

8 October 2026

Expert Panel

Attn: Environmental Protection Authority (Maggie Burns)

Via email: [REDACTED]

Dear Maggie,

Auckland Surf Park Community Stage 2 – Response to Minute 3 of the Expert Panel (FTAA-2606-1246)

We refer to the Auckland Surf Park Community Stage 2 Expert Panel's request, dated 24 September 2026, for further information from AW Holdings 2021 Limited under s67 of the Fast-track Approvals Act.

Our response to the further information request is set out below.

- (1) Please explain the intended purpose and associated future development framework (if the lots are not intended for FUZ-zone uses) for the vacant subdivision lots east of the proposed Data Centre, and provide an assessment of that in terms of potential environmental effects and the plan framework.**

As explained at the overview conference, earlier iterations of the Masterplan contemplated small-scale surf-related industrial and workshop activities in this location. Those activities were subsequently excluded from the application following the EPA's determination that they were out-of-scope. The Applicant's intended use of the allotments within the current proposal is therefore storage supporting the surf park and data centre campus, rather than the broader activities previously contemplated. The assessment below is provided as an addendum to the lodged Assessment of Environmental Effects.

Land-use consent is sought under Rule H18.4.1(A42) of the Auckland Unitary Plan (AUP) for storage facilities within the Stage 5 – Vacant Lot Subdivision Precinct, as a discretionary activity. The intended use is storage of equipment, materials and supplies associated with the operation and maintenance of the surf park and data centre campus. Any storage buildings included in the proposal would also fall under Rule H18.4.1(A2), which adopts the activity status and standards of the activity they accommodate.

The location of the precinct is considered appropriate for storage activities given its proximity to the data centre campus and adjoining North Shore Aerodrome. This arrangement provides a logical grouping of compatible activities within the Masterplan, with residential activities concentrated around the Surf Lagoon and stream amenities. The proposed storage use is also compatible with the future industrial land-use pattern anticipated by the Silverdale West Dairy Flat Industrial Area Structure Plan.

Operational noise would be required to comply with the applicable AUP standards. Subject to compliance with these standards, the storage activities are considered capable of being accommodated without adversely affecting the amenity of surrounding residential activities or the operation of the aerodrome.

The relevant Future Urban Zone provisions seek to maintain rural character and amenity and avoid subdivision, use and development that compromises future urbanisation, infrastructure provision or the transport network. This includes Objectives H18.2(3)–(4) and Policies H18.3(3), (4) and (6). While the proposed storage use is not rural in character, it forms part of a comprehensively planned development and supports the principal activities on the site. Its location and defined scope are considered compatible with the anticipated future industrial use of this part of the site, rather than creating an unrelated or unconstrained development opportunity.

Overall, the proposed storage use is considered appropriate in this location and would not compromise the wider development framework. Any future activities or buildings outside the expressly approved scope would remain subject to the applicable AUP provisions and any necessary further resource consent.

- (2) Please provide additional analysis of the requirements that would apply to the north-western residential area in terms of what parameters would be "fixed" through the proposed consent, and what would be "flexible" but subject to third-party certification (for example, could a lot purchaser seek to exceed the applicable building height limit as part of the certification process?)
- (3) Please provide additional analysis of the proposed residential lot development requirements in terms of what items or matters relate to the Council's statutory monitoring obligations, and what matters are purely related to the developer's / private design preferences or vision for the development.
- (4) Please provide comment as to the extent to which thought or discussion has taken place to date regarding whether there is a preference for the currently proposed 'Residential Development Controls' (set through conditions of consent to ensure compliance with key bulk and location minimum standards), or have options been considered where reliance could be predominantly placed upon compliance with AUP Zone standards / development controls (which could similarly be referenced through consent conditions to ensure compliance)?

In response to the Panel's queries regarding the Residential Development Controls, the Applicant acknowledges the feedback received and will undertake a comprehensive review of the controls to address both the Panel's queries and Auckland Council's comments. The revised controls and associated consent conditions will be provided as part of the Applicant's response to comments. This consolidated revision will clearly distinguish the fixed development parameters from matters subject to design flexibility, and Council's compliance-monitoring role from the developer's private design-review requirements.

