Comments on the Beachlands South application

To the Beachlands South Expert Panel
From Yueliang He and Fuyun Zhao
Property: [redacted]

Submitted 28 September 2026 | Application FTAA-2606-1256

1 Our support and the matters requiring resolution

We are the owners of [redacted], which adjoins the project and is used as our family home. We cooperated with and supported the project during its earlier planning stages and continue to support its orderly progress. During discussions in 2023, our understanding was that the road through 712 would be built approximately ten years after those discussions, in connection with the later FUZ development. At that time, we were not aware of the wastewater treatment plant now proposed near our home. Our earlier support was based on our understanding of the project and its timing at that stage.

The detailed application now describes early use of the 712 route to serve the proposed wastewater plant. This materially changes our understanding of when effects on our home may begin, their nature and their duration. Please explain how the current arrangements relate to the earlier discussions. Our earlier support should not be treated as acceptance of these newly understood effects.

We seek three outcomes: a coordinated assessment of effects on our family home; practical design responses and clear implementation safeguards; and clarification of the Area C covenant and its relationship to the proposed works. Disturbance may extend from road formation through successive construction stages to plant servicing and golf-course access. We ask that the duration and overlap of these uses be assessed together, even where individual uses are described as temporary. We request sufficient information and an itemised response before the relevant approvals are determined. Our support for the project's overall direction is not written approval of the detailed proposal or consent to vary private rights.

These comments were initially prepared by reference to Attachment 0B, Planning Assessment dated 26 June 2026 (AEE), and Attachment 10, Wastewater Concept Design and Assessment, June 2026 V2 (WW Report). We have also considered relevant parts of the updated material provided to the Expert Panel on 14 and 25 September 2026, including the updated Planning Assessment, Wastewater Report and draft conditions. Unless expressly identified as updated, AEE and WW Report page references below refer to the original June 2026 versions. References to updated draft conditions are to Attachment 0C Proposed Conditions of Consent_clean and remain proposals, not approved conditions. Where an updated document supersedes a cited version or page reference, please identify the replacement information and explain whether and how the issue raised has been addressed. The earlier references are retained where they identify the source of a specific issue. Appendix A contains supporting technical clarification requests. We comment as affected owners, not technical experts. Please respond using references R01–R21; the requested condition outcomes in section 4 are numbered separately.

2 Effects on our home and practical design responses

Property identification and coordinated plans

R01 Section 6.12 of both the original and updated AEE describes [redacted] as “670” while naming us as owners. Our property is [redacted] Please ensure that the correct address and legal description are carried consistently through all assessments, plans and Panel records, and that the property, its owners, identifiable occupiers and nominated contact representative are accurately identified.

R02 The WW Report property table includes [redacted] (PDF pages 13–14), whereas the formal project-site list in the AEE excludes it. Please explain whether any catchment, capacity, disposal-area or access assumption relies on our land. We ask for a coordinated, legible survey-based plan showing current legal boundaries, our dwelling and access, Area C, the plant, all disposal fields, pipelines, roads, drainage works, setbacks and proposed levels. Any proposed reliance on access to or use of [redacted] should be identified with its claimed legal basis.

Wastewater facilities

R03 The AEE places the treatment plant on 620 (page 28); the WW Report provides an indicative site plan at PDF page 72. Please reconcile the written location and drawings with the current legal parcels and Area C. The assessment should identify distances and levels relative to our home, outdoor living areas and boundary, rather than leave these to inference from a small-scale plan.

R04 The initial plant forms part of a longer-term system (WW Report PDF pages 23 and 81–84). Although land disposal is proposed to be decommissioned after transition to marine disposal (PDF pages 37 and 41), that is not a commitment to remove the treatment plant. We request assessment of the ultimate plant configuration and expansion envelope, as well as initial operation.

R05 Please assess noise, odour, lighting and visual effects at our existing lawful dwelling and outdoor living areas, including night-time operation, pumps, treatment equipment, standby generation, sludge handling and servicing traffic. The assessment should include reasonably foreseeable outages, maintenance and failures of treatment or odour-control equipment. The updated Air Discharge Report (17 July 2026, Table 6-1, page 22) includes [redacted] within Location H alongside 702, 692 and 682. Its approximate 360 m southeast distance is a grouped receptor entry, not a verified measurement to our dwelling. Updated draft conditions 224–226 provide for field odour surveys, with an advice note envisaging surveys on adjacent properties where access is agreed. We welcome these measures, but request that the assessment and monitoring arrangements specifically address [redacted] and its principal outdoor living areas. Please identify the proposed mitigation, applicable performance standards and the evidence supporting compliance at our property, with clear response times for corrective action and repeat verification where adverse effects or non-compliance are identified.

