Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure A:

Development Engineering: Maria Baring

Geotechnical: John Newsome

16 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Maria Baring – Development Engineer John Newsome – Geotechnical Engineer
Qualifications & Relevant Experience:	**Maria Baring:** I hold a Bachelor of Science in Civil Engineering and have 20 years' experience in resource consent processing. I am a Full Member of Engineering New Zealand (Membership No. 1010183) and have extensive experience in the preparation of expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation, and fast-track consenting applications. **John Newsome:** My name is John Newsome, and I currently hold one of the two Team Leader – Regulatory Engineering (South) positions with Auckland Council. I hold a bachelor's degree in Earth Sciences from Waikato University. I have 10 years-experience with a geotechnical engineering consultancy during the 1980s before joining Council in January 1991 as a development engineer. I have nearly 36 years of continuous professional experience in Resource Consents processing and other engineering aspects of land development with Manukau City Council and Auckland Council, and am familiar with a wide range of projects over this period. I have maintained my interest in geotechnical aspects of Auckland soils and provide advice to staff on projects as required.

Preparation in Accordance with the Code of Conduct:	**Maria Baring:** I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified. **John Newsome:** I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	16 October 2026

3.0 Executive Summary / Principal Issues

The application has been reviewed against the relevant District standards of the Auckland Unitary Plan. Except for the amendments to the conditions relating to the private wastewater and private water supply systems, no changes to the recommended conditions are proposed.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Beachlends South – Rule Assessment prepared by UNIO Environmental dated 26 June 2026
- Draft Proposed Conditions dated 26 June 2026
- Beachlands South Fast Track Infrastructure Report prepared by Harrison Grierson dated 24 June 2026

- Beachlands South Fast Track Infrastructure Report prepared by Harrison Grierson dated 24 June 2026 – Appendix 5
- Beachlands South Fast-Track Substantive Application Water Supply Concept v6 prepared by GWE Consulting Engineers dated June 2026

5.0 Specialist Assessment

E12 – Land Disturbance – District

The application has been reviewed by Council's Regional Earthworks Team. Sediment and erosion control matters will be addressed through the Regional Earthworks conditions. No further comments or conditions are recommended by the Development Engineer.

Land disturbance activities must be undertaken in a manner that protects public safety and avoids, remedies, or mitigates adverse environmental effects. Appropriate measures must also be implemented to prevent, or adequately manage, dust beyond the site boundary to avoid nuisance effects.

The proposed earthworks conditions have been reviewed and are supported. No amendments are recommended.

PC 120 E12.6.2 Earthworks including filling within the 1 per cent annual exceedance probability (AEP) flood plain and/or flood prone areas

The application has been reviewed by Healthy Waters. Subject to the conditions recommended by Healthy Waters, no further comments or conditions are required from the Development Engineer.

E38.6.5 Overland flow paths

The application has been reviewed by Healthy Waters. An as-built overland flow path plan, including cross-sections and longitudinal sections, will be required following completion of the earthworks to confirm final overland flow path regime and demonstrate compliance with the required freeboard to the finished floor levels of the proposed buildings and dwellings.

The proposed conditions have been reviewed and are supported. No amendments are recommended.

PC120 E36 – Natural Hazards and flooding – [A89]

The proposal involves on-site wastewater treatment and disposal systems and effluent disposal fields in the 1 per cent annual exceedance probability floodplain on the 620 Whitford-Maraetai Road.

The application has been reviewed by Council's Regional Wastewater Team. Subject to the recommended Regional Wastewater conditions, no further comments or conditions are required from the Development Engineer.

E38.6.3 Services

Stormwater Reticulation Networks

The application has been reviewed by Healthy Waters as the asset owner. Subject to the recommendations of Healthy Waters, no further comments are provided by the Development Engineer.

Water Reticulation Networks

The Beachlands area is not currently serviced by Watercare as a utility operator. For the Beachland South Project, the bulk water supply will be provided by Pine Harbour Living Limited as non-utility water supplier. The development will be serviced by an additional groundwater bore together with the existing Formosa bore. The water supply system, including dedicated storage and reticulation infrastructure, is designed to meet the firefighting water supply requirements of SNZ PAS 4509:2008.

Drinking water suppliers are required to comply with the Water Services Act 2021, including the obligation to provide safe and reliable drinking water. Appropriate management systems and controls must be implemented to identify, assess, and manage risks to drinking water quality.

Pine Harbour Living Limited is registered with Taumata Arowai and is responsible for meeting the requirements of the Water Services Act 2021. As the proposed water reticulation network will remain private ownership and will not with Auckland Council, Council will not certify the completed works. Accordingly, the consent holder must submit as-built plans for all private water supply infrastructure, accompanied by certification from a Suitable Qualified and Experienced Professional such as a Chartered Professional Engineer. The certification must confirm that the works have been constructed generally in accordance with the approved engineering plans under Condition 1.

Wastewater Reticulation Networks

The application has been reviewed by Council's Regional Wastewater Team. Subject to the recommended Regional Wastewater conditions, no further wastewater-related comments or conditions are required from the Development Engineer.

Notwithstanding the above, as the proposed wastewater infrastructure will remain in private ownership and will not vest in Council, Condition 173 should be amended to require the Consent Holder to provide as-built plans for the private wastewater system, together with certificate by a Chartered Professional Engineer (CPEng) confirming that the system has been constructed generally in accordance with the approved engineering plans under Condition 1.

The proposed alternative provision allowing connection to the Watercare network is contingent upon Watercare's confirmation of available network capacity and the granting of all necessary approvals. As these matters fall within Watercare's jurisdiction as asset owner operator, the Development Engineer does not support inclusion of this provision in the amended conditions.

Utilities

Vector has confirmed by email that the applicant may proceed with the design and construction of the internal electricity reticulation network for the development. While existing feeders currently have limited capacity, Vector has advised that full network capacity is expected to be available following the commissioning of the new feeders, anticipated within approximately two years.

The applicant has provided correspondence from Chorus confirming that connection to the Ultra-Fast Broadband (UFB) fibre network is available for the development.

The recommended conditions have been reviewed, and no amendments are proposed.

Geotechnical (*John Newsome****)***

I am satisfied that there has been sufficient geotechnical investigation and assessment to reliably confirm that the development proposal is a workable proposition for this area. In this regard, the depth of analysis and quality of engineering commentary gives me confidence that all relevant geotechnical aspects have been both understood and addressed, and that there are viable engineering solutions available to ensure the success of the project as designed. Furthermore, I consider there is sufficient expertise demonstrated to facilitate the necessary ongoing supervision and monitoring during the construction and final certification phases of the development.

6.0 Section 67 Information Gap

We have not identified any Section 67 information gaps.

7.0 Recommendation

Based on the information available, a high-level engineering assessment has been undertaken. Subject to the amended conditions recommended below, we support the proposal.

8.0 Proposed Conditions

Condition 173 Amended to read

Wastewater Reticulation Networks – Non – Utility Operator

The Consent Holder must construct a wastewater reticulation network to serve the development with a sewer system and a wastewater treatment plant, in accordance with the approved engineering plans as required by Condition 1 and Appendix 1 to the conditions and the staged wastewater treatment and reticulation network set out in GWE Wastewater Concept Design Report. As-Built plans for the private wastewater system accompanied by either a Producer Statement Construction Review (PS4) or certification signed by a Chartered Professional Engineering (CPEng) confirming that the works have been satisfactorily undertaken must be provided prior to the issue of a 224(c) certificate.

Advice Notes:

The consent holder must obtain an encroachment license from Auckland Council for the private asset located within the land proposed to vest as legal road. The encroachment license must be obtained prior to the vesting of the road.

Condition 174 Amended to read

Water Reticulation Network – Non-Utility Operator

The Consent Holder must provide As-Built plans for the private water supply system, accompanied by either a Producer Statement Construction Review (PS4) or certification signed by a Chartered Professional Engineer (CPEng), confirming that the system has been constructed in accordance with the engineering plans referenced in Condition [1].

The Consent Holder must also provide evidence of a fully executed operation and maintenance agreement with a suitably qualified and accredited service provider for the ongoing operation, monitoring, maintenance, repair, renewal, and management of the private water supply system.

The information required by this condition must be submitted to Council prior to the issue of a 224(c) certificate.

Advice Notes:

The consent holder must obtain an encroachment license from Auckland Council for the private asset located within the land proposed to vest as legal road. The encroachment license must be obtained prior to the vesting of the road.

The following geotechnical engineering conditions are required:

The earthworks design and construction must be undertaken and supervised by a suitably qualified engineering professional. In supervising the works, the suitably qualified engineering professional must ensure that they are constructed and otherwise completed in general accordance with the Tonkin & Taylor Ltd Geotechnical report dated June 2026. (reference job number 1014358.3200 v1.2)

Certification from a suitably qualified engineering professional responsible for supervising the works must be provided to Council, confirming that the works have been completed in accordance with condition XX [condition reference], within ten (10) working days following completion. Written certification must be in the form of a geotechnical completion report, or any other form acceptable to the council.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure B:

Regional Earthworks

Matthew Byrne

07 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	FTAA-2606-1256
Council reference number:	BUN60467962

2.0 Technical Specialist Memo - Earthworks & Erosion and Sediment Control

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Matthew Byrne – Erosion & Sediment Control Consultant to Earth, Streams and Trees Team
Qualifications & Relevant Experience:	I hold the qualifications of: Bachelor of Environmental Studies and have over 22 years of experience in the field of earthworks and streamworks assessment, and earthworks and streamworks environmental compliance monitoring. I am a member of the International Erosion and Sediment Control Association (Australasia). I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications, and have appeared as an expert witness before consent authorities and the Environment Court on multiple occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:	
Date:	7 October 2026

3.0 Executive Summary

The following memorandum assesses the applicant's proposal to undertake approximately 1,344,000m^3 of earthworks over 118.6 ha, associated with a large-scale, staged urban development at Beachlands South, Auckland. Cut to fill earthworks are required to prepare the land for the development of approximately 2,000 dwellings, commercial and community facilities, schools, and supporting infrastructure.

Erosion and sediment control (ESC) will be achieved by constructing ESC measures in accordance with best practice that will meet or exceed the guidance contained in Auckland Council's Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region, June 2016 (GD05).

The following ESC measures are proposed:

- Sediment retention ponds (SRPs) are proposed as the primary method of treatment for sediment laden runoff generated during the earthworks. Areas that cannot drain to an SRP because of site grades or are not large enough to require construction of an SRP, will be treated by decanting earth bunds (DEBs).
- SRPs and DEBs will be chemically treated with provision of a chemical treatment management plan (ChTMP) ahead of earthworks commencing.
- Standard silt fences (SF), super silt fences (SSF), clean-water diversion bunds (CWD), dirty-water diversion bunds (DWD), and stabilised construction entrances/access ways (SCE) are proposed.
- Progressive stabilisation and monitoring and maintenance of all ESC measures throughout the duration of earthworks is proposed.
- Enhanced ESC will be achieved by the implementation of an Erosion and Sediment Control Adaptive Management Plan (ESCAMP) throughout the duration that earthworks are undertaken. Provision of an ESCAMP has been proposed through conditions of consent.

The application documents include a set of indicative erosion and sediment control plans (ESCPs) designed to demonstrate that the earthworks can be completed in accordance with best practice and

GD05, and with the necessary controls and staging strategy outlined in the Beachlands South Precinct Plan.

The applicant concludes that adverse land disturbance effects will be no more than minor, subject to the implementation of the proposed ESC methodology and the preparation and certification of final ESCPs, a ChTMP, and an ESCAMP prior to earthworks commencing.

Overall, I support the applicant's proposal subject to the Expert Panel's consideration of what I consider are relevant Beachlands South Precinct Plan provisions, and subject to the addition of a recommended Review Condition relating to the applicant's requested 25-year expiry date for the earthworks permit. Details regarding these matters are provided in Sections 6.5 and 9 respectively.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- BEACHLANDS SOUTH, Fast-track Approval Substantive Application, Assessment of Environmental Effects and Statutory Analysis, dated 26 June 2026, by UNIO Environmental. (AEE)
- Beachlands South Fast Track, Infrastructure Report, including Earthworks and Erosion and Sediment Control Plans, dated 24th June 2026, by Harrison Grierson.
- DRAFT PROPOSED CONDITIONS, BEACHLANDS SOUTH FAST TRACK APPLICATION, dated 26 June 2026.
- S67 Response Table, undated, by Unio Environmental.
- Beachlands South Fast Track, Ecological Impact Assessment, Version 3, dated 10 September 2026, by Viridis Environmental Consultants.
- Auckland Unitary Plan, I458 Beachlands South Precinct, Standard I458.6.11 and Precinct Plan 7: Earthworks Catchments.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

Section 7.2 of the AEE identifies the reasons for consent relating to earthworks under chapter E11 of the Auckland Unitary Plan (AUP). The applicant has identified that consent for earthworks under rule E11.4.1 (A5) is required, however, this is incorrect. Consent under E11.4.1 (A8) and (A9) is required and the applicant has correctly identified these rules as reasons for consent.

6.0 Specialist Assessment

6.1 - Site Description & Existing Environment

Section 5 of the applicant's AEE contains a description of the site and its surrounding area. I have accepted and adopted these descriptions during completion of my assessment below.

Potential sediment discharges associated with the earthworks, will be overland to unnamed permanent, intermittent and modified natural watercourses, and natural inland wetlands located on the site, which in turn discharge to the coastal marine area of Waikōpua Creek to the southwest of the site, and to the wider Whitford Embayment, west of the site. These coastal marine areas form part of the Tamaki Strait and the wider Hauraki Gulf.

6.2 – Relevant Background Information

Five (5) catchments are identified within the Beachlands South Precinct, mapped in Precinct Plan 7 under the Auckland Unitary Plan (AUP), and the proposed earthworks will be undertaken across six (6) stages within these 5 catchments. The earthworks have been proposed to generally comply with Precinct Plan 7's limits that require open area restrictions and construction sequencing.

The relevant Precinct Plan 7 provisions are stated at I458.6.11 and they limit the maximum disturbed area to 20 ha cumulatively across five (5) precinct plan catchments at any one time, limit earthworks comprising disturbed and stabilised areas to 15 ha within each catchment during any single earthworks season, and limit the maximum disturbed area exposed within each catchment to 5 ha at any one time.

Earthworks at the site have commenced under a separate resource consent, granted by the Auckland Council in December of 2025, and are not dependent on the current Fast-Track application being approved. The current Fast-Track application seeks approval for the remaining, much larger earthworks programme across the wider development area as detailed above.

The two programmes are intended to form one coordinated development sequence. The consented Stage 1 works establish the first development area, whilst the proposed Fast-Track works extend earthworks and infrastructure progressively into the later stages.

Accordingly, Stage 1 is not separate from the overall project in a physical or development sense, but it is separate in consenting terms: Stage 1 already has consent, whereas the current Fast-Track application seeks the approvals needed to complete the balance of the development.

6.3 - Assessment of Effects on the Environment - Earthworks

The potential environmental effects of the proposed earthworks are primarily associated with erosion of exposed surfaces at the site and the subsequent sedimentation of the receiving environment, being unnamed freshwater tributaries of the CMA and ultimately, the CMA of Waikōpua Creek, the wider Whitford Embayment, and the Hauraki Gulf.

Sediment can degrade aquatic values such as water quality, smother habitat for aquatic fauna within these receiving environments, and directly impact aquatic fauna by blocking their breathing apparatus. The applicant has stated that the project will utilise ESC measures, intended to meet GD05 and, in several material respects, exceed its baseline guidance, to help ensure the earthworks are appropriately managed.

6.4 – Earthworks and ESC

- Approximately 756,000m^3 of cut and 588,000m^3 of fill over approximately 118.6ha are proposed.
- Earthworks have been proposed across 6 Stages and include eighty-three (83) ESC device catchments.
- Thirty-five (35) SRPs and forty-eight (48) DEBs have been proposed as the main method of sediment control.
- SRPs will be constructed based on 3.75% criteria, having 3.75m^3 of impoundment volume for every 100m^2 of contributing catchment, and a maximum catchment of 4 ha per SRP. These criteria exceed the baseline guidance contained in GD05.
- Chemical treatment of all SRPs and DEBs has been proposed. A draft ChTMP has been included as have conditions of consent that require a final ChTMP to be provided ahead of earthworks commencing, which must include bench testing of not only standard chemicals such as poly aluminium chloride (PAC), but also of organic flocculants.
- An ESCAMP has been proposed to monitor the performance of the ESC measures and the receiving environment, and to trigger corrective management responses where sediment discharges may cause unexpected adverse sediment related effects.
- The application documents include a set of indicative erosion and sediment control plans (ESCPs) in accordance with GD05. The location of all SRPs, DEBs, CWDs, DWDs, SF, SSF, and SCEs are shown on the indicative plans.
- Non-structural ESC measures include progressive stabilisation of earthworks areas as they reach the desired gradients, and regular monitoring and maintenance of all controls in accordance with the guidance contained in GD05.

The application proposes an ESC regime that is generally consistent with GD05 and includes enhanced measures that exceed the minimum GD05 guidance, particularly increased SRP sizing, reduced pond catchments, universal chemical treatment, exposed area limits and adaptive monitoring and management.

The ESCPs have been designed to demonstrate that the earthworks can be completed in accordance with best practice and GD05, and with the necessary controls and staging strategy outlined in the Beachlands South Precinct Plan. The provision of final ESCPs, specific to each stage of earthworks, has been proposed as a condition of consent as has the provision of a final ChTMP, and an ESCAMP.

Regarding the provision of final ESCPs, this is not uncommon, particularly given the significant area of earthworks proposed. Provision of finalised ESCPs allows the indicative controls to be refined to reflect

detailed staging and changes to the earthworks methodology and site conditions, provided any changes remain within the scope of the consent and achieve an equivalent or higher level of ESC performance.

Regardless, the indicative ESCPs propose a range of ESC measures in accordance with GD05, and it is the applicant's intention that the final ESCPs will specify the exact controls required, having regard to the earthworks' volume and area for the relevant season in which they are proposed, and having regard to any staging that is proposed.

Overall, I support the applicant's earthworks and ESC methodology. I support their proposal to provide finalised ESCPs for any given area of the site ahead of earthworks commencing and I also support their proposal to provide a final ChTMP ahead of earthworks commencing. These measures are recognised as industry best practice measures and will help ensure that potential sediment related effects are managed appropriately.

Provision of an ESCAMP ahead of earthworks commencing and the implementation of that plan throughout the duration of earthworks at the site is also supported. The purpose of the ESCAMP is to monitor the performance of the ESC measures and receiving environments, and to trigger corrective management responses where sediment discharges may cause unexpected adverse sediment related effects. Implementation of an ESCAMP for an earthworks operation of this nature is considered best practice and will help ensure that the potential sediment related effects of the proposal are appropriately managed.

6.5 – Precinct Plan Provisions

As noted above, the applicant proposes through condition 43, to limit exposed bulk earthworks areas to 20 ha across the project and 15 ha within each catchment at any one time. However, these proposed limits do not accurately reflect provision **I458.6.11** of Precinct Plan 7, which distinguishes between cumulative disturbed area, the total area of earthworks undertaken during an earthworks season, and the disturbed area exposed at any one time. The operative provision establishes the following three separate limits:

- 20 ha maximum disturbed area, cumulatively across all Precinct Plan 7 catchments at any one time.
- 15 ha of earthworks, comprising disturbed and stabilised areas, within each catchment over a single earthworks season.
- 5 ha maximum exposed area within each catchment at any one time.

The applicant's proposed conditions of consent, specifically, proposed condition [43] suggests that the open area limits apply to bulk earthworks only and not to overall earthworks, regardless of whether they are "bulk earthworks" or general earthworks (i.e., any earthworks and/or land disturbance). Proposed condition 43 states:

> The maximum area of exposed earth associated with bulk earthworks at any one time throughout the duration of the project when exercising this consent must be no greater than 20 hectares across the Project and 15 hectares within each catchment.

Advice note: This limit applies to "bulk" earthworks only and not to "post-construction" subdivision or development related earthworks.

I draw the Expert Panel's attention to the advice note under proposed condition 43, which states that the condition applies only to bulk earthworks and not to post-construction subdivision or development-related earthworks. In my view, this limitation is inconsistent with Standard I458.6.11 of the Beachlands South Precinct provisions, which applies to earthworks generally and is not expressly limited to bulk earthworks or to any particular consent or stage of development.

Standard I458.6.11 is titled "**Earthworks**", and its stated purpose is *"to minimise sediment runoff and manage discharge effects on the receiving environment"*. Consistent with that purpose, the standard regulates earthworks by reference to the extent and condition of the land disturbed, rather than to the particular type or stage of earthworks being undertaken.

Specifically, Standard I458.6.11 provides that:

- the maximum disturbed area across all catchments identified in Precinct Plan 7 must not exceed 20 ha cumulatively at any one time;
- no more than 15 ha of earthworks, comprising disturbed and stabilised areas, may be undertaken within each catchment during any single earthworks season; and
- the maximum disturbed area within each catchment must not exceed 5 ha exposed at any one time.

The use of the terms "all catchments", "cumulatively" and "at any one time", together with the absence of any express limitation to bulk earthworks, indicates that these restrictions apply to all earthworks within the relevant Precinct Plan 7 catchments, including subsequent civil, subdivision and development-related earthworks where they contribute to the disturbed, exposed or seasonal earthworks area.

On this basis, I recommend that proposed condition [43] be amended so that it accurately reflects each of the limits in Standard I458.6.11 and does not restrict the application of those limits to bulk earthworks.

6.6 – Timing & Seasonal Restriction

Consented earthworks commenced at the site in January 2026. This initial bulk-earthworks programme is expected to continue through 2028, followed and partly overlapped by civil construction over approximately five years. Further bulk, civil and secondary building-related earthworks will then occur progressively as the remaining stages are developed, with the overall construction programme extending to approximately 2039–2041. Based on my experience, I consider these timeframes to be reasonable.

The applicant has proposed a seasonal restriction for the earthworks which is consistent with the requirements of the existing Stage 1 earthworks permit. The intention of this condition is to minimise the overall duration that bare earth is exposed, and to reduce the potential effects of sedimentation on the receiving environment during Auckland's wetter winter months. I support the applicant's proposal in this regard.

6.7 – Conclusion

Regarding the proposed earthworks, the applicant considers that the implementation of best practice ESC measures will appropriately manage potential sediment-related effects, and that the effects will be less than minor. Based on my assessment of the applicant's proposal, I concur with their assessment, subject to the works being undertaken in accordance with the application documents, all supporting technical information and proposed consent conditions, including the additional recommendations set out below.

7.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps.

8.0 Recommendation

The AEE and its accompanying earthworks and ESC related documents state that proposed ESC measures will ensure the proper management of any potential sediment related effects and that any resulting effects will be less than minor. An assessment of the technical aspects of the earthworks and sediment control methodology has been undertaken, and I support the applicant's proposed earthworks and ESC related measures.

Notwithstanding this support, I have recommended an amendment to the applicant's proposed condition number 43, the relevant matters for which are discussed in section 6.5 above. I have also recommended the inclusion of an additional Review Condition, the details of which are discussed in Section 9, below.

9.0 Proposed / Amended Conditions

I consider the applicant's proposed earthworks and ESC related conditions to be appropriate. However, I have recommended an amendment to proposed condition 43.

I have also recommended an additional condition relating to the applicant's proposed 25-year expiry date for the earthworks permit. The applicant has suggested that a Review Condition for the earthworks permit is unnecessary due to the proposed staging of the works. However, earthworks staging is not relevant to the intention of a Review Condition. Simply put, a Review Condition allows for the earthworks permit to be reviewed should it be determined that the ESC measures proposed in the application documents no longer represent best practice.

In Table 1, below, my recommended amendment to Proposed Condition 43 is shown as being ~~struck through~~, whilst my recommended additional condition is underlined.

Table 1 –Recommended Amendment & Additional Condition

	Existing Proposed Condition – ~~struck through~~	**Recommended Amendment- underlined**
[43]	~~The maximum area of exposed earth associated with bulk earthworks at any one time throughout the duration of the project when exercising this consent must be no greater than 20 hectares across the Project and 15 hectares within each catchment.~~ ~~*Advice note: This limit applies to "bulk" earthworks only and not to "post-construction" subdivision or development related earthworks.*~~	The Consent Holder must undertake all earthworks authorised by this consent so that: a. the maximum disturbed area across all catchments identified in Precinct Plan 7 does not exceed 20 ha cumulatively at any one time; b. no more than 15 ha of earthworks, comprising disturbed and stabilised areas, is undertaken within each catchment during any single earthworks season from 1 October to 30 April; and c. the maximum disturbed area within each catchment does not exceed 5 ha exposed at any one time. *Advice note: For the purposes of clauses (a) and (c), areas of completed earthworks that have been stabilised are no longer considered disturbed areas. Clause (b) applies to the total area of earthworks undertaken within the relevant catchment during an earthworks season, including both disturbed and stabilised areas. The limits apply irrespective of whether the works comprise bulk, civil, subdivision or development-related earthworks.*
	Recommended Additional Condition	
[XX]	**Review Condition** The Council may, within one month following each anniversary of commencement of this consent, serve notice on the Consent Holder under section 128(1) of the Resource	

	Management Act 1991, of its intention to review the conditions of resource consent LUC60467963 for the following purposes: (a) To deal with any significant adverse effects on the environment arising from the exercise of the consent which was not foreseen at the time the application was considered and which is appropriate to deal with at the time of the review. (b) To consider the adequacy of conditions which prevent nuisance and adverse effects beyond the boundary of the Site, particularly if regular or frequent complaints have been received and validated by an enforcement officer. (c) To consider developments in erosion and sediment control technology and management practices that would enable practical reductions in the discharge of sediment to the receiving environment. Or, the consent may be reviewed by the Council at any time, if it is found that the information made available to the Council in the application contained inaccuracies which materially influenced the decision and the effects of the exercise of the consent are such that it is necessary to apply more appropriate conditions.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure C:

Coastal Water Quality and Marine Ecological Effects

Dr. Kala Sivaguru

07 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Marine Ecology, Coastal water quality, sediment quality, Underwater noise effects on the coastal marine environment

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Dr. Kala Sivaguru, Senior Coastal Specialist
CC	Alan Moore, Principal Specialist
Qualifications & Relevant Experience:	My name is Kalayarasi (Kala) Sivaguru. I hold an MSc (Hons) in Marine Ecology and Ph.D. in Marine Ecology and Ecotoxicology from the University of Auckland. I am currently employed as a Senior Coastal Specialist in the Specialist Unit at Auckland Council where I have worked since March 2013. Prior to this, I worked for the Department of Conservation for 11 years where I provided advice on the conservation and management of the ecology of the marine environment in the Auckland region. In this role I undertook long-term research and monitoring programmes for marine reserves across Auckland Region. I am a member of New Zealand Marine Sciences Society and New Zealand Coastal Society. In my current role I have been involved in assessing the effects of many resource consent proposals, in particular on marine ecological values. These include various structures, including bridges, wharves, jetties, marine farms, mangrove removal, dredging and sand extraction, and discharges. This has included the assessment of effects, including underwater noise effects of

	impact and vibratory pile driving in the CMA. I have attended and presented expert evidence at Council, EPA and Environment Court hearings.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	07 October 2026

3.0 Executive Summary/Principal Issues

This technical memo assesses the water and sediment quality, marine ecological effects, and underwater noise effects associated with the proposed sheet piling required to construct a cofferdam for the proposed works within the Coastal Marine Area (CMA). The proposed CMA works include the discharge of up to 1,383 m³/day of treated wastewater via an offshore outfall located approximately 2 km offshore during Stage 2 of the development. In addition, residual effects management measures, including ecological compensation and offsetting, are proposed in relation to sediment discharges to intertidal shellbank habitats at Waikopua Shellbanks during the approximately 10-year construction phase of the wider Stage 1 urban development.

The marine ecological values described in the Marine Ecological Assessment (Attachment 13B) indicate that benthic macroinvertebrate communities within the subtidal habitat, which forms the immediate receiving environment for the proposed treated wastewater discharge, exhibit levels of abundance, richness, and diversity consistent with healthy soft-sediment habitats, including areas of seagrass. In contrast, the benthic ecological health of the surrounding intertidal habitats within the CMA is characterised by low species diversity and has been identified as degraded under the Auckland Unitary Plan Degradation Classification.

Available water quality monitoring results provided by the applicant indicate that background concentrations of total nitrogen (TN), total phosphorus (TP), and total suspended solids (TSS) are generally close to guideline concentrations at the proposed discharge location. The Water Quality Outfall Modelling Assessment predicts a mixing zone of approximately 100 m for the Stage 2 discharge volume of 1,383 m³/day, with an estimated dilution of approximately 850-fold at the edge of the mixing zone. This mixing zone forms the basis for the assessment of potential effects on water quality, sediment quality, and marine ecology. Accordingly, the assessment of environmental effects has been undertaken on the basis of the maximum proposed discharge volume of 1,383 m³/day.

The applicant proposes monitoring of water quality, sediment quality, benthic ecology, and changes in the extent of seagrass habitat in the vicinity of the offshore outfall. This monitoring programme would assist in validating the model predictions and confirming whether actual environmental effects are consistent with those predicted by the assessment.

Residual effects management measures are proposed to address contaminant and sediment discharges arising from Stage 1 construction activities associated with the wider urban development. These measures include shellbanks enhancement works at Waikopua Shellbanks, comprising mangrove removal and ongoing management across an area of up to 15 hectares. However, alternative compensation sites identified in the Ecological Report for implementation should the shellbank enhancement not achieve the intended outcomes are considered outside the scope of the current application, as no information has been provided to assess their ecological values, suitability, or effectiveness.

The wider development is proposed to occur over an approximately 10-year construction period. Therefore, should consent be granted for the proposed shellbank enhancement and mangrove removal activities, these measures should be implemented during the development and construction phases when potential adverse effects on the CMA are occurring, rather than being deferred until Stage 2 when the offshore outfall works are proposed. Implementing these measures during the construction period would better align with the proposed adaptive management framework and provide a greater opportunity to achieve the intended ecological outcomes and offset or mitigate adverse effects as they arise.

Overall, I support the proposed construction of the offshore outfall and the discharge of treated wastewater to the CMA via the offshore outfall, subject to the implementation of the recommended consent conditions, including the proposed Marine Monitoring Plan (MMP). This support is contingent upon the proposed wastewater treatment system being fully implemented prior to, or as part of, Stage 2 of the development, and that the discharge volume does not exceed the assessed maximum of 1,383 m^3/day.

In addition, I support the proposed shellbanks enhancement and mangrove removal works at Waikopua Shellbanks, as outlined in the Ecological Report and the draft Coastal and Biodiversity Management Plan (CBMP), subject to the provision of the outstanding information identified in this memo and the implementation of the recommended consent conditions.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Attachment 0B-Planning Assessment
- Attachment 0B2-s67 response table
- Attachment 10 -Wastewater Report
- 10A -Wastewater Ocen Outfall method
- Attachment 13 and 13A-Water Quality Outfall Modelling Study
- Attachment 13B-Marine Ecological Impact Assessment
- Attachment 13D-Marine EcIA Volume 2 Appendices (Appendix F)
- Attachment 13E-Marine Compensation Areas and Habitats
- Attachment 18 and 18A-Noise Assessment

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

- F2,19.8 (A84)- This rule is not required. The rules in Table F2.19.10 cover occupation of the common marine and coastal area (CMCA) and use of the coastal marine area (CMA). See Note 1 under header “Table F2.19.10 Activity table - Structures

- The Planning assessment (Attachment 0B) has included rule F2.19.2 (A12) for disposal of organic material for the shellbank enhancement works. Whilst the source of organic material for disposal is not clarified, description in the Marine Ecology Report (Attachment 13B) indicates deposition rather than disposal. Accordingly, the appropriate rule for the shellbank enhancement would be a consent trigger for deposition. Based on the description provided in the Marine ecology report, shell bank enhancement proposed is within SEA-M1 (43w1). Accordingly, the correct rule for deposition of shell material for the shellbank enhancement would be Rule F2.9.2(A9). The activity status would be a Non-Complying.

6.0 Specialist Assessment

6.1. Proposed works in the Costal Marine Area (CMA)

Wastewater outfall and discharge

The application proposes to discharge of 1383m^3/day of treated wastewater via a outfall and diffuser into the coastal marine area (CMA) during stage 2. The actual outfall pipe would have a capacity of up to 4,000m^3/day.

The proposed coastal outfall would comprise:

• Approximately 1.0 km of onshore pipeline;

• Approximately 2 km of offshore pipeline depending on final alignment selection; and

• A treated effluent diffuser at the outfall terminus

The outfall in the CMA is to be constructed using horizontal directional drilling (HDD).

The seaward end of the outfall and diffuser includes construction of a cofferdam.

Stormwater

Stormwater outfalls and ongoing stormwater discharges from the completed development are proposed. However, detailed information regarding the stormwater outfalls, including their design and associated structures within the CMA, has not been provided.

Compensation/offsetting works

The proposal includes compensation measures to address residual adverse effects associated with the wider urban development identified during the Plan Change 88 process, in particular sediment discharges.

The compensation measures include ecological enhancement works at the Waikopua Shellbanks, including shellbank enhancement by the placement of new shell material and mangrove and pest plant removal.

6.2 Ecological values of the coastal marine area relevant to the proposal

The subject CMA site comprises three distinct tidal creeks (Waikopua, Turanga and Maungamaungaroa Creeks). This area encompasses by eight Significant Ecological Areas - Marine (SEA-M1 & SEA-M2) that are identified in the AUP (Appendix F of the Marine Ecological Impact Assessment, Attachment 13B). The outfall would be directionally drilled within SEA M2 ,43a. The proposed discharge location, including the proposed coffer dam has no SEA-M overlay. However, the discharge has the potential to have effects on the values of the adjacent SEA-M2 (Turanga Creek Estuary, 43a).

The ecological values attributed to this overlay in the AUP being:

"Three distinct tidal creeks (Maungamaungaroa, Turanga, and Waikopua) flowing into one large bay, within which a complex of intertidal mud, sand, and shell flats have accumulated. This physical variety provides a similarly varied range of habitats for an assortment of animal and plant communities. The intertidal banks are a very rich feeding ground and important mid tide roost for many hundreds of a variety of international migratory and New Zealand endemic wading birds including a number of threatened species. Turanga Creek is the largest estuarine habitat, including mangrove shrubland ecosystems, in the Hunua Ecological District. The Department of Conservation has selected this area as an Area of Significant Conservation Value (ASCV)".

Attachment 13B of the application - Marine Ecological Impact Assessment provides marine ecological values of the subtidal marine habitats.

Benthic ecology is the habitat that would potentially be affected by the proposed discharge and construction of offshore outfall. Accordingly, the summary of that habitat information is repeated here.

Marine ecological values provided in the Marine Ecological Assessment show that the benthic macroinvertebrate communities within the subtidal habitat comprise abundance, richness and diversity consistent with healthy soft-sediment habitats.

I agree with the benthic ecological values provided by the applicant for the *subtidal habitat*. However, I note the benthic ecological health of intertidal habitats is characterised by low species diversity and appears to be already degraded. This is reflected in the Auckland Unitary Plan (AUP) degradation classification discussed in Section 6.5 below.

Subtidal seagrass (*Zostera muelleri subsp. novazelandica*)

Approximately 78.1 ha of intertidal and subtidal seagrass beds are present in Waikopua estuary. Seagrass cover within the intertidal zone is not continuous but is present in patches across the mid low intertidal areas, as observed during site survey and from aerial imagery.

I note that seagrass/eelgrass, is categorized as “at risk” in the NZ Threat Classification System. Policy 11 of the New Zealand Coastal Policy Statement requires that adverse effects on seagrass beds should be avoided.

Marine mammals

The Marine ecology report (Attachment 13B) identifies the potential marine mammal species that frequent the zone of influence of the discharge using DOC marine mammal sightings database. Those marine mammal species relevant to the proposal mainly include:

- Resident populations, such as Bryde’s whales and common dolphins, are present in the Hauraki Gulf year-round
- Bottlenose dolphin and orca
- Fur seals, as the most common pinniped in the Hauraki Gulf marine Park, utilise the waters, islands and rocky coastlines for resting, breeding, nursing and foraging

6.3 Sediment quality

Metals and Polycyclic Aromatic Hydrocarbons (PAH)

The applicant’s information indicates that there were no exceedances above the ERC green or DGV / GV-High guideline values for arsenic, cadmium, chromium, copper, lead, mercury, nickel and zinc.

Nutrients

Total nitrogen (TN) was reasonably consistent across all sites (600 - 700 mg/kg) and fall within the ‘good’ ecological quality status. Total organic carbon (TOC) ranged between 0.47 % to 0.61 % with most sites classified as ‘good-very good.

There is no guideline thresholds for total recoverable phosphorus (TRP). TRP concentrations ranged between 280 to 340 mg/kg. TRP concentrations were lower when compared with another study of central Auckland estuaries basins and beaches which had results between 383 - 767 mg/kg (Simha, 2025). This suggests that the TRP concentrations are comparatively low, and do not indicate enrichment.

Benthic Health and sediment quality

Benthic Health Model (BHM)

The applicant has used BHM to interpret the ecological condition of the application area.

I note that the Benthic Health Model (BHM) developed by the Auckland Council to provide a tool for classifying intertidal sites within the region to monitor the ecosystem health to report on state of the environment. The Benthic Health Model (BHM) is used to address changes in benthic community structure associated with gradients in mud and heavy metal contaminants.

Separate models have been created for two of the key environmental contaminants in Auckland area estuaries: sediment mud content (percent silt+clay, CAPmud) and sediment heavy metal concentrations (copper, lead and zinc; CAPmetals). The Trait based Index (TBI) is a functional traits-based index developed for use in Auckland Council's State of the Environment reporting. This index is based upon the richness of macrofaunal taxa in seven individual functional trait groups (Hewitt, et al, 2012).

TBI ranges from 0 (most healthy site) to 1 (most degraded site) as below (Table 1.6).:

Health group	CAP Metals		CAP Mud		TBI		Combined Health Score
	Cut-off	Value	Cut-off	Value	Cut-off	Value	
1 - Extremely good	-0.164	0.2	-0.12	0.2	0.4	0.33	≤ 0.2 "extremely good"
2 - Good	-0.067	0.4	-0.05	0.4	0.3	0.67	0.2 - 0.4 inclusive "good"
3 - Moderate	0.023	0.6	0.02	0.6		1.0	0.4 - 0.6 exclusive "moderate"
4 - Poor	0.100	0.8	0.10	0.8			0.6 – 0.8 exclusive "poor"
5 - Unhealthy		1.0		1.0			≥ 0.8 "unhealthy with low resilience"

Accordingly, I consider using the BHM tool for the subtidal offshore outfall location to have limitations due to change in benthic community composition and temporal and spatial extent of mud and contaminant concentrations. I note that the applicant's Marine Ecological assessment acknowledges those limitations in using the BHM tool. However, the report states that Mud BHM scores ranged from 4.33 to 5.26, indicating consistently high to very high relative impacts of sedimentation across all sites. Four sites (D, E20, E50, and N40) were classified as very high for mud, while the remaining five sites were classified as high. Metal BHM scores ranged from 3.61 to 5.02, showing slightly more variation.

I agree with the sediment quality assessment presented in the Marine Ecology Report (Attachment 13B), including the information relating to metals, polycyclic aromatic hydrocarbons (PAHs), nutrients, and sediment particle size.

6.4 Water quality

The applicant's Marine ecology report (Attachment 13B) has provided the following for water quality analysis:

The measurements from Foley et al. (2018) at the mouth of the Turanga Estuary (refer to Figure 4.9) from 2009 to 2015 were used to estimate background concentrations of water quality constituents within the Whitford Embayment (Table 4.5). The results indicate that background concentrations of TN, TP and TSS are close to guideline concentrations within the proposed discharge location.

Attachment 13 and 13A-Water Quality Outfall Modelling Study provides the following for water quality

The measurements of Total Nitrogen (TN), Total phosphorous (TP), and Total Suspended sediment (TSS) from Foley et al. (2018) at the mouth of the Turanga Estuary (1774464 m E, 5914091 m N, NZTM) from 2009 to 2015 enable us to estimate a background concentration of water quality constituents within the Whitford Embayment. The 80th percentile background concentrations of TN ~= 0.1 mg/L, TP ~= 0.03 mg/L and TSS ~= 15 mg/L are estimated; The guideline values from Foley et al. (2018) are based on the 80th percentile of background measurements from the Auckland region.

A summary table of the guidance, background and discharge concentrations is included in Table 2.5 of Water Quality Outfall Modelling Study.

While I acknowledge the use of available water quality data from the Council's technical publication, the reported 80th percentile values indicate that contaminant concentrations in 20% of the samples exceeded the stated concentrations. Consequently, the data may not fully capture the upper range of contaminant concentrations that may occur within the receiving environment.

6.5 AUP Degradation classification

The Auckland Council report 2013/009 titled" Identification of Degraded Marine Receiving Environments" identifies "degraded areas" on the basis of three measures of ecosystem health water quality, sediment contamination, and benthic health, using data from region wide monitoring programmes.

Overall, the Turanga Creek has been classified as 'Degraded 1' by Auckland Council (Carbines et al. 2013; Working report 2013/009, and Figure B7.4.2.1: Areas of coastal water that have been degraded by human activities in Chapter B7-Natural Resources of the AUP).

Individual measures were:

- Water quality (Degraded 1, with 'Poor' Water quality index);
- Sediment quality (red) (Environmental Response Criteria (ERC) Red conditions reflect conditions where significant degradation has probably already occurred); and
- Benthic health
  - Degraded 1, rank 4 (unhealthy)).

6.6 Effects on water and sediment quality on the CMA receiving environment

Hydrodynamic modelling

Attachment 13 and 13A-Water Quality Outfall Modelling Study provides information on hydrodynamic modelling undertaken for the wastewater discharge. The relevant points are below:

- Measured data from the Auckland region was used to set the guideline value if the measured values exceeded the ANZECC 80th percentile thresholds (Foley et al. 2018).

- The 4,000 m³/day that was modelled is the maximum flow rate for the outfall pipe. **This volume is more than three times the discharge proposed under the current consent application. Accordingly, it provides a very conservative basis for assessment against relevant guideline concentrations.**
- The modelling predicts that at edge of the 100 m mixing zone, the minimum 50th percentile dilution factor is 1100-fold and for the 80th percentile conditions, the dilution factor is 850-fold (Figure 6.3 of the report).
- The analyses indicate that changes in the concentrations of the assessed water quality constituents at the edge of the mixing zone, resulting from the treated effluent discharge, are well below applicable guideline values. These predicted changes are also substantially lower than existing background concentrations, which remain the primary determinant of overall water quality in the receiving environment.

