

4 July 2025

Response to Auckland Council Terrestrial Ecology Queries

The following letter responds to the remaining terrestrial ecology queries, that have not been addressed as part of the Virdis memorandum titled “*Delmore Fast-Track Application – Response to Auckland Council Terrestrial Ecology Queries*”. The Council queries are repeated below.

Council Comments:

NoR 6 and proposed realignment.

8.1 The realigned road has not been assessed by the Vineway ecologist, and the applicant provides no supporting ecological discussion. As noted in the McKenzie & Co. memorandum, the relocation of the road appears primarily to facilitate urban design and the development master plan, whereby it is, “guided by a development master plan for Vineway Ltd.’s Delmore Development (Stages 1 and 2)”. This is not a demonstration for the functional need for the road’s alignment but the desirability of a particular development form.

8.2 The realignment of the road will result in a greater ecological impact than the submitted memorandum suggests. The realignment is through some of the highest value and most species rich / diverse forest. Forest edge effects are well known as an adverse effect from development and infrastructure and do extend 50-60m into forest remnants (from the perimeter). The realignment of NOR6 will result in the covenant area becoming functionally / ecologically defunct throughout most of the protected area and is in direct contravention of the covenant obligations. Although I note that the effects and mitigation / offsetting will be passed on to the adjacent property owner.

8.3 Vineway Limited submits the alignment of NOR6 by AT is conceptual with detailed design to be considered at the construction phase. I agree and the location of the stormwater pond as shown in the NOR6 could be redesigned and relocated further outside the covenant area, through detailed design, to reduce or avoid the removal of habitat. For example, the AT location of the pond is not aligned to the top of known overland flow paths, as shown in McKenzie & Co Drawing 3725-1-3960. However, in my opinion, the NOR6 alignment was a clear attempt by AT and their ecologist to avoid edge effects on the forest remnant by aligning the NOR6 to the west.

8.10 The applicant does not address alternative crossing designs for the covenanted wetland that would ensure that drainage and reclamation of the wetland is avoided or minimised. For example there is a lack of discussion, either from engineering or ecological consultants on the use of multiple culverts across the width of the wetland to ensure proper and effective spread of hydrology, or use of bridging for this section of NoR6. The use of a single barrel culvert is not a functional matter of the crossing but more likely due to cost minimisation, and by extension has not applied the effects management hierarchy as required by National Environment standard for Freshwater Regulation 45. The covenant area contains both freshwater and terrestrial habitat that is protected by way of section 221 RMA.

Response:

A full assessment against the NoR 6 realignment is provided within **Appendix 51.4**.

Significant Ecological Areas

8.4 I have raised concerns with the lack of identification of significant ecological areas (SEAs) pursuant of AUP(OP) Policy B7.2 and National Policy Statement for Indigenous Biodiversity. This matter remains outstanding with the applicant's ecologist.

8.5 In my opinion, most, if not all, of the existing terrestrial and freshwater habitats (including the covenants) meet SEA Criteria / Factors. They do so, for their connectiveness to protected areas (covenants / reserves), the presence of indigenous wetland, and/or presence of regionally / nationally threatened species.

Response:

An Assessment of the proposal against the NPS-IB is contained within Appendix 1 of this letter. The NPS-IB clearly states that it is the responsibility of territorial authorities to identify and map SNAs (or SEAs). Clause 3.8 of the NPS-IB is as follows: "Every territorial authority must undertake a district-wide assessment of the land in its district to identify areas of significant indigenous vegetation or significant habitat of indigenous fauna that qualify as SNAs." We consider Policy 6 of the NPS-IB specifically applies to this process, in which the measures under Appendix 1 of the NPS-IB must be followed.

Nonetheless, the Ecological Impact Assessment generally treats areas of native vegetation that fall outside of the formally mapped AUP SEA-Ts with the same level of protection. These areas have been delineated by Viridis and are largely located within existing consent notice areas. New planted areas that may in time meet the significance criteria are required to be protected under the conditions of consent. A small amount of vegetation is proposed for removal within these consent notice areas. This is limited to crossings necessary to realise development of different parts of the site. Crossings have been located to minimise impacts, for example by avoiding locations that cross the central part of the area. Revegetation is proposed alongside new areas of consent notices that will provide further protection of ecological features.

The upshot is that the protection of all existing areas of native vegetated has been recognised and provided for, either by total avoidance, or by careful design and management and replanting.