R06 We request a seasonal land-disposal water balance and assessment of wet-weather saturation, ponding, runoff and effects on connected surface water or groundwater. Please specify stop-irrigation criteria, usable emergency storage, lawful contingency arrangements and responses if replacement disposal infrastructure is delayed. A land-disposal reserve should not be treated as automatically usable without confirming its suitability.

R07 Please identify each primary and reserve land-disposal field on the coordinated plan, its area, operational status and setbacks from [redacted], and any associated tanks, pumps or irrigation equipment. Clarify whether reserve fields are included in the assessed effects and when they may be used.

The road through 712 and construction

R08 The original Attachment 9A, Infrastructure Report Appendix 1, PDF page 20 (Construction Management Plan, section 5.2, internal page 4), states that an additional access through 712 will be created during the initial stage, first serving the proposed wastewater treatment plant and then providing alternative golf-course access while the existing access is reconfigured as public road. The updated AEE section 6.9 (pages 65–66) also associates this access with earthworks Stage 1, although it is identified as subdivision Stage 8. These are different staging systems; subdivision Stage 8 does not establish that construction access will be delayed until the later residential stages. Please confirm whether the current construction programme retains or changes the access sequence described in the original Construction Management Plan.

R09 Please provide a coordinated programme distinguishing formation of the construction access, road construction, use by construction traffic serving later development stages, plant construction and servicing, alternative golf-course access, and any eventual public or private road use. For each use, identify expected start and end dates or decision triggers, vehicle types, daily and peak movements, heavy-vehicle frequency, operating hours and the route relative to [redacted] Confirm whether golf-course access is temporary or permanent, when any temporary use will cease, and how the route will then be managed.

R10 We request detailed plans and sections showing road levels, retaining structures, drainage, lighting, fencing and landscaping near [redacted] Please assess traffic noise, headlight intrusion, privacy, pedestrian safety and safe continued use of our existing access. Please confirm whether sludge-removal and other heavy servicing vehicles would use this route, with their expected frequency and operating hours.

R11 Construction controls should address dust, noise, vibration, truck movements, working hours and temporary access restrictions. Where potentially damaging works are proposed nearby, we request an appropriate pre-construction condition survey and a clear process for investigating and remedying attributable damage. Please identify the interface with separately authorised earthworks so that the relevant controls and responsible parties are clear. Updated draft condition 75 permits construction and earthworks at any time subject to the relevant construction noise standards. Please specify appropriate working and vehicle operating hours near [redacted] including arrangements for any necessary out-of-hours work and advance notice.

Drainage landscape and combined effects

R12 Please assess pre- and post-development drainage around 680, including relevant heavy-rainfall and blockage scenarios, road embankments, culverts, filling and land irrigation. We seek protection against adverse changes to runoff, erosion, flooding or the functioning of existing drainage. Please assess any potential effects of project groundwater abstraction on lawful neighbouring supplies where a relevant hydraulic connection exists.

R13 Attachments 1 and 2 show our understanding of the proposed locations and the actual view from our home. The applicant should verify the indicative annotations and assess effects from these actual viewing locations.

R14 Our principal outlook consists of our garden and lawn, open land and trees in the middle distance, and the coastal panorama beyond. In our understanding of the plans, the plant, Area C and the road through 712 lie across this principal viewing direction. Buildings, equipment, moving vehicles, fencing and lighting could change the character of this whole outlook even where distant sea views remain visible. We are concerned that the combined change could be substantial and materially diminish residential amenity and the property's appeal. We are also concerned about possible effects on value, but have not quantified any loss or supplied an independent valuation.

R15 Please provide verified visual simulations and representative sections from the actual photographic viewpoint, principal living spaces, terraces and outdoor areas. They should show site levels, the full heights and extent of buildings and equipment, roads, retaining structures, fences, lighting and planting. Assess construction, initial operation, ultimate expansion, mature planting and night-time conditions, with seasonal effects where relevant. The applicant should confirm the viewpoint locations and camera parameters with us. Please identify which specialists have visited [redacted] the dates and locations inspected, and whether the principal living spaces and outdoor areas were assessed. For any desktop-only assessment, explain its evidence base and limitations, and whether a targeted site visit is needed. We are willing to facilitate access by prior arrangement; any Panel visit should be coordinated through the project team administering the Panel process.

