regional benefits as outlined in Volume 1 which includes public safety and contribution to the maintenance of a just society.</p> <p>The proposed watercourse works are considered appropriate as they are associated with the existing Auckland Prison and minimise effects on the coastal environment values to the existing possible.</p> <p>The proposal is consistent with Objective 6.</p>

New Zealand Coastal Policy Statement 2010 (amended 2025)		
Objectives and Policies		Comment
	<ul style="list-style-type: none"> • <i>the protection of habitats of living marine resources contributes to the social, economic and cultural wellbeing of people and communities;</i> • <i>the potential to protect, use, and develop natural and physical resources in the coastal marine area should not be compromised by activities on land;</i> • <i>the proportion of the coastal marine area under any formal protection is small and therefore management under the Act is an important means by which the natural resources of the coastal marine area can be protected; and</i> • <i>historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development.</i> 	
Policy 6 - Activities in the coastal environment	<p>1. <i>In relation to the coastal environment:</i></p> <ul style="list-style-type: none"> a) <i>recognise that the provision of infrastructure, the supply and transport of energy including the generation and transmission of electricity, and the extraction of minerals are activities which may be required for the social, economic and cultural well-being of people and communities;</i> b) <i>consider the rate at which built development and the associated public infrastructure should be enabled to provide for the reasonably foreseeable needs of population growth without compromising the other values of the coastal environment;</i> 	As set out in the Landscape and Visual Effects Assessment (Appendix 3C) and summarised in Volume 3, the proposed watercourse works are considered to have low or less than minor adverse effects on natural character and will have low adverse visual effects. Subject to the implementation of the proposed replanting, the proposal will overall enhance the landscape character of the Site. Additionally, any development on-site enabled by the wider proposal to increase capacity at Auckland Prison will be appropriately set back from the coastal environment and will not compromise activities of national or regional importance that have a functional need to locate in the coastal environment.

New Zealand Coastal Policy Statement 2010 (amended 2025)

Objectives and Policies		Comment
	<ul style="list-style-type: none"> c) <i>encourage the consolidation of existing coastal settlements and urban areas where this will contribute to the avoidance or mitigation of sprawling or sporadic patterns of settlement and urban growth;</i> d) <i>recognise tangata whenua needs for papakāinga, marae and associated developments and make appropriate provision for them;</i> e) <i>consider where and how built development on land should be controlled so that it does not compromise activities of national or regional importance that have a functional need to locate and operate in the coastal marine area;</i> f) <i>consider where development that maintains the character of the existing built environment should be encouraged, and where development resulting in a change in character would be acceptable;</i> g) <i>recognise the potential of renewable resources in the coastal environment, such as energy from wind, waves, currents and tides, to meet the reasonably foreseeable needs of current and future generations;</i> h) <i>consider how adverse visual impacts of development can be avoided in areas sensitive to such effects, such as headlands and prominent ridgelines, and as far as practicable and reasonable apply controls or conditions to avoid those effects;</i> i) <i>set back development from the coastal marine area and other water bodies, where practicable and reasonable, to protect the natural character, open</i> 	<p>The proposal has significant national and regional benefits as outlined in Volume 1 which includes public safety and contribution to the maintenance of a just society.</p>

New Zealand Coastal Policy Statement 2010 (amended 2025)

	Objectives and Policies	Comment
	<p><i>space, public access and amenity values of the coastal environment; and</i></p> <p><i>j) where appropriate, buffer areas and sites of significant indigenous biological diversity, or historic heritage value.</i></p> <p><i>2. Additionally, in relation to the coastal marine area:</i></p> <p><i>a) recognise potential contributions to the social, economic and cultural wellbeing of people and communities from use and development of the coastal marine area, including the potential for renewable marine energy to contribute to meeting the energy needs of current and future generations;</i></p> <p><i>b) recognise the need to maintain and enhance the public open space and recreation qualities and values of the coastal marine area;</i></p> <p><i>c) recognise that there are activities that have a functional need to be located in the coastal marine area, and provide for those activities in appropriate places;</i></p> <p><i>d) recognise that activities that do not have a functional need for location in the coastal marine area generally should not be located there; and</i></p> <p><i>e) promote the efficient use of occupied space, including by:</i></p> <p><i>i. requiring that structures be made available for public or multiple use wherever reasonable and practicable;</i></p>	

New Zealand Coastal Policy Statement 2010 (amended 2025)

Objectives and Policies		Comment
	<ul style="list-style-type: none"> ii. <i>requiring the removal of any abandoned or redundant structure that has no heritage, amenity or reuse value; and</i> iii. <i>considering whether consent conditions should be applied to ensure that space occupied for an activity is used for that purpose effectively and without unreasonable delay.</i> <p>3. <i>Where an activity is infrastructure, including renewable electricity generation or electricity transmission, an aquaculture activity, or extraction of minerals for the purpose of supporting infrastructure, (6)(1)(e), (2)(c) and (2)(d) above must be read to apply if the activity has a functional need or operational need to locate in the coastal marine area.</i></p> <p>4. <i>In this policy, 'operational need' and 'functional need' have the meanings set out in the National Planning Standards issued under section 58E of the Act.</i></p>	
<p>Policy 17 – Historic heritage identification and protection</p>	<p><i>Protect historic heritage in the coastal environment from inappropriate subdivision, use, and development by:</i></p> <ul style="list-style-type: none"> <i>(a) identification, assessment and recording of historic heritage, including archaeological sites;</i> <i>(b) providing for the integrated management of such sites in collaboration with relevant councils, heritage agencies, iwi authorities and kaitiaki;</i> <i>(c) initiating assessment and management of historic heritage in the context of historic landscapes;</i> 	<p>There is one recorded archaeological site within the Site along the coastal edge of Pāremoremo Creek (R10/831). There is the potential for landscape mitigation planting in this area to affect the values of this archaeological site. This site is identified on the LMEEP and a Designation condition has been proposed to require that no land disturbance (other than planting by hand) is undertaken within 10m of this archaeological site. These measures will protect this archaeological site from inappropriate use and development.</p>

New Zealand Coastal Policy Statement 2010 (amended 2025)		
Objectives and Policies		Comment
	<p><i>(d) recognising that heritage to be protected may need conservation;</i></p> <p><i>(e) facilitating and integrating management of historic heritage that spans the line of mean high water springs;</i></p> <p><i>(f) including policies, rules and other methods relating to (a) to (e) above in regional policy statements, and plans;</i></p> <p><i>(g) imposing or reviewing conditions on resource consents and designations, including for the continuation of activities;</i></p> <p><i>(h) requiring, where practicable, conservation conditions; and</i></p> <p><i>(i) considering provision for methods that would enhance owners' opportunities for conservation of listed heritage structures, such as relief grants or rates relief.</i></p>	

National Policy Statement for Infrastructure 2025		
Objectives and Policies		Comment
Objective 1	<p><i>The objective of this National Policy Statement is to:</i></p> <p><i>a) ensure the national, regional and local benefits of infrastructure are provided for;</i></p> <p><i>b) enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;</i></p> <p><i>c) enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;</i></p>	<p>The NPS-I requires decision-makers to recognise infrastructure as nationally significant under the RMA and provides national direction to support its development, maintenance and upgrades while still addressing adverse impacts. The NPS-I applies to all decisions under the RMA affecting the operation, maintenance, renewal, and upgrade of existing infrastructure, as well as new infrastructure development.</p> <p>The proposed watercourse works are enabling of development associated with Auckland Prison capacity increase (Correction Facilities are considered additional infrastructure, which is</p>