Residential Society

8.7 Vineway Ltd have not provided assessment or comment on the inclusion of the covenanted areas into the responsibilities of the resident's Incorporated Society. I remain of the opinion that there are significant issues with individual private ownership and the maintenance of covenants where there is residential development. Private Lot owners are then liable for any degradation, damage or losses to those habitats through adjacent activities, including dumping of greenwaste, construction materials or household items, which are common issues in Council Reserves. Easements created through covenants will not restrict public access to only those areas.

Response: The proposal will see the creation of a Residential Society for both Stage 1 and Stage 2. New Lots 1901, Lot 1904, 1905, 1908, 1910, 1920 and 1922 comprise the areas of new vegetation to be protected via

a consent notice. These areas would be owned and managed by the relevant Stage 1 or Stage 2 Residential Society. Residential lots that contain existing consent notice areas would remain in private ownership, however the overall maintenance and management of the protected vegetation would be a responsibility of the relevant Stage 1 or Stage 2 Residential Society. Refer to the proposed conditions in **Appendix 57**.

8.9 The applicant's ecologist agrees that walkways and lookouts are inappropriate in existing covenant areas. I agree but would extend that to all proposed protected areas as well. I am aware that pedestrian accesses are proposed through both existing and proposed covenanted areas as part of both stages, but notably for Stage 2 for accessibility / connectivity reasons. Mr Wallace (Barker & Associates) has provided comment in his memorandum, dated 11 June 2025. In effect this will create pseudo-public reserves by allowing unrestricted access to these areas of bush / revegetation. Whilst the ecologist has made some comments on the effects of creating the walkways / lookouts, the location design and construction is unknown, including the location of the suggested low-impact but very costly boardwalks. The long-term maintenance and upkeep of the tracks is not discussed and would presumably default to the owners of the land. As noted above, those same private landowners would be liable for any damage to the covenanted areas, which creates an issue for Auckland Council, whereby the regulator has tacitly accepted the unrestricted access and by extension any associated adverse effect must therefore arguably be acceptable, or enforceability with consent notice obligations is nullified.

Response: The applicant has received conflicting advice from Auckland Council specialists with regard to pedestrian connections. Ecological effects on pedestrian access are included within the Viridis Memo titled “*Delmore Fast-Track Application – Response to Auckland Council Terrestrial Ecology Queries*” (**Appendix 42.4**). Should the Panel consider that pedestrian connections are required for the development, locations for the pathways have been identified within the Key Changes Memo (**Appendix 48.2**). Conditions of consent have been proposed that would require a public pathway easement over these areas in favour of Auckland Council.

8.11 The applicant has not assessed possible access from the adjacent Ara Hills development for connection to the proposed development east / south of the covenant area and the proposed wastewater irrigation on 55 Russell Road. The pine trees to the east of the property boundary and adjacent to the site are located along a ridgeline with gradual sloping topography, facilitating easy to form roading along an existing paper road. This alternative access would negate the removal of the covenant for a JOAL, access that provides existing pedestrian access via a farm crossing over the watercourse.

Response: The applicant has considered the pedestrian connection identified above. Ultimately it was not considered practical for the following engineering reasons:

- The earthworks within this location would be significant as the road reserve to vest is only slightly wider than the minimum road width required. Therefore, earthworks outside of the boundary would be necessary.
- The road reserve to vest does not span far enough south, resulting in an awkward turning junction into Delmore.
- The final levels on the NoR in this location are not known and it is therefore difficult to design a connection.

9.1 I requested a Planting and Implementation plan for enhancement planting and revegetation areas. This has been supplied, dated 14/02/2025 by Greenwood Associated, but in my opinion is directed predominantly to landscape planting, not revegetation, irrespective of the subject matter. The author seems unaware of current Auckland Council planting standards. Notably, the document provides for plant replacements to the discretion of the applicant, not the regulator, and the use of mulch which is inappropriate both for ecological restoration as it suppresses plant succession (See Auckland Council Code of Practice Chapter 7 – Landscape & Te Haumanu Taiao revegetation guidance). The use of mulch is not supported in 100-year ARI floodplains where flooding is a risk, in contravention of AUP(OP) provision E15.6.8. An updated version could be considered as a condition of consent.

