

MEMO

Project Number	FTAA-2603-1194
To	Fast-track Panel – Waikanae North Development
Subject	Response to Minute 15 and to Mr Williamson’s comments on the conditions
Date	12 October 2026

Purpose

1. This memorandum responds to Minute 15 of the Panel (8 October 2026) and to the comments of Mr Jon Williamson, the Panel’s hydrogeology adviser, conveyed by the EPA on 5 and 7 October 2026 on the proposed conditions dated 6 October 2026. It is accompanied by:
 - (a) Appendix 33 – Applicant’s Proposed Draft Conditions, Version 3, dated 12 October 2026, as a clean copy and as a copy showing tracked changes;
 - (b) the change register and concordance (Versions 1, 2 and 3), dated 12 October 2026, in which rows 621 to 626 record each change made since 6 October 2026 and its source; and
 - (c) a response by O’Callaghan Design Limited, *Response to Fast Track Panel on Flooding Risk Associated with a breach failure of the Outlet Flow Control Structure*, dated 12 October 2026, which addresses paragraph [5] of Minute 15.

Mr Williamson’s comments

2. **Condition G4.** Mr Williamson’s proposed wording was adopted in the 6 October 2026 conditions. No further change has been made.
3. **Condition R43(f).** Mr Williamson’s further comment of 7 October 2026 was that the method by which trigger levels are calculated should be defined in the consent, with the Hydrological Monitoring Report limited to performing the calculation and reporting against it. This suggestion has been agreed to and a change has been made. Condition R43(f) has been recast so that the trigger levels and the method of deriving them sit in the condition. The wording was developed with Greater Wellington’s hydrologist and consents officer between 8 and 12 October 2026, and Greater Wellington’s wording has been adopted with additions. In summary:
 - (a) the Alert level is fixed at the 5th percentile (low) and the 95th percentile (high) of the water-level record at each monitoring site, and the Alarm level at the respective 3rd and 97th percentiles. Greater Wellington’s hydrologist has advised that the 5th and 3rd percentiles reflect levels adopted by the Environment Court in a 2024 decision. The upper levels serve the outcomes in R43(f)(iii) that concern rising groundwater, namely the operation of the stormwater management system and groundwater levels in land downgradient of Te Harakeke Swamp;
 - (b) the method of derivation is stated in R43(f)(iv): seasonally adjusted percentiles calculated for each month of the year where the record supports it, established from both not less than 10 years of record at the nearest monitoring bore (or an approved proxy site) and the certified groundwater model simulated over a climatic period of not

less than 10 years. This addresses the limited length of the site baseline record that was discussed at the hydrology conferencing;

- (c) the timing of the Alarm monitoring report has been corrected to run from the Alarm being triggered, and notification of Kāpiti Coast District Council where an Alarm relates to Te Harakeke Swamp is made mandatory; and
 - (d) at Greater Wellington's suggestion, water levels in the Ngārara Stream are now addressed separately in a new R43(g): because the realigned stream is to be raised, its target is an environmental water level that achieves the restoration outcomes, to be set through certification of the HMR and the detailed design under Condition R103 from the baseline monitoring and a calibrated rainfall-runoff model of the stream. The remaining items of R43 are relettered (h) to (l), and the cross-reference in Condition G4 is updated accordingly.
- 4. For clarity, the twenty-year transient period in Condition G4 is the predictive run of the model. The ten-year climatic period in R43(f)(iv) is the period over which the model is used to establish the baseline statistics from which the trigger levels are derived. The two are complementary.
 - 5. **Condition S31.** Mr Williamson's recommended additions of 7 October 2026 are adopted as proposed. The Groundwater Monitoring Plan now extends to excavations requiring dewatering including peat excavation near wetlands, to monitoring wells where peat excavation near wetlands is proposed, and to the design of dewatering discharge soakage locations.

Minute 15

- 6. **Condition R137.** Condition R137 has been augmented so that the detailed design of the twin box culverts and overflow weir must address the three possible failure modes identified by the Panel - overtopping failure, seepage failure (including piping and internal erosion), and structural failure, including sliding and instability. WNDL notes that the structure is designed to pass flows over a defined overflow crest, so the overtopping assessment will be directed at the earth embankments either side of the structure rather than at the crest itself.
- 7. Paragraph 5 of Minute 15 addressed the risk of breach. The accompanying response by Mr O'Callaghan sets out how the potential downstream effects of a breach will be understood and managed. It is proposed that a breach assessment of the flow-control structure be prepared by a Chartered Professional Engineer with expertise in breach assessment and unsteady hydraulic flood modelling. This would be followed, if necessary, by a certified mitigation plan, with the structure not to be commissioned until the required measures are in place. Mr O'Callaghan recommends that these requirements be included as conditions and sets out draft wording for that purpose.
- 8. That recommendation is accepted. Because the new conditions would sit after Condition R137 and renumber the balance of Part B, they have not been inserted in the 12 October 2026 conditions accompanying this response. Rather, they will be incorporated with the consequential renumbering and cross-references, in the restructured Version 4 that WNDL will address in response to Minute 16. The assessment is a design-stage flood-hazard check and does not bear on the matters addressed in WNDL's response of 5 October 2026 on the classification of the structure.

Other change

9. **Conditions R25 and R26.** Amendments have been made to these conditions following ongoing discussion with Greater Wellington Regional Council. The baseline turbidity trigger level in R25 is now defined over the 24 hours following each baseline rainfall event, and the downstream trigger in R26(a)(ii) is restated as a paired comparison - response actions are required where the downstream reading exceeds the concurrent upstream (control) reading by more than 20 per cent and exceeds the certified baseline trigger level. The absolute 15 NTU trigger in the 6 October 2026 wording is removed at Greater Wellington's request. Greater Wellington's wording has been adopted.

Status of the conditions

10. The conditions dated 12 October 2026 supersede those dated 6 October 2026. The tracked-changes copy shows all changes from Version 2 (21 August 2026); the changes made since 6 October 2026 are identified in the change register at rows 621 to 626. A restructured Version 4 will be addressed in response to Minute 16.

On behalf of Waikanae North Developments Limited



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