National Policy Statement for Infrastructure 2025		
	Objectives and Policies	Comment
	<p>d) <i>ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and</i></p> <p>e) <i>ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.</i></p>	<p>incorporated in the definition of infrastructure). This is consistent with and supports the purpose of the National Policy Statement for Infrastructure (2025).</p> <p>The proposal has significant national and regional benefits as outlined in Volume 1 which includes public safety and contribution to the maintenance of a just society.</p>
<p>Policy 1: <i>Providing for the benefits of infrastructure</i></p>	<p>1. <i>Decision-makers must ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for.</i></p> <p>2. <i>Decision-makers must recognise that the benefits of infrastructure include:</i></p> <p>a) <i>providing for the social, cultural and economic wellbeing of present and future generations;</i></p> <p>b) <i>creating, supporting and enhancing well-functioning urban and rural environments;</i></p> <p>c) <i>supporting sufficient development capacity to meet demand for housing and business land;</i></p> <p>d) <i>providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy;</i></p> <p>e) <i>helping to protect and restore the natural environment;</i></p> <p>f) <i>supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and</i></p> <p>g) <i>reducing the risks from, and improving resilience to, natural hazards and climate change.</i></p>	<p>Volume 1 provides an overview on how the Auckland Prison Capacity increase proposal provides national and regional benefits. The proposal is in accordance with the NPS-I. The proposal has significant national and regional benefits as outlined in Volume 1 which includes public safety and contribution to the maintenance of a just society.</p> <p>There is a functional need for the proposed watercourses to enable those benefits to be realised (as described in detail at Section 6.3.4.2 of Volume 3).</p>

National Policy Statement for Infrastructure 2025		
Objectives and Policies		Comment
	<p>3. <i>Decision-makers must recognise:</i></p> <ul style="list-style-type: none"> a) <i>the significant risks to, and impacts on, public safety, the wellbeing of people and communities, and the environment that may occur when infrastructure services are compromised; and</i> b) <i>that infrastructure networks can be both independent and interconnected.</i> 	
<p>Policy 2: Operational need or functional need of infrastructure to be in particular locations and environments</p>	<ul style="list-style-type: none"> 1. <i>Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments.</i> 2. <i>Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to:</i> <ul style="list-style-type: none"> a) <i>provide services to people and communities in a timely, effective and efficient manner;</i> b) <i>operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries;</i> c) <i>access or connect to particular natural or physical resources, including other infrastructure;</i> d) <i>be accessible so infrastructure activities can be undertaken effectively and efficiently;</i> e) <i>locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure has been spatially identified in advance;</i> 	<p>With the proposed capacity increase project at Auckland Prison, there are a number of factors which mean that there is a functional need to reclaim Watercourses 1 and 2. These are set out in Section 6.3.4.2 of Volume 3.</p> <p>The proposal is consistent with Policy 2.</p>

National Policy Statement for Infrastructure 2025

National Policy Statement for Infrastructure 2025	
Objectives and Policies	Comment
	<p align="center"><i>f) and manage risks from natural hazards.</i></p>
<p>Policy 4: Enabling the efficient and timely operation and delivery of infrastructure activities</p>	<p><i>1. Decision-makers must:</i></p> <ul style="list-style-type: none"> <i>a) enable the efficient and timely delivery of infrastructure activities;</i> <i>b) enable cross-boundary infrastructure networks;</i> <i>c) provide flexibility for infrastructure providers to use new or innovative technologies and methods to improve the delivery of infrastructure services and/or improve environmental outcomes;</i> <i>d) enable opportunities to make more effective use of existing infrastructure;</i> <i>e) consider opportunities for continuous improvement in service delivery and environmental outcomes when renewing or replacing resource consents; and</i> <i>f) enable the upgrading of infrastructure where this will:</i> <ul style="list-style-type: none"> <i>i. improve the resilience of infrastructure to the risks from natural hazards and effects of climate change;</i> <i>ii. maintain or improve its level of infrastructure service, including to meet increasing demand; or</i> <i>iii. improve environmental outcomes.</i> <p><i>2. Decision-makers must:</i></p>

National Policy Statement for Infrastructure 2025		
	Objectives and Policies	Comment
	<ul style="list-style-type: none"> a) <i>recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity; and</i> b) <i>have regard to existing information and assessments undertaken by the infrastructure provider, including, but not limited to, information prepared using the Better Business Cases methodology developed by The Treasury New Zealand, infrastructure strategies prepared under the Local Government Act 2002, or the Infrastructure Priorities Programme developed by New Zealand Infrastructure Commission Te Waihanga.</i> 	
<p>Policy 6: Recognising and providing for Māori interests</p>	<ul style="list-style-type: none"> 1. <i>Decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities, including by:</i> <ul style="list-style-type: none"> a) <i>taking into account the outcome of any engagement with tangata whenua on any relevant resource consent, notice of requirement, or request for a private plan change;</i> b) <i>recognising the opportunities tangata whenua may have in developing and operating their own infrastructure at any scale or in partnership; and</i> c) <i>local authorities:</i> <ul style="list-style-type: none"> i. <i>providing opportunities for tangata whenua involvement where infrastructure and infrastructure supporting activities may affect a site of significance or issue of cultural significance to Māori; and</i> 	<p>Whetū Consultancy Group was engaged by Corrections to support engagement with Māori on the proposal to increase capacity at Auckland Prison, including the proposed watercourse works. A Māori Consultation and Cultural Values Assessment report is provided in Appendix 1F of Volume 1 of the Substantive Application. That report documents the consultation process with Iwi/Mana Whenua and identified groups, outlines cultural values and interests of Mana Whenua and makes recommendations to respond to those values and interests. Included in the report is the Cultural Values Assessment (CVA) prepared by Ngaati Whanaunga and a Cultural Impact Assessment (CIA) prepared by Te Rūnanga o Ngāti Whātua. Further details are provided also provided in Section 5.8 of Volume 3 Substantive Application.</p> <p>The recommendations include continued engagement with four Mana Whenua in the Auckland Prison project, enabling the role of Kaitiaki in management plans and participation in the enhancement and restoration of landscape and terrestrial ecology.</p>

National Policy Statement for Infrastructure 2025

National Policy Statement for Infrastructure 2025	
Objectives and Policies	Comment
	<p align="center"><i>ii. operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono ā Rohe.</i></p>
<p>Policy 7: Assessing and managing the effects of proposed infrastructure activities</p>	<p><i>1. When assessing and managing the effects of infrastructure activities, decision-makers must:</i></p> <ul style="list-style-type: none"> <i>a) have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work;</i> <i>b) consider the technical and operational requirements and constraints of infrastructure activities;</i> <i>c) take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure;</i> <i>d) take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and</i> <i>e) ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.</i>

Corrections has actively considered the values, interests and recommendations identified in the Cultural Assessment report (including including the Ngaati Whanaunga report and the draft report prepared by Te Rūnanga o Ngāti Whātua), and where appropriate and relevant, have sought to provide for them in the proposal as explained in Section 9.3 and Table 5 of **Volume 1**.

Refer to Section 5 Assessment of Effects in Volume 3 of the Substantive Application.

Boffa Miskell Ecologists have provided an assessment of the ecological values of the watercourses and riparian vegetation proposed to be removed. This assessment includes ecological effects from the proposed reclamation and piping and associated works (including vegetation clearance) and proposed mitigation, remedy offset of compensation required in accordance with the effects management hierarchy.

The application of the effects management hierarchy is set out in the ecology assessment provided in **Appendix 3B**.

National Policy Statement for Infrastructure 2025		
Objectives and Policies		Comment
Policy 9: Managing the effects of new infrastructure and major upgrades	<ol style="list-style-type: none"> 1. <i>Decision-makers must enable new infrastructure or major upgrades of existing infrastructure activities in all environments.</i> 2. <i>Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans.</i> 3. <i>Where (2) does not apply, the adverse effects of new infrastructure and major upgrades must be, where practicable, avoided, remedied or mitigated.</i> 	<p>Auckland Prison is an existing prison and has been designated for prison purposes since at least 1973 (with the prison being operational since approximately 1968).</p> <p>The proposed watercourse works are enabling of development associated with Auckland Prison capacity increase.</p> <p>The adverse effects where practicable have been avoided, remedied or mitigated as set out in the Volume 3 of the Substantive application.</p> <p>As mentioned above, the application of the effects management hierarchy is set out in the ecology assessment provided in Appendix 3B.</p>

National Policy Statement for Natural Hazards 2025		
Objectives and Policies		Comment
Objective 1	<i>Natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach.</i>	The Engineering Design Report prepared by Aurecon (Appendix 3G) includes an assessment on flood risks and catchment flows at the site and provides a more detailed overview of site investigations, including for geotechnical investigations. Further details on Natural Hazards and Stormwater Management (Section 2.4) and Geotechnical (Section 2.5) and Natural Hazards (Section 5.7) can be found in Volume 3 of the Substantive Application.