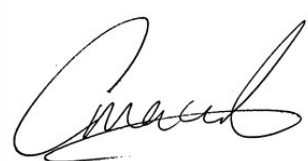
Response: An example Planting Maintenance and Implementation Plan has been provided to Council, as a draft. A condition of consent is proposed which requires the consent holder to prepare a Planting Maintenance and Implementation Plan for the re-vegetation areas, which would ultimately be certified by Council. The comments outlined above can be addressed at that time.

9.2 I requested that the planting plan be revised as there appeared to be terrestrial planting where wetland offsets planting is proposed. I am unaware of this revision being provided but if so, it could be a condition of consent.

Response: Refer to updated landscape plans attached as **Appendix 44.4**.

Yours sincerely | Nāku noa, nā

Barker & Associates Limited



Charlotte MacDonald

Associate

[Redacted contact information]

Appendix 1: Updated Assessment against NPS-IB

Assessment against the National Policy Statement for Indigenous Biodiversity 2023 – Objective and policy analysis

Policy Wording	Assessment
<p>Objective 2.1</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 	<p>The proposal aims to avoid, minimise and offset residual ecological effects through:</p> <ul style="list-style-type: none"> • Retaining and protecting existing native vegetation, including Significant Ecological Areas (SEA-Ts) and consent notice areas. • Avoiding vegetation clearance in high-value areas such as SEA-T_6652 and vegetated buffers adjacent to the Nukumea Reserve. Development is also set down from the Nukumea Reserve to minimise light spill effects on indigenous fauna, particularly bats. • Minimising the extent to which indigenous vegetation needs to be removed by limiting it to crossings that are essential to enable development of the different parts of the site. Offsetting unavoidable indigenous vegetation loss (approx. 2.25ha) with 32.8ha of on-site revegetation planting, at a ratio of 1:14.6. The vegetation mixes have been designed to support returning vegetated areas to the original ecosystem of WS11. Species have also been selected that provide feeding habitat for indigenous birds. They have also been located to try to maximise connectivity benefits, which sees the site providing a vegetated link from the SEA-T across the Nukumea Reserve in the north, to the SEA-T in the south outside the property. • Offsetting unavoidable wetland loss with additional wetland areas, resulting in a net gain of 2,172m² of wetland habitat. Although this is recorded for completeness as wetlands do not fall within the scope of the NPSIB. • Applying ecological management and consent conditions including pre-works fauna survey's in addition to the analyses already undertaken; fauna management plans, riparian buffers, and lighting/pet controls to mitigate edge and post-development effects.

<p>(iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.</p>	<p>As a result of these actions the proposal is consistent with the requirement to ensure <u>no overall loss</u> in indigenous biodiversity within the project site and will result in a net biodiversity gain.</p>
<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.</p> <p>Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:</p> <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 applicant has consulted with the relevant iwi and Treaty settlement entities as required under the FTAA. Three iwi authorities have prepared Cultural Impact Assessments. A summary of feedback from these entities relating to indigenous biodiversity is included below:</p> <ul style="list-style-type: none"> • Support the general avoidance of native vegetation and the placement of conservation covenants. • Support enhancement planting. • Removal of native vegetation should be avoided, and where not possible should be replanted at a ratio of 1:2 with native eco-sourced species. • Vegetation removal and earthworks should be undertaken in strict accordance with kauri dieback hygiene protocols (in kauri areas). • Removal of vegetation and earthworks should be undertaken in such a way as to avoid or minimise injury or mortality to native birds, bats and reptiles including through survey, translocations, management plans and seasonality. <p>The above recommendations have been incorporated into the proposal as part of the revegetation strategy, the Tree Management Plan, the Fauna Management Plan, and consent conditions.</p>
<p>Policy 3: A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.</p>	<p>As outlined within Section 3.7 of the NPS-IB, local authorities must adopt a precautionary approach toward proposed activities where the effects on indigenous biodiversity are uncertain, unknown or little understood, but those effects could cause significant irreversible damage to indigenous biodiversity. The precautionary principle in the NPSIB reflects the use of the concept in the International Convention on Indigenous Biodiversity, to which New Zealand is a signatory. The principle is generally understood to recognise that lack of certainty regarding an environmental threat should not be an excuse for not taking action to avert that threat (see <i>Sustain Our Sounds v New Zealand King Salmon Co</i> [2014] NZSC 40, from para [109].</p>

In this case, the effects on indigenous vegetation are clearly understood, and planting is providing to replace vegetation that is lost at a ratio of 1:14.6. This aspect of the proposal does not require a precautionary approach.