- (5) Please explain the development strategy and envisaged development path for the commercial centre in terms of the roll out and timing of commercial GFA relative to the establishment of the new residential neighbourhood. Please include the following in the response:
 - (a) identify the extent to which and timeframe over which new residents within the neighbourhood are likely to need to visit other existing commercial centres to meet their daily needs?
 - (b) would the commercial centre include activities that could draw in customers from beyond the neighbourhood such as for example a supermarket?
 - (c) is the developer planning to subsidise or incentivise initial commercial operators (i.e. a cafe or corner shop) in the earliest stages of development when the residential population will be lowest?

The Village Centre forms an integral part of the Auckland Surf Park Community and is intended to serve residents, surf park visitors, employees and accommodation guests. Its development strategy differs from a conventional residential subdivision, where commercial viability is typically dependent on achieving sufficient residential occupation. The Surf Lagoon provides a destination attraction and customer base from opening, supporting the early establishment of hospitality and complementary commercial activities rather than relying solely on residential numbers.

Initial hospitality facilities associated with the Surf Lagoon and Amenity Precinct are envisaged to operate from the opening of the Surf Lagoon, with the Village Centre Precinct progressively developed alongside the residential neighbourhoods in response to combined resident and visitor demand and tenant uptake. With reference to the Development Timeline included as Appendix 66 of the lodged application, the Village Centre Precinct is anticipated to be completed by the end of 2030.

During the early stages, residents would continue to visit existing commercial centres for groceries and services not yet available on site. This reliance is expected to reduce as the market and associated convenience services become operational, which may occur before completion of the wider Village Centre Precinct. The timing of these individual activities has not yet been confirmed and will depend on construction sequencing and tenant uptake. Once established, they would enable residents to meet a proportion of their daily needs within the development, although travel elsewhere for higher-order shopping and specialist services would continue.

The Village Centre Precinct is also intended to attract customers from beyond the neighbourhood through hospitality, surf-related retail and destination health and wellness activities. The proposed market will provide a grocery function, enabling residents to meet a proportion of their day-to-day shopping needs within the development while also serving visitors and the wider community.

The Applicant is not proposing to subsidise or financially incentivise initial commercial operators. The early commercial strategy is instead based on the customer demand generated by the Surf Lagoon and associated activities, supplemented by the increasing residential population.

- (6) Please identify the likely generation of school students within the development and the closest primary and secondary school options available, and provide an assessment of how students will access at least those facilities.**

Please refer to the Urban Design Memorandum included as **Attachment 1** of this response.

- (7) Please explain what consultation (if any) has occurred in terms of the timing and nature of local passenger transport services within the development (other than a potential future RTS service) to meet the needs of the new community and in particular school-related travel.**

As part of Stage 1, the Applicant proposed improvements to passenger transport infrastructure on Dairy Flat Highway near the site, which were developed through engagement with Auckland Transport (AT). These improvements are secured through the Stage 1 conditions, which remain applicable to this application.

The existing bus stop on Dairy Flat Highway serves southbound travel only and is located on the road shoulder, without a connecting footpath. The consented upgrades comprise a pair of bus stops, a pedestrian crossing between them and footpath connections to the development (refer to Condition 69 of **Appendix 60**). These improvements will provide safer and more convenient access to existing

passenger transport services and enable return journeys by bus. They will also support school-related travel where the available routes and timetables provide suitable connections.

AT does not currently operate weekend bus services at this location. To address this gap, the consented Stage 1 proposal includes a private weekend shuttle service between the site and Hibiscus Coast Bus Station in Silverdale for visitors and staff. The shuttle will operate in perpetuity unless otherwise agreed with Auckland Council (refer to Condition 89 of **Appendix 60**). It is anticipated that any agreement to discontinue the shuttle would coincide with AT introducing a suitable weekend service. The timing and provision of public bus services remain matters for AT.

- (8) (Section 8.2.3 of AEE) - Are these total volumes / truck movements for the full development as a whole, or are these 'Stage 2' volumes / truck movement numbers (e.g. separate from / additional to those already considered under the Stage 1 approval / decision)? It was clear during the site visit that enabling earthworks for Stage 1 are well underway.

The earthworks volumes in section 8.2.3 of the AEE represent the revised totals for the development as a whole, including the Stage 1 consented area and the Stage 2 components. They are not additional quantities to be added to those authorised under Stage 1.

The figures were presented on a site-wide basis to provide a consolidated assessment, as the proposed earthworks levels are interdependent across the site. This includes variations within the Stage 1 consented area to accommodate the new wave lagoon configuration, associated design changes and the Stage 2 components of the proposal.