National Policy Statement for Natural Hazards 2025

Objectives and Policies		Comment
		<p>The proposed pipes and associated works have been designed to minimise potential adverse flooding effects through ensuring sufficient capacity to accommodate the 100 year and 10 year ARI events and in the case of Watercourse 2, to also provide secondary conveyance for the 100 year event.</p> <p>The ground levels will be generally consistent with the existing ground level once pipes are installed and watercourses are reclaimed. Refer to DRG-CC-0700 Rev A, prepared by Aurecon provided in Appendix 3G which sets out the final proposed contours.</p>
Policy 1	<i>When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.</i>	<p>The Engineering Design Report prepared by Aurecon and provided in Appendix 3G assesses potential flood risks as a result of piping Watercourses 1 and 2.</p> <p>The Engineering Design Report concludes that the proposed watercourse works will have a negligible effect on downstream flood levels or hazard risk.</p>
Policy 2	<i>Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.</i>	
Policy 3	<i>Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.</i>	<p>The reclaiming of watercourse 1 and 2 is not expected to result in a very high natural hazard risk that needs to be avoided as set out above.</p>
Policy 4	<i>Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.</i>	<p>As mentioned above, the Engineering Design Report concludes that the proposed watercourse works will have a negligible effect on downstream flood levels or hazard risk.</p>

National Policy Statement for Natural Hazards 2025		
Objectives and Policies		Comment
Policy 5	<i>Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.</i>	The proposed pipes have been designed to accommodate peak flows, including accounting for climate change.
Policy 6	<i>The potential impacts of climate change to at least 100 years into the future must be considered.</i>	

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
B7 Natural Resources		
B7.2. Indigenous Biodiversity		
B7.2(1) Objective 2	<p>(1) Areas of significant indigenous biodiversity value in terrestrial, freshwater, and coastal marine areas are protected from the adverse effects of subdivision use and development.</p> <p>(2) Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring.</p>	<p>The proposed works are outside any significant indigenous biodiversity areas.</p> <p>The proposal includes a comprehensive landscaping and ecological mitigation, offset and compensation package which includes riparian planting along watercourses and wetlands where riparian planting is sparse and ecological values are low (see Ecological Effects Assessment, Appendix 3B) and augmentation planting within the SNA and ONL where required (see the LMEEP, Appendix 3A and the LEIMP, Appendix 3L).</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<p>Overall, the proposed measures will contribute to enhancing and restoring existing indigenous biodiversity values within and around the subject site.</p> <p>The proposal is considered to be consistent with Objective 2.</p>
B7.2.2 Policy 5	Avoid adverse effects on areas listed in the Schedule 3 of Significant Ecological Areas – Terrestrial Schedule and Schedule 4 Significant Ecological Areas – Marine Schedule.	The proposed works are outside the identified SEA's.
B7.3 Freshwater systems		
B7.3.1 Objective 1	Degraded freshwater systems are enhanced.	Not applicable.
B7.3.1 Objective 2	Loss of freshwater systems is minimised.	<p>The proposal will result in the piping of 124m of watercourse 1 and 114m of watercourse 2. The development areas of the associated designation have been specifically identified to avoid significant ecological areas and limit the loss of watercourse extent, and by association freshwater systems, as much as practicable.</p> <p>A comprehensive ecological offset and compensation package is proposed which includes:</p> <ul style="list-style-type: none"> • Watercourse offset planting (1.05 ha) around watercourse 6 • Watercourse compensation planting (1.6 ha) around watercourse 3, and upper reaches of watercourses 1 and 6 (northern tributary). • Wetland compensation planting (0.28 ha), around wetlands B and D. • Culvert improvement and upgrade works at Watercourse 6 to provide additional stream values and expanding the extent of

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<p>the watercourse available for mobile aquatic biota (1,380 m of permanent stream and 1,959 m of intermittent stream);</p> <ul style="list-style-type: none"> Comprehensive weed and pest animal management programme for the new planted area (28 hectares) at Auckland Prison site. <p>Overall, it is considered that subject to the implementation of ecological offset and compensation measures, there will be less than minor adverse effects on freshwater values.</p> <p>The proposed dewatering is localised and temporary in nature and will be undertaken in accordance with GD05. Baseflows will be maintained and there will be no impact on water levels of surrounding waterbodies. Overall, there will be less than minor adverse effects on freshwater values as a result of the proposed groundwater dewatering takes.</p> <p>The proposal is therefore considered consistent with Objective 2.</p>
B7.3.1 Objective 3	The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated.	The proposal does not result in any changes in land use.
B7.3.2(4) Policy 4	<p><i>Avoid the permanent loss and significant modification or diversion of lakes, rivers, streams (excluding ephemeral streams), and wetlands and their margins, unless all of the following apply:</i></p> <p>(a) <i>it is necessary to provide for:</i></p> <p>(i) <i>the health and safety of communities; or</i></p> <p>(ii) <i>the enhancement and restoration of freshwater systems and values; or</i></p>	<p>Section 6.3.4.2 of Volume 3 sets out the functional need for the reclamation of watercourses 1 and 2 as proposed. In summary, an open watercourse would significantly compromise the security of the prison. A detailed discussion on alternatives that were considered in the development of the proposed designation alteration is provided in Volume 1. Overall, the reclamation works are considered necessary to enable the Auckland Prison capacity increase to occur.</p> <p>The development areas of the associated designation have been specifically identified to avoid significant ecological areas and limit the loss of watercourse extent as much as practicable.</p>

The Auckland Unitary Plan (Operative in Part 2016)