I note the following in relation to the modelling:

While the applicant has relied on the findings of Foley et al. (2018) to establish guideline values for the receiving environment, the use of 80th percentile ambient water quality values as modelling input parameters introduces additional uncertainty into the assessment. An 80th percentile value indicates that 80% of samples are at or below that concentration, while 20% exceed it. Consequently, the modelling is not based on the actual effluent quality proposed for discharge.

The applicant also states that modelling a discharge volume of 4,000 m³/day rather than the proposed Stage 2 discharge volume of 1,383 m³/day is conservative, and that the resulting predicted mixing zone of approximately 100 m should likewise be regarded as conservative. While I agree that the use of a larger discharge volume provides a conservative assessment, I note that the rationale for adopting 4,000 m³/day relates to the ultimate design capacity of the pipeline of the outfall and potential future stages of development rather than the volume currently proposed.

For the purposes of the current application, I consider the predicted 100 m mixing zone to be an appropriate basis for the effects assessment. This is because compliance with relevant contaminant guideline values is expected to be achieved beyond the mixing zone, consistent with the New Zealand Coastal Policy Statement (NZCPS) definition of a mixing zone:

Mixing zone is defined in the NZCPA as below:

“The area within which ‘reasonable mixing’ of contaminants from discharges occurs in receiving waters and within which the relevant water quality standards do not apply”.

<u>Effects</u>

Accordingly, the extent of the mixing zone forms the basis for managing and assessing the effects of the discharge on the receiving environment during stage 2.

However, I recommend a consent condition limiting the maximum discharge volume to the proposed volume of 1383m^3/day under the current application. Any future increase in discharge volume beyond the consented amount should be subject to further assessment and additional resource consents, as required.

Summary

Based on the maximum discharge volume of 1,383 m³/day proposed for Stage 2 and the predicted dilution of approximately 850-fold at the edge of the estimated mixing zone, any adverse effects on water and sediment quality within the wider coastal marine area are expected to be less than minor.

However, measurable changes in water and sediment quality are still anticipated within the immediate receiving environment, particularly within approximately 100 m of the diffuser before full mixing occurs. Given the uncertainties associated with the modelling assumptions and the importance of validating predicted outcomes, monitoring of key water and sediment quality parameters within the receiving environment is recommended. Such monitoring would provide confirmation of the model predictions and enable any unforeseen effects to be identified and managed appropriately.

6.7 Effects on marine ecology from the proposal

While I generally agree with the magnitude of effects conclusion in Attachment 13B-Marine Ecological Impact Assessment, I note the following:

Potential effects from the treated wastewater discharge

Contaminant loads and target effluent quality

The Wastewater Report (Appendix 10) provides estimated contaminant loads in Section 5.3.2 and details of treatment performance and target effluent quality in Section 11.3. The report states that the treatment standard will be maintained at the same level as Stage 1, with the primary difference being the discharge pathway, namely discharge via a marine outfall rather than land disposal.

The above sections set out the predicted effluent quality and contaminant loads entering the CMA receiving environment based on the proposed discharge volume of 1,383 m³/day. As contaminant loads are expected to increase proportionally with increases in discharge volume, it is considered appropriate that, should consent be granted, the authorised discharge volume be limited to a maximum of 1,383 m³/day. A condition is recommended to ensure compliance with this limit.

Seagrass habitats

The applicant has relied primarily on aerial imagery to estimate the extent of seagrass habitat within the offshore outfall area. While the Ecological Report identifies approximately 78.1 ha of

seagrass habitat, it does not distinguish between intertidal and subtidal seagrass beds, with the latter being most relevant to the proposed discharge location.

In addition, seagrass extent is known to vary seasonally, and some features identified from aerial imagery may represent macroalgal assemblages rather than seagrass. Accordingly, the mapped extent of both intertidal and subtidal seagrass habitat identified in the Ecological Report may change over time.

Given the predicted increases in total nitrogen (TN), total phosphorus (TP), and total suspended solids (TSS) loads associated with the proposed discharge, there is potential for changes in the spatial extent, density, and condition of seagrass beds over time. In particular, elevated TSS concentrations may reduce light penetration through the water column, which can adversely affect seagrass productivity, growth, and long-term health.

However, I note that the applicant proposes to monitor potential effects on the spatial extent of subtidal and intertidal seagrass within the Whitford Embayment that may be attributable to nutrient enrichment from the discharge. This monitoring is outlined in Section 5.5.1 of the proposed Marine Monitoring Plan (MMP).

As seagrass beds has been identified as at risk in the New Zealand Threat Classification list, I strongly recommend monitoring the changes in the extent of seagrass beds within the mixing zone (100m from the outfall) and outside the mixing zone of discharge location.

Effects on Benthic infauna (Benthic health)

Whilst the proposed offshore outfall discharge location is located outside the SEA-M overlays identified in the AUP, a number of SEA-M1 and SEA-M2 areas are present within the wider receiving environment. In addition, many of the ecological values attributed to the SEA-M overlays, particularly those associated with intertidal habitats, relate to benthic communities that provide feeding grounds for avifauna and values related to mangrove ecosystems. These benthic habitats are also the ecological receptors most likely to be directly affected by the proposed discharge.

Policy B7.2.2(5) of the AUP requires adverse effects on SEA-M1 and SEA-M2 areas to be avoided. The applicant's assessment of effects is based on a predicted 100 m mixing zone derived from the discharge modelling. To verify the predicted magnitude of effects associated with key contaminants, including nutrients, metals and total suspended solids (TSS), I support the proposed benthic ecology monitoring programme under the Marine Monitoring Programme (MMP). However, to ensure that the monitoring provides ecologically meaningful results, appropriate indicator species should be selected from the baseline benthic macroinvertebrate communities, and suitable sampling locations and monitoring frequencies should be established to enable the detection of any adverse changes attributable to the discharge.

Effects on fish and avifauna

It is considered that the proposed treated effluent quality is not likely to cause any detrimental effects on mobile species such as fish and avifauna and/or any effects through food chains and trophic level interactions.

Cumulative effects of the proposed discharge

It is acknowledged that quantifying cumulative effects from the proposed discharges to the CMA receiving environments is challenging. Models are useful and allow us to predict outcomes, but they are predictions only. Given that the Applicant's estimated discharge volume during stage 2 is 1383m^3/day and compared to the catchment's total discharge, the resulting cumulative effects are unlikely to be readily distinguishable from natural variability.

It is noted that there is other two wastewater discharge applications within the wider receiving environment, namely Watercare's wastewater treatment plant discharge application, which is currently being processed, and the Whitford Manor wastewater treatment plant discharge application, which is currently under appeal.

Should consents be granted, the discharge from all these three applications could cumulatively affect the ecology of the wider Turanga estuary.

However, the proposed Monitoring and Management Plan (MMP) would provide a mechanism to validate the predictions made in the assessment and to identify any unforeseen adverse effects arising from the discharge, including cumulative effects.

Summary of ecological effects on the environment

In summary, based on the ecological values provided for the immediate receiving environment, the subtidal habitats are characterised by generally healthy soft-sediment communities, with benthic ecological values considered relatively high. This is supported by the spatial extent and distribution of seagrass habitats identified within both the immediate and surrounding receiving environment. However, the AUP degradation classification identifies the intertidal habitats within Turanga Creek as being of low ecological diversity and already degraded.

However, the AUP degradation classification identifies the intertidal habitats within Turanga Creek as being of low ecological diversity and already degraded. As noted in Section 6.5 above, Policy B7.2.2(5) of the AUP seeks to avoid adverse effects on areas identified in the Schedule 4 Significant Ecological Areas – Marine (SEA-M) Schedule. While the proposed treated wastewater discharge is unlikely to result in significant adverse effects on the existing ecological values of the receiving environment, including those associated with the SEA-M overlays, it is considered appropriate to require a level of ecological monitoring to ensure that no further degradation occurs as a result of the discharge entering Turanga Creek. Accordingly, I support the ecological monitoring programme outlined in the MMP Ecological Report (Attachment 13b), which will provide a mechanism to verify the predicted effects and confirm that the ecological values of the receiving environment are maintained over time.

6.8 Effects from the Construction of offshore outfall

Beachlands South Wastewater Ocean Outfall HDD Methodology (Attachment 10A), Marine Ecology report (Attachment 13B) and the response to questions raised related to construction in the s67 memo provide the following:

- The preferred alignment and construction methodology have been developed on the basis of the preliminary geological interpretation and are considered technically feasible for the anticipated ground conditions. The alignment will be refined during subsequent design stages following completion of additional marine geotechnical investigations and detailed HDD design.
- The offshore HDD of 450mm diameter outfall pipeline spread shall be established on a jack-up barge positioned at the offshore exit location in approximately 4.5 m water depth. The coffer dams and dewatered area are expected to be in the order of 150 m^2.
- The details relating to the cofferdam dimensions and layout is not available and will be provided in detailed design phase. The area provided in the methodology document is indicative only.
- Currently it is estimated that the diffuser setup will be approximately 10m long, could occupy a space of about 2m wide, and the diffuser may be about 0.5m above the seabed.
- Detail relating to the number, diameter, spacing, and orientation of diffuser ports is not available at this stage and will be provided in the detailed design phase.

Construction effects of offshore outfall

Based on the indicative outfall alignment plan, a portion of the proposed pipeline would be located within an SEA-M2 area identified in the AUP. However, this section of the pipeline is proposed to be installed using Horizontal Directional Drilling (HDD). No direct disturbance of the foreshore or seabed or the associated ecological values within the SEA-M2 area is anticipated. Accordingly, any adverse effects on the ecological values of the SEA-M2 by the HDD installed outfall are expected to be negligible. However, where the pipeline emerges from the seabed and the offshore outfall and diffuser are installed, there would be some construction-related effects on the seabed.

The Ocean Outfall Methodology report identifies two potential construction options. The preferred option involves the use of a cofferdam for installation of the above seabed outfall and diffuser. While the duration of construction has not been specified in the information provided, the works are likely to occur over several months. Construction activities, including cofferdam installation and removal, excavation works, and retrieval of the tunnelling machine, would result in temporary disturbance of the seabed.

In addition, retrieval of tunnelling machine and cofferdam removal would also cause disturbance to the seafloor. These works are likely to cause an increase in suspended sediment which could affect the benthic fauna. But this is likely to be short term, confined to the construction period, and such disturbance would be remedied by natural processes within a short time.

The proposed construction methodology includes measures to minimise sediment disturbance, including the implementation of erosion and sediment control measures and the use of a cofferdam to contain construction effects. These mitigation measures are expected to substantially reduce adverse effects associated with the construction phase.

Construction of stormwater outfalls

I note that while the Planning Report (Attachment 0B) identifies the relevant infrastructure rules relating to stormwater outfalls within the CMA in Section 7.2 (F2.19.10, Rule A133), no further information has been provided regarding the number, design, or construction methodology of the proposed stormwater outfalls. Notwithstanding this information gap, any adverse effects arising from the construction of the stormwater outfalls are anticipated to be temporary, localised, and confined to the immediate works area. Given the small scale and typical nature of such works, construction-related effects on the coastal environment are expected to be less than minor.

To provide for the construction of the stormwater outfalls, the conditions are included for the construction, occupation of the Common marine and coastal area (CMCA,) and use of the CMA associated with these structures.

To ensure construction effects are appropriately managed, I support the draft consent condition requiring the preparation and implementation of a Construction Management Plan (CMP) prior to commencement of works. The CMP would provide detailed information on the final design, dimensions, construction methodology, and environmental management measures for the offshore outfall and stormwater outfalls in the CMA. It would also enable review of the final alignment of the pipeline and offshore outfall. I note that any significant departure from the indicative alignment assessed as part of this application may result in additional environmental effects and could require further assessment and resource consent approvals.

Given the ecological value of seagrass habitats, it is recommended that appropriate measures be implemented during construction of the outfall and diffuser to avoid, remedy, or mitigate adverse effects on these habitats as much as reasonably practical. This approach is consistent with the intent of Policy 11 of the NZCPS, which requires protection of indigenous biological diversity and habitats supporting threatened species within the coastal environment.

6.9 Underwater noise effects from impact and vibratory sheet piling

The Applicant has sought a consent (under F2.19.8, Rule A114 of the AUP) to undertake impact driving and vibratory piling (sheet piling) for the proposed cofferdam construction works within the CMA.

F2.23.1 (1) and F2.23.1 (3) (c)-Matters of discretion are relevant to this application in relation to underwater noise effects.

F2.23.1 (c)-Matters of discretion

Underwater blasting, impact and vibratory piling, marine seismic surveys

(i) the health and well-being of marine fauna (including threatened and at-risk species) and people from the underwater noise associated with the proposal;

(ii) the practicability of being able to control the underwater noise effects;

(iii) the social and economic benefits of the proposal; and

(iv) the extent to which non-transitory or more than minor adverse effects on threatened or at risk indigenous species (including Maui's Dolphin and Bryde's Whale) are avoided.

Attachment 18, Assessment of Noise and Vibration Effects report has provided the following in relation to sheet piling for the proposed cofferdam construction:

- *The outfall would be located approximately 2km offshore in water that is approximately 5m deep (low tide). A coffer dam, nominally 20m x 10m would be constructed using an estimated 100 sheet piles, each in the order of 10 – 15m long. Initially, sheet piles would be vibrated through the mud seafloor before being bedded into the underlying stiffer materials with a percussion rig. Due to the small size on the coffer dam, it is anticipated that this process would take less than one week. The design team estimates that there will be up to 200 hammer strikes per day from the piling rig using a sacrificial timber dolly to both protect the pile and reduce noise.*
- On completion, the sheet piles would be pulled out with a crane, which would likely require a vibrating head to loosen them. The removal could be completed within one week.

Attachement 18 has provided the table below to indicate the base noise level and minimum distance from sheet piling to meet thresholds for the proposed sheet piling:

Table 10. Base Noise Data for Sheet Piling

	Noise Level at 1m, dB	
	Percussive Piling	**Vibro Piling**
SEL_{cum}	208	203
L_{peak}	214	189

Table 11. Minimum Distance from Piling to Meet the Thresholds

Species Group	LF Cetaceans	HF Cetaceans	VHF Cetaceans	Phocid Pinnipeds	Otariid Pinnipeds
SEL_{cum} threshold (m)	320	200	610	270	200
L_{peak} threshold (m)	NA	NA	200	NA	NA

NA – L_{peak} noise level is less than the threshold for the species group

The report states that mitigation and management measures would be required where marine mammals or penguins are observed within the specified separation distances during construction activities. To address potential effects associated with underwater noise, the report recommends a range of mitigation and management procedures, which are incorporated into the draft Construction Noise and Vibration Management Plan (CNVMP).

I note the following in relation to the above assessment:

Impact driving or vibratory piling in the water will generate underwater noise. The proposed sheet piling work involves both impact pile driving and vibratory piling.

Underwater noise has the potential to affect marine fauna including marine mammals, birds, fish species and benthic invertebrates. However, there are currently no established guidelines in New Zealand for these taxa groups.

Guideline for marine mammals

There is no New Zealand guidance on underwater noise effects in relation to any marine fauna including marine mammals and fish species. However, the scientific agency of National Oceanic & Atmospheric Administration (NOAA, 2024) (as updated by Southall et al (2019)) has produced guidelines that identify threshold levels above which individual marine mammals are predicted to experience changes in hearing sensitivity. Those changes are either temporary (Temporary Threshold Shift (TTS)), or permanent (Permanent Threshold Shift (PTS) for acute (<24hours)).

Based on the predicted noise levels in the above table, the underwater noise levels exceed the threshold levels predicted, mainly for TTS (as in the table below) to experience changes in hearing sensitivity.

Table 1: Summary of NOAA 2024 Guidelines auditory injury thresholds.

NOAA species group	Species included	Impulsive criteria (impact piling)	Non-impulsive criteria (vibro piling)
Permanent threshold shift (PTS)			
High-frequency (HF) cetaceans	Orca, common dolphin, dusky dolphin, bottlenose dolphin	193 $SEL_{cum\ (HF)}$ 230 dB L_{peak}	201 dB $SEL_{cum\ (HF)}$
Phocid Pinnipeds (PW)	Leopard seals	183 $SEL_{cum\ (PW)}$ 223 dB L_{peak}	195 dB $SEL_{cum\ (PW)}$
Otariid Pinnipeds (OW)	Sea lions and fur seal	185 $SEL_{cum\ (OW)}$ 230 dB L_{peak}	199 dB $SEL_{cum\ (OW)}$
Low frequency cetaceans (LF)	Bryde's whales	183 $SEL_{cum\ (OW)}$ 222 dB L_{peak}	197 dB $SEL_{cum\ (OW)}$
Temporary threshold shift (TTS)			
High-frequency (HF) cetaceans	Orca, common dolphin, dusky dolphin, bottlenose dolphin	178 $SEL_{cum\ (HF)}$ 224 dB L_{peak}	181 dB $SEL_{cum\ (HF)}$
Phocid Pinnipeds (PW)	Leopard seals	168 $SEL_{cum\ (PW)}$ 217 dB L_{peak}	175 dB $SEL_{cum\ (PW)}$
Otariid Pinnipeds (OW)	Sea lions and fur seal	170 $SEL_{cum\ (OW)}$ 224 dB L_{peak}	179 dB $SEL_{cum\ (OW)}$
Low frequency cetaceans (LF)	Bryde's whales	168 $SEL_{cum\ (OW)}$ 216 dB L_{peak}	177 dB $SEL_{cum\ (OW)}$

Accordingly, there is potential for marine mammal species identified as species of interest in Section 6.2 to be affected by underwater noise generated during construction, should they be present within the piling threshold distances identified in the applicant's underwater noise assessment.

To minimise underwater noise effects and avoid or mitigate adverse effects on marine mammals, appropriate consent conditions have been recommended in the condition section.

While the proposed impact and vibratory piling activities will generate underwater noise, the implementation of the proposed piling methodology, together with the mitigation and management measures included in the applicant's draft conditions, it is reasonable to conclude that adverse effects on potential marine mammals arising from the proposed impact and vibratory piling activities will be less than minor.

6.10 Residual effects management

Marine Ecological assessment outlines the approach to proposed residual effects management in section 6 of the Report. The Report states that there are no residual effects associated with the installation and operation of the ocean outfall and treated wastewater discharge. The residual effects management approach, as set out in the Private Plan Change 88, seeks to achieve

No Net Loss (NNL) outcomes for marine biodiversity through the type and magnitude of restoration and enhancement actions proposed. Accordingly, this section sets out:

• *An overview of residual effects management, i.e. offsetting and compensation (Section 6.1).*

• *The overall approach for addressing the residual effects on marine ecological values that cannot be avoided, remedied or mitigated (Section 6.2).*

• *The proposed habitat restoration or enhancement measures that will be undertaken for the purpose of addressing residual effects on marine ecological values (Section 6.3).*

Further the report add that the requirement for a Coastal Bird Management Plan (CBMP) was developed through the Beachlands South Precinct (BSP) process and was ultimately included in the Precinct Provisions.

Particular measures put forward are summarised below and outlined in more detail in the indicative draft CBMP in Appendix G:

- *Enhancement of the Waikopua Shellbanks, which are located within the Coastal Marine Area (CMA) to the south and west of the Project area. The Waikopua Shellbanks comprise two discrete shellbank features formed on either side of the estuarine creek and stream that drain from the Project area. The northern shellbank covers approximately 1 ha, while the southern shellbank covers approximately 0.6 ha, giving a combined enhancement area of approximately 1.6 ha.*
- *The degradation of shellbanks is primarily associated with encroachment by invasive weeds, including pampas, and mangroves which limits the availability of open shellbank habitat for roosting and nesting birds. Selective vegetation removal (mangroves and saline vegetation) and replanting of ground cover native species that introduce better line of sight, alongside pest mammal management, will improve the quality of this habitat type both for roosting and nesting purposes.*
- *Mangrove management. Selective removal of mangroves and ongoing maintenance of seedlings is proposed to maintain quality foraging habitat at the mouth of the Waikopua Creek. Without intervention it is likely that mangroves will continue to expand seawards in this location, compromising foraging habitat quality and impinging on other habitats.*
- *An area of approximately 5 ha is proposed for mangrove removal, as shown in Figure 4.1 of the CBMP (Appendix G). Subsequent to initial removal, a wider area of approximately* ***15 ha*** *is proposed for ongoing management and seedling control to maintain high-quality intertidal foraging habitat for coastal avifauna, as well as to provide for the protection of firm muddy sand / cockle shell covered flats from mangrove encroachment.*

An adaptive management approach is further outlined in the CBMP, noting here that in the event that compensation actions do not provide positive effects to coastal biodiversity values that outweigh adverse effects, ***there are other locations within the Whitford Embayment that could be considered for compensation actions, including:***

- *Roost enhancement of shellbanks close to Motukaraka Island or at Porterfield Road Esplanade Reserve.*

- *Restoration of the Waikopua Islands. A 2016 Ecological Restoration Plan for the islands outlines a number of potential compensation actions that could be implemented (Boffa Miskell, 2016).*

In conclusion, this report considers that all residual effects associated with the FTAA application can be adequately addressed through implementation of compensation measures outlined in the CBMP and associated Biodiversity Compensation Modelling. Associated monitoring to verify that expected ecological outcomes have been realised and to guide adaptive management, will further ensure positive effects (that outweigh adverse effects) for marine ecological values.

While I acknowledge the adaptive management approach anticipated by the Plan Change 88 process and the associated precinct provisions, I do not agree that deferring the provision of missing key information to the CBMP is appropriate. The information currently available is insufficient to enable a robust assessment of whether the proposed adaptive management measures are capable of achieving the intended environmental outcomes. In my view, the key components of the adaptive management framework should be provided as part of the application to allow the effectiveness of the proposed approach to be properly evaluated at the consent application stage.

<u>Effects from mangrove removal and shellbank enhancement</u>

The Ecological report states that :

When considering the ecological value of mangroves at this location, consideration is given to their regional IUCN threat status of Least Concern and the fact that they are locally and nationally common. At this location, the low stature mangroves are unlikely to provide the broader suite of ecosystem services that would be expected from old-growth, established mangrove habitats, although it is likely that they provide some foraging habitat for banded rail (Gallirallus philippensis), with a threat classification of 'At Risk – Declining' (Robertson et al., 2021). In the area proposed for mangrove removal, mangroves are also encroaching on other high value habitats. When balancing the ecological function of mangroves against the potentially detrimental impact to other high value habitats, mangroves are considered to be of moderate ecological value.

Areas of mangrove removal have been carefully considered to both achieve positive outcomes for coastal birds and shellbank habitat and to avoid the removal of older, higher stature mangroves that support higher species richness and biomass than recently established, low-stature mangrove stands (Morrisey et al., 2010). On this basis, mangrove removal proposed includes more recent mangrove encroachment i.e. back to a baseline circa early 2000s.

Studies on the effects of mangrove removal have identified that the type of mangrove removal (i.e. seaward strip, large scale contiguous, patchwork, seedling removal) has different levels of

ecological effect (de Satge, 2021). The proposed mangrove removal type would be considered small contiguous, given it is a small area on the seaward edge of extensive mangrove habitat in the Waikopua Creek. The de Satge study does not reference any specific case studies of small contiguous mangrove removal; however we expect the effect to be similar to that identified in seaward strip removal, which is considered to have a lower level of ecological effect as mangrove vegetation is still retained nearby (de Satge, 2021).

In the long term, it is considered that there will be an improvement in both the quality and availability of intertidal foraging habitat and the enhancement of a high-quality roost and nesting site. These positive effects are considered alongside the potential adverse effect on banded rail, noting:

• Extensive mangrove habitat availability in the Waikopua Creek; and

• Enhancement of the coastal compensation wetland behind the Waikopua Shellbanks will provide improved habitat and therefore a positive effect for banded rail.

While the mechanisms to achieve positive effects to the Waikopua Shellbanks may themselves have impacts to marine ecological values, overall effects can be managed to be very low for mangrove habitat, with a net gain effect for coastal avifauna and shellbank habitats.

While I generally accept the anticipated positive effects for coastal avifauna arising from the compensation and biodiversity offsetting measures outlined above, I note the following matters.

The proposed residual effects management measures appear to be linked to the agreed marine biodiversity outcomes established through the Private Plan Change 88 process. In support of this, the applicant has appended the report Estimates of Construction-Phase and Mature-Phase Contaminant Loads (NIWA, December 2021) to Attachment 13A, Water Quality Outfall Modelling Study.

My understanding is that the proposed shellbank enhancement areas and mangrove removal locations have been identified to offset or compensate for the potential effects associated with sediment discharges during the estimated 10-year construction phase of the development.

A draft Coastal Biodiversity Management Plan (CBMP) has been provided as Appendix G. However, this document has not yet been finalised. Accordingly, it is recommended that a condition be imposed requiring the finalisation and implementation of the CBMP.

I also note that the proposed residual effects management framework adopts an adaptive management approach and identifies additional locations, including shellbanks near Motukaraka Island, the Porterfield Road Esplanade Reserve, and the Waikopua Islands, as potential future management sites. As the ecological assessment does not provide any information or assessment of ecological values, scale of works, potential effects, or management outcomes for these locations, they are considered to be outside the scope of the current application and have therefore not been assessed in this review.

In relation to the proposed mangrove removal as part of the shellbank enhancement programme, the applicant's assessment does not consider the positive climate change-related functions of mangroves such as providing buffer from erosion.

In addition, any coastal permits issued for the proposed shellbank enhancement and mangrove management measures could only be granted for a period of 35 years. There is no guarantee that replacement consents would be granted in the future. But I also note, that if the compensation works were associated with sediment discharges during development, the discharges would cease once the development was completed.

Further, the proposed construction period for the wider development is approximately 10 years. Therefore, should consent be granted for the proposed shellbank enhancement and mangrove removal, these activities should be implemented during the development and construction phases, when potential effects on the CMA are occurring, rather than being deferred until Stage 2, when the CMA works proposed in this application are to be undertaken. Implementing these measures during the construction period would better align with the intended adaptive management approach and provide a greater opportunity to achieve the anticipated ecological outcomes and offset or mitigate construction-related effects as they arise.

7.0 Section 67 Information Gap

I have identified that there are no significant information gaps requiring a request under s67. However, I consider that the following detailed information should be provided through the recommended conditions:

- Detailed information on the proposed stormwater outfalls, including the number, design, location, and footprint of any associated energy dissipation and/or riprap structures within the CMA.

Detailed information relating to the Waikopua Island shellbank enhancement works, including the proposed total area of mangrove removal, volume of shell deposition, methodology for deposition, timing, extent of works, and monitoring requirements.

8.0 Recommendation

Treated wastewater discharge via offshore outfall

I support the proposed construction of offshore outfall and treated wastewater discharge to the CMA via the offshore outfall, subject to the implementation of the recommended consent conditions including implementing the proposed Marine Monitoring Plan (MMP). This support is contingent on the proposed wastewater treatment system being fully implemented prior to, or

as part of, Stage 2 of the development, and the discharge volume shall not exceed the assessed maximum of 1,383 m³/day.

Residual effects management (Compensation and offsetting)

I support the proposal outlined in the Ecological Report and the draft Coastal and Biodiversity Management Plan (CBMP), subject to the following:

- The shellbank enhancement and mangrove removal being undertaken at the Waikopua Shellbanks, as proposed. The area of mangrove removal should include the removal of low-stature mangroves within the Waikopua shellbank area, to the extent that is reasonably practicable.
- The shellbank enhancement and mangrove removal works being implemented as soon as practicable following the granting of consent, rather than being deferred to a later stage of the development.
- The implementation of all recommended consent conditions.

I do not support the implementation of residual effects management measures at the alternative locations identified in the Ecological Report. No information has been provided regarding the ecological values of these sites, the nature and extent of the proposed activities, the potential adverse effects arising from those activities, or the likelihood of achieving the anticipated ecological outcomes. As a result, I am unable to adequately assess the environmental effects associated with the proposed residual effects management measures at these alternative locations or determine whether they would be appropriate.

9.0 Proposed Conditions

I recommend that, should consent be granted for the proposed coastal discharge (DIS60471469), the construction, occupation and use of the Common Marine and Coastal Area (CMCA) for the offshore wastewater outfall and stormwater outfalls (CST60468041), and the shellbank enhancement and mangrove removal activities (CSTXXXXXX), the consent be subject to the following conditions.

(Additions are shown in red, and deletions are shown with strikethrough formatting)

Conditions Review

Shellbank enhancement including mangrove removal in the CMA at Waikopua Shellbanks

(Mangrove removal)

Condition 88:

~~Vegetation~~ Mangrove removal within the CMA must be undertaken outside the main native bird

breeding season (September to January inclusive) except where a suitably qualified ecologist has confirmed to the Consent Holder in writing that vegetation is clear of any native nesting birds, eggs, or chicks.

Additional Conditions

88A: One month prior to commencing mangrove removal associated with the shellbank enhancement activities, the consent holder must provide detailed information including but not limited to the total area of mangrove removal and ongoing management proposed over the duration of consent, Identification of all access points to the CMA, and the intended location of stockpiles of cleared vegetation on the adjacent reserve/site.

88B: All mangrove removal activities shall be undertaken using hand-held tools.

88C: All mangroves removed under this consent must be disposed of outside the coastal marine area (CMA) at the completion of work.

88D: The consent holder must cut all mangroves as close to the seabed level as possible to avoid leaving stumps that could create safety hazard post mangrove removal in the area.

Shellbank enhancement

88E: The consent holder must not deposit any organic material within the coastal marine area CMA at Waikopua Shellbanks other than shell material associated with shellbank enhancement activities. All shell material for shellbank enhancement sourced from an authorised supplier.

88F: The consent holder must provide the total volume of shell material deposited in the coastal marine area for shellbanks enhancement. The CBMP must include methodogy to monitor the extent of shell material deposited in the CMA.

Condition 89-No change

Marine Monitoring Plan (MMP)

Condition 91 & 92:

One month prior to discharging the treated wastewater under this consent, the consent holder must submit a finalised Marine Monitoring Plan (MMP) to Council for certification. The objective of the MMP is to provide detailed methodologies/techniques and process for the monitoring to obtain comparable data over the duration of consent, sampling sites should be close enough to detect any changes from the proposed discharge and to isolate other catchment contributions, sampling sites should be close enough to detect any changes from the proposed discharge and to isolate other catchment contributions, reporting and review of the environmental effects of the discharge authorised by this coastal permit. The MMP must specify the frequency of monitoring and parameters to be monitored, sampling locations and methodologies for baseline and routine monitoring.

(a) Baseline and routine monitoring must include monitoring of appropriate indicators of benthic ecology, sediment and water quality in the vicinity of the offshore wastewater outfall.

(b) Monitoring of change in the spatial and temporal extent of subtidal and intertidal seagrass in the Whitford embayment that can be attributed to effects from nutrient enrichment.

Occupation of the CMCA, and use of the structures in the CMA

Conditions 279:

This consent authorises the construction of an offshore outfall associated with wastewater discharge, construction of a cofferdam related to construction of offshore outfall, and stormwater outfalls, occupation of the coastal marine area with the structures, and use of the Coastal Marine Area (CMA) as part of the Project referenced in Condition [1] and Appendix 1 of the conditions, including the relevant engineering plans and Wastewater Concept Report prepared by GWE, include the following:

- A treated wastewater discharge pipe extending 2km into the CMA below the seabed;
- A treated wastewater discharge outlet structure extending from below the seabed to above the seabed;
- The construction of a temporary piled cofferdam to enable the construction of the outlet structure; and
- To discharge a maximum of treated wastewater of 1383m^3/day via the offshore outfall
- To discharge stormwater via outfall structures in the CMA.

Marine Construction Management Plan (MCMP)

Condition 281-287-No change recommended

Condition 288- ~~Marine Mammal Management Plan~~. It should read as Underwater noise from sheet piling

Condition 288 :

The Consent Holder must develop an Underwater Noise Management Plan (UWNMP), which must include monitoring and mitigation measures employed during sheet impact and/ or vibratory piling works for the construction and removal of a cofferdam in the CMA to manage underwater noise effects on the coastal marine area~~. on these marine mammal species~~. Mitigation measures to be included in the UWNMP must include the following:

Condition 289: No change recommended

Exclusive and Non-Exclusive Occupation of the common marine and coastal area

~~Condition 290:Exclusive occupation applies to that part of the CMA where the outlet structure rises from below the seabed to above the seabed and a small safety area around this structure. The exact area of exclusive occupation shall be defined on a plan and submitted to Council for certification once these works are completed.~~

~~Condition 291:Occupation, being non-exclusive occupation, of the CMA applies to the area where the treated wastewater pipe is located below the seabed. The exact area of non-exclusive~~

~~occupation shall be defined on a plan and submitted to Council for certification once these works are completed.~~

~~Condition 292: The Consent Holder may, for safety and security reasons, temporarily restrict public access to parts of the non-exclusive occupation area for maintenance, repair or monitoring purposes~~.

Exclusive and Non exclusive Occupation-offshore outfall and stormwater outfalls

Condition 290-292

The occupation of the common marine and coastal area by the authorised structures is not an exclusive right of occupancy. The general public or any person(s) must not be excluded from the area(s) or any part of the area(s) to which this consent applies, unless necessary for the primary purpose of the structure(s), and only to the extent to enable the primary purpose of the structures; and public access can only be excluded for safety, security, and maintenance reasons

Condition 293A (Post construction)

The consent holder must, reinstate the site within one week following the completion of works authorised under this consent in the CMA, remove all machinery, cofferdam and materials from the coastal marine area.

Duration

The duration to occupy the CMA with offshore outfall and stormwater outfalls, and use the structures must expire on 31 December 2061 (35 years) unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

Condition 297A (Shellbank enhancement and mangrove removal)

The duration of consent for the shellbank enhancement, mangrove removal, and ongoing mangrove seedling removal within the mangrove removal area (up to 15 hectares) must expire on 31 December 2061, unless the consent has lapsed, been surrendered, or been cancelled at an earlier date in accordance with the Resource Management Act 1991.

Condition 312

~~The volume of treated wastewater discharged via the coastal outfall discharge pipe must not exceed 4,000,000 litres per day.~~

The volume of treated wastewater discharged via the coastal outfall discharge pipe must not exceed 1383m^3 per day.

I note that the Marine Ecological Assessment (Attachment 13B) and the Water Quality Outfall Modelling Report (Assessment 13) assessed the contaminants loading associated with a treated wastewater discharge volume of 1,383 m^3/day, rather than the maximum capacity of the outfall (4000m^3/day).

Condition 314

This consent will expire on 31 January 2041 unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

It is not clear that the above duration of consent relates to treated wastewater discharge to the CMA. If it is, the duration sought for the discharge during stage 2 appears to be 15 years.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure D:

Coastal Hazards

Dr. Tola Omidiji

06 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Coastal Hazard Specialist

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Dr. Tola Omidiji
Qualifications & Relevant Experience:	I hold the qualification(s) of Bachelor of Science in Geography, Master of Science in Geography and Planning and Doctor of Philosophy in Physical Geography. I have 11 years of experience in coastal geomorphology and coastal management. I have over 2 years of experience working under the RMA, including the preparation of technical assessments and expert evidence for resource consent applications and plan changes.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	6 October 2026

3.0 Executive Summary / Principal Issues

N/A

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- AEE titled*: "Beachlands South, Fast-track Approval Substantive Application Assessment of Environmental Effects and Statutory Analysis,* prepared by UNIO Environmental, 26 June 2026
    - BEACHLANDS SOUTH – RULES ASSESSMENT, prepared by UNIO Environmental, dated 26 June 2026
- Report titled*: Beachlands South Fast Track Application Coastal hazard NPS-NH and AUP risk assessment, Job Number 1014358.2501 v1.2 CHA,* prepared by Tonkin & Taylor Limited, dated June 2026.
- Appendix A: *Coastal Hazard Assessment (**CHA**) Beachlands South Private Plan Change Prepared for Beachlands South Limited Partnership*, Prepared by Tonkin & Taylor Ltd Date January 2022, Job Number 1014358.v4.
- Report titled: *Beachlands South Fast-track Application Open Space Strategy*, by Jasmax and Studio Pacific, dated 12 August 2026.
- Application Plans:
    - *Overall Resource Consent Scheme Plan*, Rev A, Harrison Grierson, 29 May 2026
    - Architectural Drawings, prepared by Jasmax and Studio Pacific, Revision A, dated 15 June 2026.
    - *Stormwater and Wastewater Overall Layout Plan*s, Rev B, prepared by Harrison Grierson, August 2026.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

5.1 Additional reasons for consent

The area of proposed development is within the coastal erosion hazard area (CEHA) as per the part (a), b (i) and CEHA 1, 2 and 3 definitions in Chapter J and J1.4 (definitions) of the AUP and Plan Change 120 respectively.

- The proposed development and subdivision at the above site trigger the various consents below which were not identified in the AEE Report:

5.1.2 Auckland Unitary Plan (AUP)

The proposed works trigger resource consents for the following reasons:

Activities:	**Rules:**
Parts of the new coastal walkway structure within the coastal erosion hazard area.	E36.4.1 (A4): All other buildings and structures on land in the coastal erosion hazard area, is a **Restricted Discretionary Activity**.
Stormwater pipe and outfall infrastructure within the coastal erosion hazard area.	E36.4.1 (A5): On-site septic tanks, wastewater treatment and disposal systems, effluent disposal fields, underground storage tanks, water tanks (including rainwater tanks) or stormwater pipes or soakage fields on land in the coastal erosion hazard area, is a **Restricted Discretionary Activity.**
Subdivision of land within the coastal erosion hazard area.	E38.4.1 (A11): Subdivision of land within the coastal erosion hazard area, is a **Restricted Discretionary Activity.**

5.1.3 AUP - Plan Change 120

The proposed works trigger resource consents for the following reasons:

Activities:	**Rules:**
Parts of the new coastal walkway structure within **CEHA 3**	**Use** – E36.4.1A (A59): Activities where natural hazard risk is acceptable in accordance with Table E36.3.1B.1 in coastal hazard areas, is a **Permitted Activity**. **Development –** E36.4.1A (A69): Construction of private roads, roads intended to be vested, and accessways in coastal hazard areas, in coastal hazard areas, is a **Restricted Discretionary Activity.** E36.4.1A (A77): All other buildings and structures, including retaining walls and earth bunds, in coastal hazard areas, is a **Restricted Discretionary Activity.**

	New stormwater pipe and outfall infrastructure within **CEHA 3.**	**Use** – E36.4.1A (A59): Activities where natural hazard risk is acceptable in accordance with Table E36.3.1B.1 in coastal hazard areas, is a **Permitted Activity**. **Development** – E36.4.1A (A68): On-site septic tanks, wastewater treatment and disposal systems, effluent disposal fields, underground storage tanks, water tanks (excluding above-ground domestic rainwater tanks) or stormwater pipes or soakage fields on land in the coastal hazard areas, is a **Restricted Discretionary Activity**.
	New wastewater treatment plant outfall infrastructure within CEHA **1.**	**Use** – E36.4.1A (A59): Activities where natural hazard risk is acceptable in accordance with Table E36.3.1B.1 in coastal hazard areas, is a **Permitted Activity**. **Development** – E36.4.1A (A68): On-site septic tanks, wastewater treatment and disposal systems, effluent disposal fields, underground storage tanks, water tanks (excluding above-ground domestic rainwater tanks) or stormwater pipes or soakage fields on land in the coastal hazard areas, is a **Restricted Discretionary Activity**.
	Subdivision of land within the coastal erosion hazard area.	E38.4.1 (A11): Subdivision of land within the coastal erosion hazard area, is a **Restricted Discretionary Activity.**

6.0 Specialist Assessment

Council's Regulatory Review:

6.1 Hazard Assessment

As the application is a **Restricted Discretionary activity**, I have considered the matters below:

1. the matters of discretion in E36.8.1(1),
2. the matters of discretion E38.7.3.4,
3. risk assessment requirements in E36.3 (4A) (a - e),
4. E36.9 special information requirements,
5. The Council's Areas Susceptible to Coastal Instability and Erosion (ASCIE) are a s104(1)(c) matter.

The National Policy Statement for Natural Hazards (NPS-NH) is also relevant. I have considered the NPS-NH and taken this into account in my recommendations.

The RMA, and Policy 25 of the New Zealand Coastal Policy Statement (NZCPS) require avoiding increased risk of development in areas affected by coastal hazard over at least the next 100 years. In addition, Policy 24 of the NZCPS requires parties to undertake coastal hazard assessments using the best available information.

Coastal Erosion Hazard Area – Site Specific Assessment

Tonkin & Taylor, on behalf of the applicant, has undertaken a site-specific coastal hazard assessment in accordance with Council's technical report, TR2020/021 and the MfE Coastal Hazards and Climate Change Guidance (2017) that incorporates sea level projections and Vertical Land Movement (VLM).

Tonkin & Taylor provided the current, 50-year and 100 year ASCIE values for Cells A[1] to H[2] for the site (Figure 1). They further presented a map (Figure 2) which indicates that the site-specific 50- and 100-year ASCIE lines, when measured from the cliff toe, sits within the parent site. However, sections of the proposed coastal walkway structure and (stormwater and wastewater) infrastructures are located seaward of the 100 year ASCIE line (Figure 2). The 100-year ASCIE line does not impact any of the proposed new building platforms at the above site.

I have reviewed the input parameters used by Tonkin & Taylor in their ASCIE calculations. I note that the MfE (2017) guidance used in their 2022 assessment has since been updated in 2024. The assessment adopts an effective sea-level rise (eSLR) scenario of 1.23 m per 100 years from the present-day baseline, compared with 1.64 m per 100 years under the updated guidance. This represents a difference of ~0.4 m in eSLR over 100 years. Based on my review, I consider that this difference in the eSLR input would not materially alter the areas identified as being potentially affected by coastal erosion and associated instability.

It should be noted that the assessment is based on a formula that uses geology, topography, projected sea level rise and vertical land movement figures. Whilst it results in a calculated number, this is simply a projection to be used for planning purposes to manage risk.