R16 Please compare practicable alternatives, including moving the plant or individual components, reducing platform levels and structure heights, changing road and equipment layouts, and controlling lighting. Screening should be assessed for its own effects on the open outlook and coastal views; tall planting should not be assumed to resolve the effects if it creates a different visual obstruction. The assessment should explain the residual combined effects at [redacted] and the reasons for the preferred design.

R17 We are concerned that disturbance may begin with road formation, continue through construction traffic serving successive development stages, and persist or recur through plant servicing, golf-course access and any final road use. Even if individual activities are described as temporary, successive or overlapping uses could expose our home to prolonged disturbance with limited respite. Please assess their combined duration, intensity, peak periods and night-time effects at [redacted] including privacy and overlooking, traffic noise, vibration, headlights and fixed lighting, dust, drainage and safe access. Please identify any periods when uses will overlap and assess the residual effects after mitigation, rather than assessing each stage or facility in isolation.

R18 Please also explain how the road and infrastructure layout affects future lawful connections to [redacted] and consider avoiding unnecessary design barriers. We do not seek approval for development of [redacted] or the grant of private connection rights through these comments.

3 Area C clarification documents and safeguards

R19 The updated AEE section 6.12 (pages 68–69) describes a covenant benefiting [redacted] while using the address “670”. Separately, Attachment 23, [redacted] records a land covenant in Transfer C868567.5. Please confirm that this is the instrument described in AEE section 6.12. Please confirm our property’s relationship to the covenant and provide the complete instrument with all schedules and plans, any surrender, variation or modification documents, and a survey-based overlay relating historical Area A on DP166414 and current Area C on DP501271 to each proposed building, road and facility. Please identify which works require the covenant to be addressed, whether any change is proposed and the intended process, and the basis for any position that roads and associated infrastructure are not restricted. We do not ask the Panel to determine the parties’ ultimate private-law rights. We note the general advice note in the updated draft conditions requiring the Consent Holder to obtain other necessary approvals and comply with the Property Law Act 2007 and other rules of law. That is helpful, but it does not specifically identify Land Covenant C868567.5 or clarify how works within Area C will be implemented consistently with that covenant. The assessment should not assume that the covenant has already been resolved. We reserve all private rights.

R20 Because the application identifies a covenant affecting Area C and the title records Transfer C868567.5, we ask that any approval avoid creating uncertainty at the implementation stage or being understood as authorising works contrary to unresolved private property rights. To the extent lawfully available, any approval relating to buildings or structures within Area A on DP166414 / Area C on DP501271 should make clear that such approval does not itself authorise a breach of Land Covenant C868567.5, and that works inconsistent with that covenant should not commence unless the covenant has first been lawfully surrendered, varied, modified or otherwise resolved so as to permit those works.

R21 If the Panel considers that this matter is not appropriately expressed as a resource consent condition, we ask that the same distinction be stated clearly in the decision or an advice note, so that the Fast-track approval cannot later be misunderstood as having determined or overridden private property rights.

4 Responses decisions and conditions requested

Our priority is to avoid or reduce effects through practicable changes to siting, levels and layout, and then secure enforceable safeguards for the effects that remain. Please obtain an itemised response and sufficient specialist information before determining the relevant approvals. Fundamental questions about site suitability and effects on 680 should be resolved before approval, rather than left solely to detailed design. If unacceptable effects cannot be adequately addressed, the relevant layout or activity should be revised before approval.

If approvals are granted, we request conditions, to the extent within the Panel’s powers and supported by the evidence, addressing the following outcomes:

1. Identified approved plans and a defined wastewater capacity and expansion envelope, with clear staging controls. The assessment and conditions should remain coordinated if the design changes. The Technical Documents schedule in the updated Appendix 1 to the draft conditions remains marked “To be confirmed”; the final schedule should identify the applicable documents and revisions and be consistent with the conditions.

2. Required mitigation installed and verified before the relevant activity begins, with measurable noise, odour, lighting and discharge requirements supported by specialist assessment.

3. Appropriate baseline and operational monitoring at relevant locations, with clear sampling frequency, reporting and independent verification where warranted.

4. Defined triggers, response times and corrective actions for failures, excessive loading, ponding, runoff or non-compliant discharges, including immediate protective action where required. Preparing an upgrade report should not substitute for controlling an ongoing adverse effect.

5. Clear arrangements for transition from land disposal, any interim continuation, decommissioning and rehabilitation. Further connections should be managed so that operational treatment and lawful disposal capacity are not exceeded.