The Auckland Unitary Plan (Operative in Part 2016)	
Objectives and Policies	Comment
<p>(iii) <i>the sustainable use of land and resources to provide for growth and development; or</i></p> <p>(iv) <i>infrastructure;</i></p> <p>(b) <i>no practicable alternative exists;</i></p> <p>(c) <i>mitigation measures are implemented to address the adverse effects arising from the loss in freshwater system functions and values; and</i></p> <p>(d) <i>where adverse effects cannot be adequately mitigated, environmental benefits including on-site or off-site works are provided.</i></p>	<p>A comprehensive ecological offset and compensation package is proposed which includes:</p> <ul style="list-style-type: none"> • Watercourse offset planting (1.05 ha) around watercourse 6 • Watercourse compensation planting (1.6 ha) around watercourse 3, and upper reaches of watercourses 1 and 6 (northern tributary). • Wetland compensation planting (0.28 ha), around wetlands B and D. • Culvert improvement and upgrade works at Watercourse 6 to provide additional stream values and expanding the extent of the watercourse available for mobile aquatic biota (1,380 m of permanent stream and 1,959 m of intermittent stream); • Comprehensive weed and pest animal management programme for the new planted area (28 hectares) at Auckland Prison site. <p>Overall, it is considered that subject to the implementation of ecological offset and compensation measures, there will be less than minor adverse effects as a result of the loss in freshwater system functions and values.</p>
<p>B7.3.2(5) Policy 5</p> <p><i>Manage subdivision, use, development, including discharges and activities in the beds of lakes, rivers, streams, and in wetlands, to do all of the following:</i></p> <p>(a) <i>protect identified Natural Lake Management Areas, Natural Stream Management Areas, and Wetland Management Areas;</i></p>	<p>The proposed works are outside any identified Natural Lake Management Areas, Natural Stream Management Areas, and Wetland Management Areas.</p> <p>Climate change has been incorporated into the modelling when determining proposed pipe sizes and design. The pipe at watercourse 1 will have capacity for the 100 year ARI event which is sufficient to accommodate future development (with upgrades required to the wider</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
	<p><i>(aa) improve resilience to the effects of climate change;</i></p> <p><i>(b) minimise erosion and modification of beds and banks of lakes, rivers, streams and wetlands;</i></p> <p><i>(c) limit the establishment of structures within the beds of lakes, rivers and streams and in wetlands to those that have a functional need or operational requirement to be located there; and</i></p> <p><i>(d) maintain or where appropriate enhance:</i></p> <p><i>(i) freshwater systems not protected under Policy B7.3.2(5)(a);</i></p> <p><i>(ii) navigation along rivers and public access to and along lakes, rivers and streams;</i></p> <p><i>(iii) existing riparian vegetation located on the margins of lakes, rivers, streams and wetlands; and</i></p> <p><i>areas of significant indigenous biodiversity.</i></p>	<p>network) and watercourse 2 pipe is designed to accommodate the 10-year ARI event, with improved conveyance of 100 year event flows at ground level.</p> <p>The proposed construction methodology and erosion and sediment control measures have been designed in accordance with GD05. Excavation is proposed to be limited to 1.5m depth and a maximum of 8m long trenches for the installation of the pipes, with each segment being reinstated and stabilised at the end of each week.</p> <p>Section 6.3.4.2 of Volume 3 sets out the functional need for the reclamation of watercourses 1 and 2 as proposed.</p> <p>The proposal includes a comprehensive ecological offsetting and compensation package including the replanting of 2.65 ha of native planting around watercourses 1, 3 and 6 and wetland compensation planting (0.28 ha), around wetlands B and D, as shown in the Landscape Mitigation and Ecology Enhancement Plan (LMEEP), prepared by Boffa Miskell, dated 09 October 2025 Appendix 3A.</p>
B7.3.2(13) Policy 13	<p><i>Promote the taking of groundwater rather than the taking of water from rivers and streams in areas where groundwater is available for allocation.</i></p>	<p>The proposal involves groundwater dewatering during temporary works and will maintain baseflows of both watercourses. Groundwater will be discharged into the watercourses (following diversion through sediment control measures).</p> <p>The proposal is consistent with Policy 13.</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
B7.4. Coastal water, freshwater and geothermal water		
B7.4.1 Objective 2	<i>The quality of freshwater and coastal water is maintained where it is excellent or good and progressively improved over time where it is degraded.</i>	The proposed watercourse works will not increase impervious areas. Accordingly, the proposed pipe sizes and designs, coupled with the wider stormwater management system (particularly Pond 2) are considered sufficient to ensure the quality of water being discharged to the coastal environment is maintained.
B7.4.1 Objective 5	<i>The adverse effects from changes in or intensification of land use on coastal water and freshwater quality are avoided, remedied or mitigated.</i>	The proposal does not result in intensification of or changes in land use. Upgrades to stormwater management onsite will be considered and designed accordingly once future development is confirmed.
B7.4.1 Objective 6	<i>Mana Whenua values, mātauranga and tikanga associated with coastal water, freshwater and geothermal water are recognised and provided for, including their traditional and cultural uses and values.</i>	<p>The Māori Consultation and Cultural Values Assessment report (Appendix 1F of Volume 1 of the Substantive Application) identifies a shared cultural value to include Restoration and Protection of Waterways.</p> <p>The report makes a number of recommendations including continued engagement with four Mana Whenua in the Auckland Prison project, enabling the role of Kaitiaki in management plans and participation in the enhancement and restoration of landscape and terrestrial ecology.</p> <p>The proposal includes a comprehensive mitigation, offset and compensation package to be implemented via the EcMP and the LEIMP. Mana whenua have been provided with the opportunity to be involved in appropriate plant and species selection.</p> <p>Corrections has actively considered the values, interests and recommendations identified in the Cultural Assessment report (including including the Ngaati Whanaunga report and the draft report prepared by Te Rūnanga o Ngāti Whātua), and where appropriate and relevant,</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<p>have sought to provide for them in the proposal as explained in Section 9.3 and Table 5 of Volume 1.</p> <p>Overall, the proposal is consistent with the recommendations in the Māori Consultation and Cultural Values Assessment report and will provide opportunities for the recognition of the identified cultural value relating to the Restoration and Protection of Waterways.</p> <p>Overall, the proposal is consistent with Objective 6.</p>
B8 Coastal Environment		
B8.3.1(2) Objective 2	<i>The adverse effects of subdivision, use and development on the values of the coastal environment are avoided, remedied or mitigated.</i>	<p>Stormwater discharge is to tributaries of the Paremoremo Creek which connects to the Waitematā Harbour. The proposal does not result in the increase of any impervious areas or associated run-off and the proposed riprap will provide an improved situation with regards to erosion and scouring. Furthermore, the proposed erosion and sediment control plan and construction methodology has been designed in accordance with GD05 and will minimise the risk of sediment laden water entering the tributaries.</p> <p>Overall, it is considered the proposal is consistent with Objective 2.</p>
B8.3.2(7) Policy 7	<i>Set back development from the coastal marine area, where practicable, to protect the natural character and amenity values of the coastal environment.</i>	The proposed works are outside of the coastal marine area.
Chapter E1 Water quality and integrated management		
E1.2(1) Objective 1	<i>Freshwater and sediment quality is maintained where it is excellent or good and progressively improved over time in degraded areas.</i>	The proposal does not result in the increase of any impervious areas or associated run-off and the proposed riprap will improve the current situation and ensure there is no erosion and scouring as a result if the

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<p>stormwater discharge. The proposed construction works, including dewatering and discharge of groundwater will be done in accordance with the the construction methodology and erosion and sediment control plan, which are both in accordance with GD05.</p> <p>Overall, it is considered that freshwater and sediment quality will be maintained.</p>
E1.2(2) Objective 2	<i>The mauri of freshwater is maintained or progressively improved over time to enable traditional and cultural use of this resource by Mana Whenua</i>	<p>There are no protected customary rights over Watercourses 1 and 2 which are the subject of this resource consent application.</p> <p>Stormwater discharge is to tributaries of the Pāremoremo Creek which connects to the Waitematā Harbour. The proposal does not result in the increase of any impervious areas or associated run-off and the proposed riprap will provide an improved situation with regards to erosion and scouring. Additionally, the proposed offset and compensation package will significantly improve the ecological values of other watercourses on site (which are also tributaries of the Pāremoremo Creek). In particular, compensation will afford improved habitat and fish passage for the native Longfin Eel (At-Risk declining) at watercourse 6.</p> <p>Overall, the proposal will maintain and progressively improve the mauri of freshwater which connects to the Waitematā Harbour.</p> <p>As identified in Volume 3 the proposal includes a comprehensive mitigation, offset and compensation package to be implemented via the EcMP and the LEIMP. Mana Whenua have been provided with the opportunity to be involved in appropriate plant and species selection.</p> <p>Corrections has actively considered the values, interests and recommendations identified in the Cultural Assessment report (including including the Ngaati Whanaunga report and the draft report prepared by</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<p>Te Rūnanga o Ngāti Whātua), and where appropriate and relevant, have sought to provide for them in the proposal as explained in Section 9.3 and Table 5 of Volume 1.</p> <p>Overall, the proposal is consistent with the recommendations identified in the Māori Consultation and Cultural Values Assessment report (Appendix 1F) and will provide opportunities for the recognition of the identified cultural values relating to the Restoration and Protection of Waterways.</p>
E1.3(2) Policy 2	<p><i>Manage discharges, subdivision, use, and development that affect freshwater systems to:</i></p> <p><i>(1) maintain or enhance water quality, flows, stream channels and their margins and other freshwater values, where the current condition is above National Policy Statement for Freshwater Management National Bottom Lines and the relevant Macroinvertebrate Community Index guideline in Table E1.3.1 below; or</i></p> <p><i>(2) enhance water quality, flows, stream channels and their margins and other freshwater values where the current condition is below national bottom lines or the relevant Macroinvertebrate Community Index guideline in Table E1.3.1 below.</i></p>	<p>The Ecological Assessment prepared by Boffa Miskell (Appendix 3B) includes Macroinvertebrate Community Index scores (MCI-sb) in assessing the watercourse values.</p> <p>In watercourse 1, the MCI-sb score is identified as 81.0 which is indicated of fair quality conditions. In watercourse 2, the MCI-sb score is identified as 75.67 which is indicative of poor-quality conditions. In comparison with the Auckland Council guidelines in Table 1.3.1, it is noted that both scores are below the guidelines identified for Rural areas.</p> <p>The Ecological Assessment also provides a MCI-sb score for watercourse 6 of 82.38 indicating fair quality conditions, but below the MCI guidelines for rural areas.</p> <p>The proposed watercourse works, including relocation of the existing stormwater discharge points in watercourses 1 and 2, will not result in any increase in impervious areas or changes in land use. The proposed pipes will have a similar flow rate as the existing situation and are designed to generally align with the watercourse channel where possible. Overall, the water quality is likely to be maintained at watercourses 1 and 2.</p>