6.2 Matters of discretion – AUP

6.2.1 E36.8.1 (1) (a): the type of activity being undertaken and its vulnerability to natural hazard events including the consequences of a natural hazard event in relation to more or less vulnerable activities

Coastal walkway

Part of the applicant's proposed new coastal walkway (Figure 3) is seaward of the 100-year ASCIE line. While the seaward portion of the walkway may be affected by coastal erosion and instability over time, it is a non-habitable, low-risk structure.

Any future damage would not be expected to pose a significant risk to people. If damaged, the structure could be repaired, rebuilt, relocated or removed.

New infrastructure

The proposed stormwater pipe and outfall and wastewater treatment plant outfall (Figure 4) are located within the site-specific 100-year CEHA.

As non-habitable infrastructure, they are less sensitive to coastal erosion and instability hazards compared to residential buildings, and any future damage would primarily affect asset performance rather than public safety.

The wastewater outfall is to be installed by directional drilling, as such it will be subsurface and unlikely to be affected by erosion.

Subdivision

The proposed subdivision (Figure 5) is an integral component of the intensification of the application site.

Following the Tonkin & Taylor Limited Coastal Hazard Assessment Report, it is agreed that the site specific 100-year future ASCIE extends into the parent subject site.

6.2.2 E36.8.1(1)(b): The likelihood of the event occurring and the likely extent of any damage to people, property or environment.

The likelihood of coastal erosion occurring is considered to be ongoing but generally localised, reflecting the site's exposure to coastal processes during high tides and, particularly, during storm surge conditions.

In the 2022 CHA Report, Tonkin & Taylor Limited notes that the shoreline is relatively sheltered, with generally low wave heights and limited wave exposure due to the site's orientation, surrounding coastal morphology and the shelter provided by the Pine Harbour Marina. They further comment that coastal wave interaction with the shoreline is largely restricted to higher tide levels, with the potential for increased erosion during periods when elevated water levels coincide with energetic wave conditions.

In assessing the coastal erosion and instability hazards at the site, the applicant has provided a site-specific erosion calculation and map which indicates that sections of the proposed coastal walkway and associated stormwater and wastewater infrastructure are located seaward of the 100-year ASCIE line. These elements have the potential to be affected by coastal erosion over the 100-year assessment period, with the extent of potential effects dependent on the rate and spatial distribution of shoreline retreat (Figures 1 and 2). In contrast, the 100-year ASCIE line does not intersect any of the proposed new building platforms. The proposed buildings are therefore located landward of the site-specific 100-year ASCIE line.

I note that an existing esplanade reserve fronts much of the site. The applicant proposes to vest an additional esplanade reserve and provide a coastal pathway that runs along the coastline as part of the subdivision proposal. In a coastal context, the esplanade reserve provides separation between development and the coastal margin and allows for public access and space within which future coastal hazard effects can be accommodated. This is a relevant factor given the potential for coastal erosion and future cliff hazards to affect the site. The proposed esplanade reserve will provide an additional measure for managing future coastal erosion and cliff hazard risk by maintaining land between the proposed development and the coastline. Council considers this to be an appropriate additional erosion risk

management approach, particularly in combination with the site-specific erosion assessment and the location of the proposed building platforms landward of the site-specific 100-year ASCIE.

6.2.2 E36.8.1(1)(c): Effects on public access, landscape, and environmental values

The proposed coastal walkway structure will be located on private land. As such, there are no public access matters of concern.

Parts of the proposed stormwater infrastructure are located within private property and within the public esplanade reserve. The proposed wastewater infrastructure is similarly located within private property, the public esplanade reserve and the Coastal Marine Area (CMA).

The sections of the stormwater pipe and outfall and wastewater treatment plant outfall located within the esplanade reserve will be installed below ground.

The stormwater pipe and wastewater treatment plant outfall have a functional need to be located in this position to enable discharge to the CMA.

The proposed works will not affect existing public access through the esplanade reserve.

Overall, there are no proposed erosion hazard mitigation works associated with the development that would cause effects on public access and landscape values.

6.2.3 E36.8.1(1)(d): Ability to relocate buildings or structures within a hazard area

The proposed coastal walkway is not designed as being relocatable, but is a public access structure, relatively low cost and could be removed if necessary.

The proposed stormwater pipe and wastewater treatment plant outfall are within the CEHA. These structures are non-inhabitable structures. Any impact on the infrastructure will be a low risk to lives or property.

Presuming if erosion hazard becomes imminent, the infrastructure can be relocated to reduce the risk in the future.

6.3 Assessment against Matters of Discretion E38.7.3.4 - Subdivision

(a) a specified building area that meets the requirements of Standard E38.8.1.

This is a matter for the planner to consider.

(b) access to all proposed building platforms or areas

Access to all building platforms is located outside the future 100-year ASCIE.

(c) on-site private infrastructure required to service the intended use of the site.

The proposed Lots will be serviced by new private stormwater infrastructure.

Parts of the proposed stormwater pipe and wastewater treatment plant outfall are seaward of the 100-yr ASCIE line.

Should this infrastructure be affected by coastal erosion over time, they can be modified and still perform their functions.

6.4 Subdivision assessment under PC 120

The proposed subdivision is a **restricted discretionary activity** under Rule E38.4.1 (A11). The relevant matters of discretion are in E38.7.3.3. These have been modified over those in the same section in the AUP (1)(a)

(1)(b) will be met if the proposal is granted.

(1)(c) this is a matter for the planner to consider.

(1)(d) the proposal meets this criterion; as access to all building platforms is located outside the future 100-year ASCIE.

(1)(e) (i) the proposal does not meet this criterion because parts of the stormwater and wastewater infrastructure are within the CEHA. Should coastal erosion affect this infrastructure, it could be modified to maintain its intended function.

(ii) Not Applicable.

Summary:

- The applicant has proposed sections of a new coastal walkway, new stormwater pipe and outfall, wastewater treatment plant outfall and subdivision within a coastal erosion hazard area.
- These proposed development and subdivision trigger resource consent under the CEHA provisions of Chapter E36 and E38 of the AUP and AUP Plan Change 120.
- The applicant has undertaken a site-specific hazard assessment in terms of determining the potential extent of coastal erosion over a 100-year period. This erosion calculation and assessment have been reviewed and is acceptable.

- The proposed stormwater and wastewater infrastructure are non-habitable, low risk structures.
- The proposal will not impact public access, landscape and other environmental values.
- The proposal does not exacerbate erosion at the site or adjacent sites.
- The proposal does not warrant any conditions of consent to manage coastal erosion hazard effects.

7.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps.

8.0 Recommendation

I support the application based on the available information.

9.0 Proposed Conditions

I have no amendments / recommended additional conditions for this application.

10.0 Supporting Documents

References

Roberts, R., N Carpenter and P Klinac (2020). Predicting Auckland's exposure to coastal instability and erosion, Auckland Council, technical report, TR2020/021. https://www.knowledgeauckland.org.nz/publications/predicting-auckland-s-exposure-to-coastal-instability-and-erosion/

Figures

Table 5.2: ASCIE for all cells

Cell	Current ASCIE (m)	2080 ASCIE (m)	2130 ASCIE (m)
A[1]	-9	-19	-32
B[2]	-5	-10	-15
C[1]	-9	-19	-32
D[2]	-27	-33	-38
E[2]	-52	-62	-72
F[2]	-52	-58	-64
G[2]	-5	-10	-15
H[2]	-5	-10	-15

1 calculated using the beach method, see Section 5.1.2.

2 calculated using the cliff method, see Section 5.1.1.

Figure 1: Table showing the site-specific ASCIE distances for the current, 2080 and 2130 assessment periods across Cells A[1]-H[2]. Negative values indicate landward erosion distances measured from the 2017 shoreline or baseline position. Values marked[1] were calculated using the beach method, while values marked[2] were calculated using the cliff method.

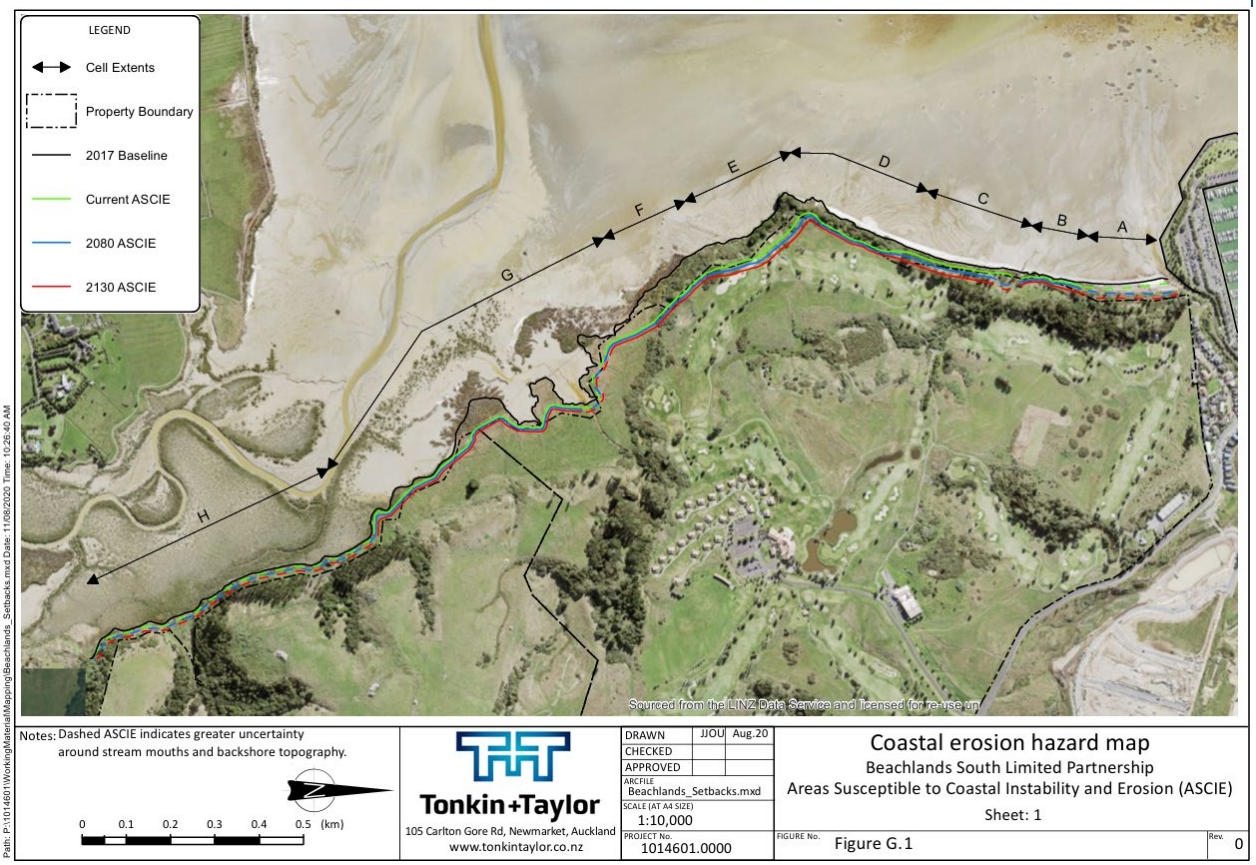


Figure 2: Map showing the site-specific 2017 baseline, current ASCIE (green line), 50-year ASCIE (blue line) and 100-year ASCIE (red line) that could impact the site (Coastal Hazard Assessment Report, Tonkin & Taylor Limited, 2022).



Figure 3: Proposed coastal walkway (Rev A, Architectural Plans, Studio Pacific Architecture, 15 June 2026)

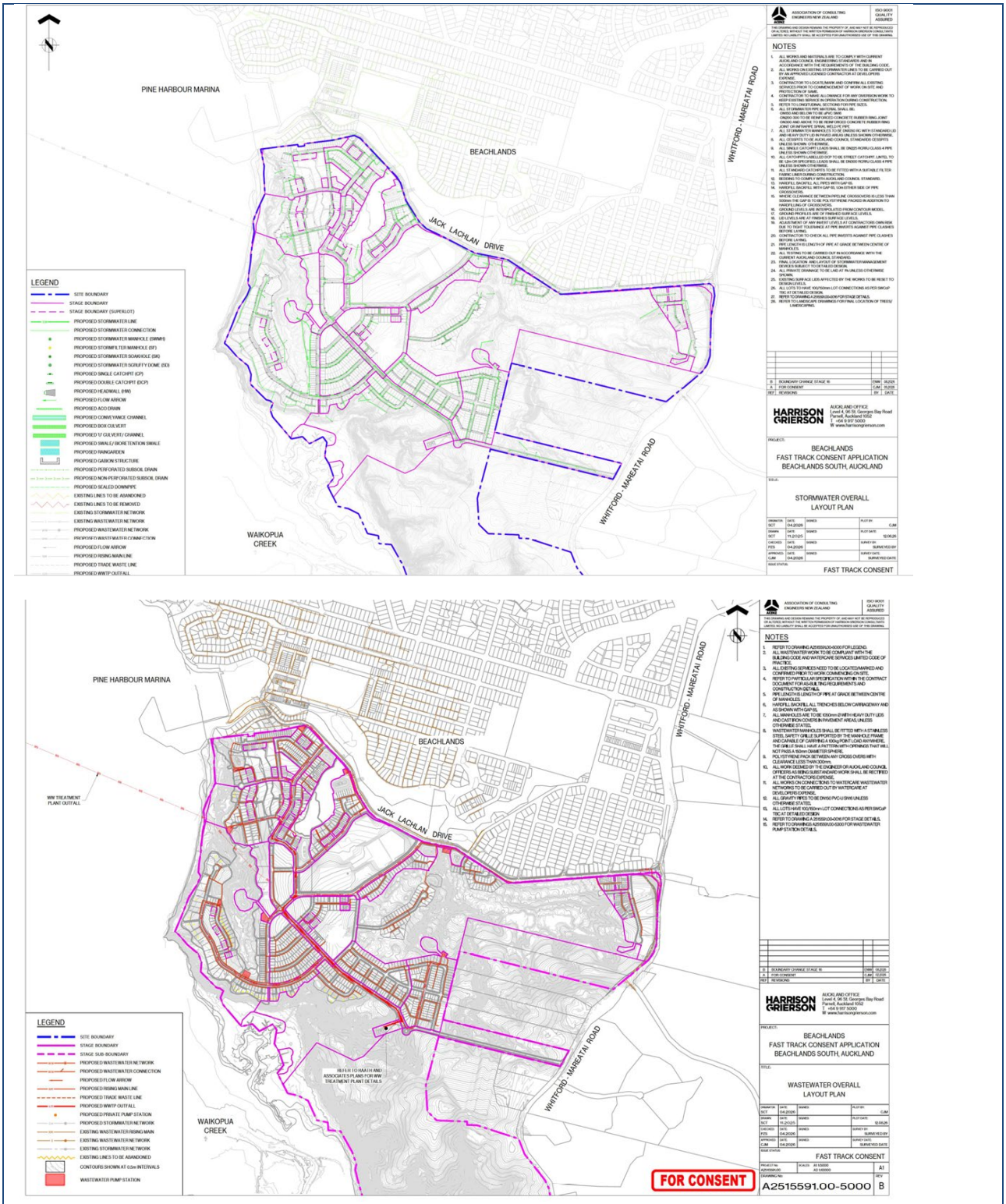


Figure 4: Proposed stormwater and wastewater infrastructure plans (Rev B, Harrison Grierson, August 2026).

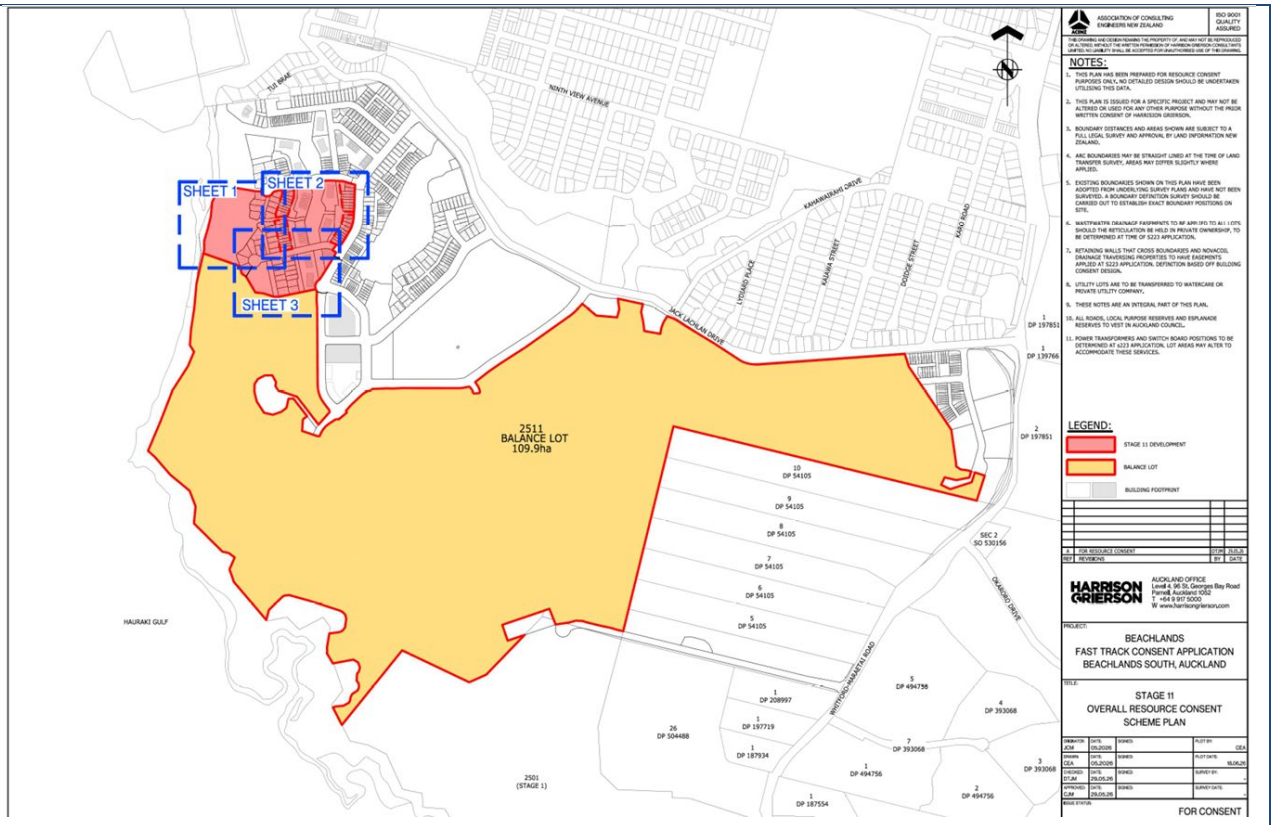


Figure 5: Proposed scheme plan (Rev A, Harrison Grierson, 29 May 2026).

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure E:

Groundwater Diversion and Dewatering

Hester Hoogenboezem

19 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Groundwater Diversion and Dewatering

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Hester Hoogenboezem – Senior Specialist – Coastal and Water Allocation Team
Qualifications & Relevant Experience:	I hold the qualification(s) of: Bachelor of Science in Environmental and Engineering Geology and a Bachelor of Science (Hons) In Engineering and Environmental Geology. I have 19 years of experience in geotechnical engineering and engineering geological assessments. I am a member of Engineering New Zealand. I have prepared expert evidence and technical assessments for resource consent applications and fast-track applications on numerous occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	19 October 2026

3.0 Executive Summary / Principal Issues

In summary, the proposed Beachlands South development comprises residential dwellings, a hotel and conference venue, commercial and community activities, protected ecological restoration areas, walking and cycling networks, community facilities, and provision for two future schools. The proposal also includes associated earthworks and supporting infrastructure, comprising transport facilities, roads, telecommunications, power, water supply, stormwater and wastewater networks, treatment and storage facilities, drainage systems, pipelines, pump stations, outfalls, and associated discharges.

The development requires extensive earthworks, with most proposed excavations less than 5 m deep. The deepest excavation is a proposed 9 m deep pond located in the northern part of the site. Several buildings also incorporate single-level basement car parking. The proposed works will require underfill drainage, while basement construction will involve excavation, retaining walls, and associated drainage infrastructure. These works have the potential to intercept and modify groundwater flow and will require groundwater diversion and dewatering during both construction and operation.

Principal groundwater diversion and dewatering issues identified are:

- The assessment is based on the regional groundwater level rather than the natural groundwater level, as required by the Auckland Unitary Plan (AUP).
- The application does not include plans showing the location and depth of proposed underfill and earthworks drainage.
- The locations of proposed retaining walls and associated drainage measures have not been provided.
- The application does not identify the location, depth, construction timing, or groundwater interaction of underground infrastructure, including roads, utilities, stormwater and wastewater networks, treatment and storage facilities, drainage systems, pipelines, pump stations, and outfalls.

Consequently, a comprehensive assessment against AUP Standard E7.6.1.10 (1 to 6), based on the natural groundwater levels (including perched groundwater conditions) and incorporating the proposed drainage, retaining walls, and infrastructure works, has not been provided.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- A report titled *"Beachlands South Fast Track Design Report",* prepared by Jasmax, revision C and dated 12 August 2026.
- A report titled *"Beachlands South – Fast-track Approval Substantive Application Assessment of Environmental Effects and Statutory Analysis",* prepared by Unio Environmental, dated 26 June 2026.
- A report titled *"Beachlands South – Rules Assessment",* prepared by Unio Environmental, dated 26 June 2026.

- A report titled *"Beachlands South Fast Track Application Landscape & Natural Character Effects Assessment",* prepared by Bron NZ Ltd, dated 20 August 2026.
- A report titled *"Beachlands South Fast-Track Application Geotechnical Report",* prepared by Tonkin and Taylor Ltd, version 2.2, dated 19 June 2026.
- A report titled *"Beachlands South Fast Track Infrastructure Report",* prepared by Harrison Grierson and dated 24 June 2026.
- A report titled *"Beachlands South Fast Track Ecological Impact Assessment",* prepared by Viridis Environmental Consultants, dated September 2026.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

The AEE rules assessment by Unio Environmental, dated 26 June 2026, acknowledged consent is required for the works involving dewatering that will take longer than 30 days (E7.6.1.6 (2)), as shown below.

Standards E7.6	Compliance
E7.6.1.6. Dewatering or groundwater level control associated with a groundwater diversion permitted under Standard E7.6.1.10, all of the following must be met: (1) The water take must not be geothermal water; (2) The water take must not be for a period of more than 10 days where it occurs in peat soils, or 30 days in other types of soil or rock; and (3) The water take must only occur during construction.	(1) The proposed groundwater take is not geothermal water – **Complies**. (2) The dewatering associated with the groundwater diversion to enable construction of the concrete core caps is likely to take longer than 30 days – **Infringe**. Resource consent is sought for a **restricted discretionary activity**. (3) Will **Comply**.

The assessment also recognised that consent is required under Regulation 45C(4) of the National Environmental Standards for Freshwater (NESF), as the proposal involves the diversion of water within a 100 m setback of a natural inland wetland for the purpose of constructing urban development and is likely to change the water level range or hydrological function of the wetlands, which is a restricted discretionary activity.

I consider the following reasons for consent to be applicable:

AUP Standards E7.6.1.10 and E7.6.1.6 set out the permitted activity standards for groundwater diversion associated with excavations, including trenches and tunnels, and for dewatering or groundwater level control associated with such diversions.

The proposal has been assessed against these standards and is considered to not comply for the following reasons:

- Dewatering activities are anticipated to continue for more than 30 days, contrary to Standard E7.6.1.6(2).
- Dewatering and groundwater level control are likely to continue beyond completion of construction, as some excavations will permanently extend below natural groundwater levels, drained retaining walls are proposed, and other areas of earthworks may require permanent drainage, contrary to Standard E7.6.1.6(3).
- Insufficient information has been provided to determine compliance with Standard E7.6.1.10(5)(a), which requires that excavations intercepting groundwater are located a distance from neighbouring structures at least equal to the depth of the excavation.
- Compliance with Standard E7.6.1.10(6)(c) cannot be determined, as the location and extent of proposed drainage measures have not been provided. This standard requires any excavation extending below the natural groundwater level to be located at least 10 m from a lawful groundwater take.

When assessed against Regulation 45C (4) of the NES-Freshwater, the proposal involves the diversion of groundwater within 100 m of natural inland wetlands for the purpose of urban development and may alter the water level range and hydrological functioning of those wetlands.

Accordingly, consent is required under AUP Rule E7.4.1(A20), potentially Rule E7.4.1(A28), and Regulation 45C(4) of the NES-Freshwater as **Restricted Discretionary Activities**.

6.0 Specialist Assessment

S67 Response and Reasons for Consent

In response to a section 67 request, the Applicant stated that a groundwater diversion consent is not required, because the proposed underfill drains would only intercept isolated seepages, perched groundwater, and groundwater lenses located above the regional groundwater table.

I do not agree with this conclusion. The assessment of groundwater diversion and dewatering under the AUP is not limited to the regional groundwater table. The relevant assessment relates to the natural groundwater level, which includes perched groundwater, isolated seepages, and groundwater lenses. On

the basis of the information that has been provided, and applying the natural measured groundwater levels, I consider that consent is required for groundwater diversion and dewatering activities.

Diversion or dewatering of these groundwater resources has the potential to alter local groundwater conditions and may adversely affect neighbouring properties, structures, infrastructure, groundwater-dependent ecosystems, and the wider receiving environment. Accordingly, groundwater diversion and dewatering associated with the proposed earthworks, retaining walls, basements, and supporting infrastructure require assessment.

However, the applicant has not assessed the diversion or dewatering of the natural groundwater level, nor included corresponding consent conditions.

Groundwater Impact Assessment for Earthworks and Infrastructure

The Tonkin & Taylor report (Version 1.2, June 2026) acknowledges that perched groundwater may be encountered within the proposed excavations and that drainage measures may be required to manage seepage.

As noted above, perched groundwater forms part of the natural groundwater system and should therefore be included within the assessment of effects. Drainage measures associated with earthworks may alter groundwater conditions and potentially affect neighbouring properties and groundwater-dependent ecosystems.

The application does not identify the location, depth, extent, or discharge arrangements of proposed underfill drainage, nor does it adequately identify the location and construction details of the proposed infrastructure works, including roads, utilities, pipelines, pump stations, stormwater infrastructure, and wastewater infrastructure. Consequently, I am unable to fully assess the actual or potential groundwater diversion and dewatering settlement effects associated with these works or identify the third parties most at risk.

Excavations, Basements and Retaining Walls

The Tonkin & Taylor report states that the excavation, drainage requirements, and groundwater management measures for retaining walls will be determined through future detailed design. Similarly, the report acknowledges that several proposed buildings incorporate basement car parking and may require groundwater diversion, although the extent of any diversion has not yet been determined.

While I agree that many of the retained excavations appear to be located away from site boundaries, the full extent of groundwater diversion and dewatering associated with retaining walls, basements, and other retained structures has not been established. As a result, the application does not provide sufficient information to assess compliance with AUP Standard E7.6.1.10 or to undertake a comprehensive assessment against the matters of discretion in AUP E7.8 for Restricted Discretionary Activities. In addition, wall deflection and mechanical settlement have not been calculated for the proposed retaining structures.

I therefore consider that insufficient information has been provided to fully assess potential adverse effects from both groundwater diversion and dewatering (consolidation settlement) and from construction of the proposed retaining structures (mechanical settlement), on neighbouring properties and the environment.

Effects on Wetlands

Viridis concluded that the wetlands proposed to be reclaimed are generally of low ecological value and that adverse effects can be appropriately addressed through the proposed compensation measures. The assessment further concluded that the affected freshwater features are not irreplaceable and that the compensation site provides a feasible opportunity to achieve substantial freshwater gains.

The proposal was reviewed by Antoinette Bootsma, Senior Freshwater Specialist (Earth, Streams & Trees Team, Auckland Council), who confirmed that the values of the affected wetlands had been appropriately considered within the Biodiversity Compensation Model calculations and generally agreed that the aquatic compensation principles contained within Appendix 7 of the National Policy Statement for Freshwater Management had been demonstrated.

No additional information gaps relating to wetland effects were identified. Accordingly, I rely on Antoinette Bootsma's assessment regarding the actual and potential effects on wetlands.

7.0 Section 67 Information Gap

At the time of writing this Memo I have identified the following information gaps:

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
1. *Reasons for consent not fully identified*	- *The assessment only considered the regional groundwater table and did not assess effects on the natural groundwater level, including perched groundwater. Consequently, a groundwater diversion and dewatering consent and associated conditions were not considered.*	*A complete assessment of effects has not been provided and appropriate consent pathways and conditions have not been identified.*	***High.*** *The omission may result in unassessed groundwater diversion and dewatering effects and inadequate consent conditions.*
2. *Earthworks/underfill drainage plan not provided*	- *The location, depth, extent and discharge of proposed underfill drainage have not been identified.*	*The extent of groundwater diversion and dewatering cannot be determined and the associated effects on the environment and neighbouring*	***Medium.*** *The potential effects of permanent drainage measures on groundwater conditions,*

		structures and Services cannot be accurately assessed.	*neighbouring properties, and the receiving environment remain uncertain.*
3. *A plan showing depth location of proposed infrastructure and confirmation of construction time.*	- *Plans showing the location, depth, construction methodology and duration of underground infrastructure works have not been provided*	*The extent and duration of potential groundwater diversion and dewatering associated with utility installation cannot be assessed.*	***Medium.*** *Potential groundwater effects associated with infrastructure construction and operation remain uncertain.*
4. *Retaining wall and associated drainage plans not provided*	- *The location of retaining walls and the extent of drainage proposed behind retaining walls have not been identified.*	*The potential groundwater diversion and dewatering effects associated with retained excavations cannot be fully assessed.*	***Low.*** *Most retaining walls appear to be located away from site boundaries and are likely to be outside the zone of influence of neighbouring properties.*
5. *Assessment of effects of these drainage and groundwater diversion activities not provided*	- *Detailed assessment of the effects of drainage, groundwater diversion and dewatering has been deferred to future design stages and consent conditions.*	*The actual and potential effects on the environment and neighbouring structures and Services cannot be adequately assessed, and appropriate monitoring, mitigation and management measures cannot be determined.*	***Medium.*** *Deferring assessment may result in unforeseen effects, additional information requirements, or delays during detailed design and construction.*
6. *Assessment of wetland effects based on incomplete groundwater information*	- *The assessment of effects on wetland hydrology was undertaken without a clearly defined extent of groundwater diversion and dewatering activities.*	*The full extent of potential effects on wetland water levels and hydrological functioning cannot be independently verified.* *I nonetheless understand the existing assessment*	***Low.*** *The wetland assessment adopted conservative assumptions, and Auckland Council's freshwater specialist did not identify any*

		included conservative parameters and assumptions.	*further information gaps. Accordingly, the residual level of uncertainty is considered low.*

Overall conclusion

While the information gaps relating to the location and extent of groundwater diversion and dewatering activities create uncertainty regarding the scale of effects and appropriate mitigation measures, the most significant deficiency is the failure to assess effects on the natural groundwater level, including perched groundwater, and to identify the associated groundwater diversion and dewatering consent requirements. This limits the ability to undertake a complete assessment against AUP Standards E7.6.1.6 and E7.6.1.10 and the matters of discretion in AUP E7.8.

8.0 Recommendation

I recommend that the Applicant identify the location, extent, and design of all proposed earthworks, including infrastructure excavations, earthworks drainage, underfill drainage, and retaining wall drainage, and undertake an assessment of the associated groundwater diversion and dewatering effects against AUP Standards E7.6.1.10 (1 to 6) and the relevant matters of discretion under AUP E7.8 for **Restricted Discretionary Activities.**

Based on the information currently available, I am unable to support the application, as insufficient information has been provided to enable a complete assessment of the actual and potential effects associated with groundwater diversion and dewatering.

Should consent nevertheless be granted, I recommend that the conditions set out in Section 9.0 of this memorandum are imposed. These conditions will ensure that groundwater diversion and dewatering effects are appropriately assessed, managed, monitored, and mitigated, and that any actual or potential effects on the environment, neighbouring properties, structures, infrastructure, and groundwater-dependent ecosystems are appropriately avoided, remedied, or mitigated such that the resulting effects are less than minor.

9.0 Proposed Conditions

Proposed Consent Conditions – WAT Groundwater Diversion and Dewatering

Definitions

Words in the ground dewatering (take) and groundwater diversion consent conditions have specific meanings as outlined in the table below.

Alarm Level	*Specific levels at which actions are required as described in the relevant conditions.*
Alert Level	*Specific levels at which actions are required as described in the relevant conditions.*
Bulk Excavation	*Includes all excavation that affects groundwater excluding minor enabling works and piling less than 1.5 m in diameter.*
Commencement of Excavation	*Means commencement of Bulk Excavation or excavation to create perimeter walls.*
Completion of Construction	*Means when the Code Compliance Certificate (CCC) is issued by Auckland Council*
Completion of Excavation	*Means the stage when all Bulk Excavation has been completed and all foundation/footing excavations within 10 meters of the perimeter retaining wall have been completed.*
Condition Survey	*Means an external visual inspection or a detailed condition survey (as defined in the relevant conditions).*
Damage	*Includes Aesthetic, Serviceability, Stability, but does not include Negligible Damage. Damage as described in the table below.*
External visual inspection	*A condition survey undertaken for the purpose of detecting any new external Damage or deterioration of existing external Damage. Includes as a minimum a visual inspection of the exterior and a dated photographic record of all observable exterior Damage.*
GSMCP	*Means Groundwater and Settlement Monitoring and Contingency Plan*

Monitoring Station	*Means any monitoring instrument including a ground or building deformation station, inclinometer, groundwater monitoring bore, retaining wall deflection station, or other monitoring device required by this consent.*
RL	*Means Reduced Level.*
Seasonal Low Groundwater Level	*Means the annual lowest groundwater level – which typically occurs in summer.*
Services	*Include fibre optic cables, sanitary drainage, stormwater drainage, gas and water mains, power and telephone installations and infrastructure, road infrastructure assets such as footpaths, kerbs, catch-pits, pavements and street furniture.*
SQEP	*Means Suitably Qualified Engineering Professional*
SQBS	*Means Suitably Qualified Building Surveyor*

Category of Damage	**Normal Degree of Severity**	**Description of Typical Damage** *(Building Damage Classification after Burland (1995), and Mair et al (1996))*	**General Category** *(after Burland – 1995)*
0	Negligible	Hairline cracks.	**Aesthetic Damage**
1	Very Slight	Fine cracks easily treated during normal redecoration. Perhaps isolated slight fracture in building. Cracks in exterior visible upon close inspection. Typical crack widths up to 1 mm.	
2	Slight	Cracks easily filled. Redecoration probably required. Several slight fractures inside building. Exterior cracks visible, some repainting may be required for weather-tightness. Doors and windows may stick slightly. Typically, crack widths up to 5 mm.	
3	Moderate	Cracks may require cutting out and patching. Recurrent cracks can be masked by suitable linings. Brick pointing and possible replacement of a small amount of exterior brickwork may be required. Doors and windows sticking. Utility services may be interrupted. Weather tightness often impaired. Typical crack widths are 5 mm to 15 mm or several greater than 3 mm.	**Serviceability Damage**

4	Severe	Extensive repair involving removal and replacement of walls especially over door and windows required. Window and door frames distorted. Floor slopes noticeably. Walls lean or bulge noticeably. Some loss of bearing in beams. Utility services disrupted. Typical crack widths are 15 mm to 25 mm but also depend on the number of cracks.	
5	Very Severe	Major repair required involving partial or complete reconstruction. Beams lose bearing, walls lean badly and require shoring. Windows broken by distortion. Danger of instability. Typical crack widths are greater than 25 mm but depend on the number of cracks.	**Stability Damage**

Table 1: Building Damage Classification

Note: In the table above the column headed "Description of Typical Damage" applies to masonry buildings only and the column headed "General Category" applies to all buildings.

Standard Conditions

Activity in accordance with plans

Condition 1: The take (dewatering) of groundwater associated with the earthworks and installation of drainage must be carried out in accordance with the plans and all information submitted with the application, detailed below, and all referenced by the council as consent number WATXXX, including:

- A report titled *"Beachlands South Fast Track Design Report",* prepared by Jasmax, revision C, dated 12 August 2026.
- A report titled *"Beachlands South – Fast-track Approval Substantive Application Assessment of Environmental Effects and Statutory Analysis",* prepared by Unio Environmental, dated 26 June 2026.
- A report titled *"Beachlands South Fast-Track Application Geotechnical Report",* prepared by Tonkin and Taylor Ltd, version 2.2, dated 19 June 2026.
- A report titled *"Beachlands South Fast Track Infrastructure Report",* prepared by Harrison Grierson, dated 24 June 2026.
- Detailed retaining wall and drainage plans.

Duration of the consent

Condition 2: The take (dewatering) of groundwater consent WATXXX must expire 35 years from the commencement of the consent, unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

Provide for a review under section 128

Condition 3: Under section 128 of the RMA, the conditions of this consent WATXXX may be reviewed by the Manager Resource Consents at the Consent Holder's cost:

Within six (6) months after Completion of Construction Phase Dewatering and subsequently at intervals of not less than five (5) years thereafter, in order:

- To deal with any adverse effects on the environment which may arise or potentially arise from the exercise of this consent and which it is appropriate to deal with at a later stage.

- To vary the monitoring and reporting requirements, and performance standards, in order to take account of information, including the results of previous monitoring and changed environmental knowledge on:

1) ground conditions
2) aquifer parameters
3) groundwater levels; and
4) ground surface movement.

Ground Dewatering (Take) and Groundwater Diversion Conditions

Notice of Commencement of Excavation

Condition 1: The Council must be advised in writing at least ten (10) working days prior to the date of the Commencement of Excavation.

Provision of an Assessment of Settlement Effects

Condition 2: Twenty (20) working days before the Commencement of Excavation, the Applicant must provide an Assessment of Settlement Effects of the proposal on the environment, adjacent buildings, structures and public services, to the satisfaction of the Council. The assessment must include the following:

a) The identification of critical cross-sections for assessment – deepest excavations, any drainage measures, proximity to adjacent buildings/structures and services and shallowest groundwater levels must all be considered.

b) An assessment of the groundwater drawdown due to the excavation and drainage measures to include consolidation settlement profiles, at the critical cross-sections from the edge of the proposed excavation extending beneath neighbouring buildings/structures (including driveways) and services.

c) The preparation of profiles, at the critical cross-sections, showing the total (combined) settlement (i.e., the consolidation settlement due to groundwater drawdown plus the mechanical settlement due to retaining wall deflection) beneath the neighbouring buildings/structures (including driveways) and services. The profiles must be annotated with the calculated maximum differential settlement (slope gradient) across neighbouring buildings/structures (including driveways) and services.

d) An assessment of the tolerance/sensitivity of the neighbouring buildings to the predicted differential settlement that could result from the dewatering and retaining wall deflections, with respect to their age, construction and foundation types, from the structural design engineer for the project. A Stage 1 Assessment - Burland Classification of Damage for the neighbouring buildings/structures must also be undertaken. If the Stage 1 assessment indicates *"Slight Damage or greater",* then a Stage 2 assessment must be completed.

e) The identification of potentially affected public services/utilities and the assessment of the combined effect of groundwater drawdown and retaining wall deflection on these services.

Advice Note: *For the purpose of compliance with conditions of consent, "the Council" refers to the council monitoring inspector unless otherwise specified. To identify your allocated officer please email monitoring@aucklandcouncil.govt.nz.*

Provision of Groundwater and Settlement Monitoring and Contingency Plan

Condition 3: If the Assessment of Settlement Effects required in **Condition 2** determines that a calculated total settlement is greater than 7 mm at a neighbouring property, a Groundwater Settlement Monitoring & Contingency Plan (GSMCP) must be provided to the Council within twenty (20) working days before the Commencement of Excavation. The GSMCP must include (but not be limited to):

a) A monitoring plan showing the locations and types of all Monitoring Stations, including building settlement marks on the neighbouring buildings/structures, ground settlement marks, retaining wall deflection marks and inclinometers (as required).

b) Alert and alarm trigger levels and monitoring frequency for total and differential settlement of the ground surface, buildings and retaining walls;

c) Pre-and-post dewatering detailed condition surveys for existing walls;

d) Settlement monitoring and the identification of neighbouring buildings/structures that require pre-and-post dewatering detailed condition surveys, together with those public services (if any), which require pre-and -post dewatering CCTV condition survey, together with a description of the proposed construction methodology/sequence and contingency options.

If it is considered that a GSMCP is not required, then a full justification for this must be provided to the Council within twenty (20) working days before the Commencement of Excavation.

Construction Methodology

Condition 4: The consent holder must provide a detailed construction methodology written or endorsed by a Chartered Geotechnical Engineer or Chartered Engineering Geologist detailing how the contractor must undertake the proposed earthworks.

The construction methodology must be provided at least ten (10) working days prior to the Commencement of Excavation for approval, and must include excavation time frames, temporary propping/weatherproofing and/or sequencing of works. This is required to ensure stability is maintained throughout the civil works stage of the development. No Bulk Excavation is permitted onsite prior to written confirmation that the construction methodology has been reviewed and approved by the Council.

Condition 5: All construction, dewatering, monitoring and contingency actions must be carried out in accordance with the approved GSMCP and the Construction Methodology required under **Conditions 3 and 4**, respectively. Bulk Excavation (that may affect groundwater levels) or other dewatering activities must not commence until the GSMCP is certified in writing by the council.

Extent of Bulk Earthworks

Condition 6: The design and construction of the earthworks, drainage and retaining walls must be undertaken in accordance with the specifications contained in the documents titled:

- A report titled *"Beachlands South Fast-Track Application Geotechnical Report",* prepared by Tonkin and Taylor Ltd, version 2.2, dated 19 June 2026.
- A report titled *"Beachlands South Fast Track Infrastructure Report",* prepared by Harrison Grierson and dated 24 June 2026.
- Detailed retaining wall and drainage plans.

Excavation Limit

Condition 7: The Bulk Excavation must not extend beyond the extent shown in the report titled *"Beachlands South Fast Track Infrastructure Report",* prepared by Harrison Grierson, and dated 24 June 2026.

PERFORMANCE STANDARDS

Damage Avoidance

Condition 8: All excavation, dewatering systems, retaining structures, basements and works associated with the diversion or taking of groundwater, must be designed, constructed and maintained so as to avoid Damage to buildings, structures and Services on the site or adjacent properties, outside that considered as part of the application process, unless otherwise agreed in writing with the asset owner.