6. A coordinated construction and traffic management framework protecting 680 throughout successive and overlapping stages, with advance notice of relevant works and changes of route use; defined working and vehicle operating hours; heavy-vehicle routing and dust controls; protection against headlight and lighting intrusion and loss of privacy; monitoring and corrective actions; and clear cessation or review triggers for temporary uses. Necessary mitigation should be in place before the relevant use begins and maintained for its duration.

7. An identified responsible consent holder and operator, a named liaison contact, a documented complaints and response process, and prompt notification to affected neighbours of incidents that may affect them. Relevant monitoring summaries should be accessible, subject to lawful privacy requirements.

8. Landscape implementation and maintenance obligations, including agreed design details for screening, lighting and fencing where necessary to mitigate effects.

9. Approved visual mitigation based on verified viewpoints and defined maximum levels and heights where justified by the assessment, with completion checks before operation and continuing maintenance. Later detailed design should remain within the assessed and approved envelope.

10. A clear implementation safeguard for Area A on DP166414 / Area C on DP501271, confirming that the approval does not itself authorise a breach of Land Covenant C868567.5 and, to the extent within the Panel’s powers, that buildings or structures inconsistent with that covenant do not commence unless the relevant private rights have first been lawfully resolved.

For each request, please identify the supporting evidence and plan references, the proposed action and how it will be secured in approved plans or conditions. Where a request is not accepted, please explain why and identify any alternative. We ask the Panel to address the Area C request expressly in its decision, including its reasons if a condition is not considered appropriate; an advice note is requested as a fallback, not as equivalent to an enforceable condition.

5 Continuing constructive engagement

We ask to be notified of material changes affecting [redacted] and given an opportunity to respond where the applicable procedure permits. We wish to receive and, where the applicable procedure permits, comment on further revisions to the proposed conditions affecting [redacted] We remain available for a focused meeting or site visit by arrangement to assist clarification and practical resolution. Our participation and willingness to discuss solutions do not constitute consent to use our land or vary any private rights.

Nothing in these comments is intended to limit any separate private discussions or agreements that may later be reached between the owners of [redacted] and the applicant.

Yueliang He and Fuyun Zhao
Owners of [redacted]
Correspondence: Calvin He, on behalf of the owners, via the accompanying submission email.

Sources: the original June 2026 Attachment 0B Planning Assessment and Attachment 10 Wastewater Report V2; relevant updated material provided on 14 and 25 September 2026, including Attachments 0B, 0C, 0C1 and 10; Attachment 21 Air Discharge Report dated 17 July 2026, Table 6-1; and Attachment 23, Record of Title 748626. The historical road-access sequence is referenced to original Attachment 9A, Infrastructure Report Appendix 1, Construction Management Plan section 5.2, PDF page 20 (internal page 4). Version and page conventions are explained in section 1.

Included attachments: 1. Owner annotated location sketch. 2. Owner annotated existing view from the home. Both are reproduced after Appendix A.

Appendix A Technical clarification requests

We ask the applicant’s specialists to reconcile the following points and identify the figures that will govern the approved design and conditions. The numerical and page references below are to the cited June 2026 versions. If the updated Wastewater Report or other updated material changes or resolves any item, please identify the replacement table, figure or page and explain the change. We raise these matters as clarification requests, not as proof that pollution or a capacity failure has occurred.

(a) WW Report Table 3 (PDF page 24) lists flows of 270, 60, 50 and 50 m³/day, which sum to 430, but gives a total of 246–300. The industrial row also says it is not expected initially. Please distinguish actual stage loads from future allowances and reconcile the school allowance with PDF page 23.

(b) PDF pages 19, 23, 37 and 62 use different capacity thresholds or averaging periods, including 70–80%, 85%, and 80% over three months. Please distinguish the triggers for design, construction and commissioning, and specify controls on further connections before additional capacity is operational.

(c) AEE page 60 describes 1,383 m³/day after a second module. WW Report PDF page 25 describes two trains providing 900 m³/day against ultimate demand of 1,368 m³/day, requiring further expansion. Please reconcile the number of modules, final footprint and assessed capacity.

(d) PDF page 44 estimates phosphorus loading of 131 kg/ha/year against its own listed guideline range of 30–60. PDF page 45 describes lower loading with stricter effluent targets. Please identify the final effluent limits, their compliance basis, soil-monitoring regime and corrective actions. We do not assert that the table’s guideline is a statutory limit.