The Auckland Unitary Plan (Operative in Part 2016)

Objectives and Policies		Comment										
	<p>Table E1.3.1 Macroinvertebrate Community Index guideline for Auckland rivers and streams</p> <table border="1" data-bbox="488 422 1066 582"> <thead> <tr> <th>Land use</th> <th>Macroinvertebrate Community Index guideline</th> </tr> </thead> <tbody> <tr> <td>Native forest</td> <td>123</td> </tr> <tr> <td>Exotic forest</td> <td>111</td> </tr> <tr> <td>Rural areas</td> <td>94</td> </tr> <tr> <td>Urban areas</td> <td>68</td> </tr> </tbody> </table> <p><i>(3) Require freshwater systems to be enhanced unless existing intensive land use and development has irreversibly modified them such that it practicably precludes enhancement.</i></p>	Land use	Macroinvertebrate Community Index guideline	Native forest	123	Exotic forest	111	Rural areas	94	Urban areas	68	<p>A comprehensive ecological offset and compensation package is proposed which includes:</p> <ul style="list-style-type: none"> • Watercourse offset planting (1.05 ha) around watercourse 6 • Watercourse compensation planting (1.6 ha) around watercourse 3, and upper reaches of watercourses 1 and 6 (northern tributary). • Wetland compensation planting (0.28 ha), around wetlands B and D. • Culvert improvement and upgrade works at Watercourse 6 to provide additional stream values and expanding the extent of the watercourse available for mobile aquatic biota (1,380 m of permanent stream and 1,959 m of intermittent stream); • Comprehensive weed and pest animal management programme for the new planted area (28 hectares) at Auckland Prison site. <p>It is considered that, subject to the implementation of the off-set and compensation measures, the proposal will enhance the wider freshwater systems on site and is considered consistent with Policy E3.2(2).</p>
Land use	Macroinvertebrate Community Index guideline											
Native forest	123											
Exotic forest	111											
Rural areas	94											
Urban areas	68											
E2 Water quantity, allocation and use												
E2.2(1) Objective 1	<p><i>Water in surface rivers and groundwater aquifers is available for use provided the natural values of water are maintained and established limits are not exceeded.</i></p>	<p>As set out in the Engineering Design Report, the proposed groundwater takes are not associated with any aquifer and will maintain baseflows within Watercourse 1 and 2.</p> <p>The proposal is consistent with Objective 1.</p>										

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
E2.2(2) Objective 2	<i>Water resources are managed within limits to meet current and future water needs for social, cultural and economic purposes.</i>	<p>The proposed groundwater dewatering take at Watercourse 1, exceeds the permitted threshold by 3m³ p/day with 8m³ p/day over a 25-day non-consecutive period proposed. At both Watercourses 1 and 2, the groundwater takes are associated with construction works which will occur Monday – Saturday and therefore the takes do not occur across a consecutive period (noting Watercourse 2 is proposed to occur for 20 non-consecutive days).</p> <p>The proposed groundwater takes are considered relatively small in scale (noting that dewatering at Watercourse 2 complies with take rates) and are temporary (only occurring for the duration of the pipe installation works). The takes are associated with surface groundwater and does not impact on any regional groundwater or aquifer and given the localised nature of the takes, there will be no impact on water levels in any surrounding waterbody.</p> <p>Overall, it is considered that the proposed dewatering takes will not impact on the ability provide for current and future water needs for social, cultural and economic purposes.</p> <p>The proposal is consistent with Objective 2.</p>
E2.2(3) Objective 3	<i>Freshwater resources available for use are managed and allocated in order of priority to provide for domestic and municipal water supplies, animals, and economic development.</i>	<p>Due to the localised and temporary nature of the proposed groundwater dewatering, and given the proposed dewatering maintains baseflows, the proposal does not impact on the availability of freshwater resources for domestic and municipal supply and animals.</p> <p>The proposal is consistent with Objective 3.</p>
E2.2(5) Objective 5	<i>Mana Whenua values including the mauri of water, are acknowledged in the allocation and use of water.</i>	<p>The quantity and methodology of groundwater takes ensure the mauri of water is acknowledged. The proposed dewatering is localised and temporary to align with the pipe installation. Baseflows of both</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<p>watercourses is maintained and the dewatering will not impact on water levels on any other waterbody. Groundwater will be discharged back into the watercourses</p> <p>The proposal is consistent with Objective 5.</p>
E2.3(13) Policy 13	<p><i>When considering any application the Council must have regard to the following matters:</i></p> <p>a) <i>the extent to which the change would adversely affect safeguarding the life-supporting capacity of fresh water and of any associated ecosystem; and</i></p> <p>b) <i>the extent to which it is feasible and dependable that any adverse effect on the life-supporting capacity of freshwater and of any associated ecosystem resulting from the change would be avoided.</i></p>	<p>As set out in the Engineering Design Report and Volume 3, given the localised nature of the groundwater takes, baseflows of the watercourses will be maintained and there will be no impacts on the water levels of near-by waterbodies. Additionally, the discharge of groundwater back into the stream will be done via erosion and sediment controls to minimise sediment discharge downstream.</p> <p>Overall, it is considered that the proposal will not adversely affect the life-supporting capacity of fresh water and any associated ecosystem.</p> <p>The proposal is consistent with Policy 13.</p>
E2.3(23) Policy 23	<p><i>Require proposals to divert groundwater, in addition to the matters addressed in Policy E2.3(6) and (7) above, to ensure that:</i></p> <p>a) <i>the proposal avoids, remedies or mitigates any adverse effects on:</i></p> <p>(i) <i>scheduled historic heritage places and scheduled sites and places of significance to Mana Whenua; and</i></p> <p>(ii) <i>people and communities.</i></p> <p>b) <i>the groundwater diversion does not cause or exacerbate any flooding;</i></p> <p>c) <i>monitoring has been incorporated where appropriate, including:</i></p>	<p>Policy 6 relates to surface water and therefore is not considered relevant. Policy 7 relates to groundwater aquifers and therefore is not considered relevant.</p> <p>The proposed surface water groundwater takes are not in proximity to any scheduled historic heritage places and schedules sites or places of significance to Mana Whenua and therefore adverse effects are avoided.</p> <p>The proposed groundwater takes are localised and temporary in nature, baseflows will be maintained and the proposal does not impact water levels on other waterbodies. Additionally, the dewatering will be undertaken in accordance with the proposed ESCP and construction methodology to minimise sediment discharge into the watercourses.</p> <p>Overall, it is considered that adverse effects on people and</p>

The Auckland Unitary Plan (Operative in Part 2016)