Alert Level Actions

Condition 9: In the event of any Alert Level being exceeded the Consent Holder must:

a) Notify the Council within 24 hours of the alert level exceedance being detected.
b) Re-measure all Monitoring Stations to confirm the extent of apparent movement.
c) Ensure the data is reviewed, and advice provided by a Suitably Qualified Engineering Professional (SQEP) on the need for mitigation measures or other actions necessary to avoid further deformation. Where mitigation measures or other actions are recommended those measures must be implemented.
d) Submit a written report, prepared by the SQEP responsible for overviewing the monitoring, to the Council within five working days of Alert Level exceedance. The report must provide an analysis of all monitoring data relating to the exceedance, actions taken to date to address the issue, recommendations for additional monitoring (i.e., the need for increased frequency or repeat condition survey(s) of building or structures) and recommendations for future remedial actions necessary to prevent Alarm Levels being exceeded.
e) Measure and record all Monitoring Stations every two days until such time the written report referred to above has been submitted to the Council.

Alarm Level Actions

Condition 10: In the event of any Alarm Level being exceeded at any ground or building Monitoring Station the Consent Holder must:

a) Immediately halt construction activity, including excavation or any other works that may result in increased deformation, unless halting the activity is considered by a SQEP to likely be more harmful (in terms of effects on the environment) than continuing to carry out the activity.
b) Notify the Council within 24 hours of the Alarm Level exceedance being detected and provide details of the measurements taken.
c) Undertake a condition survey (this could comprise either a detailed condition survey or an external visual inspection at the discretion of the SQEP responsible for overviewing the monitoring) by a SQEP or suitably qualified building surveyor (SQBS) of any building or structure located adjacent to any Monitoring Station where the Alarm Level has been exceeded.
d) Take advice from the author of the GSMCP on actions required to avoid, remedy, or mitigate adverse effects on ground, buildings or structures that may occur as a result of the exceedance.
e) Not resume construction activities (or any associated activities), halted in accordance with paragraph (a) above, until any mitigation measures (recommended in accordance with paragraphs (d) above) have been implemented to the satisfaction of a SQEP.
f) Submit a written report, prepared by the SQEP responsible for overviewing the monitoring, to the satisfaction of the Council, on the results of the condition survey(s), the mitigation measures implemented and any remedial works and/or agreements with affected parties within five (5) working days of recommencement of works.
g) Re-measure all Monitoring Stations to confirm the extent of apparent movement.

Pre-Excavation Building and Structure Survey

Condition 11: No more than six (6) months prior to the Commencement of Excavation, a detailed condition survey of existing buildings and structures, as specified in the GSMCP required under **Condition 3**, must be undertaken by a SQEP or SQBS, and a written report must be prepared and reviewed by the SQEP responsible for overviewing the monitoring. The report must be submitted for approval by the Council.

The detailed condition survey must include:

a) Confirmation of the installation of building deformation stations as required in the GSMCP.
b) A description of the type of foundations.
c) A description of existing levels of Damage considered to be of an aesthetic or superficial nature.
d) A description of existing levels of Damage considered to affect the serviceability of the building, where visually apparent without recourse to intrusive or destructive investigation.
e) An assessment as to whether existing Damage may or may not be associated with actual structural Damage and an assessment of the susceptibility of buildings/structures to further movement and Damage.
f) Photographic evidence of existing observable Damage.

This condition does not apply where written evidence is provided to the Council that the owner of a property has confirmed they do not require a detailed condition survey.

Pre-Dewatering Services Condition Survey

Condition 12: Prior to the Commencement of Excavation, a CCTV condition survey of potentially affected stormwater and wastewater services must be undertaken in consultation with the relevant service provider.

This condition does not apply to any service where written evidence is provided to the Council that the owner of that service has confirmed they do not require a condition survey.

External Visual Inspections during Construction Phase Dewatering

Condition 13: External visual inspections of the surrounding ground and the neighbouring buildings and structures identified in the GSMP required under **Condition 3**, must be undertaken for the purpose of detecting any new external Damage or deterioration of existing external Damage. Inspections must be carried out weekly from the Commencement to Completion of Construction Phase Dewatering. A photographic record must be kept, including time and date, of each inspection and all observations made during the inspection, and must be of a quality that is fit for purpose.

The results of the external visual inspections and an assessment of the results must be reviewed by the SQEP responsible for overviewing the monitoring and included in a two monthly monitoring report, submitted to the Council at a two monthly interval, for the relevant monitoring period.

This condition does not apply to any land, building or structure where written evidence is provided to the Council confirming that the owner of the land, building or structure does not require visual inspections to be carried out.

Completion of Construction Phase Dewatering - Services Condition Surveys

Condition 14: Between six and twelve months after Completion of Construction Phase Dewatering, a detailed condition survey of all previously surveyed stormwater and wastewater Services must be undertaken by a SQEP, and a written report must be prepared. The report must be reviewed by the SQEP responsible for overviewing the monitoring and then submitted to the Council, within one month of completion of the survey.

The condition survey report must make specific comment on those matters identified in the pre-dewatering condition survey. It must also identify any new Damage that has occurred since the pre-dewatering condition survey was undertaken and provide an assessment of the likely cause of any such Damage.

This condition does not apply to any Services where written evidence is provided to Council confirming that the owner of that building, structure, or Service does not require a condition survey to be undertaken.

Additional Surveys

Condition 15: Additional condition surveys of any building, structure, or Service must be undertaken, if requested by the Council, for the purpose of investigating any Damage potentially caused by ground movement resulting from Construction Phase Dewatering or retaining wall deflection. A written report of the results of the survey must be prepared and/or reviewed by the SQEP responsible for overviewing the monitoring. The report must be submitted to the Council.

The requirement for any such additional condition survey will cease six (6) months after the Completion of Construction Phase Dewatering, unless ground settlement or building deformation monitoring indicates movement is still occurring at a level that may result in Damage to buildings, structures, or Services. In such circumstances, the period where additional condition surveys may be required will be extended until monitoring shows that movement has stabilised and the risk of Damage to buildings, structures and Services as a result of the dewatering is no longer present.

Access to Third Party Property

Condition 16: Where any monitoring, inspection or condition survey in this consent requires access to property/ies owned by a third party, and access is declined or subject to what the Consent Holder considers to be unreasonable terms, or a reasonable attempt has been made to contact the property owner and occupiers (where required) to carry out monitoring, inspections

or surveys, and agreement has not been obtained, an alternative monitoring option must be developed by a SQEP and a report submitted to Council. The report must describe how the monitoring will provide sufficient early detection of deformation to enable measures to be implemented to prevent Damage to buildings, structures or Services. Written approval from the Council must be obtained before an alternative monitoring option is implemented.

Contingency Actions

Condition 17: If the Consent Holder becomes aware of any Damage to buildings, structures or Services potentially caused wholly, or in part, by the exercise of this consent, the Consent Holder must:

a) Notify the Council and the asset owner within two (2) working days of the Consent Holder becoming aware of the Damage.
b) Provide a report prepared by a SQEP (engaged by the Consent Holder at their cost) that describes the Damage; identifies the cause of the Damage; identifies methods to remedy and/or mitigate the Damage that has been caused; identifies the potential for further Damage to occur and describes actions that will be taken to avoid further Damage.
c) Provide a copy of the report prepared under (b) above, to the Council and the asset owner within ten (10) working days of notification under (a) above.

Advice Note: *It is anticipated the Consent Holder will seek the permission of the damaged asset to access the property and asset to enable the inspection/investigation. It is understood that if access is denied the report will be of limited extent.*

Building, Structure, and Services Surveys and Inspections

Condition 18: A copy of all pre-excavation building, structure condition surveys, and Service condition surveys and photographic records of external visual inspections required by this consent must be submitted to the council with the GSMCP. All other condition surveys and photographic records required by this consent must be provided to the council upon request.

Reporting of Monitoring Data

Condition 19: At two (2) monthly intervals, a report containing all monitoring data required by conditions of this consent must be submitted to the Council. This report must include a construction progress timeline, the monitoring data (including the results of condition surveys) recorded in that period, and a comparison of that data with previously recorded data and with the Alert and Alarm Levels for each Monitoring Station.

Condition 20: Upon Completion of Construction, one electronic data file (excel workbook) containing digital data for all groundwater monitoring bores must be provided to the Council. Data should include the monitoring bore name, type, location (NZTM easting / northing and elevation), screened depth for groundwater monitoring bores, absolute and relative readings (and their units of measure) and the date / time of each reading. The worksheets should contain data values only (no formulas, circular references or links to other sheets).

Notice of Completion

Condition 21: The Council must be advised in writing within ten (10) working days of when excavation and Construction Phase Dewatering has been completed.

Advice Note: *The Consent Holder is advised that the discharge of pumped groundwater to a stormwater system or waterbody will need to comply with any other regulations, bylaws or discharge rules that may apply.*

Condition 22: Certification from suitably qualified Chartered Geotechnical Engineer or Chartered Engineering Geologist must be provided to the Council, confirming that the works have been completed in accordance with the approved construction methodology as required by Condition 3, within ten (10) working days following completion. Written certification must be in the form of a geotechnical completion report, or any other form acceptable to the Council.

Groundwater Maintenance Program

Condition 23: At the Completion of Construction Phase Dewatering, the council must be provided with a maintenance program for any permanent groundwater drainage system used to manage groundwater levels.

Advice Note: *The consent holder is advised that the discharge of pumped groundwater to a stormwater system or waterbody will need to comply with any other regulations, bylaws or discharge rules that may apply.*

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure F:

Contamination

Duffy Visser

12 August 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Soil Contamination assessment

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Duffy Visser Specialist: Contamination, Air & Noise. Specialist Input, Planning & Resource Consents
Qualifications & Relevant Experience:	I hold the qualification of: Diploma in Public Health and have 5 years of experience in contaminated soil assessment. I have prepared expert evidence and technical assessments for resource consent applications, notices of requirement for designation and fast-track applications and have appeared as an expert witness before consent authorities on multiple occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	12 August 2026

3.0 Executive Summary / Principal Issues

I have assessed the application in terms of soil contamination with reference to the requirements of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES:CS) and Chapter E30 of the Auckland Unitary Plan (AUP).

By implementing the measures contained within the Contaminated Site Management Plan during the earthworks phase, any adverse effects on human health and the environment will be appropriately avoided, remedied or mitigated such that there will not be significant adverse effects.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Assessment of Environmental Effects and Statutory Analysis, prepared by Unio Environmental, dated 26 June 2026. (AEE)
- Proposed conditions, prepared by Unio Environmental, dated 26 June 2026. (PC)
- Contamination Consent Considerations Report prepared by Tonkin +Taylor, dated 24 June 2026. (CCCR)
- Contamination Site Management Plan prepared by Tonkin +Taylor, dated June 2026 (CSMP)
- Beach lands South -Rules Assessment, prepared by Unio Environmental, dated 26 June 2026. (RA)

Existing contamination reports

- Detailed Site Investigation, prepared by Tonkin +Taylor, dated November 2022. (DSI (1)) for 110 Jack Lachlan Drive and 620 Whitford-Maraetai Road.

5.0 Specialist Assessment

The site is comprised of 110 Jack Lachlan Drive and 620, 712, 758 and 770 Whitford-Maraetai Road, Beachlands.

110 Jack Lachlan
The intrusive investigation showed that HAIl activity has not “more likely than not” to have occurred on this site. Except the operational wastewater treatment plant (WWTP) that is a current HAIL activity.

620 Whitford-Maraetai Road has been subject to and impacted by HAIL activities. The Fraser Thomas investigation results confirm HAIL activities I and A8 have been undertaken on 620 Whitford-Maraetai Road, and that the rules of the NESCS and Chapter E30 of the AUP would apply to future redevelopment in identified HAIL areas.

712, 758 and 770 Whitford-Maraetai Road
Has been subject to HAIL activity due to Buildings built or demolished during time when asbestos containing material and lead based paints in use (Activity I).

Potential filling of gully and filling during residential dwelling development with fill of unknown origin (Activity I) on 712 Whitford-Maraetai Road

Future earthworks will intersect with the existing WWTP on 110 Jack Lachlan Drive.
Part of the WWTP will be filled and re-developed for residential use; however, as part of site preparation a top-soil strip is expected where earthworks are planned

T+T consider it is possible that soil disturbance within the identified HAIL area on 110 Jack Lachlan Drive and the potential HAIL areas 758 and 770 Whitford-Maraetai Road could exceed the NESCS and AUP permitted activity limits.

Consents required

In terms of the NES:CS:

Subdivision and change of use

WWTP to residential: if contamination is present, future occupants will not come into contact with soil following the proposed topsoil strip and filling. Thus, it is highly unlikely that the proposed subdivision and change of land use will harm human health. On this basis, subdividing or change of use is a permitted activity under Regulation 8(4) of the NESCS and consent is not required.

It is also highly unlikely that the change in use for 758 and 770 Whitford-Maraetai Road from rural residential use to recreational use (golf course) will harm human health. If contamination is present, future users will not come into contact with soil following earthworks. The change in use for 758 and 770 Whitford-Maraetai Road is also a permitted activity under Regulation 8(4) of the NESCS

Soil disturbance

NESCS would apply to proposed soil disturbance on 758 and 770 Whitford-Maraetai Road.

As a DSI has not been undertaken for 758 and 770 Whitford-Maraetai Road, soil disturbance for the Site will be a discretionary activity under the NESCS (per Regulation 11).

In terms of the AUP Chapter E30:

As a DSI has not been undertaken for 758 and 770 Whitford-Maraetai Road. Discharges from the soil disturbance will require consent as a Discretionary Activity under Chapter E30 of the AUP (Table E30.4.1 A7).

The CSMP

I accept the advice from T+T and agree that by implementing the measures contained within the CSMP during the earthworks phase, it is our overall conclusion that any adverse effects on human health and the environment will be appropriately avoided, remedied or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Project.

The CSMP sets out pre-works investigations for the existing WWTP and potential HAIL areas on 758 and 770 Whitford-Maraetai Road to be undertaken prior to earthworks to establish health and safety controls for construction and confirm soil disposal requirements.

The handling of contaminated soils and the remediation of land within the project area will be guided and managed in accordance with the recommendations and procedures contained within CSMP. The CSMP details the additional sampling to confirm controls for earthworks, health and safety and contingency procedures should unexpected contamination be encountered.

I agree with the overall conclusion of T+T: that by implementing the measures contained within the CSMP during the earthworks phase, any adverse effects on human health and the environment will be appropriately avoided, remedied or mitigated such that there will not be significant adverse effects.

I support the application overall.

6.0 Recommendation

I recommend that the application be approved

Land disturbance activity must be undertaken in accordance with the Contamination Site Management Plan (CSMP), titled Contamination Site Management Plan prepared by Tonkin +Taylor, dated June 2026.

7.0 Proposed Conditions

Although I agree with the proposed conditions, additional conditions are needed and the conditions for land use consent and the discharge consent should be separated. For ease of reference, I have summarised the recommended condition in the attached document

Conditions recommended to apply to consents LUC60467963, under the NES:CS, and DIS60468040 under Chapter E30 of the AUP

CS1. The Council must be informed in writing, at least ten working days prior to the start date of the soil disturbance authorised by this consent.

Advice Note:

For the purpose of compliance with the conditions of consent, "the Council" refers to the council's monitoring inspector unless otherwise specified. Please email monitoring@aucklandcouncil.govt.nz to identify your allocated officer.

CS2. Land disturbance activity must be undertaken in accordance with the Contamination Site Management Plan (CSMP), titled Contamination Site Management Plan prepared by Tonkin +Taylor, dated June 2026. Any variations to the CSMP must be submitted to the Council for certification prior to their implementation prior to implementation to ensure that it appropriately manages any adverse soil contamination effects and is within the scope of this consent.

Advice Note:

The Council acknowledges that the Contamination Site Management Plan is intended to provide flexibility of the management of the works and contaminant discharges. Any updates should be limited to the scope of this consent and be consistent with the conditions of this consent. If you would like to confirm whether any proposed updates are within scope, please contact the Council.

CS3. Prior to future earthworks in the vicinity of the existing Wastewater treatment plant (WWTP) but after the WWTP ceases operation, pre-works investigation, must be undertaken and the updated CSMP based on the findings and provide to Council.

CS4. At least 10 working days prior to soil disturbance occurring on the site, a Detailed Site Investigation (DSI) must be undertaken on the sites where a DSI has not been done.

The DSI must:

a. Provide details of sampling undertaken to characterise the site's contamination status in accordance with the Contamination Site Management Plan prepared by Tonkin +Taylor, dated June 2026 (CSMP)

b. Be prepared in accordance with the Contaminated Land Management Guidelines No.1 & No.5: (Ministry for the Environment, revised 2021);

c. Include a map of sampling locations and tabulated sampling results;

d. Include an interpretation of the sampling results against the Soil Contaminant Standards (SCS_{health}) for the protection of human health as set out in the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, (NES:CS) and the Permitted Activity soil acceptance criteria detailed by Standard E30.6.1.4 of the AUP; and

e. Be prepared by a Suitably Qualified and Experienced contaminated land Practitioner (SQEP).

CS5. The consent holder must engage a Suitably Qualified and Experienced contaminated land Practitioner (SQEP) to oversee any works involving the disturbance of potentially contaminated material and ensure the procedures and control measures in the certified CSMP are adhered to throughout these works. All sampling must be undertaken in accordance with the *Contaminated Land Management Guidelines No. 5* (Ministry for the Environment, revised 2021).

Advice Note: Soil contamination sampling

In order to comply with the Contaminated Land Management Guidelines No.5 (Ministry for the Environment, revised 2021), all sample analysis should be undertaken in a laboratory with suitable experience and ability to carry out the analysis.

CS6. During earthworks all necessary action must be taken to prevent dust generation, and sufficient water must be available to dampen exposed soil, and/or other dust suppressing measures must be available to avoid dust formation. The consent holder must ensure that dust management during the excavation works generally complies with the *Good Practice Guide for Assessing and Managing Dust* (Ministry for the Environment, 2016).

CS7. In the event of an accidental discovery of contamination during soil disturbance which has not been previously identified, the consent holder must immediately cease the works in the vicinity of the contamination hotspot and notify the Council and engage a suitably qualified and experienced contaminated land practitioner (SQEP) to assess the situation (including possible sampling and testing), and decide in conjunction with the Council on the best option for managing the material.

Advice Note: Accidental discovery of contamination

Where unanticipated contamination is discovered during the works, a revision of the CSMP may be required to ensure that the contamination is appropriately managed. Any revision of the CSMP is required to be submitted to Council for certification prior to its implementation.

CS8. The disturbance of soil where asbestos has been found to be present must avoid discharges of dust and be undertaken in accordance with the NZ Guidelines for Assessing and Managing Asbestos in Soil (BRANZ, 2024) or any updates to this document, and the CSMP.

CS9. Any excavated material that is not re-used on site must be disposed of at an appropriate facility or site authorised to accept the levels of contamination identified. Evidence of the locations where excavated material has been disposed of must be retained by the consent holder during the works and made available to the council on request.

CS10. All sampling and testing of contamination on the site must be overseen by a SQEP. All sampling must be undertaken in accordance with the Contaminated Land Management Guidelines, No.5 Site Investigation and Analysis of Soils (Ministry for the Environment, 2021).

CS11. Within three months of the completion of soil disturbance on the site a Work Completion Report (WCR) or if remediation is required, a Site validation Report (SVR) must be submitted to the Council for certification.

CS12. The WCR report referred to in CS 10 must be prepared by a SQEP in accordance with the Contaminated Land Management Guidelines, No. 1: Reporting on Contaminated Sites in New Zealand (Ministry for the Environment, revised 2021) and contain sufficient detail to address the following matters:

a. A summary of the soil disturbance undertaken, including the location and dimensions of the excavations carried out and the volume of soil excavated
b. Details and results of any additional soil and groundwater sampling (if undertaken) and interpretation of the results in the context of the NES:CS, the AUP, and the Cleanfill criteria
c. Details and results of the stormwater quality monitoring and interpretation of the results against the Australian and New Zealand Environment Conservation Council (ANZECC) *Guidelines for Fresh and Marine Water Quality* (2000).

d. Details and results of any vapour monitoring (if undertaken) and interpretation of the results against the appropriate guidelines

e. Records/evidence of the appropriate disposal for any material removed from the site

f. Details of any validation sampling undertaken on materials imported to site

g. Details of any stormwater/groundwater encountered during the works, details on any treatment and volume of disposal offsite.

h. Records of any unexpected contamination encountered during the works and response actions, if applicable

i. Conditions of the final site ground surface

j. Reports of any complaints, health and safety incidents related to contamination, and/or contingency events during the earthworks

k. A statement certifying that all works have been carried out in accordance with the requirements of approved plans and consent conditions, otherwise providing details of relevant breaches, if applicable;

CS13 .The purpose of the SVR referred to in condition 10 is to provide written confirmation from a Suitably Qualified and Experienced contaminated land Practitioner (SQEP) that the soils on the site are highly unlikely to pose a risk to human health or the environment for the intended land use.

The SVR must be provided prior to prior to issuing approval for the subdivision under s224(c) of the RMA),

and must be prepared by a Suitably Qualified and Experienced contaminated land Practitioner, in accordance with the *Contaminated Land Management Guidelines No.1 & No.5:* (Ministry for the Environment, revised 2021 and must contain sufficient detail to address the following matters:

a. A summary of the works undertaken, including the locations and dimensions of excavations and the volume of soil excavated;

b. Conditions of the final site contamination profile, including details and results of any validation testing undertaken (with a map of sampling locations and tabulated sampling results) and interpretation of the results in the context of the NES:CS and the AUP *(for each proposed lot*);

c. Details and results of any other contamination testing undertaken during the works (including any sampling undertaken on materials re-used on site or imported to site and/or asbestos air monitoring);

d. Records/evidence of the volumes and disposal locations for any material containing elevated levels of contaminants removed from the site;

e. Records of any unexpected contamination encountered during the works and response actions, if applicable;

f. Any on-going monitoring and/or management measures required to minimise risks to human health or the environment as a result of the final site contamination profile;

g. Reports of any complaints, health and safety incidents related to contamination, and/or contingency events during the land-disturbance activities; and

h. A statement certifying that all works have been carried out in accordance with the requirements of the CSMP and consent, otherwise providing details of relevant approved variations or breaches, if applicable.

i. A statement confirming that the soil on site has been remediated and/or managed such that it is highly unlikely to pose a risk to human health or the environment for the intended land use. The above statement must include confirmation that the soil remaining within the site is compliant with either the relevant Soil Contaminant Standards (SCS_{health}) for the protection of human health, as set out in the *National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health* (NES:CS) and the Permitted Activity soil acceptance criteria detailed by Standard E30.6.1.4 of the AUP, or the site-specific trigger values, based on a site-specific human health and environmental risk assessment.

Advice Note: Site Validation Report

The SVR enables the council to update the property file information relating to soil contamination, including the files of any newly created lots. If newly created lots have differing soil contamination profiles, the SVR should specifically detail this. Until an SVR is submitted and certified by the council, the Land Information Memorandum for the property will not be updated to reflect any soil contamination remediation work undertaken.

Advice Note

If any contamination exceeding the Permitted Activity soil acceptance criteria, set out in Chapter E30 of the AUP is retained within the site upon the completion of the proposed land-disturbance activity, and contaminant discharges are likely to occur unless specific management of the site remains in place, a long-term contaminant discharge consent under Chapter E30 of the AUP may be required for the site.

Advice Note:

The WCR or SVR will enable the Council to update the property file information relating to soil contamination.

Advice Note:

If you are demolishing any building that may have ACM in it:

- *You have obligations under the relevant regulations for the management and removal of asbestos, including the need to engage a Competent Asbestos Surveyor to confirm the presence or absence of any ACM*
- *Work may have to be carried out under the control of person holding a WorkSafe NZ Certificate of Competence (CoC) for restricted works*
- *If any ACM is found, removal or demolition will have to meet the Health and Safety at Work (Asbestos) Regulations 2016*
- *Information on asbestos containing materials and your obligations can be found at www.worksafe.govt.nz;*

Further conditions recommended to apply to consent DIS60468040 under Chapter E30 of the AUP

DC 14. Consent DIS60468040 expires (fifteen years) from the date of commencement unless it has been surrendered or been cancelled at an earlier date pursuant to the RMA.

DC15. The disturbance of soils containing elevated levels of contaminants must be managed in accordance with the CSMP to minimise the discharge of contaminants

(including debris, soil, silt, sediment or sediment-laden water) from the subject site to either land, stormwater drainage systems, watercourses or receiving waters:

a. Erosion and sediment controls must be installed along the boundaries of the land-disturbance areas in accordance with the CSMP and Auckland Council guidance document 2016/005: *Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region;*

b. The excavation areas must be maintained in a damp state while works are occurring to supress the generation of dust during the works;

c. Filter cloths or cover mats must be installed over the stormwater cesspits in the vicinity of the excavation areas;

d. Vehicles must be inspected prior to leaving the works area and wheels brushed/cleaned as required to avoid the potential for sediment to leave the site on vehicle tyres and enter the stormwater system; and

e. Any truckloads of excess excavated material leaving the site must be covered during transportation.

DC16. Temporary stockpiles of excavated soils containing elevated levels of contaminants must be located within an area protected by erosion and sediment controls and be covered outside working hours and during periods of heavy rain. Stockpiling of material containing separate phase hydrocarbons or odorous petroleum hydrocarbons must not take place.

DC17. The conditions of this consent may be reviewed every 5 years from the date of granting pursuant to section 128 of the RMA, by giving notice pursuant to section 129 of the RMA, for the following purposes:

a. To deal with any significant adverse effect on the environment arising or potentially arising from the exercise of the consent and which was not apparent at the time of granting the consent.

b. In the case of contamination, to require the consent holder to adopt the best practicable option to remove of reduce any adverse effect on the environment.

c. In the case of earthworks, to alter monitoring requirements as a result of previous monitoring outcomes, and/or in response to changes to the environment and/or hydrogeological knowledge.

d. To deal with any adverse effect on the environment arising or potentially arising from the exercise of this consent and in particular effects on: water quality; sediment transport; and functioning of natural ecosystems; through altering or providing specific performance standards.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure G:

Landscape Architecture

Peter Kensington

21 October 2026

Fast-track Approvals Act 2024 – Substantive Application

Specialist Response – Landscape Architecture

1.0 Application description

Application and property details

Fast-track project name:	Beachlands South
Fast-track application number:	FTAA-2606-1256
Application proposal:	Application by Beachlands South Limited Partnership at 110 Jack Lachlan Drive, 620, 712, 758 and 770 Whitford-Maraetai Road, and the adjacent Coastal Marine Area, at Beachlands, Auckland, to: • develop a comprehensively planned, and public transport focussed, community, to achieve a well-functioning urban environment comprising: residential dwellings; community and commercial activities (including a local centre, offices, hotel/conference centre, light industrial and retail activities); protected ecological restoration areas; walking and cycling networks; and community facilities; and • enable the potential development of two schools; as well as all associated earthworks and all associated infrastructure including transport facilities, intersection upgrades and roading, telecommunications, power, and water supply, stormwater, and wastewater infrastructure. Noting that the application proposal includes provision for wastewater collection, conveyance, treatment, storage and disposal infrastructure, including with land located within the Future Urban Zone identified for wastewater management purposes.

2.0 Technical Specialist Memo – Landscape Architecture

To:	Brooke Dales (Lead Planner) and Adonica Giborees (Principal Project Lead)
From:	Peter Kensington, Consultant Specialist – Landscape Architect (KPLC Limited)
Qualifications and relevant experience:	I hold the qualifications of: Bachelor of Landscape Architecture (Honours) and Bachelor of Regional Planning (Honours) and I have 30-years' experience in landscape architecture and planning. I am a Registered Member of Tuia Pito Ora, the New Zealand Institute of Landscape Architects and a Full Member of the New Zealand Planning Institute. I have prepared expert evidence and technical assessments for various applications for resource consent, requests for plan changes, notices of requirement for designations and fast-track applications. I have appeared as an expert witness before consent authorities and the Environment Court.

Preparation in accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and I have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent application processes, such as expert conferencing, which is directed by the Panel. I confirm that the opinions I have expressed in this memo are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	21 October 2026

3.0 Documents reviewed

I have reviewed all of the application material in preparing this memorandum, noting that the documents within the following attachments have particular relevance to assisting with a review within my area of expertise:

- 0A Legal Considerations Memorandum dated 26 June 2026
- 0B Assessment of Environmental Effects and Statutory Analysis dated 26 June 2026
- 0C Draft Proposed Conditions dated 26 June 2026
- 1 Design Report (Revision C) dated 12 August 2026
- 2 Architectural Drawings (various)
- 3 Open Space Strategy dated 12 August 2026
- 4 Urban Design Assessment (Revision A) dated 12 August 2026
- 5 Sustainability Assessment dated 25 June 2026
- 6 Landscape and Natural Character Effects Assessment dated 20 August 2026

I am aware of the zoning and precinct provisions under the Auckland Unitary Plan (**AUP**) which apply to the site and which 'frame' an assessment of the proposal's effects on natural character and landscape character and values.

I confirm that I have visited the site and surrounding area during July 2026 including viewing the site from the various representative public viewpoints that informed the applicant's assessment of the proposal. I have viewed the photo simulations (dated 9 July 2026) of the proposal as well as copies of original photos from each viewpoint.

I also confirm that I have been involved (for the council) in pre-application discussions between the applicant and the council during 2026; and these discussions have been ongoing, with the aim of resolving relevant issues.

I have also read the specialist urban design review prepared by Mustafa Demiralp for the council. I am also aware that terrestrial ecology review comments are being provided for the council by Luke Stanley; and that Roja Tafaroji is providing parks planning comments on behalf of the council's Parks and Community Facilities Department. I confirm my support for the intent of the review comments being made by these specialists.

4.0 Specialist assessment

I acknowledge that the application proposal overall is mostly consistent with the operative AUP provisions for this site (including Precinct I458); and has been informed by very experienced and capable landscape, urban design and architectural professionals. The resulting design response is of a high quality and provides a positive response to the site's opportunities and constraints, within the 'frame' of the relevant statutory provisions.

There is a strong landscape restoration component of the proposal through establishing the Ecological Protected Area Network, which will be maintained by a future Residents Society. I am also conscious that the application is supported by Ngāi Tai ki Tāmaki - including the provision of a Cultural Values Assessment (Attachment 20).

My specialist review mostly concurs with the assessment by the applicant's landscape architect (Stephen Brown)[1] in relation to the proposal's effects on natural character and landscape character and values. There is only one area of assessment where I disagree with Mr Brown's assessment findings, as I set out below.

My review has assessed the application proposal in the context of the relevant statutory provisions under the AUP, including those of the Beachlands South Precinct – in particular, objective I458.2.(16) and policy I468.3.(22). I have also included consideration of the statutory provisions under chapters E18 (Natural character of the coastal environment) and E19 (Natural features and natural landscapes in the coastal environment), in particular objectives E18.2.(1) and E19.2.(1) and policies E18.3.(3) and E19.3.(2). I note that the Brown NZ Assessment has not explicitly referenced the chapter E18 and E19 provisions.

In my opinion, the location, scale and design of proposed Building C1 (Apartment Type 4) - referenced by Mr Brown as the Western Apartment Building - will not achieve an appropriate integration within the existing and planned coastal environment of the site. I have assessed that this building will be at odds with Beachland's physical and visual integrity and sense of place. At 12-levels (40.1m), this building is 30m higher than the permitted building height standard of 11m for a building in the location proposed, which is a reasonably significant margin.

In assessing the adverse effects on natural character and landscape character and values that arise from the Western Apartment Building, the visual simulations provided from Viewpoints 8-9 and 11-12 have been helpful, as has the assessment commentary within the Brown NZ Assessment for each of these viewpoints. It is my review assessment that the following adverse effects on natural character and landscape character and values arise:

Viewpoint 8 – Clifton Peninsula	Moderate (more than minor)
Viewpoint 9 – Pine Harbour-Auckland Ferry	Moderate-High (more than minor)
Viewpoints 11/12 – Beachfront 01/02	High (significant)

I note that the Brown NZ Assessment reaches similar findings for Viewpoints 9 and 11/12 but tempers these when including a ten-fifteen year 'settling in' period. I do not agree with this assessment approach, with such a lengthy timeframe to allow for mitigation being too great (three-five years is more appropriate). In other words, I do not agree that it is appropriate to factor a longer timeframe than five years when considering mitigation effectiveness.

It is therefore my assessment that the proposed Western Apartment Building is incongruent with the outcomes anticipated for this sensitive coastal location and will likely result in significant adverse effects on natural character and landscape character and values. The proposed form and mass of the building is relatively monolithic and is not mitigated through architectural modulation or elevational elements to reduce these effects. In my opinion, given the prominence of the proposed building, this structure should be redesigned and possibly reduced in height.

I acknowledge that the detailed architectural design of this particular building will include quality materials and that further refined articulation may occur during developed and detailed design. However, I am not convinced

[1] As set out in the *'Landscape and Natural Character Effects Assessment'* from Brown NZ Limited, dated 26 August 2026

that these measures will mitigate the overall building bulk and mass to an acceptable degree. The building, which is at a height that is not anticipated in this coastal location, will be a visually prominent anomaly, in my opinion.

Other than the above issue, I support the remainder of the application because it will result in an appropriate scale of adverse effects on natural character and landscape character and values. Significant positive effects will also result from the proposed works within the Ecological Protected Area Network; and the proposed architectural and landscape design response is of a high quality and responds appropriately to the AUP anticipated outcomes.

5.0 No further information required to understand landscape effects

I have not identified any information gaps in the application relevant to my area of expertise.

6.0 Proposed conditions

I have reviewed the proposed draft conditions of consent that have been suggested by the applicant (at Attachment 0C of the application material), specifically the district land use and subdivision consent conditions [93], [97]-[101], [190]-[191] and [207] which relate to: certification of building and landscape design/management; implementation of consented planting; and establishment of a Residents Society for long-term management. In my opinion, the proposed conditions relevant to landscape architecture matters are appropriate; however, I offer the following suggestions to improve the relevance of the specific conditions listed below:

Condition [100] Prior to the occupation of buildings in sub-precinct A, final landscape design, including drawings, specifications and related maintenance plan, ~~and landscape plans~~ for the Fairway Reserve area as indicated in the Beachlands South Open Space Strategy (referenced in condition 1) ~~shall~~ must be submitted to the Council for certification. The design of Fairway Reserve must comply with the following: ~~standards I458.6.8(2) to (5).~~

(a) A continuous safe walking and cycling connection must be provided within the Fairway Reserve connecting between the Village Centre and the Pine Harbour Ferry berths.

(b) The Fairway Reserve must be available for public use at all times unless written approval has been obtained from the council for an alternative. In all circumstances the Fairway Reserve must be available for public use between the hours of 7am and 11pm.

(c) The Fairway Reserve must be formed and vested in the Council; or maintained by way of an appropriate legal protection mechanism which must include the registration of an access easement on the title to which the Fairway Reserve applies is required to ensure preservation of the reserve and its ongoing maintenance by the owner(s) of the land concerned.

(d) Fences, or walls, or a combination of these structures, adjoining the Fairway Reserve must not exceed the heights specified below, measured from the ground level at the boundary:

(i) 1.2m in height; or

(ii) 1.8m in height if the fence is at least 50% visually open

Condition [101] Prior to the occupation of any building in the Sub-precinct A (Marina Point) and Sub-Precinct D (Coastal), the relevant section of the indicative coastal pathway as shown on AUP I458.10.5 Precinct Plan 5 must be formed to a minimum width of 3m to link the relevant stage of development with the Pine Harbour Ferry terminal. This coastal pathway must be maintained by way of an appropriate legal protection mechanism. For the purposes of this ~~standard~~ condition, 'occupation' means occupation and use for the purposes permitted by the resource consent but not including occupation by personnel, engaged in construction, fitting out or decoration.

7.0 Recommendation

While I support the majority of the application proposal and I mostly concur with the findings of the specialist assessment of Stephen Brown, it is my review assessment that the proposed Western Apartment Building (Building C1 (Apartment Type 4)) is incongruent with the outcomes anticipated for this sensitive coastal location and will result in significant adverse effects on natural character and landscape character and values. In my opinion, given the prominence of the proposed building in the coastal environment, this structure should be redesigned.

Peter Kensington
Consultant Specialist – Landscape Architect
Registered NZILA and MNZPI



Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure H:

Urban Design

Mustafa Demiralp

09 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Urban Design

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Mustafa Demiralp – Principal Urban Design
Qualifications & Relevant Experience:	I hold a Bachelor of Urban Design and Landscape Architecture and a Master of Urban Design. I have over 17 years of experience in urban design across both the private and public sectors in New Zealand. I have prepared urban design assessments and technical advice for resource consent applications, plan changes, and fast-track applications, and have been involved in a wide range of projects, including structure planning, master planning, and medium- to high-density residential developments. I am currently a Principal Urban Designer at Auckland Council, where I provide urban design advice on resource consent and private plan change applications, and contribute to hearings and assessment processes for large-scale residential, mixed-use, and subdivision developments.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	9.10.2026

3.0 Executive Summary / Principal Issues

3.1 The proposal demonstrates a number of positive urban design outcomes, including a coherent masterplanned structure, a strong mixed-use centre, a substantial open-space and ecological network, and a generally logical distribution of residential density and land uses. Overall, the proposal establishes a strong urban design framework for a comprehensively planned coastal community.

3.2 The key urban design concerns relate to the limited north-south public road connectivity within eastern Marina Point and the extent to which some COALs are relied upon as the primary frontage and access environment for a considerable number of dwellings. A more localised concern also remains regarding vehicle-dominated frontage conditions associated with some narrow-frontage typologies.

3.3 Subject to the matters discussed in this memorandum, I generally support the proposal from an urban design perspective.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

Appendix B: Planning Assessment – Reasons for Consent (specialist area).
Appendix C: Proposed Draft Consent Conditions (specialist area).
Appendix 1: Design Report.
Appendix 2: Architectural Drawings, including the Overall Masterplan and precinct-specific plans for the Marina, Village Centre, Community, Coastal, Central East and Employment Precincts, together with apartment, housing typology, streetscape and school design information.
Appendix 3: Open Space and Landscape Plans.
Appendix 4: Urban Design Assessment (Rev B), including supporting walking and cycling isochrone mapping.
Appendix 19: JOAL Lighting Plans.

5.0 Specialist Assessment

Positive Urban Design Outcomes

5.1 The proposal has a number of positive urban design attributes at the strategic and masterplan level. The overall structure is broadly coherent and generally aligns with the intended land-use, density and height distribution of the Beachlands South Precinct. Higher-density residential development is generally concentrated around Marina Point, the Village Centre and key transport and open-space areas, providing a logical relationship between intensity, public transport accessibility and principal community destinations.

5.2 The overall block and movement structure is also generally well connected and appropriate to the proposed mix of residential and mixed-use typologies. The masterplan provides a reasonably

legible network of streets and blocks, with multiple connections to Jack Lachlan Drive, including approximately five connection points across the wider development. In some locations the topography and ecological framework result in cul-de-sac street endings, and in parts of the development COALs perform functions that might otherwise be provided by public streets. Notwithstanding these localised qualifications, the overall block structure is generally suitable for the proposed development typologies and provides a coherent framework for movement, access and neighbourhood formation.

5.3 A notable strength of the proposal is that it establishes a genuine mixed-use community rather than a predominantly residential greenfield development. Residential development is integrated with retail, employment, hospitality, education, recreation, community facilities and visitor accommodation. The Village Centre provides a clear focal point for these activities and is appropriately located to support both the ferry terminal and surrounding residential neighbourhoods.

5.4 The landscape and open-space framework is another key strength. The proposal establishes a substantial and integrated open-space framework, including the EPAN network, coastal pathways, parks, stormwater/open-space areas and other green links. This provides a strong landscape structure through the development and supports pedestrian and cycle connectivity between neighbourhoods, the coast, the Village Centre, schools and other key destinations. The broader coastal and open-space structure and connectivity are considered as particular strengths of the masterplan.

5.5 The proposed residential areas also provide a range of housing environments and densities. Marina Point appropriately accommodates the highest residential intensity given its proximity to the Pine Harbour Ferry Terminal and Village Centre, while the Coastal and Golf sub-precincts generally transition toward lower-density residential forms. This contributes to a legible overall urban structure and provides variation in neighbourhood character across the development. The range of apartments, terraced housing and detached dwellings also provides a good degree of housing choice and assists in creating varied neighbourhood conditions across the development.

5.6 The Village Centre is also positive in principle. Its block and perimeter structure is generally coherent, buildings largely address surrounding streets, and parking is predominantly internalised or located behind buildings. The mixed-use concept is supported and provides a clear focal point within the wider development.

5.7 The Community sub-precinct similarly provides a coherent structure around the schools, community uses and Community Park. The location of the park between the Village Centre and school/community uses provides a useful spatial relationship between civic, recreational and residential activities.

5.8 Overall, notwithstanding the more specific matters discussed below, the proposal provides a strong strategic framework for a comprehensively planned coastal settlement, with a generally logical distribution of land uses and density, a substantial open-space network, and a movement structure that places considerable emphasis on walking and cycling.

Precinct Overview

Sub-precinct A – Marina Point

5.9 Marina Point accommodates the highest-density residential development within the proposal and is appropriately located between the Pine Harbour Ferry and the Village Centre. The proposed density pattern is also broadly consistent with the Precinct Plan, with the THAB-zoned land concentrated through the central part of the sub-precinct around the Fairway Reserve and accommodating the principal apartment development. Residential intensity then generally reduces toward the outer edges of the sub-precinct, creating a gradual transition to lower-density development that is broadly consistent with the intended precinct structure.

5.10 The Fairway Reserve provides a strong and legible open-space spine through the precinct and assists in connecting the ferry terminal, residential areas and Village Centre. Apartment buildings generally address streets and public open spaces, providing good opportunities for passive surveillance and helping to reinforce the urban character of the precinct. The relatively compact form of development also supports efficient land use while allowing substantial open-space and ecological areas to be retained elsewhere within the wider masterplan.