Table 1 compares the Stage 1 consented earthworks with the revised whole-of-development totals sought through this application. The final column identifies the net change from the Stage 1 approval.

Table 1: Earthworks Breakdown between Stage 1 and Stage 2 Applications.

Earthworks	Stage 1 Consented	Revised whole-of-development under this Application	Net change from Stage 1
Cut Volume	197,771m ³	275,922m ³	+78,151m ³
Fill Volume	109,768m ³	282,546m ³	+172,778m ³
Area	32.87ha	50.48ha	+17.61ha
Associated Truck Movements	2,657	1,215	-1,442

- (9) (Section 8.2.5) - Please clarify the relationship between the proposed water take volumes and the water needs for the data centre/s. Does the proposed water take intend to account for 100% of the water supply needs for the proposed data centre/s? Is there any understanding/ detail that can be provided with regard to the battery cooling method/s which would be used within the data centre/s (e.g. are they intended to be water-cooled)? Is there an understanding of the potential water demand specific

to the data centre/s, which can be considered alongside / as a component of the total proposed water demand to serve the wider site development and activities?

The water-demand assumptions adopted for the data centre campus are based on the operational requirements provided by the operator. The proposed cooling arrangement for Data Centre 2 is consistent with that assessed and approved for Data Centre 1 under the Stage 1 consent.

The data centre and Surf Lagoon will operate as two separate water circuits connected through a heat exchanger. Waste heat generated by the data centre, at approximately 30°C to 40°C, will be transferred from the data centre's cooling circuit to the lagoon's water-treatment system, warming the lagoon and supporting year-round operation. The lagoon, in turn, provides a heat sink for data centre cooling. The two water streams do not mix, and water within the data centre cooling circuit is recirculated rather than discharged.

Accordingly, the proposed arrangement does not rely on conventional evaporative cooling towers and does not require cooling-tower make-up water or generate cooling-tower blowdown. Water requirements will include the initial filling of the cooling circuit only.

The data centre cooling circuit will require an initial fill of approximately 5,000 m³, which has been accounted for in the proposed water-demand calculations and will be supplied via the groundwater take. Filling will occur progressively at a rate that accommodates the water requirements of the wider development and remains within the available supply and treatment capacity. If required, the groundwater supply can be supplemented by water delivered by tanker to support filling.

This is a one-off commissioning requirement rather than an ongoing operational demand. Once filled, the closed-loop circuit will recirculate water without evaporative losses, so no ongoing make-up water will be required for evaporation. If the circuit is drained for maintenance, refilling would be managed on the same basis.

- (10) Is it intended that the power generation from the solar farm will meet the full power needs of the various activities / uses proposed through the Stage 2 application, including the full power supply needs for the data centre/s? If the AT designation was to proceed over time into a project - is there an understanding of how much of the proposed solar farm / power generation may be lost to make way for the RTN? How would it be intended / proposed to make-up this 'shortfall' in power supply in order to continue to meet the ongoing power needs of the various other activities and the data centre/s?**

The proposed solar farm is not intended to meet the full electricity requirements of the Stage 2 development, including the data centre campus. Rather, it would provide a supplementary source of renewable generation alongside grid supply. The development's electricity supply strategy therefore does not rely on the solar farm meeting all operational demand.

The solar farm has been purposefully located within the New Zealand Transport Agency (NZTA) Rapid Transit Network (RTN) designation corridor to make productive use of land that would otherwise be sterilised pending delivery of the transport project. Solar panels typically have an operational lifespan of 25–30 years, broadly aligning with the anticipated longer-term delivery of the RTN, with construction currently expected to commence around 2048. The solar farm therefore provides an appropriate interim use of the land, with the panels and associated structures capable of being removed or relocated to accommodate construction of the RTN.

Notwithstanding this, opportunities to retain or replace renewable generation may include rooftop solar installations, additional land acquisition for solar generation, or alternative technologies that become available over time. These options would be assessed closer to implementation of the RTN, having regard to the development's energy requirements, available technology and any necessary approvals.

The operator has confirmed that sufficient electricity supply capacity is available to provide for AI Data Centre 1. Discussions are ongoing with a further electricity supply provider to meet the requirements of Data Centre 2.

Yours sincerely | Nā māua noa, nā

Barker & Associates Limited



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