The Auckland Unitary Plan (Operative in Part 2016)	
Objectives and Policies	Comment
<p>(i) <i>measurement and recording of water levels and pressures; and</i></p> <p>(ii) <i>measurement and recording of the movement of ground, buildings and other structures.</i></p> <p>d) <i>mitigation has been incorporated where appropriate including:</i></p> <p>(i) <i>minimising the period where the excavation is open/unsealed;</i></p> <p>(ii) <i>use of low permeability perimeter walls and floors;</i></p> <p>(iii) <i>use of temporary and permanent systems to retain the excavation; or</i></p> <p>(iv) <i>re-injection of water to maintain groundwater pressures.</i></p>	<p>communities are sufficient mitigated as the proposal will not impact on water availability or quality.</p> <p>As set out in the Engineering Design Report, overall, the project as a whole will have a negligible effect on flooding. As set out in section 5.3 of the Engineering Design Report, the proposed dewatering will be discharged into diversion channels which will be constructed to convey the 5% AEP peak flows with provision for overflows for up to the 100 year ARI event. The proposed takes will not impact water levels in any other waterbody. Overall, the takes will not cause or exacerbate any flooding.</p> <p>Given the localised and temporary nature of the water take, monitoring is not considered necessary.</p> <p>The water take will be undertaken in accordance with the construction methodology and ESCP. As set out in the Engineering Design report, areas of excavation are limited to 8m lengths and are to be stabilised at the completion of each length / stage.</p> <p>Sandbag offer dams, diversion channels and silt sock 'turkeys nests' are proposed as the main mechanisms for undertaking the works. As above, the excavation will be undertaken in 8m lengths, and earthworked over and stabilised at the completion of each length.</p> <p>Given the localised nature of the groundwater take, there will be no impact on groundwater pressure.</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
E3 Lakes, rivers, streams and wetlands		
E3.2(2) Objective 2	<i>Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced.</i>	<p>The proposal results in the loss of 124m of watercourse 1 and 114m of watercourse 2. A comprehensive ecological offset and compensation package is proposed which includes:</p> <ul style="list-style-type: none"> • Watercourse offset planting (1.05 ha) around watercourse 6 • Watercourse compensation planting (1.6 ha) around watercourse 3, and upper reaches of watercourses 1 and 6 (northern tributary). • Wetland compensation planting (0.28 ha), around wetlands B and D. • Culvert improvement and upgrade works at Watercourse 6 to provide additional stream values and expanding the extent of the watercourse available for mobile aquatic biota (1,380 m of permanent stream and 1,959 m of intermittent stream); • Comprehensive weed and pest animal management programme for the new planted area (28 hectares) at Auckland Prison site. <p>Overall, it is considered that the proposal is consistent with Objective 2.</p>
E3.2(4) Objective 4	<i>Structures in, on, under or over the bed of a lake, river, stream or wetland are provided for where there are functional or operational needs for the structure to be in that location, or traverse that area.</i>	Section 6.3.4.2 sets out the functional need for the reclamation of watercourses 1 and 2 as proposed.

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
E3.2(5) Objective 5	<i>Activities in, on, under or over the bed of a lake, river, stream and wetland are managed to minimise adverse effects on the lake, river, stream or wetland.</i>	The Ecological Assessment prepared by Boffa Miskell (Appendix 3B) provides a detailed overview of how the effects management hierarchy has been addressed in the application. In summary:
E3.3(2) Policy 2	<p><i>Manage the effects of activities in, on, under or over the beds of lakes, rivers, streams or wetlands outside the overlays identified in Policy E3.3(1) by:</i></p> <p><i>(a) avoiding where practicable or otherwise remedying or mitigating any adverse effects on lakes, rivers, streams or wetlands; and</i></p> <p><i>(b) where appropriate, restoring and enhancing the lake, river, stream or wetland.</i></p>	<p><u>Avoidance:</u></p> <p>Future development Areas A and B have been selected to avoid as much as possible wetlands, watercourses and other significant features (such as the ONL). The proposed reclamation of 124m of watercourse 1 and 114m of watercourse 2 is the minimum required to ensure prison security is not compromised.</p> <p><u>Minimise:</u></p> <p>To minimise disturbance of the watercourse works, an Ecological Management Plan is proposed which includes timing of vegetation clearance (to minimise disturbance to bird nesting); tree felling protocols for potential roost trees for bats; erosion and sediment control measures and a construction management plan which aligns with GD05.</p> <p><u>Remedy:</u></p> <p>Where effects cannot be mitigated they are proposed to be remedied through the Native Fish Capture and Relocation Plan and the salvage and relocation of lizards in accordance with the Lizard Management Plan.</p> <p><u>Offset:</u></p> <p>Watercourse offset planting (1.05 ha) around watercourse 6 is proposed to offset the loss of Watercourses 1 and 2.</p> <p><u>Compensation:</u></p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<ul style="list-style-type: none"> • Watercourse compensation planting (1.6 ha) around watercourse 3, and upper reaches of watercourses 1 and 6 (northern tributary). • Wetland compensation planting (0.28 ha), around wetlands B and D. • Culvert improvement and upgrade works at Watercourse 6 to provide additional stream values and expanding the extent of the watercourse available for mobile aquatic biota (1,380 m of permanent stream and 1,959 m of intermittent stream); • Comprehensive weed and pest animal management programme for the new planted area (28 hectares) at Auckland Prison site. <p>Overall, the proposal is considered consistent with Objective 2 and Policy 2.</p>
E3.3(3) Policy 3	<i>Enable the enhancement, maintenance and restoration of lakes, rivers, streams or wetlands.</i>	<p>As set out above, the proposed offset and compensation measures will provide for the enhancement, maintenance and restoration of watercourses 3 and 6.</p> <p>The proposal is considered consistent with Policy 3.</p>
E3.3(5) Policy 5	<p><i>Avoid significant adverse effects, and avoid, remedy or mitigate other adverse effects of activities in, on, under or over the beds of lakes, rivers, streams or wetlands on:</i></p> <p>(a) <i>the mauri of the freshwater environment; and</i></p> <p>(b) <i>Mana Whenua values in relation to the freshwater environment.</i></p>	<p>The proposal does not result in the increase of any impervious areas or associated run-off and the proposed riprap will provide an improved situation with regards to erosion and scouring. Additionally, the proposed offset and compensation package will significantly improve the ecological values of other watercourses on site (which are also tributaries of the Pāremoremo Creek). In particular, compensation will afford improved habitat and fish passage for the native Longfin Eel (At-Risk declining) at watercourse 6.</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<p>Overall, the proposal will maintain and progressively improve the mauri of freshwater which connects to the Waitematā Harbour.</p> <p>The proposal includes a comprehensive mitigation, offset and compensation package to be implemented via the EcMP and the LEIMP. Mana Whenua have been provided with an opportunity to be involved in appropriate plant and species selection.</p> <p>Corrections has actively considered the values, interests and recommendations identified in the Cultural Assessment report (including including the Ngaati Whanaunga report and the draft report prepared by Te Rūnanga o Ngāti Whātua), and where appropriate and relevant, have sought to provide for them in the proposal as explained Section 9.3 and Table 5 of Volume 1.</p> <p>Overall, the proposal is consistent with the recommendations in the Māori Consultation and Cultural Values Assessment report (Appendix 1F) and will provide opportunities for the recognition of the identified cultural values relating to the Restoration and Protection of Waterways.</p>
E3.3(7) Policy 7	<p><i>Provide for the operation, use, maintenance, repair, erection, reconstruction, placement, alteration or extension, of any structure or part of any structure in, on, under, or over the bed of a lake, river, stream or wetland, and any associated diversion of water, where the structure complies with all of the following:</i></p> <p><i>(a) there is no practicable alternative method or location for undertaking the activity outside the bed of the lake, river, stream or wetland;</i></p> <p><i>(b) the structure is designed to be the minimum size necessary for its purpose to minimise modification to the bed of a lake, river, stream or wetland;</i></p>	<p>Section 6.3.4.2 of Volume 3 sets out the functional need for the reclamation of watercourses 1 and 2 as proposed.</p> <p>As set out in the Engineering Design Report, the proposed pipes have been sized and designed to accommodate the 100 year ARI event and 10 year ARI event (with improved conveyance at reinstated ground level). The proposed pipes are found to have sufficient capacity to accommodate existing and future development (with upgrades required to the wider stormwater management system following confirmation of design) and will have less than minor adverse effects of flooding both upstream and downstream, and on and off site.</p>

The Auckland Unitary Plan (Operative in Part 2016)