5.11 The main concern relates to the movement and access structure, particularly the limited extent of public road frontage and north-south connectivity in the eastern part of Marina Point. A number of superlots rely heavily on COALs for access, although the urban design implications vary depending on their frontage relationship. The concern is more pronounced for MP12, MP14, MP22 and MP23, where the COAL functions as the principal access and street address, and dwellings have only a limited relationship with public roads, typically at the ends of the blocks. MP13, MP15, MP24 and MP25 also rely on COALs for vehicle access and servicing however benefit from a principal frontage to the Fairway Reserve/open-space edge. The eastern part of the precinct also relies on cul-de-sac streets and COAL connections rather than a more connected north-south public street network. Some frontages, particularly MP02, are also interrupted by frequent vehicle crossings. These matters are discussed further below.

Sub-precinct B – Village Centre

5.12 The Village Centre is intended to form the principal commercial, civic and social focus of Beachlands South and is appropriately located at the centre of the wider masterplan and in close proximity to the coast. The proposed arrangement is broadly consistent with the Precinct Plan direction, which anticipates a compact, walkable mixed-use centre accommodating commercial, employment, community and higher-density residential activities, supported by a high-quality public realm and pedestrian-focused street environment.

5.13 The overall block and perimeter structure is generally positive. Buildings largely address surrounding streets and public spaces, with parking and servicing predominantly internalised or located behind buildings. This creates a more pedestrian-oriented urban form and provides good opportunities for active frontages and passive surveillance. The approach is also consistent with the precinct assessment criteria, which seek buildings that positively address streets and open spaces, provide interactive ground-floor frontages and minimise the visual effects of ancillary parking.

5.14 The Village Park provides a positive civic and open-space focus within the centre. It incorporates a range of complementary spaces and activities, including a village green, bespoke playground and nature-play areas, plaza space, outdoor dining areas, seating, an outdoor stage and picnic opportunities. This variety provides a good mix of everyday use, informal gathering and community activity, and reinforces the Village Centre as the social heart of the wider development. The larger Community Park within Sub-precinct C performs a separate neighbourhood and recreation function.

5.15 The built form also benefits from variation in height, massing and architectural expression across the centre. The precinct contains a range of generally mid-rise buildings, including three- to six-storey forms, with modulation, balconies, varied rooflines and subtle differences in materiality and architectural treatment. This avoids a uniform built edge and contributes positively to the intended village character and sense of place. The architectural approach also responds to the precinct criteria seeking enclosure around public spaces.

5.16 Overall, the Village Centre is considered to provide a strong urban design framework and an appropriate civic and mixed-use heart for Beachlands South.

Sub-precinct C – Community

5.17 The Community sub-precinct accommodates a range of social and community infrastructure, including education facilities, recreation, visitor accommodation, and public open space alongside residential development. This is generally consistent with the Precinct Plan direction, which anticipates the area as a focal point for community and civic activities, with education, recreation and associated uses located in close proximity to the Village Centre.

5.18 A key strength is the concentration of these community facilities in a central and accessible location near Jack Lachlan Drive. The relationship between the schools, Community Park and Village Centre creates a strong civic and recreational focus, supporting convenient walking and cycling within the precinct and to the wider Beachlands area. The Community Park is particularly well located between the education area and Village Centre, providing an important link between civic, recreational and residential activities.

5.19 The residential block structure is generally coherent. CM3 adopts a positive perimeter-style arrangement with parking internalised within the block, while the surrounding residential development provides an appropriate transition to lower-density areas. Some dwellings, including Building B and some units in Building C, have less favourable south or south-east orientations. However, these represent a relatively small proportion of the total number of units within the superlot.

5.20 The precinct also accommodates the proposed hotel at CM5, which is a notably taller element. However, its relatively isolated position, substantial setbacks and open-space setting provide some capacity to accommodate the additional height. The additional section and shading information provided through the section 67 process has not identified any significant urban design concerns in relation to height or shading effects.

5.21 CM1 provides a generous COAL arrangement with a dedicated pedestrian route and is not considered inherently problematic from an urban design perspective. CM4 is more constrained, with parts of the COAL functioning as the primary frontage and access environment for dwellings

rather than solely as rear access. This reinforces the broader concern regarding the extent to which COALs perform the role of residential streets, discussed further below.

Sub-precinct D – Coastal

5.22 The Coastal sub-precinct is predominantly residential and shaped by the site's topography, ecological areas and coastal setting. This is generally consistent with the Precinct Plan, which seeks development that responds to coastal landform, while maintaining a more spacious residential character toward the coastal edge. The proposed coastal pathway, retained gullies, ecological areas and open-space corridors are key features that provide public access, amenity and integration with the natural environment.

5.23 The residential pattern is generally varied, comprising a mix of apartment, terrace and detached housing, with a reduction in intensity toward the more sensitive coastal edge. Many of the detached dwellings are relatively conventional and do not raise significant urban design concerns. There are also opportunities in parts of the precinct, including around C6–C8, for streets and development edges to positively contribute to the surveillance and activation of adjoining open-spaces.

5.24 The principal built-form issue relates to the taller apartment building within C1. At approximately 12 storeys, this represents a substantial increase in scale relative to the surrounding lower-density residential context and creates a relatively abrupt transition in built form. A building of this height might more typically be anticipated within the Village Centre or other higher-intensity parts of the masterplan. However, its relatively isolated position, substantial separation from neighbouring development and surrounding open-space context provide some capacity to accommodate the additional height. The additional shading information provided through the section 67 process has not identified a material urban design concerns.

5.25 Overall, the Coastal sub-precinct establishes a strong relationship with the coastal landscape and open-space network. The integration of the coastal pathway with ecological areas are particular strengths. The principal urban design qualification relates to the scale and transition of the C1 apartment building rather than the overall precinct structure.

Sub-precinct E – Golf

5.26 The Golf sub-precinct retains the existing golf course and clubhouse facilities while accommodating additional predominantly lower-density residential development. This is generally consistent with the precinct direction, which seeks to retain organised sport and recreation while enabling complementary residential development.

5.27 A key strength is the retention of a substantial open landscape within the wider masterplan. The golf course provides an established recreational and community asset and contributes to the visual amenity and landscape identity of this part of the development. The retained clubhouse also provides an opportunity to continue supporting recreational and social activity associated with the golf course.

5.28 The residential development is generally lower in scale and sits comfortably within the open golf-course setting. The COAL-based residential blocks are also less concerning than in other parts of the masterplan. These areas generally comprise detached dwellings within a more spacious

setting, and the approximately 9m COAL profiles provide greater flexibility to accommodate pedestrian movement, landscaping and berm allocation.

5.29 A more localised concern relates to the fragmented nature of some residential clusters, including around JL1 and CE3, which are relatively isolated and terminate in cul-de-sacs or COAL-based arrangements. While this appears to respond to topography and the configuration of the retained golf-course and ecological areas, it results in some neighbourhood pockets being less directly connected to the wider street network.

5.30 Overall, the Golf sub-precinct benefits from the retention of a significant recreational landscape and generally provides an appropriate lower-density residential transition within the wider masterplan.

Sub-precinct F – Employment

5.31 The Employment sub-precinct is located along the eastern edge of the development adjoining Whitford-Maraetai Road and accommodates a mix of light industrial, commercial and mixed-use activities. This broadly aligns with the Precinct Plan direction, which seeks to provide local employment opportunities and support a more balanced mix of land uses across the wider development. Light industrial and business activities are concentrated near Whitford-Maraetai Road, while mixed-use areas provide opportunities for residential accommodation above ground-floor employment activities.

5.32 Superlot E1 is generally well organised, with building blocks positively addressing the public street through their frontage and orientation, while COALs function more conventionally as rear-access lanes. E3 follows a similar principle in part, although the rear block comprising Lots 1058–1073 is both addressed and accessed primarily from the COAL, resulting in a more vehicle-dominated frontage environment. The proposed architectural approach is otherwise appropriate to the intended employment and mixed-use typologies, with building modulation, roof form variation and frontage articulation contributing positively to the anticipated character of the precinct.

Urban Design Concerns and Unresolved Matters

COAL Reliance and Eastern Marina Point Street structure

5.33 A key urban design concern relates to the extent to which COALs are used as the primary frontage and access environment for dwellings that do not have direct frontage to a public road network. This is most evident within Marina Point, including MP10, MP11, MP12, MP14, MP22 and MP23, and also occurs CM4 within the Community sub-precinct and JL1 and CE3 within the Golf sub-precinct. Other Marina Point blocks, including MP13, MP15, MP24 and MP25, also rely on COALs for vehicle access and servicing, but benefit from a stronger principal frontage relationship with the Fairway Reserve/open-space edge. Several of these COALs serve relatively large groups of dwellings, and some submitted layouts indicate relatively constrained overall widths of approximately 6 m.

5.34 The concern is particularly pronounced in the eastern part of Marina Point, where limited north–south public street connectivity results in a movement network that relies heavily on COALs and cul-de-sacs. This reduces the clarity of the public street hierarchy and places greater reliance on private accessways to perform the role of residential streets.

5.35 A related issue arises along some east–west public roads, where blocks including MP12–MP17 and MP22–MP25, present side elevations toward the road rather than their principal residential frontages. This reduces opportunities for direct building address, passive surveillance and activation of the public street. Some dwelling typologies, including the T3-C typology, also appear to provide limited habitable-room glazing or activation opportunities to these side elevations, further weakening the relationship between buildings and the public realm.

5.36 Where COALs function as the primary frontage and access environment, the quality and functionality of these spaces become particularly important. Matters requiring further resolution include pedestrian amenity and separation from vehicle movement, landscaping and berm allocation, lighting, visitor access and parking, waste collection, servicing and vehicle manoeuvring.

5.37 The concern does not apply equally to all COALs. In some parts of CM1 and the Golf sub-precinct, wider profiles, detached housing typologies and more generous landscape settings provide greater flexibility and generally achieve a more acceptable outcome. The issue is therefore focused on the more constrained locations, particularly within Marina Point sub-precinct, where large groups of dwellings rely on COAL access in the absence of direct road frontage.

5.38 Within CM1, the COAL arrangement is relatively spacious and incorporates a 1.5 m pedestrian route. The COAL-accessed dwellings are generally detached with reasonable separation and landscaping opportunities, and the arrangement is not considered inherently problematic from an urban design perspective. Further consideration will nevertheless be required in relation to waste collection, bin storage, and the final allocation and treatment of berm and landscape areas.

5.39 CM4 presents a more constrained condition. In parts of the block, the COAL functions conventionally as rear access, including for Lots 875–882, while elsewhere it provides the principal frontage and access environment for dwellings such as Lots 863–870. In these locations, the pedestrian route is positioned immediately behind parking spaces, resulting in pedestrians moving through an area closely associated with vehicle manoeuvring rather than within a clearly separated pedestrian environment. A similar arrangement occurs around Lots 1228–1229. This is not considered an optimal urban design outcome and reinforces the broader concern regarding COALs being relied upon as the primary frontage and access environment in the absence of direct road-reserve frontage.

5.40 Where the E27.6.6 pedestrian access standards apply, the relationship between pedestrian routes, parking areas and vehicle access should be confirmed by the transport specialist, particularly in relation to the required physical separation of pedestrian access from vehicle movements.

<u>Vehicle-Dominated Frontage and Pedestrian Environment</u>

5.41 A further urban design concern relates to the relationship between dwelling frontage width and vehicle access in Marina Point MP02, in particular, the T2-A typology has a relatively narrow frontage width and the frequent provision of individual vehicle crossings results in a substantial proportion of the street edge being occupied by driveways. This reduces opportunities for continuous landscaping, street tree planting and a strong pedestrian-oriented interface.

5.42 The issue is therefore not simply the number of vehicle crossings, but the cumulative effect of a long row of narrow-frontage typologies where vehicle access occupies a significant proportion of

the street edge. In these locations, careful detailed design will be required to ensure pedestrian continuity, landscape provision and the residential character of the street is not unduly compromised by vehicle access.

Assessment Summary

5.43 Overall, the proposal establishes a strong and generally coherent urban design framework, supported by a logical distribution of density and land uses, an extensive open-space network, and positive relationships between development, public streets and key community destinations. The principal urban design concern relates to the limited north-south public street-based connectivity within eastern Marina Point and the extent to which COALs are relied upon as the primary frontage and access environment rather than public road frontage. A more localised concern also remains in relation to vehicle-dominated frontage associated with narrow-frontage typologies within MP02. These matters are addressed further through the recommendations and proposed conditions below.

6.0 Section 67 Information Gap

6.1 During the section 67 process, the applicant provided additional information in response to the urban design matters raised. The information provided was sufficient to address the specific information request and enable further assessment. However, in some cases the additional information did not fully resolve the underlying urban design concern associated with the matters raised.

6.2 The information requested, the applicant's response, and how this informed my assessment and urban design position are summarised below.

Item 1 – Varying Levels of Design Resolution and Future Design Flexibility

6.3 The information request sought clarification on how the proposed architectural and landscape certification would ensure that detailed design responds appropriately to individual lot and superlot contexts, including orientation, topography, retaining and interface conditions, CPTED, residential amenity and private-lot landscaping.

6.4 The application provided sufficient information to understand the intended urban design outcomes across the development, notwithstanding the relatively high-level nature of some residential areas. While much of the current approval material relies on masterplans, superlot plans, and generic housing typologies rather than fully resolved lot-specific designs, the proposed certification conditions will be important in ensuring these outcomes are appropriately realised as detailed design progresses.

Item 2 – Movement Network and Connectivity

6.5 The information request sought clarification of the proposed street hierarchy and connectivity, including the rationale for locations where through-road connections are not provided, particularly at the eastern end of Marina Point where north–south movement appears to rely significantly on COALs.

6.6 The applicant has explained that alternative through-road connections were considered and has identified ecological constraints, topography and gully geometry, block efficiency and the wider pedestrian/open-space network as reasons for the proposed arrangement. This provides a reasonable strategic explanation for why a more continuous public road network has not been pursued.

6.7 The additional information nevertheless does not resolve the concern that, in eastern Marina Point, COALs provide a significant proportion of the connectivity and access roles that might otherwise be provided through the public street network. This is particularly evident around MP12–MP15 and MP22–MP25, where the same access corridors operate as rear lanes for some blocks and as the principal frontage and access environment for others.

Item 3 – COAL Design and Function

6.8 The information request sought further clarification of the hierarchy, dimensions and intended function of COALs, including their role as pedestrian spaces, their relationship with public streets and open spaces, and their ability to accommodate access, servicing and other operational requirements where they serve larger groups of dwellings.

6.9 The additional information provides typical COAL cross-sections and broadly clarifies the intended design approach. However, the broader concern remains that a significant number of residential areas rely on COALs as the primary frontage and access environment in the absence of direct road frontage, particularly within Marina Point and CM4. The detailed urban design implications of this arrangement are discussed in Section 5.3 above.

Item 4 – Vehicle Crossings and Pedestrian Continuity

6.10 The information request sought clarification on how frequent vehicle crossings proposed within Marina Point would be managed to maintain pedestrian continuity, frontage landscaping and streetscape quality.

6.11 The applicant has provided sufficient clarification of the intended approach, including the consolidation of crossings where practicable, consistent footpath surface treatments, and targeted landscape planting. However, a localised urban design concern remains in relation to narrow-frontage typologies and the cumulative effect of repeated crossings, as discussed in Section 5.3.

Item 5 – Height, Built Form and Interfaces

6.12 Additional information was requested regarding the effects of taller buildings, including shading analysis, sections and visual information illustrating relationships with surrounding development.

6.13 The applicant has provided the requested sections and shading diagrams for Blocks CM5, CM3, C1-A and MP01. No material shading concerns have been identified for CM5, CM3 or C1-A (Apartment Type 4).

6.14 For MP01, the shading analysis does not indicate significant effects on existing residential properties. Some shading is shown for proposed residential Lots 272–274. While the scale transition at MP01 is somewhat abrupt within its immediate context, the generous separation to

surrounding development, particularly to the east, means this is not considered to result in significant urban design concerns at this stage.

6.15 C1-A is one of the taller buildings and is located within a relatively low-density setting, including nearby detached residential lots. While the building represents a notable increase in scale relative to its surroundings, the absence of material shading effects, its spacious setting, and separation from neighbouring dwellings provide some support for the proposed height and form.

6.16 From an urban design perspective, a building of this scale might more typically be anticipated within the Village Centre or other higher-intensity parts of the precinct. Nevertheless, I do not consider its location to give rise to a significant urban design concern that would warrant further information at this stage. The treatment of the building base and ground-level interface will, however, be important in assisting its integration with the surrounding lower-density context and providing an appropriate transition in scale and character.

6.17 In relation to wider visual dominance and landscape effects arising from the height of C1-A and the other taller buildings, I defer to Council's landscape specialist.

Other Section 67 Requests

6.18 The remaining urban design information requests related to the open-space network and precinct linkages, walkability and access to key destinations, and park/open-space edge relationships.

6.19 The applicant provided additional explanation and supporting information addressing these matters, including clarification of the open-space and play provision within Sub-precinct F, walking and cycling catchment analysis for key destinations, and the rationale for locations where continuous park-edge roads have not been provided.

7.0 Recommendation

7.1 Overall, I consider the proposal to establish a strong strategic urban design framework, and most matters raised through the section 67 process have been satisfactorily clarified. The following recommendations are intended to address the remaining urban design concerns.

Eastern Marina Point Street Structure

7.2 I recommend introducing at least one additional north-south public road through the eastern part of Marina Point to achieve a more legible and connected public street network. This would reduce reliance on COALs as the primary frontage and access environment for larger groups of dwellings, minimise nested COAL arrangements, strengthen the relationship between east–west streets and adjoining development, and provide a clearer hierarchy between public streets and private accessways.

COAL Frontage and Function

7.3 Where COALs remain the primary frontage and access environment for dwellings without direct road frontage, particularly within Marina Point and CM4, the detailed design should demonstrate an acceptable residential environment. This should include clear pedestrian provision, landscape

and berm allocations, lighting, visitor access and parking, waste and bin collection, servicing and vehicle manoeuvring. Where relevant, the pedestrian access arrangements should also be confirmed against the applicable E27.6.6 requirements.

Public Street Activation in Eastern Marina Point

7.4 For blocks where side elevations address public roads, including parts of MP12–MP17 and MP22–MP25, opportunities should be taken to strengthen the relationship with the street through additional habitable-room glazing, entrances or other architectural measures, where practicable, to improve passive surveillance and frontage activation.

MP02 Narrow Frontage Typologies

7.5 The detailed design of the T2-A typology within MP02 should seek to minimise the cumulative dominance of vehicle crossings and maximise pedestrian continuity, frontage landscaping and opportunities for street-tree planting.

C1-A Building Base Options

7.6 It is recommended to test options for varied building base treatment of the taller apartment building within C1, so that the lower levels provide an appropriate transition in scale and character to the surrounding lower-density residential development.

Lot 2010 Open Space Opportunity

7.7 Consider whether Lots 765–769 could be incorporated into, or more closely integrated with, Lot 2010 to create a larger and more legible neighbourhood park. The existing block configuration presents a strong opportunity for an open space substantially framed by public roads, with improved visibility, access and passive surveillance.

8.0 Proposed Conditions

8.1 The proposed condition framework already includes a number of provisions relevant to urban design. Conditions 93–95 provide for architectural certification, dwelling relocation and application of approved housing typologies at detailed design stages; Condition 97 provides for detailed landscape certification for publicly accessible areas; Conditions 102–105 address waste management and lighting in specified circumstances; and Condition 199 addresses the construction of COALs.

8.2 In my view, this framework generally provides an appropriate basis for subsequent detailed design. However, two additional conditions are recommended.

- The first addresses the heavy reliance on COALs as the primary frontage and access environment for a large number of dwellings that lack the benefit of public street frontage.

- The second is intended to ensure that where dwelling locations change or approved typologies are subsequently applied in a materially different context, the urban design relationships relied upon in the current assessment are maintained.

Amendment to Condition 199 and new Condition 199A – COAL detailed design

8.3 Condition 199 currently requires COALs to be constructed to the road controlling authority's standards to provide access to dwellings, buildings and car parks. While this addresses the basic access function, it does not expressly address the broader urban design role of COALs where they provide the primary frontage and access environment for dwellings rather than public street frontage. In particular, the condition does not specifically address pedestrian amenity, frontage quality, landscape and berm treatment, waste and servicing arrangements, visitor parking, lighting, or the relationship between dwelling entrances and the accessway.

8.4 I therefore recommend that Condition 199 be supplemented by the following:

[199A] COAL Detailed Design

Prior to construction of any COAL that provides the primary pedestrian and vehicle access to dwellings without direct public street frontage, the Consent Holder must submit a detailed COAL Design Plan to Council for certification.

The plan must demonstrate an integrated and functional residential frontage and access environment and where relevant include the following:

- *carriageway and pedestrian-route dimensions;*
- *pedestrian access designed in accordance with the relevant E27 pedestrian access standards, including E27.6.6 where applicable, with appropriate physical separation from vehicle access, parking and manoeuvring areas;*
- *landscape and berm allocation, including planting locations and dimensions;*
- *lighting;*
- *dwelling entrances and opportunities for passive surveillance;*
- *visitor parking arrangements;*
- *waste and recycling storage, presentation and collection arrangements;*
- *servicing and emergency access; and*
- *vehicle manoeuvring and measures to minimise conflict between pedestrians, parked vehicles and servicing activity.*

New Condition 95A – Contextual urban design assessment

8.5 Conditions 94 and 95 allow dwelling locations to change within individual lots and approved housing typologies to be applied to specified residential lots. While this provides appropriate flexibility, a typology or dwelling arrangement that performs well in one location may generate different urban design relationships when applied to another lot, orientation or interface.

Condition 97 also expressly excludes landscaping on private lots from the later detailed landscape certification process.

8.6 The existing conditions therefore do not expressly require consideration of how changes in dwelling location or typology may affect site-specific urban design outcomes, including the response to topography and retaining, orientation and street or COAL interface, relationships with adjoining development and public open space, CPTED and passive surveillance, privacy and outlook, pedestrian access, boundary treatment and private-lot landscaping.

8.7 I therefore recommend the following additional condition:

[95A] Contextual Urban Design Assessment

Where a dwelling location is changed under Condition 94, or an approved housing typology is applied under Condition 95, in a manner that results in a materially different relationship to:

- *a public road;*
- *a COAL;*
- *a public open space;*
- *an adjoining residential site;*
- *a significant retaining structure or level change; or*
- *another key frontage or interface shown in the approved plans.*

The Consent Holder must submit a design assessment to Council for certification that the requirements of Condition 95 have been met. The assessment must demonstrate that an equivalent or better urban design outcome is achieved, having regard to:

- *orientation and address to streets, COALs and public open spaces;*
- *passive surveillance and CPTED;*
- *relationships to adjoining dwellings and boundaries that address privacy and outlook;*
- *topography, retaining and level changes;*
- *pedestrian access and legibility; and*
- *associated private-lot landscaping, including frontage planting, privacy planting, boundary treatment and interfaces with streets, COALs and public open spaces.*

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure I:

Universal Design

Nidhi Nautiyal

09 October 2026

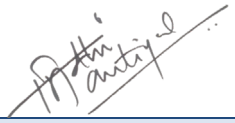
1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Universal Design Specialist -Nidhi Nautiyal

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Nidhi Nautiyal – Principal Universal Design Specialist, Auckland Council
Qualifications & Relevant Experience:	I hold a Bachelor of Architecture, a Master in Sustainable Architecture, and a doctorate in Architecture (Community facilities focused multi-residential developments) and have 18 years of combined work experience in architecture & planning (TODs and walkable catchments), 6 years of specialisation in Universal Design and 5 years of teaching experience (UoA). I have been at the Council as a Specialist Universal Designer for the past 4.5 years. I am an affiliated member of NZIA**.** I have offered universal design-related advice for resource consent applications, universal design audits for mixed-use developments within plan changes, and notices of requirement for designation applications, including CRL. I also liaise with AT as part of an advisory group that deals with all matters of public access and safety on public transport, comprising disabled advocates from various organisations.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct. While not having appeared as an expert witness in any proceedings, I assure you that I have compiled responses based on my experience in my role as a universal design SME at the Council. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others. I also agree to follow the Code when participating in any subsequent processes, such as an expert conference, if directed by the Panel.

Signature:	Nidhi Nautiyal (PhD), Principal Specialist Universal Design, Auckland Council 
Date:	09.10.2026

3.0 Executive Summary / Principal Issues

This Universal Design memorandum reviews a Fast-track substantive application (FTAA) for 'Beachlands South', included in Schedule 2 of the FTAA as a Listed Project with significant regional or national benefits. The Project location or Site is situated across approximately 159.58 hectares of live-zoned land and approximately 108.6 hectares of Future Urban-zoned land at 110 Jack Lachlan Drive and at 620, 712, 758, and 770 Whitford-Maraetai Road, Beachlands.

Matters concerning pedestrian safety and movement were raised under s67 RFIs, to which the applicant team responded satisfactorily, except for details on the housing typology.

Section 6 comments on those responses and further assesses new information shared by the applicant on pedestrian safety around streets and crossings, ease of access to public areas within the development, the provision, design and nature of residential dwellings, the provision of accessible parking, and the importance of accessible playgrounds in large mixed-use developments.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Attach 0B Planning Assessment
- Attach 0B2 s67 Response Table
- Attach 0C Proposed Conditions of consent
- Attach 1_ Beachlands South Design report, Rev C
- Attach 2_Architectural drawing Set
- Attach 2.11 & 2.12 (response to RFIs)
- Attach 3_Open space strategy
- Attach 4 Beachlands South_UDA -Rev B (Rev A - Final on cover)
- Attach 8 ITA

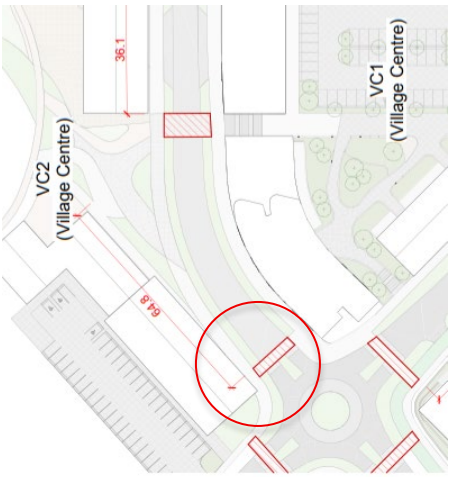
5.0 Additional Reasons for Consent Not Included in AEE / Incorrect Reasons for Consent

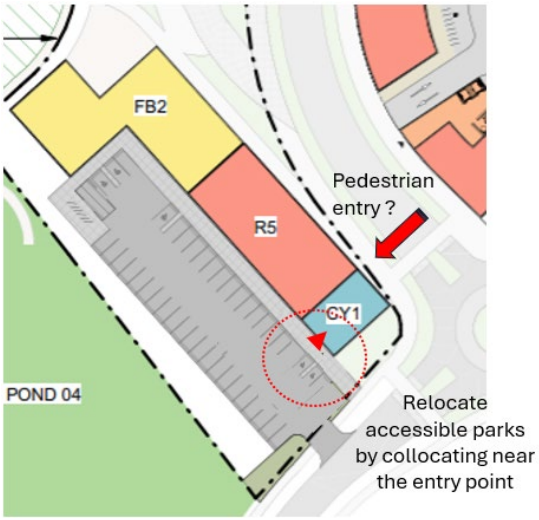
None

6.0 Specialist Assessment

6.1 Location of Community facility block

The rationale for locating the community facility building, stating the strategic corner location, with entry points from the South and End, has been noted in Appx 2.11. including reasons such as uninterrupted views adding visual relief at the upper level.



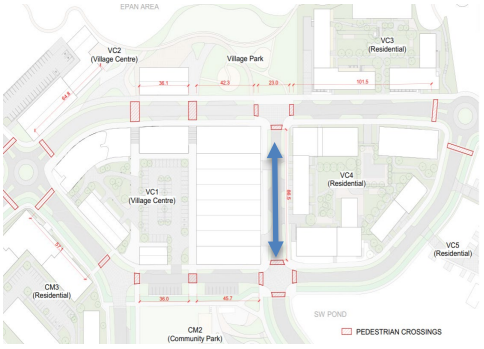


While noting the pedestrian crossing on the main street (also serving as the main bus route) leading to the community building, it is assumed the street-facing side will be the main pedestrian entry point, effectively rendering the car park entry at the rear of the building the secondary entrance. Considering this rationale, the location of the community facilities block is justified as it prioritises pedestrian linkages to a main entrance over a hidden secondary entrance.

However, the location of the accessible car parks should be revised. I advise moving the provision closest to the rear entry to minimise the length of the accessible travel route. An alternative, highlighted in a circle, is shown in Fig. 2 as a suggestion for the design team.

6.3 Pedestrian crossings between Village centres (VC)

The longest distance between two crossings located between VC1 and VC4 is indicated as 86.5m. It sits well within the 80-100m guide for urban environments to maintain pedestrian convenience and safety, and therefore, an acceptable distance apart.



6.4 Vehicle crossings and footpath conflict

Segment covered by others in detail.

The response to concerns raised under s67universal design RFIs regarding possible pedestrian-vehicle collision due to multiple crossing points has been noted under the Urban design tab of the 0B Response table.

I note the similar concerns raised by the urban designer and support any further design recommendations they may add to minimise conflict points, such as consolidating vehicular entries, changing the orientation of building blocks, or any other design amendments they may propose for enhanced outcomes.

6.5 CPTED concerns common areas, including car parking, open green, and coastal edges

I have noted the response in Attach 2.12, p5, which suggests a few design strategies to enhance passive surveillance and improve visibility in the proposal by creating a well-considered movement network with pedestrian links adjoining open spaces, building orientation facing linkages and open spaces, maintaining clear sightlines, landscape treatment, and avoiding inactive rear boundaries.

I concur with the design team's approach, as a combination of the above-mentioned strategies is useful in creating a 'sense of safety' for pedestrians, including children, using streets and extended play areas and agree that a well-worked-out design based on intuitive wayfinding principles remains the key to design out crime.

For a thorough pedestrian safety analysis, further recommendations include developing an integrated movement-pattern and building-orientation plan for each cluster within the development to ensure no areas remain unassessed. This assessment may be carried out in conjunction with a lighting and signage plan before lodging the building consent application. Alternatively, a CPTED assessment may be carried out by an expert consultant.

6.6 Housing typologies & apartment design

The s67 RFI response sheet does not address my query regarding the percentage of affordable units, housing accessibility parameters, and universal design aspects of the proposed housing typologies.

It is noted in Attach 1 Design report Rev C, that a variety of apartment typologies will be introduced. I support the design team's consideration of including a range of apartment sizes there, from 1-bed to 4-bed, to cater to a variety of household sizes. The location of higher-density apartment blocks at the fringes, with easy access to open space, transport, and amenities, is also commended. The proposed live-work units near the Eastern edge complement the area's light industry.

Similarly, Attach 4 UDA reflects a balanced mix of uses in the proposal for appropriate intensification, but does not address the design quality of the dwellings of the proposed housing typologies.

Housing provisions with diverse income mix, typologies, sizes and universal access considerations allow a wide range of household types to enjoy affordable, equitable rental or homeownership opportunities. Refer to the ADM apartment guide for universal design https://www.aucklanddesignmanual.co.nz/en/urban-design-guidance-and-processes.html. Therefore, to create equitable housing opportunities, the following aspects should be considered during the detailed dwelling design stage.

- A mix of housing tenures with a tenure-blind architectural approach – A certain percentage of the total housing stock to be proposed as affordable, including tenures such as affordable rental & alternative procurement models, as well as market-rate.
- Universal design dwelling standards - A certain percentage of dwellings within each housing typology designed in accordance with universal design access parameters such as ease of access from the footpath to the building entrance, step-free thresholds at ground level, and wheelchair- and pram-friendly gradients of less than 1:12.
- Accessible dwelling design - A certain percentage of dwellings within each housing typology to be designed with accessibility features (including wider corridors, accessible toilets and dedicated accessible parking).

6.7 Accessible parking ratios

I have noted the accessible car parking ratios worked out in Table 7.10 of Attach 8 ITA, and support excess provision in certain areas. Design-wise, creating accessible car parking aisles post-construction is challenging and expensive due to the additional 1.1m bay requirement; hence, excess provision at the design stage is a good strategy.

The allocation of general car spaces and their accessible component for VC2 (retail, food and beverage, and community), however, is missing from the table.

E4	12	1	Yes - 1
CM3	114	4	Yes - 4
VC1	54	3	Yes – 3
VC3	82	3	Yes - 3
VC4	150	4	Yes – 3

The accessible car parking design has also been noted in figures 7-54 – 59 in the same document.

Whereas fig 7-56 arrangement works best for parking, reversing and accessing the lift core, with minimal Continuous Accessible Path of Travel (CAPT) requirement, arrangements in fig 57 & 58 should be reconsidered with a suggestion to move the provision adjacent to the lift core in order to avoid wheelchair-vehicle

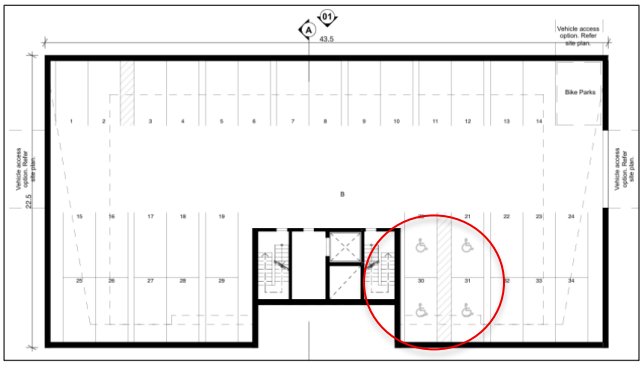


Figure 7-55: Type 2 Parking Layout

conflict, or adequately provide a safe CAPT from its current location.

The allocation of accessible car parks 30 & 31 in fig 7-55 type 2 parking with back-to-back parking bays appears impractical. Similarly, it seems the general car parking arrangement in type 1, fig 54, needs resolution. Arrangements may be modified before lodging the building consent. Refer to NZS 4121 for accessible parking guidelines.

6.8 Accessible playgrounds

I have noted the design teams' intention to consider a fully accessible playground in it's s67 response.

The 'suburb park', located at the centre of the Site, has been noted in particular as *"the primary destination" open space for Beachlands South, providing a larger catchment recreation space with a mix of flexible fields, play and social infrastructure.* My further advice, therefore, is to explore this provision as an all-age-friendly, accessible playground by incorporating sensory engagement equipment to promote inclusivity for children and adults with mobility issues and cognitive challenges.

As mentioned earlier, research suggests that in New Zealand, 1 in 4 people live with a disability, yet many adults and children are deprived of recreational facilities as regular playgrounds continue to remain inaccessible to those with special physical and cognitive needs. Developers of large-scale mixed-use developments, therefore, must champion universal access in design, products, and services to promote social inclusion.

7.0 Section 67 Information Gap

7.1. From a universal design perspective, no critical gaps have been identified, warranting withholding the decision for this application.

8.0 Recommendation

In my assessment, I do not identify any reasons to withhold consent based on the information provided in the proposal regarding pedestrian linkages, movement, and safety.

I therefore consider the consent to be granted with the following conditions and additional information provided to either the Auckland Council Universal Design Specialist or the Urban Designer before lodging the building consent.

9.0 Proposed Conditions

Design, Layout and Finishing of Buildings		
Condition	**Design, Layout and Finishing of Buildings**	**Comment or suggestion**
3	The housing typologies within the Beachlands South Housing Typologies document (as referenced in Condition [1] may be constructed on the residential lots specified in this Typologies document, in accordance with the identified lot size. The final design for each lot shall be submitted to the Council for certification of compliance with this Condition.	I agree with this Condition.
3A	*Before lodging the Architectural Building Consent (ABC), a finalised Apartment Schedule and apartment drawings must be submitted to the Council for written certification. The information must include the following:* *a. An analysis demonstrating efforts to consider Universal Design parameters in apartments closest to vertical circulation hubs, alongside an updated Apartment Schedule identifying dwellings designed to be accessible to meet design and access requirements, amounting to either 1% of the dwellings within each apartment complex or 5% of the total dwellings in the development, whichever is less.* *b. The ABC should provide for a range of dwelling sizes;* *c. Updated floor plans for each of the apartments to meet the above parameters* *d. A statement prepared by a Universal Design specialist or accessibility consultant confirming all considerations for Universal Design undertaken in general, and how design parameters for the accessible apartments have been met.* *e. Any changes proposed to the certified Universal Design Apartment Schedule must also be certified in writing by the Council prior to implementation.*	Advice notes: 1. Auckland Council Research (TR2025/31): Published in June 2026, the Auckland Council technical report "*Experience of disabled Aucklanders in medium-density housing*" found that most medium -density housing (MDH) dwellings lacked basic accessibility and flexibility at the design stage. Also, post-occupancy retrofitting and modifications resulting from inadvertently acquired injuries or disabilities impose substantial costs on the homeowner/renter. Therefore, the universal design team encourages a certain percentage of total dwellings to incorporate universal design features at the design stage. 2. Accreditation can be sought by the Consent Holder Accessibility Assessors, such as Lifemark (or equivalent), working to maximise accessibility, mobility, and adaptability for the aged or disabled.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure J:

Waste Plan Consents

Jan Burberry

09 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Waste Plan Consents

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Jan Burbery – MUDs advisor
Qualifications & Relevant Experience:	I hold the qualification(s) of Post graduate diploma in applied science, and I have seven years' experience in waste plan consents work. I am a full member of the Waste Management Institute of New Zealand (WasteMINZ). I have prepared numerous technical assessments for resource consent applications, and in addition, plan changes, and fast-track applications.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses, and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	9 October 2026

3.0 Executive Summary / Principal Issues

The proposal is intended to be delivered in stages across multiple precincts. Waste servicing will be a significant operational consideration for residential buildings and the other commercial and education uses.

The proposed intention to have a condition to provide waste management plans just prior to occupation is not supported. It is essential that waste-related provisions are addressed at the design stage – especially with regard to roading, on-site bins for individual dwellings, berm space, and bin storage for apartment buildings.

There is an opportunity to plan a coherent waste strategy for the development as a whole but this has not been taken up.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

Initial documents

- Proposed Draft Consent Conditions
- Overall Masterplan Rev B
- Architectural Drawings: Overall Masterplan Rev B; Apartments Rev A; Housing Typologies Rev A
- Design Report

Subsequent documents

- Conditions
- Architectural Drawings: Overall Masterplan Rev B; Apartments Rev A; Housing Typologies Rev A

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

N/A

6.0 Specialist Assessment

6.1 A summary of references to waste matters in various documents follows. These were documents provided initially which do not appear to have changed.

9ZD Scheme Plans 1 show 19 stages. A coherent approach is advised for all 19 stages.

It appears that all dwellings will have frontage to a road or a JOAL. The most appropriate design will incorporate access for council collection from all residential dwellings (and possibly some small businesses). It is noted that council may be able to service the development as a whole, as collection can be made on site as well as from the kerbside. Any waste management plans and references to waste collection should therefore be kept “supplier neutral”. Where a council service can be provided in part or in whole, rates will include waste charges accordingly without exemption.

Attachment 9R Roading 1 shows that lots 275-292 nearly all have vehicle crossings but the other side have a few only. Might have some relevance for waste collection, if this is correct. The siting of features such as swales, trees and street furniture can have an impact for truck arm access.

Attachment 9: Integrated Transportation Assessment

The proposal is to provide several local and collector road corridors within the development, with sub-categories (references 7.1, 7.3, 7.10). Bin placement on the berm needs to be considered as part of roading design. Point 7.10 Servicing notes that each of the 22 proposed apartment buildings will have one loading space regardless of GFA. This should inform location of bin storage areas.

One of the few specific references to waste is seen in *Figure 7-68: Super lot VC1 – loading space tracking (basement)* shows an area marked "Refuse" with tracking shown in a circular direction so truck goes out frontways. Having the loading bay next to the bin storage area would be appropriate.

6.2 Insufficient information has been provided about waste collection and servicing to undertake any comprehensive assessment.

Like any design elements, provisions for waste management are most effective when considered during the early design stages of a development and proposals should address this in design plans. This helps ensure that appropriate waste storage, collection access and servicing requirements are integrated into the layout and design of the development from the outset.

To propose that a condition to leave waste plans for apartment buildings and commercial users until just prior to occupation is, at least, surprising. It is essential that waste-related provision is addressed at the design stage – especially with regard to roading, on-site bins for individual dwellings, berm space, and bin storage for apartment buildings.

7.0 Section 67 Information Gap

At the time of writing this memo, I have identified the following information gaps.

7.1 No overall waste strategy.
7.2 No details about access for waste collection from residential dwellings, and JOALs in particular.
7.3 No details about bin provision for all residential dwellings including apartment blocks.
7.4 No details about waste materials by type and volume.
7.5 No dimensions for bin enclosures, where shown, or detail as to estimated waste volumes and how they have been sized for the estimated waste.

Without this information it is not possible to provide any comprehensive or useful assessment.

The absence of this information misses the opportunity to design a coherent waste management approach for the development as a whole.

8.0 Recommendation

I do not support the application with specific regard to the condition for waste management plans to be left until close to final development.