A precautionary approach has been adopted in respect of fauna, which are more difficult to identify, and for some species, like cryptic lizard species, are uncertain. The approach taken to averting the risk of harm to fauna species within the site is described in detail within pages 4-5 of Virdis' further response memo titled "Delmore Fast Track Application – Response to Auckland Council Terrestrial Ecology Queries". In summary:

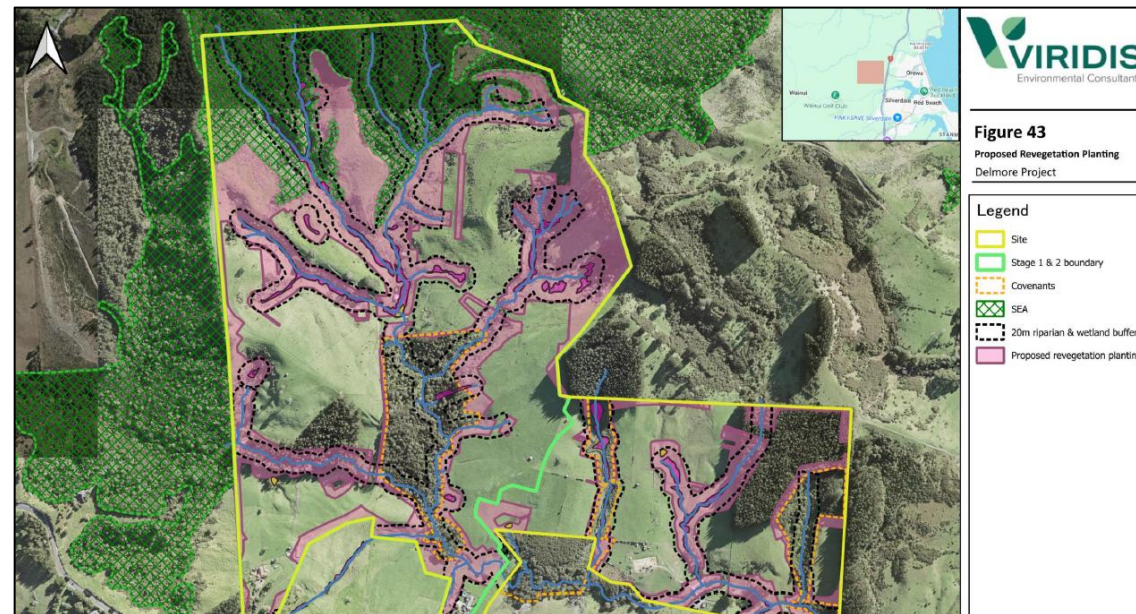
- The Ecological Impact Assessment (EclA) was informed by a comprehensive desktop review of national and regional biodiversity databases, recent field data including a 2022–2023 long-tailed bat survey involving 93 acoustic deployments within 10 km of the site, and on-site habitat assessments to evaluate suitability for threatened species such as indigenous lizards, birds, and bats. It was also informed by the information on fauna provided as part of the NOR 6 process.
- The proposed consent conditions require that ecological surveys are undertaken for long-tail bats, lizards, Threatened or At-Risk birds and wetland birds prior to the commencement of any earthworks.
- The ecological surveys will inform a Fauna Management Plan to manage the risk to these species during construction. The FMP will be certified by Auckland Council. These measures ensure that unforeseen impacts on indigenous biodiversity are identified and managed, reflecting a precautionary and adaptive management approach.

This approach is considered both precautionary and appropriate in this instance because:

- Detailed species-specific surveys at this stage of an application process are typically reserved for instances where there is a high likelihood of presence and where works may impact high-value or sensitive habitat, such as large forest remnants or SEA-Ts.
- The site is not known to be heavily used by bats, and areas of high ecological value that may provide habitat to lizards are avifauna are being avoided, with only limited indigenous vegetation removal proposed.