The Auckland Unitary Plan (Operative in Part 2016)	
Objectives and Policies	Comment
<p>(c) <i>the structure is designed to avoid creating or increasing a hazard;</i></p> <p>(d) <i>the structure is for any of the following:</i></p> <ul style="list-style-type: none"> (i) <i>required as part of an activity designed to restore or enhance the natural values of any lakes, rivers, streams or wetlands and their margins, or any adjacent area of indigenous vegetation or habitat of indigenous fauna;</i> (ii) <i>designed to maintain and/or enhance public access to, over and along any lake, river, stream or wetland and their margins;</i> (iii) <i>necessary to provide access across a lake, river, stream or wetland;</i> (iv) <i>associated with infrastructure;</i> (v) <i>necessary for flood protection and the safeguarding of public health and safety; or</i> (vi) <i>required for the reasonable use of production land.</i> <p>(e) <i>the structure avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on Mana Whenua values associated with freshwater resources, including wāhi tapu, wāhi taonga and mahinga kai.</i></p>	<p>The pipes form part of the existing on-site stormwater management infrastructure at the Auckland Prison.</p>
<p>E3.3(11) Policy 11</p>	<p><i>Encourage the planting of plants that are native to the area.</i></p> <p>Planting associated with the ecological offset and compensation package will be predominantly native except for exotics where required to be fast growing species to provide visual screening, as set out in the LMEEP and LEIMP.</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
E3.3(12) Policy 12	<i>Encourage the incorporation of Mana Whenua mātauranga, values and tikanga in any planting in, on, or under the bed of a lake, river, stream or wetland.</i>	<p>The proposal includes a comprehensive mitigation, offset and compensation package to be implemented via the EcMP and the LEIMP. Mana Whenua have been provided with opportunities to be involved in appropriate plant and species selection.</p> <p>Corrections has actively considered the values, interests and recommendations identified in the Cultural Assessment report (including including the Ngaati Whanaunga report and the draft report prepared by Te Rūnanga o Ngāti Whātua), and where appropriate and relevant, have sought to provide for them in the proposal as explained in Section 9.3 and Table 5 of Volume 1.</p> <p>Overall, the proposal is consistent with the recommendations in the Māori Consultation and Cultural Values Assessment report and will provide opportunities for the recognition of the identified shared cultural values and interests summarised in volume 3.</p>
E11 Land disturbance - Regional		
E11.2(1) Objective 1	<i>Land disturbance is undertaken in a manner that protects the safety of people and avoids, remedies or mitigates adverse effects on the environment.</i>	<p>The Engineering Design Report sets out the indicative construction methodology which includes undertaken excavations for installing the pipes in 8m segments to minimise disturbance to the watercourses and minimise erosion and sediment run-off. The construction methodology and proposed erosion and sediment control plan are designed in accordance with GD05.</p> <p>Overall, the proposal is considered consistent with Objective 1.</p>
E11.3(1) Policy 1	<i>Avoid where practicable, and otherwise mitigate, or where appropriate, remedy adverse effects on areas where there are natural and physical resources that have been scheduled in the Plan</i>	<p>There are no scheduled historic heritage places within the Site. While there is a recorded archaeological site within the Site (R10/831), it is not included in the Historic Heritage Schedule in the AUP and the watercourse works are situated a significant distance from that site. The</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
	<i>in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character.</i>	proposed watercourse works are outside the ONL, SEA and coastal environment.
E11.3(2) Policy 2	<p><i>Manage land disturbance to:</i></p> <p>(a) <i>retain soil and sediment on the land by the use of best practicable options for sediment and erosion control appropriate to the nature and scale of the activity;</i></p> <p>(b) <i>manage the amount of land being disturbed at any one time, particularly where the soil type, topography and location is likely to result in increased sediment runoff or discharge;</i></p> <p>(c) <i>avoid, remedy or mitigate adverse effects on accidentally discovered sensitive material; and</i></p> <p>(d) <i>maintain the cultural and spiritual values of Mana Whenua in terms of land and water quality, preservation of wāhi tapu, and kaimoana gathering.</i></p>	<p>The Engineering Design Report sets out the indicative construction methodology which includes undertaken excavations for installing the pipes in 8m segments to minimise disturbance to the watercourses and minimise erosion and sediment run-off. The construction methodology and proposed erosion and sediment control plan (Appendix 3G) are designed in accordance with GD05.</p> <p>An archaeological authority is being sought which will apply to the watercourse works (Volume 5).</p> <p>It is noted that there are no protected customary rights over Watercourses 1 and 2 which are the subject of this resource consent application.</p> <p>Corrections has actively considered the values, interests and recommendations identified in the Cultural Assessment report (including including the Ngaati Whanaunga report and the draft report prepared by Te Rūnanga o Ngāti Whātua), and where appropriate and relevant, have sought to provide for them in the proposal as explained in Section 9.3 and Table 5 of Volume 1.</p>
E11.3(3) Policy 3	<p><i>Manage the impact on Mana Whenua cultural heritage that is discovered undertaking land disturbance by:</i></p> <p>(a) <i>requiring a protocol for the accidental discovery of kōiwi, archaeology and artefacts of Māori origin;</i></p> <p>(b) <i>undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and</i></p>	<p>An archaeological assessment has been prepared to inform the proposal. The findings of the initial archaeological assessment work have assisted with informing the delineation of Areas A and B so that they are focussed on areas in the Site that have previously been modified (and are therefore unlikely to reveal any further archaeological sites).</p> <p>An Authority is being sought as part of this substantive application.</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
	<i>(c) undertaking appropriate measures to avoid adverse effects. Where adverse effects cannot be avoided, effects are remedied or mitigated.</i>	The Māori Consultation and Cultural Values Assessment report sets out recommendations including continued engagement with four Mana Whenua in the Auckland Prison project, enabling the role of kaitiaki in Management Plans, participation in the protection of archaeological / cultural sites. The proposed watercourse works are not within the vicinity of the identified archaeological site R10/831, and the designation alternation includes a proposed designation condition with specific protocols for accidental discovery and protocols for consulting with tangata whenua.
E11.3(4) Policy 4	<i>Enable land disturbance necessary for a range of activities undertaken to provide for people and communities social, economic and cultural well-being, and their health and safety.</i>	The proposed watercourse works and associated earthworks are necessary to enable an increase in capacity at Auckland Prison. The proposal to increase capacity at Auckland Prison is central to Corrections statutory obligations under the Corrections Act 2004 and accompanying Corrections Regulations 2005 to deliver and maintain a Corrections system that improves public safety, and contributes to the maintenance of a just society. Overall, it is considered the proposal is consistent with Policy 4.
E15 Vegetation management and biodiversity		
E15.2(1) Objective 1	<i>Ecosystem services and indigenous biological diversity values, particularly in sensitive environments, and areas of contiguous indigenous vegetation cover, are maintained or enhanced while providing for appropriate subdivision, use and development.</i>	The proposal results in the removal of 3,945m ² of riparian vegetation surrounding Watercourse 1 and approximately 2179m ² of vegetation surrounding Watercourse 2. It is considered that the proposed ecological offsetting and ecological compensation planting (described below) will contribute to enhancing vegetation cover, in particular for watercourses 1, 3 and 6. Overall, the proposed is considered consistent with Objective 1.