9.0 Proposed Conditions

The applicant is to provide finalised architectural, landscape plans and traffic impact assessments 12 months prior to occupation which provide details for:

- access for waste collection from residential dwellings, and JOALs in particular
- tracking for road and JOAL access that accommodates standard rubbish trucks
- estimated waste by volume and type from the proposed elements, in particular all residential dwellings
- collection of specific wastes including inorganic and e-waste
- dimensions for all bin enclosures, based on estimated waste volumes, and proposed bins by type and size that address reduction of waste to landfill
- ease of access to bin collection points.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure K:

Parks

Dr. Roja Tafaroji

08 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Parks Planning

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Roja Tafaroji - Senior Parks Planner
Qualifications & Relevant Experience:	I hold the qualification(s) of a PhD degree in Planning from the University of Auckland, a Master of Urban Design from Iran University of Science of Technology, and a Bachelor of Architecture from Gulian University, and have more than 15 years of experience as an architect, urban designer, researcher, service and asset planning analyst, urban planner and parks planner both in Iran and Aotearoa New Zealand. I am an associate member of New Zealand Planning Institute. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications, and have appeared as an expert witness before consent authorities and the Environment Court on multiple occasions. I provided Parks Asset Owner memo and feedback at pre-app stage for this proposal under PRR00043648.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:	 Roja Tafaroji Senior Parks Planner
Date:	08/10/2026
Lead Agency Release	Hester Gerber Manager Parks Planning 8/10/2026 

3.0 Executive Summary / Principal Issues

3.1. *Proposed Beachlands South development includes a diverse and extensive open space network comprising a suburb park, neighbourhood parks, civic space (Village Green), esplanade reserves, coastal open space, ecological areas, green links, and active transport connections. Parks appreciates the overall intent of providing the open space network and provides support subject to the network contributing to recreational, ecological, landscape, and amenity outcomes for future residents. The assessment has been undertaken with reference to the proposed Beachlands South Master Plan, the Auckland Council Open Space, Sport and Recreation Strategy (OSSRS), relevant Auckland Unitary Plan provisions, Auckland Plan 2050, and the National Policy Statement on Urban Development (NPS-UD), particularly the requirement to achieve well-functioning urban environments that provide people with good access to public open space and recreational opportunities.*

3.2. *While the proposed open space network broadly aligns with the Master Plan framework and delivers significant open space assets, Parks is not satisfied that the proposed open space network, in its current form, achieves the OSSRS outcomes. relating to park hierarchy, equitable distribution, accessibility, functionality, and long-term recreation provision. In particular, Parks has concerns regarding the proposed location and function of the Suburb Park, reliance on school-site open space, the functionality of several neighbourhood parks, and unresolved matters relating to the ownership, management, and resilience of the coastal open space network.*

3.3. *Parks does not accept open space associated with the proposed school site as forming part of the permanent public open space network, as unrestricted public access cannot be guaranteed. Excluding school-site open space from the assessment highlights concerns regarding the distribution of higher-order open space across the development. From a Parks perspective, the currently proposed network is overly centralised, resulting in overlapping park catchments and reduced accessibility for future residents within the southern parts of the development and future growth areas. Council's catchment analysis indicates that an alternative Suburb Park location would provide a more balanced and efficient open space network consistent with OSSRS outcomes.*

3.4. *Parks is supportive of the provision of esplanade reserves, coastal access, ecological open space, and civic open space outcomes. However, clarification remains necessary regarding the extent, ownership, vesting arrangements, management responsibilities, and long-term resilience of the coastal open space network, particularly in areas potentially affected by coastal hazards. Additional information is also required regarding neighbourhood park functionality, reserve design, landscape treatment, asset acceptance requirements, and future vesting arrangements.*

3.5. *Overall, Parks concludes that a revised open space configuration, including a more appropriately located Suburb Park, would better achieve the intended outcomes of the OSSRS and more effectively support the NPS-UD objective of a well-functioning urban environment by providing a more equitable distribution of open space, improved accessibility, reduced duplication of park functions, and a more efficient and connected park network for existing and future residents. Subject to the matters identified in this memorandum being addressed through plan refinement and recommended conditions, Parks does not oppose to the proposed development.*

4.0 Documents Reviewed

4.1 *The following assessment has been informed by a review of the application material, including but not limited to:*

- *Beachlands South Open Space Strategy, Rev. B, prepared by Jasmax and Studio Pacific Architecture, dated 12 August 2026,*
- *Scheme plans 1 & 2, prepared by Harrison Grierson, Rev. B, dated 11.08.2026,*
- *Planning Assessment documentation (AEE), prepared by Uni Environmental, reviewed by Barkers & Associates and Tattico Ltd., dated 26 June 2026,*
- *Attachment 0B2, S67 Response Table, and*
- *Other supporting technical reports.*

4.2 *Parks also attended meetings and discussions and provided feedback to the applicant during the pre-app stage under PRR00043648. The feedback I provided to the applicant is consistent with my assessment in this memo.*

4.3 *The assessment has also drawn upon input from Council's Principal Property specialist and Senior Policy Advisor from Community and Resilience Policy team regarding open space provision and catchment analysis, together with advice from Urban Designer, Landscape Architect, Parks and Places specialist, Landscape Specialist Advisor, Coastal Hazard Specialist and other relevant Council subject matter experts where appropriate.*

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

N/A

6.0 Specialist Assessment

Existing Environment

6.1. The Beachlands South development area comprises approximately 132ha of Future Urban Zoned land identified for urban development through the Beachlands South Master Plan. The Master Plan anticipates the establishment of an integrated open space network comprising a suburb park, neighbourhood parks, coastal and ecological open space, green links, play opportunities, and active transport connections.

6.2. The site is bounded by the coastal environment to the west and contains areas identified for future residential, commercial, education, ecological, transport and stormwater management purposes. The Master Plan envisages that growth within Beachlands South will be supported by a network of publicly accessible open spaces that contribute to recreation, connectivity, ecological outcomes and community wellbeing.

6.3. The application proposes an extensive open space network consisting of a coastal reserve system, green links, ecological open space, stormwater reserves, neighbourhood-scale open spaces, a centrally located civic space (Village Green), and a higher-order park identified as a Suburb Park. The proposal also includes a school site containing open space that the applicant has relied upon, to some extent, as part of the broader recreational network.

Assessment of Potential Effects

6.4. From a Parks perspective, the key consideration is whether the proposed parks, green corridors, coastal reserves and open space network will collectively provide an equitable, accessible, functional and resilient environment that supports recreation, connectivity, ecological outcomes, community wellbeing and the long term needs of existing and future residents.

Public Open Space Provision

6.5. The proposed open space network includes a variety of park and open space typologies intended to cater for a range of active and passive recreational needs.

6.6. However, for the purposes of assessing public open space provision, I do not regard open space located within the proposed school site as forming part of the permanent public open space network. Access to school land is dependent on operational, management and security considerations and cannot be relied upon as unrestricted public open space available on a 24-hour, seven-day-a-week basis.

6.7. Excluding school-site open space from the public open space assessment results in a materially different understanding of park provision, catchment coverage and hierarchy throughout the development.

Assessment of the Proposed Suburb Park

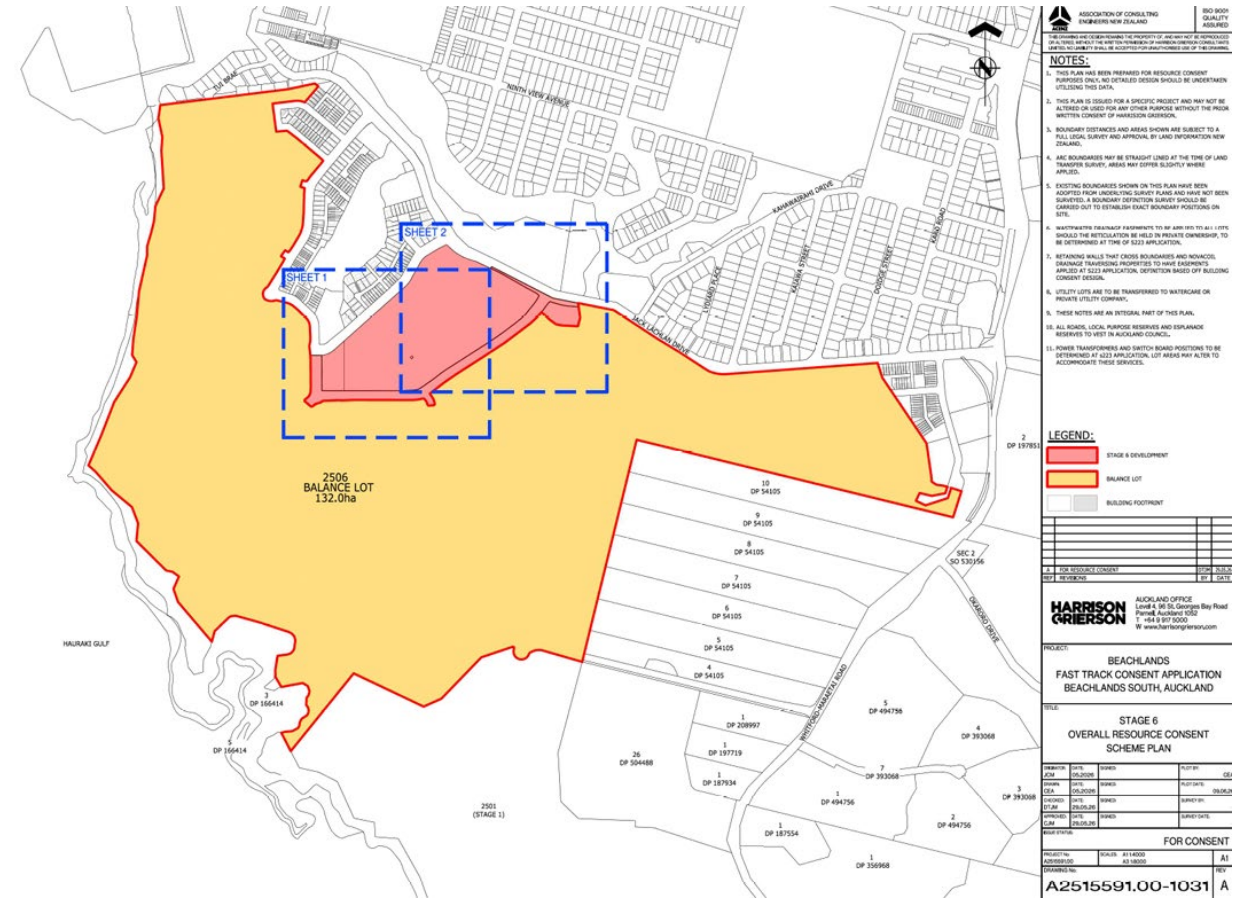
6.8. The proposal includes provision for a Suburb Park within the Beachlands South open space hierarchy. The applicant's Open Space Strategy identifies the Suburb Park as the primary destination open space for the development and references its role in providing for a range of community recreation outcomes. However, there appears to be some inconsistency across the

application material regarding the location, size and intended function of this park. In particular, different plan sets and supporting documents variously depict the Suburb Park as part of a larger superlot associated with the proposed school site, while other scheme plans identify a separate area intended to fulfil this function.

Figure 1.Snippet of Open Space Typologies from Open Space Strategy document



Figure 2. Snippet of the scheme plan showing the extent of suburb park next to the school site within stage 6)



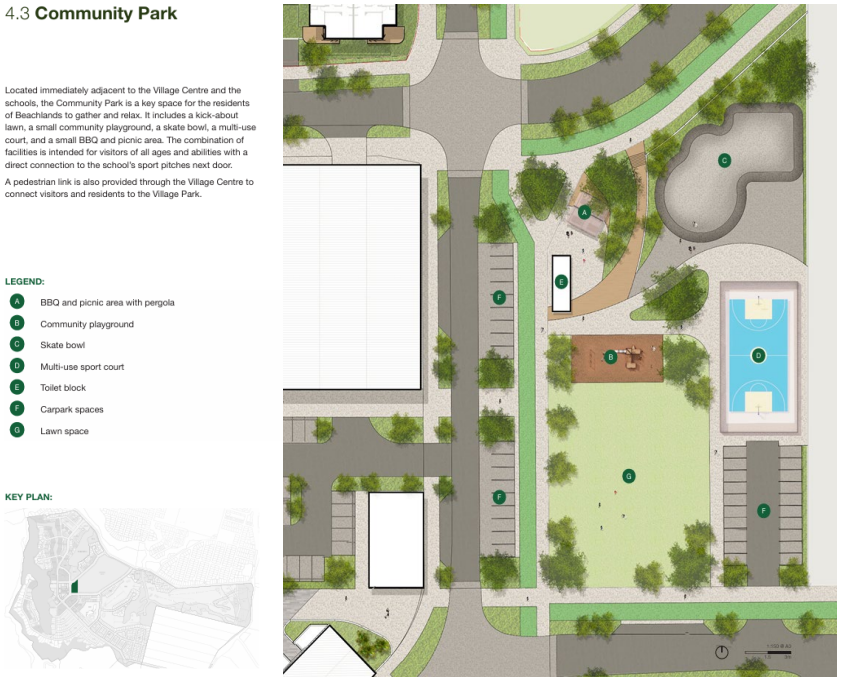
6.9. For the purposes of this assessment, I have excluded open space associated with the proposed school site from consideration as public open space. As outlined earlier in this assessment, school-site open space cannot be relied upon as a permanent public recreational asset because public access would remain subject to school ownership, management, operational requirements and security arrangements. It would also not provide for development opportunities of other formal social infrastructure and leasing needs of the community for which these open spaces are often acquired. Consequently, any assessment of suburb park provision should be based on dedicated public open space that is permanently available for unrestricted community use.

6.10. The location of a Suburb Park is a significant consideration, as it is intended to function as a higher-order recreational destination serving not only the immediate neighbourhood but also the wider catchment. The Open Space, Sport and Recreation Strategy (OSSRS) identifies Suburb Parks as key components of the open space hierarchy that should provide a broad range of active and passive recreational opportunities, support organised and informal recreation, and contribute to an efficient and equitable park network.

6.11. As part of the inconsistency in the information provided, the Open Space Strategy document include drawings and statements relevant to an open space referred to as "Community Park" which is supposedly considered as a suburb park (see Figure 3). This information does not show

alignment with any of the metrics and quality standards of a suburb park considered for provision in OSSRS.

Figure 3. Snippet of "Community Park" including specific design details from Open Space Strategy document



6.12. Parks also has concerns regarding the size of the area identified as the proposed Suburb Park. Based on the information provided on the scheme plans, Lot 1521 comprises approximately 5,695m² (0.57ha). This is substantially smaller than the typical size range for a Suburb Park identified in the OSSRS, which generally provides for parks in the order of 3-5 hectares. At its proposed size, Lot 1521 would not be capable of accommodating the range, diversity and intensity of recreational opportunities generally expected of a Suburb Park and would more closely align with a neighbourhood-scale open space function. The information provided has not adequately demonstrated how the proposed park could achieve the intended suburb-level role within the open space hierarchy given its limited size and capacity.

6.13. Based on the catchment analysis undertaken by Council's Property specialists (see Figure 4), the currently proposed location results in a concentration of higher-order open space provision within the central part of the development and creates overlap between service catchments of adjacent parks. In contrast, the southern portion of the development and future urban growth areas beyond the application boundary would have reduced access to a higher-order public recreational destination.

Figure 4. Snippet of the open space catchment analysis of the proposed open space network by the applicant - prepared by Council's Property department



6.14. From a Parks perspective, a more southerly location for the Suburb Park would provide a more balanced and effective open space outcome. Such a location would:

- *improve the geographic distribution of higher-order open space across the development;*
- *provide better service to future residents within the southern neighbourhoods;*
- *support integration with future urban growth areas located south of the application site;*
- *reduce duplication and overlap between park catchments;*
- *improve the legibility and efficiency of the open space network; and*
- *provide opportunities for a broader range of recreational and community activities.*

6.15. The open space proposed within or adjacent to the school site should not be considered an alternative to a dedicated public Suburb Park. While school facilities may provide supplementary recreational opportunities where community access arrangements are established, they do not provide the same level of certainty, permanence or accessibility as a publicly owned and managed park. Reliance on the school site would therefore reduce the resilience and long-term effectiveness of the public open space network and may result in the southern communities being underserved by higher-order recreation facilities.

6.16. I also note that, if a Suburb Park were located within the southern part of the development, it could perform both suburb-level and neighbourhood-level functions. This would improve network efficiency and potentially remove the need for one of the proposed neighbourhood parks currently indicated within Sub-precinct D, which itself raises concerns regarding size, configuration and functionality.

6.17. *Overall, while I support the inclusion of a Suburb Park within the Beachlands South development, I conclude that the current proposal has not adequately demonstrated that the proposed location represents the most effective or equitable outcome when assessed against the recreational needs of the future community, the broader open space hierarchy, and the objectives of the OSSRS. A reassessment of the park's location, size, function and relationship with the wider open space network is therefore warranted to ensure the proposal delivers a fit-for-purpose and enduring public open space outcome.*

Assessment of the proposed Neighbourhood Parks

6.18. *The proposal identifies four neighbourhood park spaces. However, not all of these appear to achieve the intended neighbourhood park function when assessed against the quality and provision standards contained within the OSSRS.*

Figure 5.Snippet of Open Space Typologies showing 4 areas of Neighbourhood Parks

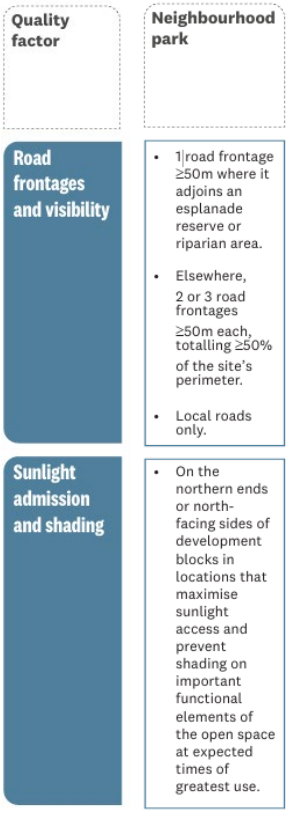


In particular:

Fairway Reserve

6.19. Fairway Reserve (noted as number 1. in Figure 5) is considered capable of providing a neighbourhood park function due to its size, recreational potential, multiple access opportunities and strategic connection between surrounding residential areas and the coastal environment. However, improvements to visibility, passive surveillance and road frontage should be incorporated to better align with CPTED principles and OSSRS quality standards.

Figure 6. Snippet from Table 16 (Detailed quality standards) from OSSRS



Quality factor	Neighbourhood park
Road frontages and visibility	• 1 road frontage ≥50m where it adjoins an esplanade reserve or riparian area. • Elsewhere, 2 or 3 road frontages ≥50m each, totalling ≥50% of the site's perimeter. • Local roads only.
Sunlight admission and shading	• On the northern ends or north-facing sides of development blocks in locations that maximise sunlight access and prevent shading on important functional elements of the open space at expected times of greatest use.

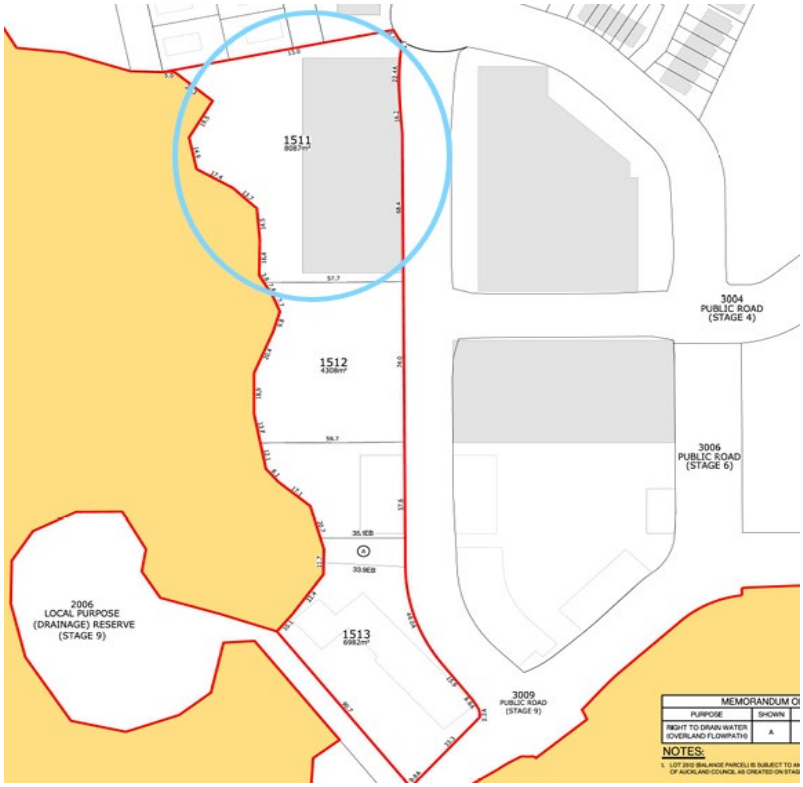
Village Green

6.20. The proposed Village Green (noted as number 2. in Figure 5) is strategically located within the Village Centre and is intended to serve as a focal gathering space for the community. Its interface with the Ecological Protected Area Network (EPAN) and proposed coastal path along the western edge will support connectivity, activation, and access between the ecological area and the Village Centre.

6.21. The Village Green (Lot 1511) is identified as approximately 8,087m²; however, a considerable proportion of the site appears to accommodate commercial and civic functions. As such, I am not satisfied that the space proposed for "Village Green" would perform a neighbourhood park

function or meet the intended role of a neighbourhood park under the Open Space, Sport and Recreation Strategy.

Figure 7. Snippet of the scheme plan showing the location of Village Park (circled blue)



6.22. From a Parks perspective, the Village Green is more appropriately characterised as a civic space that supports community gathering, social interaction, and place-making within the Village Centre. Parks supports the proposed civic open space outcome and its location. While proposed to remain in private ownership and management, Parks notes that, from a property acquisition perspective, a civic space of this nature may warrant consideration for future public ownership given its strategic location and anticipated community function.

6.23. Detailed design should incorporate CPTED principles to promote safety, accessibility, and a positive user experience. Village Green is strategically located within the commercial centre and performs an important civic and community gathering function. However, due to its urban form, commercial interface and intended role, I consider it more appropriately classified as a civic open space rather than a neighbourhood park.

Neighbourhood Parks 3 and 4

6.24. The proposed parks, identified as numbers 3. and 4. in Figure 5, within Sub-precincts D and E raise concerns regarding their size, configuration and ability to perform a genuine neighbourhood park function.

6.25. There are no dedicated lots assigned to these neighbourhood parks in the scheme plans provided.

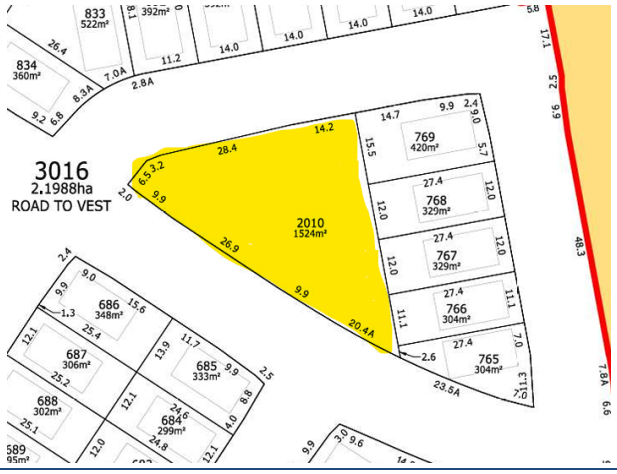
6.26. Neighbourhood Park 3 appears to be integrated within a larger ecological area and interfaces with utility infrastructure, limiting its recreational functionality.

Figure 8. Snippet of the scheme plan showing an indicative location of Neighbourhood Park 3 (green highlighted)



6.27. Neighbourhood Park 4 comprises approximately 1,524m² and is triangular in shape. This size and configuration do not align with the OSSRS expectations for a neighbourhood park and are unlikely to support the intended range of recreational activities or user experience.

Figure 9.Snippet of the scheme plan showing Lot 2010



6.28. *These matters give rise to adverse effects on recreational functionality, accessibility and overall network effectiveness.*

Coastal Open Space and Esplanade Reserves

6.29. *The Planning Assessment (Attachment 0B), prepared by Unio Environmental and Barkers & Associates (26 June 2026), confirms the provision and vesting of esplanade reserves along the Coastal Marine Area (CMA), including a publicly accessible coastal pathway. The relevant trigger for esplanade reserve provision has been identified under E38.4.1(A8) of the Auckland Unitary Plan.*

6.30. *The Scheme Plan identifies Lots 2031, 2032, 2033, 2018 and 2019 as Local Purpose (Esplanade) Reserve, with the width to make up 20m measured from Mean High Water Springs (MHWS) (surveyed in 2026). Parks supports the provision of these topped-up reserves and the associated public coastal access outcomes.*

6.31. *However, the application does not clearly address whether any existing esplanade reserve adjoining the site requires topping up to the statutory width. In accordance with section 236 of the Resource Management Act 1991, where an existing esplanade reserve is present, any required top-up should be set aside and vested in Auckland Council through a condition of consent.*

6.32. *Uncertainty also remains regarding the proposed extent, ownership, management and long-term function of the wider coastal open space network. In particular, some proposed esplanade reserve areas overlap with land identified as Ecological Protected Area Network (EPAN), while the applicant's planning assessment indicates that most open space areas are intended to remain in private ownership and management, except for stormwater reserves and ponds.*

6.33. *From a Parks perspective, clarification is required regarding the distinction between:*

- *statutory esplanade reserves required under the RMA;*
- *any additional coastal open space proposed beyond the statutory esplanade reserve width;*
- *EPAN and ecological protection areas;*
- *publicly accessible open spaces proposed to remain in private ownership; and*
- *ongoing ownership, management and maintenance responsibilities.*

6.34. *In addition, the information provided does not fully demonstrate the long-term functionality and resilience of the coastal open space network in areas potentially affected by coastal hazards, including the implications of future coastal erosion on public access, coastal walkways, and the ongoing recreational and ecological functions of these areas.*

6.35. *Subject to the above matters being satisfactorily resolved, Parks supports the proposed esplanade reserve top ups and coastal access outcomes and recommends that all required esplanade reserve land, including any statutory top-up requirements, be vested in Auckland Council in accordance with the Resource Management Act 1991.*

Streetscape, Landscape Design and Reserve Interfaces

6.36. *Parks Planning raised several landscaping matters during the section 67 process. While some information has subsequently been provided, the material currently before the Panel does not enable a complete assessment of landscape outcomes associated with future vesting assets, streetscape quality, reserve interfaces and long-term maintenance implications.*

6.37. *Potential adverse effects may arise if:*

- *insufficient tree diversity is provided;*
- *inappropriate street tree species are selected;*
- *reserve interfaces limit passive surveillance;*
- *outfalls and retaining structures adversely affect reserve amenity;*
- *CPTED principles are not incorporated into detailed design;*
- *future vesting assets create maintenance liabilities for Council;*
- *play-along-the-way features illustrated within streetscape typologies are treated as substitutes for dedicated public open space. Parks does not support such features being used to offset the provision of formal parks, particularly where public open space is proposed to be vested in Council ownership, as these features do not provide equivalent recreational function and may create ongoing maintenance obligations that Parks would not accept.*

6.38. *Given the conceptual nature of the current information, these matters can be appropriately addressed through detailed design and Engineering Approval conditions.*

Drainage/Stormwater reserves

6.39. *The Open Space Strategy document prepared by the applicant show open spaces as "stormwater parks" to "integrate constructed wetlands and water-sensitive design with accessible paths and low-key seating". While the acceptance of these reserves for vesting is for Healthy Waters department in Council, Parks has delegation to review and accept any (soft) landscaping component and hard landscaping with a recreational purpose, within drainage/stormwater reserves to vest. In accordance with OSSRS, while the primary function of these open spaces is to manage the stormwater function, they also can provide for amenity and passive recreation opportunities as their secondary function.*

6.40. *The drainage reserves are amongst open spaces which are proposed for vesting and a condition is included for their vesting. While Parks follow the direction of Healthy Waters specialists for accepting any of these open spaces, I recommend conditions of consent under Subdivision conditions at pre-implementation (Engineering Approval), post-implementation (S224c) and maintenance stage for the purpose of review and certification of landscaping within the reserves to vest should Healthy Waters have confirmed acceptability of its vesting.*

Matters Required to Achieve an Acceptable Parks Outcome

6.41. *The matters identified in this assessment can be addressed through a combination of plan amendments, consent conditions, detailed design requirements, and subsequent Council approval processes. From a Parks Planning perspective, the following matters are required to support an acceptable open space outcome:*

- *Provision of a dedicated public Suburb Park that appropriately serves the southern catchment and future growth areas.*
- *Clarification of the location, size, ownership and function of the proposed Suburb Park.*
- *Confirmation of the intended open-space hierarchy and park typologies across the development.*

- *Demonstration that proposed neighbourhood parks achieve an appropriate size, configuration and recreational function consistent with the OSSRS.*
- *Concurrent delivery of Fairway Reserve lots to ensure the park functions as an integrated recreation space.*
- *Provision and vesting of esplanade reserves in accordance with section 236 of the RMA.*
- *Clarification of ownership, maintenance and public access arrangements for coastal reserves, ecological areas and other open-space components.*
- *Provision of detailed landscape designs, including reserve planting, streetscape planting and CPTED considerations, for assessment through subsequent approval processes.*
- *Appropriate treatment of reserve interfaces, retaining structures, outfalls and boundary fencing adjoining public open space.*
- *Council acceptance of any assets, structures or infrastructure proposed within land to vest as reserve.*
- *Compliance with relevant reserve vesting, asset acceptance and Engineering Approval requirements.*

Alignment with Relevant Strategic and Planning Frameworks

6.42. The proposal has been assessed against:

- *Beachlands South Precinct provisions;*
- *Beachlands South Master Plan/Open Space Strategy;*
- *Open Space, Sport and Recreation Strategy (OSSRS);*
- *Auckland Plan 2050;*
- *Resource Management Act 1991; and*
- *relevant AUP objectives, policies and requirements.*

6.43. While the proposal broadly aligns with the overall Master Plan and delivers a substantial open space network, I am not satisfied that all components currently achieve the intended outcomes of the OSSRS or fully support the Auckland Plan 2050 outcomes relating to quality public places, accessible recreational opportunities, community wellbeing, and the creation of complete and well-functioning urban communities..

6.44. In particular, concerns remain regarding:

- *the location and role of the proposed Suburb Park;*
- *reliance on school-site open space;*
- *the functionality of neighbourhood parks within Sub-precincts D and E; and*
- *the lack of sufficient detail regarding future reserve design and landscape outcomes.*

Overall Parks Recommendation

6.45. Parks acknowledges the extensive investment in open space proposed as part of the development, including esplanade reserves, coastal access and walkways, ecological open space, civic space, neighbourhood parks, and a suburb park. Collectively, these elements have the potential to contribute to the recreational, ecological, landscape, and amenity outcomes for future residents.

6.46. Notwithstanding these positive outcomes, Parks remains concerned that the proposed open space network is overly centralised within the western and central parts of the development. As

illustrated in Figure 4, the proposed arrangement results in a concentration of open space provision and overlapping catchments associated with the Village Green, Suburb Park and neighbourhood park. This reduces the overall efficiency of the network, creates duplication in park service areas, and does not optimise the distribution of park functions across the wider development area.

6.47. *In contrast, the alternative open space configuration illustrated in Figure 11, developed by Council's Property specialists, provides a more balanced and equitable distribution of open space catchments throughout the development. Relocating the proposed Suburb Park to a more central location would improve accessibility for a greater proportion of future residents, reduce overlap between park catchments, and better distribute suburb-level and neighbourhood-level open space functions across the future urban area.*

Figure 10.Snippt of the open space catchment analysis of the proposed open space network by Council- prepared by Council's Property department



6.48. *The alternative configuration would also enable the Suburb Park to perform both suburb-level and neighbourhood-level functions in accordance with the Open Space, Sport and Recreation*

Strategy (OSSRS), removing the need for the additional neighbourhood park currently proposed within Sub-Precinct D. This would result in a more efficient and integrated open space network while maintaining the intended level of service for the future community.

6.49. *From a Parks perspective, the configuration shown in Figure 11 more effectively achieves the intended outcomes of the OSSRS by providing an accessible, connected and functional open space network that is appropriately distributed to meet the needs of current and future residents. It also aligns more closely with the National Policy Statement on Urban Development's objective of achieving a well-functioning urban environment by ensuring that communities have good access to public open space that supports a range of recreational and social activities, is appropriately located to serve anticipated growth, and contributes to the overall quality and liveability of the urban environment. The more central location of the Suburb Park improves catchment coverage and accessibility, resulting in an open space network that is better positioned to meet the needs of the future population over the long term.*

6.50. *I also note that clarification remains necessary regarding components of the coastal open space network, including reserve extent, ownership, vesting arrangements, management responsibilities, and the long-term resilience of public access and recreational outcomes in areas potentially affected by coastal hazards. These matters are important to understanding the future functionality and public benefit of the proposed coastal open space network.*

6.51. *Overall, Parks concludes that the proposed open space configuration does not represent the most appropriate outcome for Beachlands South. Parks instead supports an alternative arrangement generally aligned with Figure 11, which would better achieve the strategic outcomes sought by the OSSRS and more effectively contribute to a well-functioning urban environment through a more equitable distribution of open space provision, improved accessibility, reduced duplication of park functions, and a more efficient park network for the future community.*

7.0 Section 67 Information Gap

At the time of writing this Memo I have identified the following information gaps:

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
Open space network configuration and catchment distribution	*The applicant's proposed open space network has not demonstrated why the proposed location of the Suburb Park represents the most effective provision outcome. Council's assessment identifies a more balanced alternative configuration that would improve catchment*	*Parks is unable to conclude that the proposed open space network represents the optimal open space outcome for the future community or best aligns with the intended hierarchy of park provision under the OSSRS.*	*Risk that the open space network becomes overly centralised, resulting in duplicated park functions, inefficient provision, and reduced accessibility for future residents.*

	distribution, accessibility and network efficiency.		
Neighbourhood parks functionality and design metrics	*Detailed plans and supporting information have not been provided to demonstrate that proposed neighbourhood parks can meet the relevant OSSRS functional and design expectations, including usable recreation space, road frontage, gradients and layout requirements.*	*Parks cannot accurately assess whether the proposed parks are capable of delivering the intended neighbourhood park function.*	*Risk that future parks may not be fit-for-purpose or able to accommodate anticipated recreation needs, resulting in potential deficiencies in service provision.*
Coastal open space network and coastal hazard response	*Insufficient information has been provided demonstrating the relationship between coastal reserves, coastal walkways, future ASCIE areas, public access routes, development boundaries and any long-term adaptation approach.*	*Parks is unable to fully assess the long-term functionality, resilience and accessibility of the coastal open space network.*	*Risk that future coastal hazards may compromise public access, recreation opportunities, ecological outcomes and management responsibilities for coastal open spaces.*
Extent and ownership of coastal open space land	*The application does not clearly distinguish between statutory esplanade reserves, additional coastal reserve land, EPAN areas, privately owned publicly accessible open spaces, and associated management responsibilities.*	*Parks cannot fully assess future vesting, ownership, maintenance and management implications.*	*Uncertainty regarding Council's future responsibilities, acquisition requirements, maintenance obligations and public access arrangements.*
Streetscape and reserve landscaping details	*Information requested during the section 67 review, including planting plans, species schedules, CPTED considerations, landscape layouts and reserve interface treatments, has not been fully provided.*	*Parks is unable to fully assess landscape functionality, maintenance implications, safety outcomes or suitability for vesting purposes.*	*Risk of inappropriate landscape outcomes, higher maintenance costs, CPTED issues, and difficulties associated with future vesting and asset acceptance.*
Boundary interface treatment adjacent to public open space	*Insufficient information has been provided regarding fencing, boundary treatment and interface design between private lots and public open space areas.*	*Parks cannot assess whether appropriate passive surveillance, safety and amenity outcomes will be achieved.*	*Risk of poor park surveillance, amenity conflicts, reduced user safety and adverse interface outcomes between public and private land.*
Outfalls and associated structures within reserves	*No detailed information or visual plans have been provided demonstrating the location and treatment of outfalls within reserve areas.*	*Parks is unable to assess visual, landscape and recreational effects on reserve land.*	*Risk that infrastructure may adversely affect reserve amenity, landscape character and user experience despite the requirement of s239*

			of the RMA for reserves to vest free of any structures, interests and encumbrances on the land.

8.0 Recommendation

Parks recommendations:

Parks does not support the proposed open space provision and configurations in its current form. While the proposal provides for an extensive network of open spaces, green corridors, coastal open spaces and civic spaces, the assessment in this memorandum identifies a number of fundamental concerns regarding the location, hierarchy, functionality, accessibility and long-term resilience of the proposed open space network.

In particular, Parks concludes that the proposed open space network and arrangement is overly centralised and does not provide the most effective distribution of park functions across the future urban area (refer to Sections 6.45-6.51).

Parks supports an alternative open space configuration generally aligned with that illustrated in Figure 11. Parks concludes that this arrangement would provide a more balanced and integrated open space network, improve catchment distribution, reduce duplication of park functions, better serve future growth areas, and strengthen the role and functionality of higher-order open spaces within the development.

Parks conclude that the alternative open space configuration illustrated in Figure 11 better support the National Policy Statement on Urban Development's objective of achieving a well-functioning urban environment by improving access to public open space for a greater proportion of future residents and ensuring that open space provision is appropriately located to support the anticipated growth of the development.

Accordingly, Parks recommends that, should the Panel be minded to grant consent, the following matters be addressed:

- *the information gaps identified in Section 7.0;*
- *the recommendations contained throughout this memorandum; and*
- *the consent conditions and amendments set out in Section 8 and the Parks Condition Review document.*

Parks further recommends that the Panel assign weight to the matters raised in this memorandum and impose the recommended conditions and amendments to ensure the final open space network, reserve design outcomes, landscape treatment and coastal open space provisions achieve the intended outcomes of the OSSRS, the NPS-UD and other relevant strategic and planning frameworks.

9.0 Proposed Conditions

I recommend the following conditions be adopted which includes recommended changes to the draft conditions proposed by the applicant as well as additional conditions to be included in the final condition set. The proposed changes are shown in red along with justifications provided under the right column for Commentary.