<p>Policy 4: Indigenous biodiversity is managed to promote resilience to the effects of climate change.</p>	<p>A key component of the proposal is the extensive revegetation programme, which includes approximately 32.8 hectares of native planting (on top of existing native vegetation within consent notice areas and SEA-T) that is to be retained). Of this, 16.1 hectares will be located within 20 metres of streams and wetlands. This planting serves multiple functions, including buffering sensitive aquatic habitats, stabilising stream banks, and reducing erosion and sedimentation during high rainfall events—factors that are critical to ecosystem stability under projected climate change scenarios. The remaining 16.7 hectares of terrestrial revegetation has been strategically located to improve ecological connectivity across the site and to nearby areas of ecological significance, including the Nukumea Scenic Reserve and SEA_T_6652. This network of connected habitats enhances the potential for species migration, and dispersal, all of which are essential for ecological resilience and adaptation as climatic conditions shift.</p> <p>The proposed planting is designed to replicate the WF11 kauri, podocarp, broadleaved forest ecosystem type, which is appropriate for the site’s ecological district. Species selection favours resilient, drought-tolerant native species such as mānuka, kānuka, tōtara, and harakeke, which are likely to persist and adapt under future climate regimes. Changes to species were specifically made to improve resilience in response to comments from DOC.</p>
<p>Policy 5: Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.</p>	<p>The subject site falls within the sole jurisdiction of Auckland Council so the issue of integrated management across geographical jurisdictional boundaries does not arise. However, the proposal has been managed in an integrated way in terms of the various protections and provisions that apply to the site. The ecological assessment and design have responded to planning frameworks administered by Auckland Council, including the SEA overlay, consent notices, and relevant unitary plan provisions. The application also aligns with existing designation conditions under NOR6, which apply to a broader area and establish a shared ecological management framework. This enables consistent and integrated biodiversity outcomes across overlapping planning instruments and future stages of development.</p>
<p>Policy 6: Significant indigenous vegetation and significant habitats of indigenous fauna are identified as SNAs using a consistent approach.</p>	<p>The NPS-IB clearly states that it is the responsibility of territorial authorities to identify and map SNAs. Clause 3.8 of the NPS-IB is as follows: <i>“Every territorial authority must undertake a district-wide assessment of the land in its district to identify areas of significant indigenous vegetation or significant habitat of indigenous fauna that qualify as SNAs.”</i> We consider Policy 6 specifically applies to this process, in which the measures under Appendix 1 of the NPS-IB must be followed.</p> <p>Nonetheless, the Ecological Impact Assessment generally treats areas of native vegetation that fall outside of the formally mapped AUP SEA-Ts with the same level of protection. These areas have been delineated by Viridis and are largely located within existing consent notice areas. New planted areas that may in time meet the significance criteria are required to be protected under the conditions of consent. A small amount of</p>

	<p>vegetation is proposed for removal within these consent notice areas. This is limited to crossings necessary to realise development of different parts of the site. Crossings have been located to minimise impacts, for example by avoiding locations that cross the central part of the area. Revegetation is proposed alongside new areas of consent notices that will provide further protection of ecological features.</p> <p>The upshot is that the protection of all existing areas of native vegetated has been recognised and provided for, either by total avoidance, or by careful design and management and replanting.</p>
<p>Policy 7: SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.</p>	<p>In the NPSIB the term SNA only captures areas that identified in a planning document (NPSIB, cl 1.3). Areas to the north and west of the site are mapped as a SEA-T under the AUP. The SEA-T is shown in green hatch in the image below. This SEA-T is proposed to be protected through the following measures:</p> <ul style="list-style-type: none"> • The only vegetation proposed for removal within the SEA-T is the removal of pest plant species (eg. gorse). This is considered to result in a positive outcome for the SEA-T as it will allow native vegetation to regenerate. • The proposal includes planting of native vegetation adjacent to the existing SEA-T, which will provide a high degree of ecological activity and buffering from edge effects. This is anticipated to provide for a net gain in SEA value and ecological functioning • The proposed planting within the site will also provide ecological connections to the SEA-T, which supports ecological function and movement of fauna species. <p>The areas proposed for revegetation are indicated within the figure below.</p>



Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.

This policy has underpinned the way in which the development has been designed. Areas of existing indigenous vegetation within the site that are not identified SEA-T have been avoided, and development set back from them, except for where removal is necessary to access a part of the site. Then, as noted above, crossings have been placed to minimise effects. These existing areas are then subject to extensive further planting alongside them, which helps to support ecological function through buffering the core of the area. As set out above, a precautionary approach has been taken to fauna management on site.

Overall, Delmore has been designed to avoid adverse effects on native vegetation to the maximum extent practicable. Encroachment into these areas is limited to providing for access to the site's various parts, and where no other practicable option exists. Where encroachment is required, effects have been minimised through the specific location chosen and adopting a Tree Management Plan to reduce edge effects on vegetation that is not removed, some of the replacement vegetation will remedy adverse effects through direct replacement of lost area after construction, some will offset the vegetation lost through new, extensive planting. This is consistent with the effects management hierarchy that applies outside the SEA-Ts.