The Auckland Unitary Plan (Operative in Part 2016)

Objectives and Policies		Comment
<p>E15.2(2) Objective 2</p>	<p><i>Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring.</i></p>	<p>A comprehensive ecological offset and compensation package is proposed which includes:</p> <ul style="list-style-type: none"> • Watercourse offset planting (1.05 ha) around watercourse 6 • Watercourse compensation planting (1.6 ha) around watercourse 3, and upper reaches of watercourses 1 and 6 (northern tributary). • Wetland compensation planting (0.28 ha), around wetlands B and D. • Culvert improvement and upgrade works at Watercourse 6 to provide additional stream values and expanding the extent of the watercourse available for mobile aquatic biota (1,380 m of permanent stream and 1,959 m of intermittent stream); • Comprehensive weed and pest animal management programme for the new planted area (28 hectares) at Auckland Prison site. <p>Overall approximately 28ha of planting is proposed as part of the designation alteration (in accordance with the LMEEP and LEIMP) which integrates the above ecological planting. This planning will contribute to improving ecological connectivity and enhance ecological values at the site.</p> <p>Overall, the proposal is considered consistent with Objective 2.</p>
<p>E15.3(1) Policy 1</p>	<p><i>Protect areas of contiguous indigenous vegetation cover and vegetation in sensitive environments including the coastal environment, riparian margins, wetlands, and areas prone to natural hazards.</i></p>	<p>The proposal involves the removal of 3,945m² of riparian vegetation surrounding watercourse 1 and 2,179m² of vegetation surrounding watercourse 2.</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<p>Section 6.3.4.2 of Volume 3 sets out the functional need for the watercourse works. Accordingly, the location of the reclamation works and associated vegetation removal cannot be avoided. However, the location of Area A was selected to avoid as much as possible wetlands, watercourses and other significant features (such as the ONL). The proposed vegetation removal is the minimum required to ensure prison security is not compromised.</p> <p>Additionally, the proposal involves a comprehensive landscape mitigation and ecological offset and compensation package which includes extensive replanting, including around watercourses and wetlands on site. The proposed replanting will contribute to enhancing and restoring ecological values associated with those waterbodies and ensure that adverse ecological effects will be less than minor.</p>
E15.3(2) Policy 2	<p><i>Manage the effects of activities to avoid significant adverse effects on biodiversity values as far as practicable, minimise significant adverse effects where avoidance is not practicable, and avoid, remedy or mitigate any other adverse effects on indigenous biological diversity and ecosystem services, including soil conservation, water quality and quantity management, and the mitigation of natural hazards</i></p>	<p>The Ecological Assessment prepared by Boffa Miskell (Appendix 3B) provides a detailed overview of how the effects management hierarchy has been addressed in the application. In summary:</p> <p><u>Avoidance:</u></p> <p>Future development Areas A and B have been selected to avoid as much as possible wetlands, watercourses and other significant features (such as the ONL). The proposed reclamation of 124m of watercourse 1 and 114m of watercourse 2 is the minimum required to ensure prison security is not compromised.</p> <p><u>Minimise:</u></p> <p>To minimise disturbance of the watercourse works, an Ecological Management Plan is proposed which includes timing of vegetation clearance (to minimise disturbance to bird nesting); tree felling protocols for potential roost trees for bats; erosion and sediment control</p>

The Auckland Unitary Plan (Operative in Part 2016)

Objectives and Policies		Comment
		<p>measures and a construction management plan which aligns with GD05.</p> <p><u>Remedy:</u></p> <p>Where effects cannot be mitigated they are proposed to be remedied through the Native Fish Capture and Relocation Plan and the salvage and relocation of lizards in accordance with the Lizard Management Plan.</p> <p><u>Offset:</u></p> <ul style="list-style-type: none"> • Watercourse offset planting (1.05 ha) around watercourse 6 is proposed to offset the loss of Watercourses. <p><u>Compensation:</u></p> <ul style="list-style-type: none"> • Watercourse compensation planting (1.6 ha) around watercourse 3, and upper reaches of watercourses 1 and 6 (northern tributary). • Wetland compensation planting (0.28 ha), around wetlands B and D. • Culvert improvement and upgrade works at Watercourse 6 to provide additional stream values and expanding the extent of the watercourse available for mobile aquatic biota (1,380 m of permanent stream and 1,959 m of intermittent stream); • Comprehensive weed and pest animal management programme for the new planted area (28 hectares) at Auckland Prison site. <p>With regards to natural hazards, it is noted in the Engineering Design Report (Appendix 3G) that climate change has been accounted for in the sizing and design of pipes and that the proposed pipes are of</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
		<p>sufficient size to accommodate the 100 year ARI event (watercourse 1) and the 10 year ARI, with improved conveyance of the 100 year event at ground level (watercourse 2). Overall, the Engineering Design Report finds that the proposal will have less than minor adverse effects on flooding.</p> <p>Overall, the proposal is considered consistent with Policy 2.</p>
E15.3(10) Policy 10	<p><i>Avoid (while giving effect to Policy E15(9) above) activities in the coastal environment which result in significant adverse effects, and avoid, remedy or mitigate other adverse effects of activities, on:</i></p> <ul style="list-style-type: none"> <i>(a) areas of predominantly indigenous vegetation;</i> <i>(b) habitats that are important during the vulnerable life stages of indigenous species;</i> <i>(c) indigenous ecosystems and habitats that are found only in the coastal environment and are particularly vulnerable to modification, including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass and saltmarsh;</i> <i>(d) habitats of indigenous species that are important for recreational, commercial, traditional or cultural purposes including fish spawning, pupping and nursery areas;</i> <i>(e) habitats, including areas and routes, important to migratory species;</i> <i>(f) ecological corridors, and areas important for linking or maintaining biological values; or</i> 	<p>All stormwater discharges to the Pāremoremo Creek, which connects to the Waitematā Harbour. The proposed erosion and sediment control plan and construction methodology have been designed in accordance with GD05 and will minimise the risk of sediment laden water entering the watercourses. The proposal does not result in any increase in impervious areas and water quality is expected to be maintained.</p> <p>Overall, it is considered that the proposal is consistent with Policy 10.</p>

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
	(g) <i>water quality such that the natural ecological functioning of the area is adversely affected.</i>	
E30 Contaminated land		
E30.2 Objective 1	<i>The discharge of contaminants from contaminated land into air, or into water, or onto or into land are managed to protect the environment and human health and to enable land to be used for suitable activities now and in the future.</i>	<p>The Detailed Site Investigation prepared by Aurecon and provided in Appendix 3M informs the proposed works involving piping and reclamation of Watercourses 1 and 2 including the associated vegetation clearance. As discussed in section 2.6, while a watercourse is not an identified HAIL activity, PCOC can arise in sediment / soil and water from surrounding land uses.</p> <p>As mentioned in section 4.3, the DSI has established a 'complete' SPR linkage for Watercourse 1 for asbestos and heavy metal analyte lead. The soil analytical results for asbestos was detected above the human health criteria and lead analyte above the Auckland background soil concentration and environmental criteria.</p> <p>An ECMP has been prepared to support the watercourse works (Appendix 3H). The ECMP details the soil/water handling and disposal requirements based on the findings of the DSI, any health and safety and mitigation controls, including protocol for 'trace asbestos contamination' and 'unexpected contamination discovery'.</p> <p>The ECMP also sets out the parameters for testing of imported material intended for reinstating ground is required to determine suitability for use. This includes testing of any material from the wider Auckland Prison Site intended for use in the reclamation works.</p> <p>The management strategies are set out in Table 2 of Appendix 3H and summarised in section 5.7 of Volume 3.</p>
E30.3 Policy 2	<p>2. <i>Require any use or development of land containing elevated levels of contaminants resulting in discharges to air, land or water to manage or remediate the contamination to a level that:</i></p> <p>(a) <i>allows contaminants to remain in the ground/groundwater, where it can be demonstrated that the level of residual contamination is not reasonably likely to pose a significant adverse effect on human health or the environment; and</i></p> <p>(b) <i>avoids adverse effects on potable water supplies; and</i></p> <p>(c) <i>avoids, remedies or mitigates significant adverse effects on ecological values, water quality, human health and amenity values; while</i></p> <p><i>taking into account all of the following:</i></p> <p>(d) <i>the physical constraints of the site and operational practicalities;</i></p>	

The Auckland Unitary Plan (Operative in Part 2016)		
Objectives and Policies		Comment
	<p>(e) <i>the financial implications of the investigation, remediation, management and monitoring options;</i></p> <p>(f) <i>the use of best practice contaminated land management, including the preparation and consideration of preliminary and detailed site investigations, remedial action plans, site validation reports and site management plans for the identification, monitoring and remediation of contaminated land; and</i></p> <p>(g) <i>whether adequate measures are in place for the transport, disposal and tracking of contaminated soil and other contaminated material removed from a site to prevent adverse effects on the environment.</i></p>	<p>Proposed conditions LUC11 and DIS14 requires works to be undertaken in accordance with the ECMP.</p> <p>Overall, the proposed is consistent with Objective 1 and Policy 2.</p>