B. DISTRICT LAND-USE CONSENT CONDITIONS (LUCXXXX)		Commentary
97	*At least 20 Working Days prior to the planned commencement of any landscaping works (excluding landscaping on~~r~~ private lots, earthworks, drainage and retaining works) authorised by this consent, the Consent Holder must provide a set of detailed landscape design drawings and supporting written documentation which have been prepared by a SQEP for the stage or part of the development proposed to be progressed to the Council [in consultation with Manager Parks Planning] for certification of general compliance with the Beachlands South Open Space Strategy Landscape Drawings prepared by Studio Pacific Architecture and Jasmax referenced in Condition [1]. No landscaping activities on these publicly accessible areas may commence until the certification referred to in this condition has occurred.*	*The suggestion of inclusion of Parks Planning in this condition is related to the possibility of any open spaces being vested to Council and the importance of Parks Planning review of any soft/hard landscaping on the land fitting the purpose from a future asset owner perspective.*
98	*At a minimum, this information must include landscape design drawings, specifications and maintenance requirements including:* *(a) ...;* *(b) ...;* *...* *Advice notes: Site navigation on public roads to be vested in Council should be ....* *Where roads will vest in Council, the streetscape landscape plans may be subject to minor changes during the engineering plan*	*The suggested addition in the advice note is in confirmation of the above addition to condition 97.*

	approval stage of the subdivision. *Landscaping associated with public roads, open spaces and reserves will be considered for engineering plan approval when the lots are created, and land is to be vested at the time of subdivision for the certification of the Manager Parks Planning. It is advisable that any landscaping as part of the land use consent be designed in accordance with Auckland Council standards and in particular "The Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape.*	
99	*Before each stage of the development or part of the development proposed ....* *Advice Note: Landscaping associated with public roads, open spaces and reserves will need to be in accordance with Auckland Council standards and in particular "The Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape" and receive separate engineering plan endorsement from the Manager Parks Planning when lots are to be created, and land is vested at the time of subdivision and will need to be in accordance with certified landscaping plans under the subdivision.*	*The suggested addition to include Parks Planning is to affirm that any landscape design details on the public roads and reserves to vest must be approved by the Manager Parks Planning.*

101	*Prior to the occupation of any building in the Sub-precinct A (Marina Point) and Sub-Precinct D (Coastal), the relevant section of the indicative coastal pathway as shown on AUP I458.10.5 Precinct Plan 5 must be formed to a minimum width of 3m to link the relevant stage of development with the Pine Harbour Ferry terminal. ~~This coastal pathway~~ Any section of the coastal pathway that is not contained within the land to vest must be maintained by way of an appropriate legal protection mechanism. The consent holder is liable for maintenance of the path within the land to vest during the establishment period [in accordance with condition 192B). For the purposes of this standard, 'occupation' means occupation and use for the purposes permitted by the resource consent but not including occupation by personnel, engaged in construction, fitting out or decoration.*	*The Coastal pathway will be partly within the topped up esplanade areas which will be vested as per s236 of the RMA. There are also some other parts which may be agreed to vest to Council (at no capital cost).* *In the above cases, the council will have long term liability for ownership and maintenance of the path along the reserve land to vest.* *The above point is suggested for clarification of when it comes to ownership and maintenance in perpetuity.*
101A	***Advice Notes:*** ***LANDOWNER APPROVALS*** *All works in Council-owned lands will require Landowner Approval prior to any works being undertaken. Approval requests can be sent to landadvisors@aucklandcouncil.govt.nz*	*The advice note is necessary to ensure that works within existing Council-owned land are subject to Auckland Council's landowner approval requirements and to protect existing public open space assets during the delivery of the development.*
101B	***TREE ASSET OWNER APPROVALS*** *Any tree removals or works affecting vegetation on Council-owned lands or existing street trees will require Tree Asset Owner Approval from the Community Facilities Urban Forest Specialist Team. Approval requests can be sent to treemanager@aucklandcouncil.govt.nz.*	*The advice note is necessary to ensure that works affecting Council-owned vegetation and street trees are subject to Auckland Council's tree asset owner approval requirements and to protect the long-term landscape, amenity and ecological values of these public assets.*

SUBDIVISION CONDITIONS (SUBXXXX)	*Commentary*

160	All roads, stormwater, wastewater, ~~and~~ water supply, landscape and green infrastructure must be in general accordance with the Engineering Drawings and landscape Drawings referenced in Condition [1] and Appendix 1 to the conditions. Where the Consent Holder requires that matters of detail within the Engineering Drawings and Landscape Drawings and design are adjusted to meet the needs of the subdivision in compliance with the Auckland Council Code of Practice for Land Development and Subdivision, the Consent Holder must seek the prior approval of the Council's Regulatory Engineering Team Leader [in consultation with the Manager Parks Planning].	Roads and open spaces to vest to council will have landscape details associated with. The detailed design of the streetscape and reserve landscaping must receive approval from Parks Planning team for these assets to vest to PCF who would maintain it under the SLA with Healthy Waters and Transport Infrastructure (Former Auckland Transport). The suggested addition is to affirm the above.
163A	The consent holder must ensure Lots 2031, 2032, 2033, 2018 and 2019 are recorded in the survey plan in Auckland Council as Local Purpose (Esplanade) Reserve to vest in Auckland Council pursuant to sections 236 and 239 of the RMA 1991 in accordance with Scheme Plans for Stage 1 prepared by Harrison Grierson, Rev. A, dated 29.05.2026. The esplanade reserves must vest in the Council free of all structures, pipes, and other infrastructure assets. Advice Note: a) If the consent holder wishes to place any public structures, or assets, on the proposed esplanade reserve, approval will need to be obtained from the Council. Any approval will require local board consultation and the registration of a construction and maintenance bond, encumbrance, easement or covenant. b) If the consent holder wishes to retain any private structures on the esplanade then an easement will be required to be approved and approval obtained from the Manager Land Advisory Services under section 239 (2). c) The document will be prepared by Council's Solicitor at the applicant's cost. d) The applicant will provide a copy of the new certificate of title to the Manager Parks Planning following the issue of 224(c).	Lots 2031, 2032, 2033, 2018 and 2019 are to be top ups to the existing esplanade reserve along the coast. In accordance with s236 of the RMA, a condition must require for the topped up land to be set aside on the survey plan as an esplanade reserve adjoining the land previously set aside.
164	**Open Space Areas**	Parks does not support proposed Condition [164] in its current form, as it provides insufficient certainty regarding

	~~*The Consent Holder must obtain written confirmation from Council (Manager Land Advisory Services) that any of the proposed open space areas identified in the Beachlands South Open Space Strategy and on the scheme plans referenced in Condition [1] shall or shall not be acquired by the Council or vested in the Council (esplanade reserves or ecological areas). If the open space(s) are not acquired by Council or do not vest in Council then the land will fall under the obligation of the Residents Society or equivalent legal body (Society).*~~ ~~*Advice Note: Plans approved under Resource Consent do not constitute an Engineering Plan approval and should not be used for the purposes of constructing public works in the absence of that approval. If the Consent Holder wishes to retain any private structures, rights or encumbrances on land to be vested, it will require a certificate of acceptance from the Manager Land Advisory Services under section 239(2) on behalf of the local board.*~~ ***For park land being acquired by agreement (but vested as the means of transfer)*** *[164] Lots X,Y,Z must vest in Auckland Council as land in lieu of reserve to be held by Auckland Council as a park pursuant to Section 138 of the Local Government Act 2002 (so long as an unconditional agreement has been entered into as outlined later in this condition). Pursuant to Section 221 a Consent Notice is required to be registered against the titles to Lots X,Y,Z recording this. Lots X,Y,Z must be so vested only if by the time of application for the survey plan to be approved under S223 the applicant has entered into an agreement for sale and purchase of Lots X,Y,Z. If no agreement is in place by the time of application for the survey plan to be approved under S223 then the land will become a balance lot held as open space for recreational function.*	*the ultimate ownership and management of the proposed open space areas. Parks recommends that the condition be replaced with Council's standard conditions relating to park land acquisition and vesting (Conditions [164]-[164B]), which clearly establish the process for transfer of land to Auckland Council, the requirements for land quality and encumbrances, and the circumstances in which the land would remain in private ownership should acquisition not proceed. This approach provides greater implementation certainty and aligns with Council's standard practice for the acquisition of park land through subdivision.*

	[164A] Lots X,Y,Z must be free of easements and encumbrances and with no utility devices or structures on the land or on any of its road frontages or berms. *[164B] Where Lots X, Y and Z are to remain as balance lots, and to avoid delaying the issue of the section 223 certificate, the consent holder shall register a consent notice pursuant to section 221 of the Resource Management Act 1991 against the titles of Lots X, Y and Z, requiring that the lots be retained and managed as recreational open space.* ***Advice note:*** *a) Lots X,Y,Z are to be "Land in lieu of Reserve" and is vesting under Section RMA 239 (1)(b)* *b) The document shall be prepared by Council's Solicitor at the applicant's cost* *c) The application will provide a copy of the new certificate of Title to the Manager Parks Planning following the issue of 224c.*	
167	***Section 224 Condition Requirements*** ***Infrastructure Provision*** *Where the Consent Holder proposes to provide public wastewater, water supply and stormwater services for the Project, and any public green infrastructure within road reserves or open space areas intended to vest in Auckland Council, the below conditions that refer to public infrastructure or assets that are to be vested public ~~shall~~ must apply.*	*Parks supports the proposed amendment to Condition [167] to explicitly include public green infrastructure within road reserves and open space areas proposed to vest in Council. This amendment provides greater clarity that publicly vested green infrastructure assets are subject to the same design, delivery, approval and vesting requirements as other public infrastructure, ensuring a consistent approach to the future ownership and management of Council assets.* *Parks also supports replacing "shall" with "must" in accordance with Council's legal advice on conditions to provide greater clarity and certainty that the condition imposes a mandatory obligation on the consent holder.*

168A	***Recreation Reserves and Esplanade Reserve Development*** *Prior to the issue of the section 223 application under the RMA and at Engineering Plan Approval stage, the consent holder must submit for the certification of the Manager Parks Planning detailed engineering and landscaping plans for all hard assets / park furniture / fixtures /planting/grassing to enable reserve development to be undertaken within all recreation reserves and esplanade reserves to vest. The plan(s) and supporting planting methodology, to be submitted for Certification, must;* *a) Be in general accordance with the Vegetation Strategy in Open Space Strategy document prepared by Jasmax and Studio Pacific Architecture dated 12 August 2026.* *b) Be prepared by suitably qualified person/s* *c) Design and details of any retaining walls in the park(s)/reserve(s) or adjacent to the park(s)/reserve(s), and any other structures in the reserves.* *d) Include a weed management plan detailing weed eradication and control methods for the park, prior to and after planting.* *e) Identify all new planting to be undertaken on the site including details of the intended species, spacing, quantities, location, plant sizes at the time of planting, their likely heights on maturity and how planting will be staged and established.* *f) Include specifications for plant condition and a written specification detailing the planting methodologies to be used.* *g) Identify the existing species to be retained.* *h) Comply with the Auckland Code of Practice for Land Development and Subdivision: Chapter 7: Landscape.* *i) Demonstrate a topographic overlay to illustrate proposed gradient levels within the reserve.* *j) demonstrate a flood overlay identifying flood-prone areas within the reserve.*	*Parks recommends the inclusion of this condition and associated advice note, as the applicant's recommended conditions do not adequately secure the detailed design and review of recreation reserves and esplanade reserves prior to construction and vesting. These provisions are necessary to ensure that all reserve assets and infrastructure are designed and delivered to Auckland Council standards and are fit for purpose, safe, durable and maintainable for long-term public use and ownership. This is particularly important given Council's obligations as the future asset owner and the requirement for vested assets to undergo Engineering Plan Approval and asset owner review prior to construction.*

	k) *Demonstrate all outfalls and retaining walls, including visual assessments within the reserve.* l) *Include the location and specifications for a pedestrian pathway/boardwalk at a minimum of 3 metres in width.* m) *An annotated pavement plan and related specifications, detailing proposed site levels and the materiality and colour of all proposed hard surfacing.* n) *Provide a Safety in Design Register for the 3m wide pathway within the reserves.* ***Advice note:*** *Plans approved under Fast Track Consent do not constitute an Engineering Plan Approval and should not be used for the purposes of constructing public works in the absence of that approval.*	
168B	***Drainage reserves/ Stormwater ponds*** *Prior to the issue of the section 223 application under the RMA and at Engineering Plan Approval stage, the consent holder must submit a detailed landscaping plan(s) for stormwater ponds and drainage reserves for certification by the Manager Parks Planning. The plans must:* a) *Be prepared by a suitably qualified landscape architect.* b) *Be in general accordance with the Vegetation Strategy in Open Space Strategy document prepared by Jasmax and Studio Pacific Architecture dated 12 August 2026.* c) *Show all planting including details of intended species, location, plant sizes at time of planting and likely heights on maturity, tree pit specifications, and the overall material palette.* d) *Include planting methodology.* e) *Demonstrate a topographic overlay to illustrate proposed gradient levels within the reserve.* f) *demonstrate a flood overlay identifying flood-prone areas within the reserve.* g) *Demonstrate all outfalls and retaining walls, including visual assessments within the reserve.*	*Parks recommends the inclusion of this condition and associated advice note, as the applicant's recommended conditions do not adequately provide for detailed design review of drainage reserves and stormwater ponds. These provisions are necessary to ensure assets are fit for purpose, meet Auckland Council standards, and are subject to Engineering Plan Approval and asset owner review prior to vesting.*

	h) *An annotated pavement plan and related specifications, detailing proposed site levels and the materiality and colour of all proposed hard surfacing.* i) *Provide a Safety in Design Register for all pathways within the drainage reserves.* j) *Comply with the Auckland Code of Practice for Land Development and Subdivision: Chapter 7: Landscape.* ***Advice note:*** *Plans approved under Fast Track Consent do not constitute an Engineering Plan Approval and should not be used for the purposes of constructing public works in the absence of that approval.*	
171	***Public Infrastructure*** ***Where infrastructure is proposed to form part of a public reticulation network, any engineering plans submitted for approval must detail all the proposed public infrastructure works associated with the subdivision stage or part thereof, and be in accordance with current Council Engineering Standards, including but not limited to:*** • *Public Stormwater Reticulation* • *Public Wastewater Reticulation* • *Public Water Reticulation* • *Public Reserves Landscaping* • *Public Roads Landscaping*	*Parks recommends amending this condition to include Public Reserves Landscaping and Public Roads Landscaping. This amendment is necessary to ensure that public landscape assets are captured within the engineering approval process and are designed and delivered to Auckland Council standards prior to vesting and ongoing public maintenance.*
179	***Implementation of Landscape Works for Local Purpose Drainage Reserves*** *Prior to the issue of the section 224(c) certification for a stage, superlot or part thereof, all hard and soft landscape works proposed within the local purpose drainage reserves within the stage, superlot or part thereof which are to be vested must be implemented and be in accordance with the Beachlands South Open Space Strategy and any Engineering Plan Approval to the satisfaction of the Manager Parks Planning and landscaped in accordance with the Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape, and in particular:* a) *All areas of the reserve that have been grassed must have a 90 percent strike rate,*	*Parks recommends amendments to this condition and the inclusion of the associated advice note to provide greater certainty regarding the implementation, certification, practical completion, and ongoing maintenance of landscape works within local purpose drainage reserves. The applicant's recommended condition does not adequately specify the standards, auditing requirements, defect remediation process, or practical completion process necessary to confirm that vested assets have been delivered to Auckland Council standards. The amendments are necessary to ensure the assets are fit for purpose, suitable for long-term public ownership and maintenance, and that the commencement of the maintenance period is clearly established.*

	in a mowable condition, and be weed and rubbish free. *b) Planted slopes to be a maximum 1:3 grade and grassed slopes to be a maximum 1:5 grade.* *c) Grassing and planting must be carried out by a suitably qualified landscape contractor in the planting season (April to September) and when the weather is suitable (mild, dull and moist) and when the ground is moist and workable. Where delays occur in the agreed programme which prevents areas being planted, the consent holder must inform the Manager Parks Planning immediately.* *d) At practical completion auditing, a chartered professional engineer engaged by the applicant must provide certificates of compliance and producer statements as relevant and certify that the parks construction works have been carried out in accordance with the approved plans and comply with the requirements in condition (s) – above). Written manufacturers guarantee must be supplied for any products where warrantees are available or applicable.* *e) Any defects identified at the practical completion audit are to be remedied by the applicant. The practical completion of the works will be determined by the Manager Parks Planning to their satisfaction, and this indicates the commencement of the maintenance period.* *Advice Note: Practical completion will be determined by the Manager Parks Planning prior to the issue of the certificate required under 224(c) to demonstrate development of the drainage reserve has been satisfactorily implemented and to formalise the commencement of the maintenance period.*	

179A	***Implementation of esplanade reserve works*** *Prior to the issue of the section 224(c) certification the consent holder must undertake the following works on the Esplanade reserve Lots 2031, 2032, 2033, 2018 and 2019 to the satisfaction of the Manager Parks Planning and in accordance with the Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape, in particular:* *a) Removal of all organic and inorganic rubbish from lots 2031, 2032, 2033, 2018 and 2019;* *b) Lots 2031, 2032, 2033, 2018 and 2019 to be free of possible health and safety hazards such as large holes, dangerous trees, unstable retaining walls etc.* *c) Removal of all invasive pest plant species as listed in the Auckland Regional Pest Management Plan 2020-2030 which are located within the boundary of lots 2031, 2032, 2033, 2018 and 2019 (may trigger replanting and maintenance obligations – approved plans to be provided prior to 224C, uncompleted works bonds, maintenance bonds etc.)* *d) Removal of all pest animal species as listed in the Auckland Regional Pest Management Plan 2020-2030 which are located within the boundary of lots 2031, 2032, 2033, 2018 and 2019.* *Advice note:* *Practical completion will be determined by Parks prior to the issue of the certificate required under 224(c) to demonstrate reserve development has been satisfactorily implemented and to formalise the commencement of the maintenance period.*	*Parks recommends the inclusion of this condition and associated advice note, as the applicant's recommended condition set does not include implementation requirements for the proposed esplanade reserves. The condition is necessary to ensure the reserves (top-ups) are appropriately established and made fit for public ownership prior to vesting, including the removal of rubbish, hazards and pest species. This is particularly important given the requirement for esplanade reserves top-ups to be created and vested under section 236 of the RMA, and the need for Council to receive assets that are suitable for long-term public ownership and management.*
180	***Implementation of Landscape Works for Open Spaces to be Vested as Public Reserves (Land in lieu of reserve)***	*Parks recommends amendments to this condition to ensure it applies only to open spaces vested as land in lieu of reserve for recreational purposes. The applicant's condition applies broadly to all reserve types, whereas separate implementation conditions are necessary for recreation reserves, esplanade reserves and drainage reserves to reflect their differing statutory, operational and asset management requirements. The amendments also provide greater certainty that reserve*

	Prior to the issue of the section 224(c) certification for a stage, superlot or part thereof, all hard and soft landscape works proposed within any open space that is to be vested as Land in Lieu of reserve for recreational functions ~~public reserve~~ within the stage, superlot or part thereof must be implemented and be in accordance with the Beachlands South Open Space Strategy and any Engineering Plan Approval and to the satisfaction of the Manager Parks Planning and landscaped in accordance with the Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape, and in particular: *a) All areas of the reserve that have been grassed must have a 90 percent strike rate, in a mowable condition, and be weed and rubbish free.* *b) Planted slopes to be a maximum 1:3 grade and grassed slopes to be a maximum 1:5 grade.* *c) Grassing and planting must be carried out by a suitably qualified landscape contractor in the planting season (April to September) and when the weather is suitable (mild, dull and moist) and when the ground is moist and workable. Where delays occur in the agreed programme which prevents areas being planted, the consent holder must inform the Manager Parks Planning immediately.* *d) At practical completion auditing, a chartered professional engineer engaged by the applicant must provide certificates of compliance and producer statements as relevant and certify that the parks construction works have been carried out in accordance with the approved plans and comply with the requirements in condition (s) – above). Written manufacturers guarantee must be supplied for any products where warrantees are available or applicable.* *e) Any defects identified at the practical completion audit are to be remedied by the applicant. The practical completion of the works will be determined by the Manager Parks Planning to their satisfaction, and this indicates the commencement of the maintenance period.*	*assets are delivered, certified and practically completed to Auckland Council standards before vesting.*

	This condition only applies to open spaces that are to be vested as public reserve and does not apply to any open spaces that are to remain in private ownership or under the control of the Residents Society. For these open spaces, all hard and soft landscape works proposed within the stage, superlot or part thereof must be implemented and be in accordance with landscape design approved under Condition [X] to the satisfaction of the Manager Parks Planning, prior to the issue of the section 224(c) certification.	
184	***Public roads*** ***The engineering plans must include but not be limited to the following information:*** *(a) The information regarding the detailed design of all roads and road network activities provided for by this resource consent.* *(b) ...* *(c) ...* *(d) ...* *...* *(o) Be prepared by a suitably qualified landscape architect.* *(p) Be in general accordance with the Vegetation Strategy in Open Space Strategy document prepared by Jasmax and Studio Pacific Architecture dated 12 August 2026.* *(q) Show all planting including details of intended species, location, plant sizes at time of planting and likely heights on maturity, tree pit specifications, the overall material palette, location of streetlights and other service access points.* *(r) Show diversity of tree species particularly on Collector roads.* *(s) Avoid using tree species along the road reserve with no canopy cover effect.* *(t) Avoid using amenity planting along the road reserves except when they are proposed along park edge roads, adjacent to reserves, or to serve stormwater devices.* *(u) Ensure that selected species can maintain appropriate separation distances from paths, roads, street lights and vehicle*	*Parks recommends amendments to this condition and associated advice note to provide for the detailed design and review of streetscape landscaping as part of the Engineering Plan Approval process. The amendments are necessary to ensure street tree planting and associated landscape assets are designed in accordance with Auckland Council standards, support long-term urban forest outcomes, and are fit for purpose and maintainable following vesting.*

	crossings in accordance with the Auckland Transport Code of Practice. *(v) Include planting methodology.* *(w) Comply with the Auckland Code of Practice for Land Development and Subdivision: Chapter 7: Landscape.* *Advice Note:* *...* *Plans approved under Fast Track Consent do not constitute an Engineering Plan Approval and should not be used for the purposes of constructing public works in the absence of that approval.*	
189A	***Roading*** *Prior to issue of section 224(c) certification, all street landscaping must be implemented on roads to vest in accordance with the approved streetscape plans and to the satisfaction of the Manager Parks Planning and landscaped in accordance with the Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape, and in particular the following:* *a) The street must be cleared of any construction material, rubbish and surplus soil, and must be maintained in a neat and tidy condition.* *b) Should site factors preclude compliance with any of these conditions, the Manager Parks Planning must be advised in writing as soon as practicable and, in any case, prior to planting, and an alternative soil improvement methodology proposed by the consent holder to the satisfaction of Manager Parks Planning.* *Grassing must only be undertaken when the weather is suitable i.e. mild, dull and moist, and when the ground is moist and workable. Where delays occur in the agreed programme which prevents areas being planted, the consent holder must inform the Manager Parks Planning immediately.*	*Parks recommends the inclusion of this condition, as no equivalent condition is included within the applicant's recommended condition set. The condition is necessary to ensure that approved street tree planting and associated landscape works are implemented prior to vesting, providing certainty that the streetscape, amenity and urban forest outcomes anticipated by the development are delivered.*

192A	***As-built plans*** *Prior to the issue of the 224(c) certificate, the consent holder will provide to the Development Engineer and Manager Parks Planning as-built plans for landscape works (hard and soft) within all proposed parks, reserves, accessways and streets in the following format:* *a) For vested assets from a new development, as-built plans must be provided in digital format (DWG, DXF or GIS shape files on CD or via e-mail) as well as a pdf copy of the signed as-built plan(s).* *b) The following requirements apply to digital formats:* *i. All dimensions are to be in millimetres, and all levels and lengths in metres.* *ii. All locational data must be plotted in New Zealand Transverse Mercator 2000 (NZTM 2000) coordinates in terms of New Zealand Geodetic Datum 2000 (NZGD 2000) datum as approved by Land Information New Zealand (LINZ).* *c) All graphical data to be located/plotted to the following accuracy:* *i. X & Y coordinates +/-100mm* *ii. Z coordinates +/-50mm (e.g. lid level) in terms of the NZTM 2000 coordinates* *iii. Invert levels +/- 20mm.* *iv. Digital plans must show all required information, including specific asset information shown in the Legend of the as-built files. If external reference files, overlay or non-standard font shape files are required for this, then these should also be provided.* *d) The as-built plan (generated from the digital format) and structural drawings must include a signed certification statement by a Licenced Cadastral Surveyor or a Registered Surveyor responsible for the as-built.* *e) The as-built plans must be submitted on standard ISO metric plan sheets, drawn at scales 1:100, 200, 250, 500 or 1:1000 as appropriate or as specified by the Council. The information should fit on one sheet where possible. If this is not possible at A3*	*Parks recommends the inclusion of this condition, as no equivalent condition is included within the applicant's recommended condition set. The condition is necessary to ensure accurate as-built information is provided for all reserve and streetscape landscape assets prior to vesting and transfer to Council. This information is required to facilitate asset capture, operational management, maintenance planning, warranty administration, and future asset renewals, and is a standard Auckland Council requirement for assets entering public ownership.*

	size, multiple plan sheets must be submitted with an index sheet. On agreement with Auckland Council, hard copy plans may be saved and submitted in portable document format (pdf) for ease of transmission. *f) Existing assets must be validated by providing asset information demonstrating appropriate dimensions of the existing known assets via sketch, aerial photo, and location of the assets* *g) Details of tree and plant types, including new and established trees and plants on land to vest in Council, using scientific (latin) names and referencing any cultivars* *h) Existing assets and assets to be removed or abandoned must be shown on as-built plans.* *i) Copies of the following documents are required, where these assets will be maintained by Auckland Council.* *i. All assets | Operation and maintenance manuals or asset owner manuals, and any other documentation provided by a supplier for use by an asset owner, e.g. warranty, guarantee.* *ii. Additional documentation will be required for project records. These will be specified in project contract documents or Auckland Council project management manuals.*	
192B	***Maintenance – Reserve planting (subdivision)*** *Prior to the issue of the section 224(c) certificate, the consent holder must provide for the certification of the Manager Parks Planning a Maintenance Plan, for all planting and landscaping to be established in the reserves lots to vest. The Maintenance Plan must include:* *a) Vegetation maintenance policies for the proposed planting, in particular details of maintenance methodology and dates / frequencies.* *b) Details of watering, weeding, trimming, cultivation, pest and disease control, checking of stakes and ties, pruning and other accepted horticultural operations to*	*Parks recommends the inclusion of this condition, as no equivalent condition is included within the applicant's recommended condition set for reserves to vest. The condition is necessary to ensure reserve planting is established and maintained in accordance with the Auckland Council Code of Practice for Land Development and Subdivision prior to Council assuming ownership and maintenance responsibilities, and to secure the long-term landscape, amenity and ecological outcomes of the reserve network.*

	ensure normal and healthy plant establishment and growth. *c) Vandalism eradication policies.* *d) Design strategy, specification and management plans for the treatment/maintenance issue relating to reserve lots to vest.* *The consent holder must undertake maintenance, in accordance with the approved Maintenance Plan for a five-year period commencing on the date that the section 224(c) certificate is issued. Any maintenance issues deemed unsuitable by the Manager Parks Planning during this period must be remedied by the consent holder at their expense.* *If any damage/theft to the planting occurs during the maintenance period, the consent holder must replace damaged/stolen plants with the same species and height, and must be maintained for a period of two years following the replacement planting, to the satisfaction of the Manager Parks Planning.*	
192C	***Monitoring Report – Subdivision (5-year maintenance period)*** *Following the issue of the completion certificate under s224(c), the consent holder must submit a Monitoring Report to the Manager Parks Planning, for certification every 3 months for the first 18 months, then 6 monthly thereafter for a minimum period of five years. The Monitoring Report must include but is not to be limited to the following information in respect of reserve lots to vest:* *a) Success rates, including growth rates and number of plants lost (including an analysis of the distribution of losses);* *b) State of protection barriers where required;* *c) Canopy closure, beginnings of natural ecological process–s - natural regeneration in understorey, use by native birds, etc;* *d) A running record of fertilisation, animal and weed pest control and replacement of dead plants;*	*Parks recommends the inclusion of this condition and associated advice note, as no equivalent condition is included within the applicant's recommended condition set. The condition is necessary to provide ongoing oversight of reserve planting during the five-year maintenance and establishment period, ensuring that maintenance obligations are being undertaken in accordance with approved plans and Auckland Council standards. Regular monitoring and reporting will enable issues to be identified and rectified early, reduce the risk of asset failure at handover, and provide greater certainty that planted assets will achieve the required establishment outcomes before bond release. The condition also supports the effective administration of any bond held by Council to secure long-term performance and maintenance obligations associated with the vested reserve assets.*

	e) Details on the condition of, and recommendations for maintenance of, the fencing and *f) Recommendations for replacement of dead plants and implementation of these recommendations (remediation work).* *Any recommended remediation work must include a start date for replanting.* *The first measure of the survival rate of plants must not be measured any sooner than 12 months following planting.* ***Advice Note:*** *This condition requires monitoring reports to be submitted for a minimum of 5 years following planting. This condition will be deemed satisfied upon a satisfactory final inspection after the maintenance period and subsequent bond release.*	
192D	***Maintenance - Streetscape*** *Prior to the issue of the section 224(c) certificate, the consent holder must provide for the certification of the Manager Parks Planning a Maintenance Plan, for all planting and landscaping to be established in the streetscape (roads to vest). The Maintenance Plan must include:* *a) Vegetation maintenance policies for the proposed planting, in particular details of maintenance methodology and dates / frequencies.* *b) Details of watering, weeding, trimming, cultivation, pest and disease control, checking of stakes and ties, pruning and other accepted horticultural operations to ensure normal and healthy plant establishment and growth.* *c) Vandalism eradication policies.* *d) Design strategy, specification and management plans for the treatment/maintenance issue relating to reserve lots to vest.*	*Parks recommends the inclusion of this condition, as no equivalent condition is included within the applicant's recommended condition set. The condition is necessary to ensure streetscape planting is established and maintained in accordance with the establishment period requirements of the Auckland Council Code of Practice for Land Development and Subdivision prior to Council assuming long-term maintenance responsibilities, and to secure the long-term streetscape, amenity and urban forest outcomes anticipated by the development.*

	The consent holder must undertake maintenance, in accordance with the approved Maintenance Plan for a three-year period commencing on the date that the section 224(c) certificate is issued. Any maintenance issues deemed unsuitable by the Manager Parks Planning during this period must be remedied by the consent holder at their expense. *If any damage/theft to the planting occurs during the maintenance period, the consent holder must replace damaged/stolen plants with the same species and height, and must be maintained for a period of three years following the replacement planting, to the satisfaction of the Manager Parks Planning.*	
192E	***Monitoring Report – Streetscape (3-year maintenance period)*** *Following the issue of the completion certificate under s224(c), the consent holder must submit a Monitoring Report to the Manager Parks Planning, for certification every 3 months for the duration of the 3 years maintenance period. The Monitoring Report must include but is not to be limited to the following information in respect of roads to vest:* *a) Success rates, including growth rates and number of plants lost (including an analysis of the distribution of losses);* *b) State of protection barriers where required;* *c) Canopy maturity, beginnings of natural ecological process–s - natural regeneration in understorey, use by native birds, etc;* *d) A running record of fertilisation, animal and weed pest control and replacement of dead plants;* *e) Details on the condition of, and recommendations for maintenance of, the fencing and* *f) Recommendations for replacement of dead plants and implementation of these recommendations (remediation work).*	*Parks recommends the inclusion of this condition and associated advice note, as no equivalent condition is included within the applicant's recommended condition set. The condition is necessary to verify that streetscape planting is being maintained and successfully established throughout the three-year maintenance period required under the Auckland Council Code of Practice for Land Development and Subdivision, identify any deficiencies early, and support the effective administration and release of bonds associated with the handover of vested landscape assets.*

	Any recommended remediation work must include a start date for replanting. *The first measure of the survival rate of plants must not be measured any sooner than 12 months following planting.* ***Advice Note:*** *This condition requires monitoring reports to be submitted for a minimum of 3 years following planting. This condition will be deemed satisfied upon a satisfactory final inspection after the maintenance period and subsequent bond release.*	
192F	***Reserve Boundary Treatment*** ***Any fencing, hedging or planting along boundaries or within 2 metres of boundaries of parks and reserves (existing or to be vested) must be either low height (1.2m) or at least 50% visually permeable (max height 1.8m). Landscape planting may be implemented on the private lot and must be maintained to ensure 50% visual permeability. The council is exempt from sharing costs. A consent notice will be required to be registered on private lots bordering an open space. The consent notices will be prepared by the Council's solicitor at the consent holder's cost.***	*Parks recommends the inclusion of a Reserve Boundary Treatment condition, as no equivalent provision is included within the applicant's recommended conditions. The condition is necessary to ensure an appropriate interface between public open space and adjoining private development, maintain passive surveillance and visual permeability, and protect the long-term safety, amenity and usability of the reserve network. The associated consent notice is required to ensure these outcomes are maintained by future landowners.*
192G	***Consent Notice:*** *The consent holder must register with the Registrar-General of Land a consent notice under Section 221 of the RMA, against the computer registers (certificates of title) for lots abutting any park/reserve. The consent notice/s must record that condition 192F (above) is to be complied with on a continuing basis.* *(a) Any fencing, hedging or planting along boundaries or within 2 metres of boundaries of parks and reserves (existing or to be vested) must be either low height (1.2m) or at least 50% visually permeable (max height 1.8m). Landscape planting may be implemented on the private lot and must be maintained to ensure 50% visual permeability. The council is exempt from sharing costs.*	*Parks recommends the inclusion of this consent notice, as the effectiveness of the Reserve Boundary Treatment condition relies on ongoing compliance by future landowners. A consent notice under section 221 of the Resource Management Act 1991 is necessary to ensure that the obligations relating to fencing, planting and visual permeability adjacent to parks and reserves remain binding on subsequent owners following subdivision and transfer of title. The consent notice provides an enduring mechanism to secure the long-term safety, amenity, passive surveillance and visual connectivity outcomes intended for the reserve network.*

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure L:

Transport Performance & Optimisation (TPO)

Phil Harrison

Richard Black

Chris Freke

09 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Transport / Traffic

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Phil Harrison – Traffic Engineer (Consultant on behalf of Transport Performance and Optimisation) Richard Black – Statutory Planner (Consultant on behalf of Transport Performance and Optimisation) Chris Freke – Principal Planner (Auckland Urban Development Office)
Qualifications & Relevant Experience:	<u>Phil Harrison:</u> I hold the qualification(s) of: Master of Science in Transportation Engineering and have 40 years of experience in traffic engineering and transport planning. I am a Chartered Member of Engineering New Zealand. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications, and have appeared as an expert witness before consent authorities on multiple occasions and at the Environment Court. <u>Richard Black:</u> I hold the qualification(s) of: Bachelor of Applied Science in Environmental Management (Honours), and have 22 years of experience in planning. I am a full member of New Zealand Planning Institute and am certified under the MfE Making Good Decisions Programme. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation, and have appeared as an expert witness before consent authorities on multiple occasions and at the Environment Court. <u>Chris Freke:</u> I hold the qualification of Bachelor of Town Planning and have 40 years of experience in land use and transport.

	I am a full member of the New Zealand Planning Institute. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation, and have appeared as an expert witness before consent authorities and at the Environment Court. I was Auckland Transport's lead planner in its submission to and appeals to the Beachlands South private plan change and settlement of those appeals which resulted in the operative Beachlands South Precinct provisions.
Preparation in Accordance with the Code of Conduct:	Phil Harrison: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified. Richard Black: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified. Chris Freke: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	09/10/2026

3.0 Executive Summary / Principal Issues

This memo provides Transport Performance and Optimisation's comments on the transport aspects of the Beachlands South substantive application. It is based on the final application package dated 25 September 2026, which replaces the lodged documents. The Transport Initial Review (14 August 2026), prepared by Auckland Transport (now part of Auckland Council), was provided to the applicant as the transport s67 information request. It contains 32 information requests and two advice notes, and the applicant's responses are in the s67 response table (Attach 0B2). This memo records what remains outstanding from that review. Item numbers in brackets (for example, IR 5) refer to the Initial Review, which is attached (section 10). References to Transport Performance and Optimisation in this memo include the transport functions previously carried out by Auckland Transport.

Of the 32 requests, four are resolved (IR 1, 3, 18 and 30), 21 are partly resolved and seven are not resolved (IR 2, 5, 7, 9, 25, 29 and 32). Many of the partly resolved items rely on matters being dealt with at Engineering Approval, but the conditions that would secure them have not been included in Attach 0C. Several conditions the applicant says it has offered are also not in Attach 0C.

The principal issues are:

1. **Whitford Bypass.** The Precinct requires the Bypass beyond 1,900 dwellings. The applicant does not propose it, relying on a forecast of 1,589 vehicles per hour (vph) through Whitford in the 2041 morning peak, only 11 below the 1,600 vph at which the plan change modelling found the Bypass was needed. The applicant's own sensitivity tests go over 1,600 vph. Transport Performance and Optimisation recommends a traffic-based trigger that defers further development if 1,600 vph is reached, until the Bypass or agreed mitigation is in place (Condition N1). No condition caps the dwelling yield, so a maximum yield condition is also recommended (Condition N12).
2. **Departures from the Precinct transport triggers.** These are the omission of the Site C upgrade and the Whitford Bypass, deferral of the full Jack Lachlan Drive, Site B and Site E upgrades until after the first 68 lots, and the ferry capacity trigger at row (e) not being met. Internal collectors, the bus route and active mode links are not tied to any stage or dwelling number.
3. **Monitoring and review.** A monitoring and review condition that replicates the Precinct's special information requirements is also recommended (Condition N14). It would give an evidence base, using actual trip generation and the timing of land uses, for any future change to the development thresholds, including the stage at which the Whitford Bypass is needed.
4. **Road width departures.** No justification or safety assessment has been provided for the roads that are narrower than Council's road design standards. The cross sections would become approved plans, so the widths would be fixed at consent.
5. **Schools.** No school transport assessment has been provided. School bus turning, layover and drop-off are deferred to a plan certified before the school opens, by which time the frontage roads will have been built. The conditions normally applied to new private schools, or to designations for new state schools, are also missing.
6. **Safety for people walking and cycling.** There are no crossings at the Site A, B and E roundabouts, the roundabout entries are not designed to slow drivers enough, cyclists have no priority across side roads on Jack Lachlan Drive, and some driveways lack clear views of footpaths and cycleways. Conditions are also recommended setting a 50 km/h design speed

through the Site A roundabout (Condition N15), and requiring an active mode crossing of Whitford-Maraetai Road near Trig Road West if the Site C upgrade is omitted (Condition N16).

Transport Performance and Optimisation considers two matters to be critical information gaps under s67: the road width departures and the school frontage road layout. Two further information gaps are also identified: whether safe layouts can be achieved at the external intersections within the land available, and the ferry demand information required by I458.9(4)(e). The other outstanding matters can be managed through conditions and are dealt with in sections 6 and 9.

With the information gaps in section 7 closed and the conditions in section 9 imposed, Transport Performance and Optimisation expects that the transport effects can be appropriately managed. On the information available, we do not consider any transport effect to be an adverse impact of the scale contemplated by s85(3) FTAA. The Whitford Bypass threshold is the matter closest to that, and the recommended trigger condition is intended to manage it.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Attach 0A.1 Legal Memorandum
- Attach 0B Planning Assessment (AEE), Attach 0B1 Rules Assessment and Attach 0B2 s67 Response Table (Traffic tab)
- Attach 0C Proposed Conditions of Consent and Attach 0C1 Appendix 1 to Conditions
- Attach 1 Design Report Revision C dated 12 August 2026
- Attach 4, 4.1 and 4.1 Urban Design Assessment
- Attach 8 Integrated Transport Assessment (Hughes Traffic and Transportation)
- Attach 9R Roading 1, Attach 9S Roading 2, Attach 9T Roading 3, Attach 9U Roading 4 (Harrison Grierson).
- Transport Information Initial Review (14 August 2026) and pre-lodgement feedback to Beachlands South Limited Partnership (1 May 2026), both prepared by Auckland Transport (now part of Auckland Council)
- Preliminary comments of other Auckland Council and PT CCO specialists (5. Specialist Input\Prelim)

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

Transport Performance and Optimisation has not identified any transport reasons for consent that conflict with the updated AEE, which now records non-compliance with Table I458.6.3.1 rows (a) to (d) (non-complying under I458.4.1(A8)) and row (e) and the ferry capacity table (discretionary under I458.4.1(A9) and (A10)). The following should be checked by the Council planner:

- Primary pedestrian access (E27.6.6) Where a JOAL serves 6 to 19 dwellings, the PPA must be physically separated from vehicles. The JOAL designs separate the PPA by a mountable kerb only, which we do not consider achieves this (ITA p115). Unless the design changes, this is an infringement of E27.6.6. It is not listed among the E27 reasons for consent (Attach 0B, p77). (IR 7)
- Accessible parking (E27.6.3.2A) ITA Table 7-10 (p95) shows C9-A and C9-B each providing 1 space where 2 are required, and VC4 providing 3 where 4 are required, although the ITA states every super lot complies. Assessed building by building, these are shortfalls that are not listed in the AEE. Assessed across the whole development, they are not. The planner should confirm which approach applies. (IR 21)

Transport Performance and Optimisation agrees that the AEE correctly records the road design infringement under I458.4.1(A29), including the Sub-precinct D collector designed as a local road without cycle provision (Attach 0B, p82), and the CM2 loading shortfall under E27.4.1(A2) (Attach 0B, p77). The ITA does not assess the Sub-precinct D change (section 6.5).

6.0 Specialist Assessment

Key Headings

6.1 Existing environment

6.2 Potential effects

6.3 Proposed mitigation

6.4 Alignment with planning provisions

6.5 Recommended conditions

6.6 Engagement with the applicant's specialists

6.7 Site visit

6.8 Overall position

IR numbers refer to items in the Initial Review (14 August 2026), provided to the applicant as the transport s67 information request (attached, section 10). Transport Performance and Optimisation has checked each response in the applicant's s67 response table against the ITA, plans and conditions, and has not accepted a response unless the substance is reflected in those documents.

6.1 Existing environment

Whitford-Maraetai Road is the key external route for Beachlands South (ITA p124). It is mostly an 80 km/h rural road with a poor safety record: 110 reported crashes since 2021, including one fatal and 14 serious, most of the serious ones involving drivers losing control (ITA pp17 to 18). The Whitford roundabout is already over capacity in the morning peak, with queues of about 1 km (ITA Table 7-2). Jack

Lachlan Drive is the main access to the Pine Harbour ferry, but walking and cycling links to it are poor, and public transport use in Beachlands is low, at about 7% (ITA pp16, 138).

6.2 Potential effects

Traffic through Whitford (IR 2). The PC88 Precinct provisions require the Whitford Bypass beyond 1,900 dwellings. The applicant does not propose it, relying on a forecast of 1,589 vehicles an hour through Whitford in the 2041 morning peak (ITA Table 8-7). That is only 11 below the 1,600 at which the plan change modelling found the Bypass was needed, and the applicant's own sensitivity tests go over it (1,604 to 1,632). The risk is that traffic reaches the point the Bypass is needed without anything requiring it to be built. The inputs behind the forecast also need checking. The ITA uses a 2025 base flow of 1,246 vph southbound through Whitford, but the Trig Road count in ITA Attachment 3 (D8) shows 1,117 vph. The calculations behind the 6.16% work from home reduction have not been provided, the survey dates and durations of the 2025 counts are not stated, and the combined sensitivity test (1,632 vph) appears only in the s67 response, not the ITA. Traffic is assessed only to 2041, not the 10 years beyond completion that was requested. The application seeks "approximately 2,000 dwellings" but no condition caps the number, and the ITA indicates the 1,600 vph threshold is reached at about 2,037 dwellings (ITA p137). A maximum yield condition is recommended (Condition N12).

Whitford Village and other external intersections (IR 4, 11). Even after the Whitford roundabout upgrade, drivers on Whitford Park Road would face average delays of about two minutes and queues of over 400 m in the 2041 morning peak (ITA Attachment 1). The ITA reports the roundabout as working well overall because the main road flows freely, which hides this effect on the village.

Site C (IR 4). Removing the Trig Road signals (Site C) only slightly increases delays for Trig Road traffic (ITA Table 8-9). The Site C information has its own gaps. Table 8-9 reports LOS A for the signalised option with a 48 second Trig Road delay, which would normally be LOS D at signals. If the signals are not needed, a pedestrian and cycle crossing at or near Trig Road (for example to serve the Whitford Tennis Club) should be considered and secured with a trigger. This addresses the added safety risk from Beachlands South traffic, including at off-peak times. The applicant suggests crossings could be looked at with the Site B upgrade, but nothing in the conditions secures one near the Whitford-Maraetai Road / Trig Road West intersection. Condition N16 provides for this.

Safety for people walking and cycling at intersections (IR 10, 11, 17). There is no way to cross either arm of Whitford-Maraetai Road at the new Jack Lachlan Drive roundabout (Site A), only a "future" crossing opportunity on the northern arm. At the Whitford, Somerville and Sandstone roundabouts (Sites B, E and D), the applicant's own drawings show the entries are not shaped to slow drivers enough, and no crossings are shown at Sites B or E, including in Whitford Village. At Road 20, drivers may make U-turns further along an 80 km/h road with a history of loss-of-control crashes (ITA p31). None of these effects is assessed in the ITA. At Site A, sheet 3530 Rev B appears to give northbound cyclists an off-road route but leaves southbound cyclists riding through the two-lane roundabout. Design speeds are also inconsistent. The s67 response says Site A is designed for the existing 80 kph limit, but sheet 3530 Rev B bases its diverge and two-lane lengths on 60 kph. The Road 20 design assumes 90 kph, and the posted limit is 80 kph. The applicant supports lowering the limit to 60 kph but has not provided operating speed data for Whitford-Maraetai Road between Road 20 and the Beachlands Road roundabout, which the Initial Review asked for (IR 32). It has also not commented on the extra pedestrian demand across

Whitford-Maraetai Road expected from the fast-track proposal to the north of Site A and the community activities proposed on the pony club land. Until the design speed is confirmed, Transport Performance and Optimisation cannot confirm that Site A and Road 20 suit the speeds drivers will actually travel at. Any change to the speed limit would be decided through Auckland Council's speed limit process, which must comply with the Setting of Speed Limits Rule 2024, and cannot be secured by a consent condition. Transport Performance and Optimisation recommends a condition requiring the Site A roundabout to be designed for a 50 km/h speed through the roundabout, with approaches that safely bring drivers down from the current 80 km/h limit (Condition N15). This supports a future speed limit reduction without relying on one.

Internal roads (IR 5, 13, 14). Several roads are narrower than the Precinct and Auckland Council standards, including the Village Centre collector (20 m instead of 23 m) and parts of Jack Lachlan Drive (20.7 m instead of 23 m), and a collector in Sub-precinct D has become a local road with no cycle lane (Attach 0B, p82). No safety assessment has been provided, so Transport Performance and Optimisation cannot confirm buses, servicing, footpaths, cycle lanes and parking will work on them. On Jack Lachlan Drive, cyclists have no priority across side roads and driveways, and the western shared path narrows to 1.5 m where driveways cross it (sheet SK88). Of the other departures, Street Type 1.1.8 (Village Secondary) may be too narrow for buses and service vehicles, and Street Type 1.1.10 (Local Street Industrial) for vehicle crossings and lot access. The draft shared path sections also show some cross falls steeper than 2%.