Attachment 1 Owner annotated location sketch

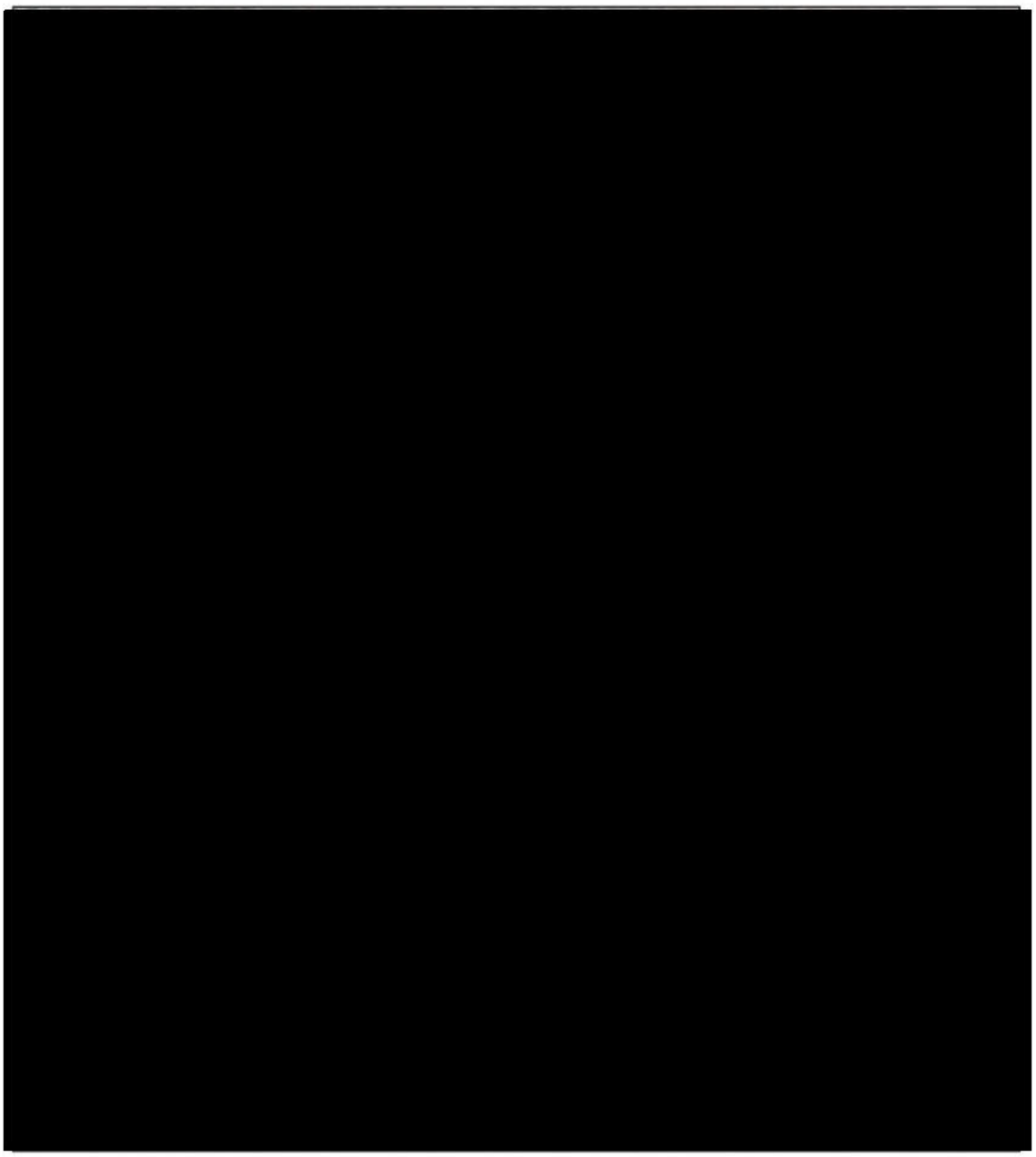


Figure 4: Overall plan of project area and masterplan for Project.

Owner annotations on the application masterplan indicate the home, principal viewing directions and understood locations of the plant, Area C and proposed road. They do not establish surveyed boundaries, the final road alignment or an overlap between the plant and Area C. The large arrows connect marked locations to labels; their arrowheads are not facility locations. “Purposed road” in the original annotation means “proposed road”.

Attachment 2 Owner annotated existing view from the home



Existing view photographed from the property and annotated by the owners. Circles and arrows identify approximate areas of concern, not measured boundaries or proposed heights. This is an existing-view photograph, not a verified future photomontage. Please use the actual viewpoint for assessment after confirming its location and camera details with the owners.