	Refer also to the responses to Objective 2.1 and policy 3.
Policy 9: Certain established activities are provided for within and outside SNAs.	Not applicable to the proposal.
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.	The proposal will deliver approximately 1,250 new dwellings, contributing to housing supply in a growing part of the Auckland region. The development includes public amenities such as a neighbourhood park, walking and cycling connections, and stormwater and transport infrastructure, supporting liveability and accessibility for future residents. The urban form has been designed to minimise ecological impacts while maximising social function, including large vegetated buffers between residential development and sensitive ecological areas.
Policy 11: Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.	The site does not include a geothermal SNA and therefore is policy is not applicable to the proposal.
Policy 12: Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.	Not applicable to the proposal.
Policy 13: Restoration of indigenous biodiversity is promoted and provided for.	<p>The proposal includes approximately 32.8 hectares of revegetation planting, representing a 1:14.6 offset ratio for the limited (2.25 ha) removal of native and exotic vegetation. Not only will this planting ensure biodiversity is maintained through replacing what is lost with equivalent vegetation, with an increased ratio to ensure success, but it is specifically targeted at the restoration priorities in clause 3.21. This planting targets existing degraded or modified areas, particularly around the edges of the existing SEA-T, within riparian zones, wetland margins, and ecological buffers, using appropriate native species that align with the site's historic ecosystem type (WF11 – kauri, podocarp, broadleaved forest). The restoration is designed to strengthen ecological corridors and reduce edge effects. All revegetated areas will be legally protected and managed through consent notices, ensuring long-term viability and enforcement of ecological outcomes.</p> <p>The subject site is zoned Future Urban and has been identified by Auckland Council as being appropriate for urbanisation. Within the proposed residential areas, ecological values are embedded through green infrastructure design, including street tree planting and on-lot planting, rain gardens, neighbourhood parks, and walkways that connect to and buffer significant habitats. Outside of the urban footprint, restoration is concentrated in larger vegetated areas, steep slopes, and riparian catchments, thereby maintaining connected indigenous cover across the site.</p>
Policy 14: Increased indigenous vegetation cover is promoted in both urban and non-urban environments.	

<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>	<p>The assessment has adopted a precautionary and habitat-based approach to identifying areas used by highly mobile fauna, which in this case are bats and avifauna, using both field-based habitat evaluations, up-to-date regional data sources (e.g. eBird, DoC Bioweb, bat monitoring surveys), and a pre-construction survey requirement which enables management to be focused on any fauna actually present at that time. The project goes beyond managing construction-phase effects on highly mobile fauna and directly addresses the ongoing potential impacts of urbanisation, such as increased human activity, pet ownership, artificial lighting, noise, and habitat fragmentation. These threats are being proactively managed through measures including: a consent notice prohibiting domestic cats (to reduce predation on birds and lizards); the revegetation focus on supporting return to its natural WS11 cover; species selection with increased focus on avifauna food species after input from DOC; extensive riparian and buffer planting (16.1ha within 20m of streams and wetlands); and large setbacks of 40m–300m¹ between residential areas and high-value ecological habitats. Vegetation buffers and lowered lot elevations along the Nukumea Reserve boundary will also help reduce light spill and noise, protecting sensitive fauna over the long term. The 32.8ha of proposed revegetation planting—strategically placed to connect habitat fragments—is designed to enhance movement corridors and improve ecological resilience for highly mobile fauna.</p>
<p>Policy 16: Regional biodiversity strategies are developed and implemented to maintain and restore indigenous biodiversity at a landscape scale.</p>	<p>The NPS-IB clearly states that it is the responsibility of territorial authorities to prepare regional biodiversity strategies. We consider that objectives and policies relating to indigenous biodiversity have been appropriately incorporated in the Unitary Plan and assessed as part of the policy assessment lodged with the substantive application.</p>
<p>Policy 17: There is improved information and regular monitoring of indigenous biodiversity.</p>	<p>Conditions of consent are proposed that require ecological surveys to be undertaken prior to development. These surveys will result in improved information on existing biodiversity in and around the site.</p>

¹ In the areas where development is closest to Nukumea Reserve or SEA-T, a minimum 40m planted setback is proposed to the nearest rear lawn. In other locations, planted setbacks typically range from 100m to 300m.