Public transport, schools and the ferry (IR 6, 26 to 29). The development relies on a large shift to ferry, bus and active modes. No bus stops have been confirmed at Marina Point or the primary school. The schools generate about 790 morning peak trips (ITA Table 8-8), and no school transport assessment has been provided. Current ferry use and future demand have not been assessed, nor has overflow ferry parking on Jack Lachlan Drive, where the new cycleway runs. The active mode staging plan is still being finalised, and the gap in shared path continuity near the school interface has not been addressed. The schools are in Stage 1.

Site access (IR 7, 8, 20). On shared driveways (JOALs), the footpath is separated from vehicles only by a mountable kerb, which does not meet the AUP standard (E27.6.6). Some basement and ground level driveways do not give drivers a clear view of people on the footpath or cycleway. Driveways for narrow lots fronting cycleways are not assessed until building consent. Where the building itself blocks the view, the fix may mean moving the access or changing the building edge. That could take the building out of general accordance with the approved plans and require an s127 variation, so the applicant should show a concept for each affected access.

Matters agreed. The assessed yield of about 2,000 dwellings (IR 1, but see the yield cap above), traffic distribution (IR 3), right turn bays on Jack Lachlan Drive (IR 18), corrected modelling (IR 30), no slip lanes at Sites B and E (IR 11), JOAL widths (IR 22) and cul-de-sac turning (IR 19).

First 68 lots. The first 68 lots are proposed to be occupied before the Whitford, Somerville and full Jack Lachlan Drive upgrades. The ITA estimates these lots add about 16 vehicles an hour (ITA p146). We consider that figure is probably too low (we calculate 28 outbound trips using the ITA trip generation and

distribution figures), but even this higher figure is small enough that occupying these lots before the upgrades is acceptable.

6.3 Proposed mitigation

The applicant proposes upgrades at Sites A, B, D and E and on Jack Lachlan Drive (Condition 122), internal roads and paths built with each stage (Condition 116), traffic monitoring every 500 dwellings (Condition 117), a school transport management plan before each school opens (Condition 119A), and driveway checks at building consent (Conditions 96A and 121A). It does not offer the Whitford Bypass, the Trig Road signals or the final ferry capacity upgrade.

Transport Performance and Optimisation considers the mitigation falls short in five ways:

- **Monitoring.** Condition 117 does not count traffic through Whitford, needs no certification and has no consequence if 1,600 vehicles an hour is reached, so it cannot replace the Bypass.
- **Staging.** Stages can be built "in any stage order", and the collector roads south of the Village Centre, the bus route and the walking and cycling links are not tied to any stage. Condition 122(b) would also let those lots be occupied before the full-length Jack Lachlan Drive cycleway is built, although the s67 response says the cycleway is part of Stage 1.
- **Site C crossing.** In omitting the Site C signals, there is no condition that requires the provision of an alternative safe crossing of Whitford-Maraetai Road for pedestrians, who will face increased problems in crossing due to the additional traffic generated by the development.
- **Conditions not offered.** The ITA and s67 response rely on road safety audits, JOAL speed management, bus-capable roads and a ferry reassessment, but none are offered in the conditions.
- **Fixed at subdivision.** Road widths and the school frontage roads are fixed at subdivision, before the conditions that would deal with them apply. These are the critical information gaps in section 7.

6.4 Alignment with planning provisions

The Precinct ties development to road upgrades and ferry capacity at set dwelling numbers (Standard I458.6.3). Departing from those triggers is non-complying or discretionary (I458.4.1(A8) to (A10)). The applicant's legal memo calls the departures "largely technical" (Attach 0A.1, para 2). Transport Performance and Optimisation does not agree for transport: the triggers are how the Precinct stops development getting ahead of its infrastructure, so departures need evidence and conditions that test the outcome.

On the specific provisions:

- **I458.8.2(3)(e)** asks whether intersections provide safe movement for pedestrians and cyclists. This has not been shown for Sites A, B, C, D and E.
- **I458.6.14 and I458.8.2(14)** (road design) ask whether constraints make full widths impractical and whether the design still gives a connected, multi-modal street network. The ITA's response on whether full widths are impractical deals specifically only with Jack Lachlan Drive (ITA pp157 to 158), not the other narrower roads. The applicant says the width departures are "not a relevant resource consent matter". That is not correct as the ITA treats them as infringements of

I458.6.14 (p150), and the legal memo lists the 20.7 m Jack Lachlan Drive reserve as a departure from Precinct Appendix 1 (Attach 0A.1, para 14(e)).

- **I458.9(4)(e) and (5)** require ferry demand information and ongoing transport monitoring. The ferry information is missing, and Condition 117 does not give effect to the monitoring in a way that controls outcomes.
- **E27.6.6** requires a physically separate footpath on JOALs serving 6 to 19 dwellings. This is not met, and the infringement is not listed in the AEE (section 5).

6.5 Recommended conditions

Transport Performance and Optimisation's recommended conditions are set out in full in section 9. The most important are:

- a traffic-based Whitford Bypass trigger (N1), with Condition 117 amended to count traffic at the Whitford roundabout and require certification, and a cap on dwelling yield (N12);
- delivery of collector roads, the bus route and walking and cycling links by stage (N10 and amended Condition 5);
- school bus and drop-off layouts approved before the frontage roads are designed (amended Condition 119A);
- road safety audits for the external intersections and Road 20 (N2), and a crossing at Site A and pedestrian works in Whitford Village (amended Condition 122);
- JOAL speed management, cycle priority on Jack Lachlan Drive, bus-capable roads and certified driveway designs (N3, N5, N4, and amended Conditions 96A and 121A); and
- monitoring that replicates the Precinct's special information requirements, as an evidence base for any future change to the upgrade thresholds, including the timing of the Whitford Bypass (N14), a 50 km/h design speed through the Site A roundabout (N15), and an active mode crossing near Trig Road West if Site C is omitted (N16).

6.6 Engagement with the applicant's specialists

Transport Performance and Optimisation's transport specialists have met with the applicant's project team on several occasions:

- 1 April 2026: presentation of the draft design to Auckland Council's pre-application team.
- 17 April 2026: urban design, architecture and open space (Parks) session.
- 21 April 2026: transport presentation covering the internal roading structure and its connection to the wider network.
- 17 August 2026: traffic and transport meeting on how the Precinct transport triggers are dealt with in the technical reports and conditions, including the 68 initial dwellings.

6.7 Site visit

No site visit has been undertaken.

6.8 Overall position

Transport Performance and Optimisation does not oppose the application in principle but does not support it on the information available. The road width departures and the school frontage layout are critical information gaps (section 7). Most other matters can be resolved through the conditions in section 9. Council does not support omitting the Whitford Bypass unless the traffic-based trigger (N1) is imposed.

7.0 Section 67 Information Gap

At the time of writing this Memo we have identified the following information gaps:

Description of Missing Information

7.1 **Road width departures (IR 5).** A justification and safety assessment for each road width departure listed in the Initial Review, covering bus operation, servicing, street furniture, footpath and cycle widths and on-street parking, and an assessment of the Sub-precinct D collector designed as a local road without cycle provision (Attach 0B, p82). Risk: High.

7.2 **School frontage road layout (IR 6, 28).** A concept layout, with vehicle tracking for a 13.5 m bus, showing that school bus stops, turning, layover and drop-off can be accommodated within the school sites or the road reserve of the school frontage roads, including how the primary school on Road 02 will be served. Risk: Medium to High.

7.3 **Feasibility of safe layouts at Sites A, B, D and E (IR 10, 11, 32).** Confirmation that pedestrian and cycle crossings will be provided, and that the Austroads entry path radius failures at Sites B, D and E (sheets 3506, 3516, 3525) can be resolved or the layouts shown to be safe, within the land available at each site. Confirmation of the design speed at Site A, with current operating speed data for Whitford-Maraetai Road between Road 20 and the Beachlands Road roundabout, and confirmation that the same speed has been used in the Site A, Road 20 and Trig Road assessments. Risk: Medium to High.

7.4 **Ferry demand information (IR 29).** Existing two hour AM peak patronage, remaining capacity and forecast demand at each ferry trigger, as required by I458.9(4)(e). Risk: Medium.

Why is this Information Essential?

Road widths (7.1). The cross sections would be approved plans, and the road reserve widths are fixed by the subdivision. A condition cannot add width the scheme plans do not allow for, so the narrower roads cannot be corrected at Engineering Approval. There is currently no safety assessment on which Auckland Council or the Panel can rely.

School frontages (7.2). The school frontage roads are designed and built before Condition 119A applies. If bus and drop-off space does not fit within the road reserve, it cannot be added later by condition.

External intersections (7.3). The intersection sites are constrained by third party land. If safe layouts cannot be achieved within the land available, the upgrades the application relies on may not be

deliverable as safe intersections for drivers or people walking and cycling, and I458.8.2(3)(e) could not be met. The detailed design can be left to conditions once feasibility is shown.
Ferry (7.4). The Precinct requires this information for applications that infringe the ferry capacity thresholds. Without it, Transport Performance and Optimisation cannot confirm whether ferry capacity keeps pace with development, although the effect beyond 1,900 dwellings could be managed by a reassessment condition.

Other matters raised in the Initial Review that remain outstanding, including the Whitford Bypass trip generation inputs, the primary pedestrian access on JOALs, the basement visibility splays and Road 20, are not listed here because Transport Performance and Optimisation considers they can be managed through conditions. More minor points from the s67 check include the 67 m queue on the Site A north approach against the turning lane length, the 1.5 m footpath at Site B (1.8 m is used elsewhere) and the Jack Lachlan Drive carriageway west of the creek (10 m in the ITA against 8.4 m on SK88). The table below summarises the gaps.

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
7.1 Justification and safety assessment for road width departures (IR 5)	A justification and safety assessment for each departure listed in the Initial Review, covering bus operation, servicing, street furniture, footpath and cycle widths and on-street parking. An assessment of the Sub-precinct D collector designed as a local road without cycle provision (Attach 0B, p82).	The cross sections are approved plans and widths are fixed by subdivision. Transport Performance and Optimisation cannot confirm the narrower roads will operate safely.	High. Cannot be corrected by condition or at Engineering Approval.
7.2 School frontage road layout (IR 6, 28)	A concept layout with vehicle tracking for a 13.5 m bus showing school bus stops, turning, layover and drop-off within the school sites or the road reserve of the school frontage roads, including how the primary school on Road 02 is served.	Transport Performance and Optimisation cannot confirm school buses and drop-off can operate without blocking the frontage roads (791 vph AM peak trips).	Medium to High. Frontage roads are built before Condition 119A applies.
7.3 Feasibility of safe layouts at Sites A, B, D and E (IR 10, 11, 32)	Confirmation that crossings can be provided, and the entry path radius failures at Sites B, D and E (sheets 3506, 3516, 3525) resolved or shown to be safe, within the land available. Confirmation of the design speed at Site A, with operating speed data for Whitford-Maraetai Road.	Transport Performance and Optimisation cannot confirm the external upgrades can be built as safe intersections for people walking and cycling, or that I458.8.2(3)(e) is met.	Medium to High. Detailed design can follow by condition once feasibility is shown.

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
7.4 Ferry demand information (IR 29).	Existing two hour AM peak patronage, remaining capacity and forecast demand at each ferry trigger (I458.9(4)(e)).	Transport Performance and Optimisation cannot confirm ferry capacity keeps pace with development beyond 1,900 dwellings.	Medium. Effect could be managed by a reassessment condition.

8.0 Recommendation

Transport Performance and Optimisation does not oppose the Beachlands South application in principle but does not support it on the information currently available.

Transport Performance and Optimisation's support depends on:

(a) the information gaps in section 7 being closed, in particular the road width departures, the school frontage road layout and the pedestrian and cyclist safety matters at the external intersections; and

(b) the condition amendments and new conditions in section 9 being adopted, in particular the traffic-based Whitford Bypass trigger (Condition N1), a maximum dwelling yield (Condition N12), the monitoring and review condition (Condition N14), the amendments to Conditions 117, 119, 119A and 122, and conditions securing the internal staging of collectors, the bus route and active mode links.

9.0 Proposed Conditions

Transport Performance and Optimisation has reviewed the transport conditions in Attach 0C and Appendix 1 (Attach 0C1). Transport Performance and Optimisation accepts Conditions 113, 115, 118, 120, 121 and 123 as drafted, subject to the new conditions below.

Transport Performance and Optimisation recommends the amendments and new conditions set out in the table. The applicant's wording is taken from Attach 0C (25 September 2026). Text added by Transport Performance and Optimisation is shown in red underline, and text deleted by Transport Performance and Optimisation in red strikethrough. New conditions are numbered N1 onwards for reference only.

No.	Condition (Transport Performance and Optimisation changes shown)	Commentary
App. 1	A2515591.00-3530 Jack Lachlan Dr / Whitford Maraetai Rd RBT Upgrade Plan Sheet 1 of 8, Revision ~~A~~B	Sheet 3530 Rev B is the current Site A layout. Drawing 3000 Rev B is marked "For Information" and shares its number with the Roading Overall Layout Plan. SK87 and SK88 are stamped "DRAFT ONLY"

	A2515591.00-3000 Bus Stop Pair Locations, Revision B (to be reissued "For Consent" under a unique drawing number) ~~A2515591.00.SK87 Proposed Jack Lachlan Drive Shared Path Design, Revision A~~ ~~A2515591.00.SK88 Proposed Jack Lachlan Drive Shared Path Design, Revision A~~	and show the path narrowing to 1.5 m. The final design is secured by Condition 122(a). The Technical Documents list is still "To be confirmed".
5	Except as provided for in these conditions, prior to any building being occupied for an individual stage or part of a development that is being progressed the required infrastructure ~~shall~~must be constructed and operational. Upon completion of a stage or part of a development that is being progressed, an updated staging plan must be provided to Council documenting: (a) all previously implemented stages (b) the remaining stages to be completed and the anticipated timeframe for each stage to be completed; and (c) the transport infrastructure to be delivered with the next stage, including roads, bus stops and walking and cycling connections, and any interim provision (such as temporary turning heads or temporary paths) until the permanent connection is built.	Condition 4 allows stages in "any stage order", and "required infrastructure" is not defined. The addition makes the transport content of each update visible to Council. Delivery of the collector network is secured by new Condition N10.
96A	Prior to the issue of building consent for any dwelling or building ~~on an individual residential lot~~ requiring a new vehicle crossing or basement access ramp, the Consent Holder must submit plans to Council for certification demonstrating that: (a) the vehicle crossing complies with AUP E27 width, number and separation requirements; (b) the vehicle crossing achieves the required separation ~~form~~from intersections; (c) any basement access ramp complies with the applicable AUP E27 gradient, transition and safety platform requirements; ~~and~~ (d) pedestrian and cyclist visibility at the access is achieved; and (e) parking spaces and manoeuvring areas, including vehicle tracking where a garage opens directly onto a JOAL, and parking space gradients comply with AUP(OP) Standard E27.6.3.	"Submit" should become certification. The applicant's s67 response says long sections will be provided for any building with basement access, but the condition only covers individual residential lots. Also corrects a typo.

114	Prior to occupation of any dwelling within each stage of the development or part of the development proposed to be progressed, the bicycle parking requirements specified in AUP(OP) ~~standard E27.6.2(5)~~ Table E27.6.2.5, including on-site secure and visitor bicycle parking, must be provided. The bicycle parking ~~shall~~must be designed and provided in accordance with AUP(OP) ~~standard E27.6.2(5)~~ Standard E27.6.2.4(6).	Aligns the condition with the provisions relied on in the s67 response.
116	Prior to the occupation of any building within a stage of the development or part of the development proposed to be progressed, all internal roading, intersections, accessways, footpaths, cycleways, bus stops and associated transport infrastructure required to serve that stage or part-stage must be completed for that stage or part of the development proposed to be progressed. The bus stops required to serve a stage are those on roads within or fronting that stage, and each must include kerbs, hardstand, a shelter and footpath connections.	Clarifies bus stop provision requirements.
117	In accordance with Special Information Requirement I458.9(5) a Transport Monitoring Report ~~shall~~must be prepared by a suitably qualified transport engineer for every 500 dwellings or residential lots cumulatively within the precinct (e.g., 500, 1,000, 1,500, ~~and 1,900~~2,000). At each of these thresholds, a Transport Monitoring Report must be submitted to Council for certification within 3 months of the threshold being reached. In addition to the matters in I458.9(5), each report must include the traffic survey and forecast required by Condition N1.	The listed thresholds end at 1,900, whereas I458.9(5) says "and so on". The report needs certification, and must measure the flow the applicant relies on in place of the Whitford Bypass (see N1).
119	In accordance with Special Information Requirement I458.9(9) a Transport Design Report is required for any new road intersection or upgrading of existing road intersection identified on Precinct Plan 6, and must be submitted to Council for certification prior to ~~construction commencing on these intersections~~Engineering Plan Approval for those intersections. The report must include: (a) pedestrian and cycle crossing provision and cycle priority; (b) bus stops and bus vehicle tracking, where the intersection is on the bus route; (c) the design speed, with justification against both the posted speed limit and surveyed operating speeds; and	As drafted, the report has no content and is not certified, so it cannot be relied on to resolve the matters Transport Performance and Optimisation has deferred to detailed design.

	(d) the findings of the road safety audit required by Condition N2 and the designer's response.	
119A	Prior to Engineering Plan Approval for any road fronting a school site, the Consent Holder must submit to Council for certification a school frontage layout plan showing school bus stops, bus turning and layover areas, pick-up and drop-off areas and pedestrian crossing points, with vehicle tracking for a 13.5 m bus. Pick-up and drop-off areas and any bus layover areas must be accommodated within the school site. The road and internal access arrangements must be designed and constructed in accordance with the certified plan. The layout plan may show interim works where a road is built before the school is established, provided the vested road reserve can accommodate the ultimate layout and the interim works do not add undue cost to the future school works. Prior to occupation of any school activity, the Consent Holder must submit a School Transport Management Plan to Council for certification, prepared by a suitably qualified transport specialist and following consultation with ~~Auckland Transport~~ the school operator and the Ministry of Education where applicable. [...] (i) monitoring and review of the plan following commencement of school operation, at least annually for the first three years of operation, with the results provided to Council. [...] Where any school activity is to be operated by a party other than the Consent Holder, the Consent Holder must, before transferring or leasing the school site, register a consent notice on the record of title requiring that no school activity is occupied until a School Transport Management Plan has been certified under this condition, and that the certified plan is implemented and maintained for as long as the school activity operates. The Consent Holder must also give the school operator a copy of this condition and the certified plans and confirm this to Council in writing. The consent notice must also require the school operator to complete any works shown on the certified school frontage layout plan that were not completed through the subdivision.	The school frontage roads are built in earlier stages, so bus and drop-off space must be fixed before Engineering Approval, not before the school opens. The applicant's reference to consulting Auckland Transport is deleted because Council certifies the plan, and consultation with the school operator and the Ministry of Education stays "where applicable". Unchanged parts of the condition are shown as [...]. The consent notice secures compliance if the school site is transferred or leased. The conditions normally applied to designations for new state schools and to consents for new private schools should also be applied to the proposed schools.

121A	Prior to the issue of building consent for any building containing a basement or ground-level vehicle access for buildings within CM3, VC1, VC3 and VC4, the Consent Holder must submit to Council for certification redesigned complying plans demonstrating that either: (a) the relevant vehicle access achieves the pedestrian and cyclist visibility splays required by Auckland Transport Practice Note 07 or any equivalent ~~Auckland Transport~~Auckland Council standard applicable at the time of detailed design; or (b) the relevant access has been redesigned or relocated so that the required visibility splays are achieved. Where a visibility splay for a vehicle crossing in the Marina, Coastal or Employment precincts relies on an adjacent lot corner, any fence, wall or planting within the splay must be visually permeable and maintained as such, secured by consent notice.	Transport Performance and Optimisation supports the new condition but plans should be certified, not just submitted. The ITA relies on permeable fencing on lot corners (p119), which no condition secures.
122	The following Road upgrades as shown on Engineering Plans A2515591-3500 ~~Rev A~~ to A2515591-3625 ~~Rev A~~ (inclusive), at the revisions listed in Appendix 1, by Harrison Grierson and Ferry Capacity upgrades must be carried out and be operational in accordance with the timing outlined below: (a) Prior to the occupation of any of the lots or dwellings within Stage 1 (including Stage 1A and Stage 1B): (i) Site A on Precinct Plan 6: Upgrade of Whitford-Maraetai Road/Jack Lachlan Drive intersection, including the active mode facilities shown on drawing A2515591.00-3530 Rev B and a pedestrian and cycle crossing of Whitford-Maraetai Road, the design of which must be approved by Council; [...] (b) Prior to the occupation of any dwellings or residential lots (except up to 68 residential lots delivered in accordance with (a)): [...] Site (B) on Precinct Plan 6: Upgrade of Whitford Park Road / Whitford Road / Whitford-Maraetai Road roundabout to provide an additional traffic lane on the Whitford Road (western) approach and an additional lane on the Whitford-Maraetai Road	Sheet 3530 is now Rev B. Site A has no crossing of Whitford-Maraetai Road, and the ITA describes pedestrian works in Whitford Village as "integral" to Site B (p76), but neither is secured. Row (b) corrects a typo. Site C: see Condition N16.

	(eastern) approach, and pedestrian improvements in Whitford Village including crossing points on the roundabout approaches; [...] Ferry Upgrades, row (b): Prior to the occupation of more than 500 dwellings or residential lots Ferry Upgrades, row (e): Replace with Condition N13 (ferry capacity reassessment). The applicant says one is proposed (Attach 0A.1 para 10(d)), but none is in Attach 0C.	
184	The engineering plans must include but not be limited to the following information: [...] (c) Vehicle tracking for all intersections, cul-de-sacs, turning heads and mid-block horizontal curves according to the Auckland Transport Engineering Standards (Design Code Urban and Rural Roadway Design).	Cul-de-sac tracking was provided only as screenshots in the s67 table.
N1	**Whitford-Maraetai Road traffic trigger** (a) Each Transport Monitoring Report required by Condition 117 must include: (i) a survey of the AM peak hour traffic flow on the Whitford-Maraetai Road approach to the Whitford Road / Whitford Park Road / Whitford-Maraetai Road roundabout, counted on at least three weekdays (Tuesday to Thursday) during school term; and (ii) a forecast of that flow at the next 500 dwelling threshold, using the methodology in the ITA with updated traffic generation and distribution assumptions that align with the survey results. (b) If the surveyed flow, or the forecast flow at the next threshold, exceeds 1,600 vehicles per hour, no further dwellings or residential lots may be occupied until either: (i) the Whitford Bypass (Precinct Plan 6, Site F) is constructed and operational; or (ii) alternative mitigation has been certified by Council as addressing the effects the Bypass is intended to manage.	Table I458.6.3.1 row (e) requires the Bypass beyond 1,900 dwellings. The applicant relies instead on the PC88 reference flow of about 1,600 vph, with a forecast of 1,589 vph (ITA Table 8-7). This condition tests that forecast as the development is built out, and it operates as a condition precedent.
N2	**Road safety audits** Prior to Engineering Plan Approval for the works at Sites A, B, D and E, Intersections 1 to 5 and the Road	The applicant says road safety audits will be done, but no condition secures them. Sheets

	20 intersection, the Consent Holder must obtain an independent detailed design road safety audit in accordance with current NZTA road safety audit guidance, and provide the audit, the designer's responses and the client decisions to Council. The audits for Sites B, D and E must address the entry path radius at each approach.	3506, 3516 and 3525 show entry path radius failures at Sites B, E and D.
N3	**JOAL speed management and pedestrian access** Prior to occupation of any dwelling served by a JOAL listed in Section 7.13 of the ITA, speed management measures complying with Table E27.6.4.3.3 of the AUP(OP) must be installed on that JOAL within 10 m of the road boundary and at intervals of no more than 30 m, as shown on plans certified by Council. On JOALs serving dwellings without road frontage, the primary pedestrian access must be located on the side serving those dwellings.	The ITA says "a condition has been prepared" (pp117 to 118), but none is in Attach 0C. Engineering Approval may not apply to private JOALs.
N4	**Bus-capable roads** All roads on the bus route shown in ITA Figure 7-4 must have a minimum carriageway width of 7 m. Prior to Engineering Plan Approval for any of those roads, the Consent Holder must provide vehicle tracking for the 13.5 m urban bus check vehicle at every intersection and horizontal curve on that road, for approval by Council.	The s67 response says bus-capable design "can be provided by way of a consent condition", but none is in Attach 0C.
N5	**Cycle priority on Jack Lachlan Drive** Where the bi-directional cycleway on Jack Lachlan Drive crosses a side road, JOAL or vehicle crossing, a raised priority crossing, or an alternative treatment approved by Council, must be provided. The design must be approved by Council at Engineering Plan Approval, and the crossing must be constructed with the relevant section of cycleway under Condition 122.	Drawings 3045 and 3046 show the cycleway crossing side roads with no priority treatment.
N6	**Temporary turning heads** Where a road ends at a stage boundary before its extension is constructed, the Consent Holder must provide a temporary turning head before any dwelling or building served by that road is occupied. The turning head must accommodate the design vehicle for that road under Condition 184(c) and, as a minimum, Council's standard refuse collection vehicle and a FENZ fire appliance, as shown by vehicle tracking approved at Engineering Plan Approval. When the road is extended, the turning head must be removed and the road reinstated.	Requested for Location 5 and other stage boundaries (IR 12). Not secured.

N7	**Road 20 intersection** The Road 20 / Whitford-Maraetai Road intersection must be constructed in accordance with drawing A2515591.00-3301 Rev C, including the solid median island, and be operational before Road 20 is opened to traffic.	The Road 20 layout is not listed in Condition 122 and has no timing.
N8	**Consent notices: access and JOALs** (a) A consent notice must be registered on the record of title of each residential lot fronting a collector road with a cycleway, preventing direct vehicle access to that road. (b) The Residents Society consent notice must require all JOALs to be kept clear of parked vehicles at all times, supported by signage or road marking.	Avoids repeated vehicle crossings over the cycleway, and secures the s67 response's reliance on JOALs "remaining clear for vehicle movements at all times".
N9	**Road cross sections** The road cross sections on drawings A2515591.00-3250 to 3256 fix the road reserve, carriageway, cycleway and footpath widths for each road type. Kerb types, berm treatments, street furniture, tree pits and other details may be refined at Engineering Plan Approval with Council's agreement, provided those widths are not reduced.	Makes clear what is fixed at consent and what is left to Engineering Approval. This is subject to the width departures being resolved first (section 7, gap 7.1).
N10	**Delivery of the transport network by stage** Prior to the occupation of any dwelling or building within a stage, the collector roads, bus route roads and bus stops, and walking and cycling links shown within or fronting that stage on the Proposed Staging Plans (A2515591.00-1000 Rev B and A2515591.00-1001 Rev B) must be constructed and operational, together with any connection needed to link them to the existing road network or to a completed stage.	Conditions 4, 5 and 116 do not tie the collector network, bus route or active mode links to any stage or dwelling number. Note, Drawings 1000 and 1001 are marked "For Information".
N11	**Public access easement** Prior to the issue of a s224(c) certificate for the stage containing the central active mode link to Jack Lachlan Drive, an easement in gross in favour of Auckland Council must be registered over that link, providing 24-hour public access for walking and cycling (1.8m minimum width and physically separated).	The link relies on a public access easement over a private JOAL. The existing easements condition only covers easements shown on the scheme plans.
N12	**Maximum dwelling yield**	The application seeks approximately 2,000 dwellings and the ITA assesses up to 2,000, but

	The total number of dwellings and vacant residential lots enabled by this consent must not exceed 2,000.	no condition caps the yield. Part 4 of the application previously stated 2,700. The ITA indicates the 1,600 vph threshold is reached at about 2,037 dwellings (ITA p137). A cap of 2,000 matches the assessed yield. Any increase would need a variation supported by an updated transport assessment.
N13	**Ferry capacity reassessment** (a) Before more than 1,500 dwellings or residential lots are occupied, the Consent Holder must submit to Council for certification a Ferry Capacity Assessment prepared by a suitably qualified transport engineer. The assessment must include: (i) surveyed two hour AM peak patronage at Pine Harbour, counted on at least three weekdays (Tuesday to Thursday) during school term, and the remaining capacity; (ii) forecast ferry demand at each 500 dwelling threshold through to full development; (iii) park and ride demand and on-street parking demand on Jack Lachlan Drive, and any overflow onto the cycleway; and (iv) any measures required to manage a shortfall in ferry or parking capacity. (b) No more than 1,900 dwellings or residential lots may be occupied until either: (i) the assessment shows that ferry capacity will meet forecast demand at each remaining threshold; or (ii) the measures identified in (a)(iv) are in place, or alternative mitigation has been certified by Council as addressing the shortfall.	Table I458.6.3.1 requires capacity for 1,150 passengers before more than 1,900 dwellings are occupied. The ITA and Planning Assessment say this will not be met and that a reassessment condition is proposed (Attach 0A.1 para 10(d)), but none is in Attach 0C. This condition provides it, and gives effect to I458.9(4)(e). Triggering the assessment at 1,500 dwellings leaves time to act before 1,900. A consent condition cannot require Council to provide ferry services, so the hold point in (b) is what secures the outcome.
N14	**Transport monitoring and review** (a) In addition to the matters required by Conditions 117 and N1, each Transport Monitoring Report must address the special information requirements in I458.9 and include:	The Precinct relies on its special information requirements (I458.9) to test development against its transport assumptions, but Condition 117 refers only to I458.9(5). This condition gives an evidence base, from actual trip generation and the timing of land uses, for any future change to the

	(i) surveyed trip generation and mode share for the activities occupied at the time, compared with the ITA assumptions; (ii) the land uses established to date and those expected before the next threshold; and (iii) the operation of the intersections at Sites A to E and the Whitford roundabout, and public transport and ferry use. (b) Under s128(1)(a) of the RMA, Council may review the transport conditions of this consent within six months of certifying each Transport Monitoring Report, to deal with any adverse transport effect the report identifies, including the timing of the Whitford Bypass.	upgrade thresholds, including the stage at which the Whitford Bypass is needed.
N15	**Site A design speed** The Whitford-Maraetai Road / Jack Lachlan Drive roundabout (Site A) must be designed so that vehicles travel through the roundabout at no more than 50 km/h, with approaches designed to bring vehicles safely down from the posted speed limit at the time of design. The Transport Design Report required by Condition 119 must demonstrate this using surveyed operating speeds.	Sheet 3530 Rev B uses a 60 kph design speed, the s67 response says Site A is designed for 80 kph, and the posted limit is 80 kph (IR 32). A 50 km/h speed through the roundabout supports the crossing required by Condition 122(a)(i) and any future speed limit reduction, which is decided separately under the Setting of Speed Limits Rule 2024.
N16	**Crossing near Trig Road West** If the Site C upgrade (Whitford-Maraetai Road / Trig Road West) on Precinct Plan 6 is not constructed, a pedestrian and cycle crossing of Whitford-Maraetai Road must be provided at or near that intersection, in a location and form approved by Council, prior to the occupation of more than 1,200 dwellings or residential lots.	The applicant says existing pedestrian demand is negligible, but Beachlands South will add traffic at all times of day, which makes crossing harder for existing users such as the Whitford Tennis Club. The applicant has said it can include crossing measures near Trig Road if Transport Performance and Optimisation advises. This condition secures them. Trigger aligns with the Site C row in Table I458.6.3.1.
Advice notes	1. Other approvals are required outside this consent, including encroachment licences from Auckland Council for any private utilities located within roads to be vested. 2. Nothing in this consent varies the binding agreement between the developer and Auckland	Raised as advice notes in the Initial Review. The applicant responded "Noted" to the first and did not respond to the second. The existing general advice note on other consents does not mention encroachment licences.

	Council. Compliance with that agreement remains necessary. 3. The Transport Design Manual (TDM) sets out the engineering design requirements for works within the transport corridor. Please note, any future works within an Auckland Council transport corridor, or land to vest with Auckland Council will need to be designed to comply with the Auckland Code of Practice for Land Development and Subdivision Chapter 3: Transport (ATCoP) or latest Transport Technical Design Manual (TDM). Design which cannot be executed in accordance with the TDM will require a Departure from Standards, which is at the discretion of Auckland Council's appropriate delegation to approve.	

10.0 Supporting Documents

Attached: the Initial Review prepared by Auckland Transport (now part of Auckland Council), "Beachlands South – Transport Information Requirements Review" (14 August 2026), provided to the applicant as the transport s67 information request. IR numbers in this memo refer to the items in that document.

Beachlands South – Transport Information Requirements Review

Project	Beachlands South – 110 Jack Lachlan Drive and 620, 712, 758 and 770 Whitford-Maraetai Road
Application	Fast-track Approvals Act substantive application, lodged 29 June 2026
Subject	Transport information required
Prepared by	Auckland Transport
Date	14/08/2026

1. Purpose

This document consolidates the transport review of the Beachlands South substantive application lodged under the Fast-track Approvals Act 2024 and sets out the information required from the applicant in order for the transport effects of the proposal and the proposed mitigation to be fully assessed.

Matters where the lodged documents are considered to respond adequately to the pre-lodgement and specialist feedback, stormwater and flood risk, rural to urban road transitions, blue-green and integrated design, safety and CPTED, and the overall structure of development staging have not been carried forward into requests.

2. Key actions

The requests are ordered so that the matters requiring attention first appear in Part A. In summary, the applicant is asked to provide:

- confirmation of the residential yield for which approval is sought, noting the application documents describe both approximately 2,700 and up to 2,000 dwellings (item 1);
- further justification and sensitivity testing of the trip generation, externalisation and work from home assumptions, which determine whether the 1,600 vph Whitford Bypass threshold is exceeded, together with the underlying 2025 traffic count data (item 2);
- a traffic distribution diagram showing how development traffic has been assigned to the network, including the proportion assumed to use Road 20 (item 3);
- the information needed to consider the proposed removal of the Precinct Plan 6 Site C upgrade, and the applicant's view on crossing facilities in lieu of signalisation (item 4);
- justification and safety assessment for each departure from Auckland Transport and Auckland Council minimum road widths (item 5);
- a school transport assessment, noting the schools are proposed through land use consent rather than designation (item 6);
- a complete assessment and revised design of primary pedestrian access, which does not currently meet Standard E27.6.6 as a permitted activity (item 7); and
- a more detailed assessment of visibility splay shortfalls, which may not be capable of resolution after consent is granted where the obstruction is a proposed building (item 8).

Part A also seeks confirmation that delivery of the external upgrades, collector links, active mode connections and bus infrastructure is secured against the Precinct triggers and the binding agreement (item 9). Part B sets out the remaining requests, which concern design, safety and delivery detail. The

distinction is one of sequence and emphasis; all of the requests are considered necessary for a full assessment of transport effects.

3. Documents reviewed

- Attachment 8 – Integrated Transportation Assessment, Hughes Traffic and Transportation, dated 24 June 2026
- Attachment 2.8 – Beachlands South Streetscape Strategy (Revision A), Jasmax / Studio Pacific Architecture
- Attachment 3 – Beachlands South Open Space Strategy (Revision A), Jasmax
- Attachment 4 – Urban Design Assessment (Revision A), Jasmax
- Attachment 9F – Stormwater Management Plan
- Attachment 9R – Roading Plans 1 to 4, Harrison Grierson, dated May 2026
- Attachment 0C – Proposed Conditions of Consent, and Appendix 1 to Conditions (staging plans)
- Attachments 9ZD and 9ZE – Scheme Plans 1 and 2
- Attachment 5 – Beachlands South Precinct Sustainability Assessment, Stantec
- Fast-track Approvals substantive application form, Unio Environmental Limited, dated 26 June 2026

4. Part A – Key matters

No.	Application document and reference	Information requested
1	ITA Section 6 / Substantive Application Part 4 (page 20) – development yield	Substantive Application Part 4 describes approximately 2,700 residential dwellings, while ITA Section 6 assesses up to 2,000 dwellings and the ITA staging programme reaches 1,965 dwellings by 2041. **Please confirm** the residential yield for which approval is sought, and confirm that the transport assessment, trip generation, intersection modelling and infrastructure triggers have been prepared on that basis. If the yield exceeds that assessed in the ITA, the transport assessment will need to be updated accordingly.
2	ITA Sections 8.3, 8.6 and 8.8 – trip generation assumptions and the Whitford Bypass threshold	The ITA forecasts a 2041 southbound AM peak flow on Whitford-Maraetai Road of 1,589 vph, below the 1,600 vph threshold that triggers the Whitford Bypass. That outcome depends on the cumulative effect of several assumptions that reduce forecast trip generation, and small changes to any of them place the flow above the threshold. The applicant's own sensitivity test, reducing the work from home component from 15% to 10%, produces 1,604 vph. A two year delay in completion, an increase in the external proportion of generated traffic from 45% to

No.	Application document and reference	Information requested
		47%, or a reduction in the factor applied to existing traffic leaving Beachlands from 7.5% to 6.5% would each have the same effect. The 6.16% hybrid worker assumption is also questioned. Hybrid workers are widely observed to work from home on Mondays and Fridays rather than Tuesday to Thursday, and Tuesday to Thursday flows are the more appropriate basis for assessing effects. If the Tuesday to Thursday hybrid proportion were closer to 2%, the threshold would be exceeded. **Please provide** further justification for the 6.16% figure and the statistical probability calculations from which it is derived, including the extent to which it reflects evidence that the incidence of working from home has fallen slightly since the 2023 Census. **Please provide** further sensitivity testing illustrating the cumulative effect of overestimating the trip generation reduction factors, including a forecast that retains the PC88 assumptions for externalisation. It is also usual to assess network performance for at least 10 years beyond completion, to confirm capacity for further growth before new infrastructure is required. The review requirements within the Precinct plan may provide a basis for revisiting conditions if the information provided supports this. **Please provide** the details of the 2025 traffic count on which the analysis relies, including the date, duration and location of the count, vehicle classifications and turning counts. No such information has been provided.
3	ITA Section 8.9 – traffic distribution and assignment	It is not clear how development traffic has been distributed onto the network. The northbound flow on Whitford-Maraetai Road approaching the Jack Lachlan Drive intersection is forecast to reduce as a result of the development, which suggests that all development generated traffic has been assumed to enter Beachlands South via Road 20. **Please provide** a traffic distribution diagram showing how generated traffic has been assigned to the network, inbound and outbound, for both AM and PM peaks, including all external intersections and the resulting link flows with background traffic. **Please confirm** the proportion of development generated traffic arriving from the south that is expected to enter the site via Road 20.
4	ITA Section 8.8 – Precinct Plan 6 Site C upgrade (Whitford-Maraetai Road / Trig Road)	The ITA concludes that the Site C upgrade is no longer required, departing from the transport infrastructure package anticipated by the Beachlands South Precinct. The conclusion relies on the revised yields, externalisation and work from home assumptions addressed in item 2. Auckland Transport's comments on the appropriateness of removing this upgrade will be made at a later stage of the process; the requests

No.	Application document and reference	Information requested
		below are directed at obtaining the information needed to reach that view. **Please provide** the basis for the revised trip generation and externalisation assumptions as they apply specifically to the Site C testing, and modelling that demonstrates the intersection performance with and without the upgrade in place. **Please provide** the applicant's view on pedestrian and cycle crossing facilities at this location in lieu of the signal upgrade, and what those facilities might entail. There are existing and future active mode demands to cross Whitford-Maraetai Road here, which may be affected by increases in traffic, including outside peak periods.
5	Attachment 2.8 Beachlands South Streetscape Strategy / ITA Section 7.3 – collector and local road widths	A number of proposed collector and local road widths, and some footpath and cycle facility widths, are below Auckland Transport and Auckland Council minimum standards. The ITA provides justification based on urban design outcomes, active mode emphasis and site constraints. **Please provide** justification and a safety assessment for each departure, specifically addressing Street Type 1.1.6 (2.85 m is insufficient to accommodate street furniture and through path functions, noting the 24 m Main Street Collector standard in AC CPLDS Chapter 3, Transport 3.2.3.1), Street Type 1.1.8 Village Secondary (bus capability, service and delivery vehicle access, and traffic lane widths), Street Type 1.1.9 (17.8 m against the standard 18 m), Street Type 1.1.10 Local Street Industrial (approximately 20 m is generally required for efficient vehicle crossings and lot access), and Street Type 1.1.11 (reduction from 18 m to 16.6 m, and its dependence on subdivision layout, vehicle access and on-street parking effects), together with the 20 m Village Centre collector proposed in place of 23 m and the reduced width sections of Jack Lachlan Drive. Justification should address bus operation, servicing, street furniture, footpath and cycle facility widths, on-street parking effects, and safety outcomes.
6	ITA Section 7.3 – schools access and transport effects	The schools are proposed to be established through land use consent rather than designation, so the transport procedures usually secured through a designation need to be addressed through this process. The ITA addresses school collector cross sections but no school specific transport assessment was identified. **Please provide** a school transport assessment addressing school bus access, circulation, turning and layover (including for a secondary school serving a wider rural catchment); drop-off and pick-up arrangements and parking management on school related roads;

No.	Application document and reference	Information requested
		pedestrian and cycle crossing provision on school frontages; and the location of all school access points by mode. **Please confirm** the outcome of engagement with the Ministry of Education on school access points, and how designation style transport conditions, for example a school travel plan and a transport management plan, are proposed to be replicated through the land use consent, including any effects of the co-location of the primary and secondary schools.
7	ITA Section 7.12 – primary pedestrian access	The assessment of primary pedestrian access (PPA) does not appear to be complete, focusing primarily on apartment building access, yet the ITA states that PPA requirements are complied with across the whole proposal. The application includes a number of JOALs where dwellings are proposed as part of this application rather than vacant lots. The PPA to these dwellings is crossed by vehicles, sometimes on the opposite side of the JOAL to the dwellings, and the roading plans show all JOAL PPAs separated by mountable kerb only. That design does not meet Standard E27.6.6 of the AUP as a permitted activity. For some JOALs the PPA is also proposed on the side where future dwellings will have frontage to the public road, rather than the side where the only access is via the JOAL. **Please provide** a full assessment of all PPAs and revise the design of the PPAs to align with the requirements of the standard.
8	ITA Section 7.15 – visibility splays	A number of basement vehicle accesses without adequate visibility splays are flagged in the ITA, some on roads with cycle facilities, and the ITA states these infringements will be resolved through subsequent design stages. The extent to which the splays are restricted is not clear, and where the obstruction is a proposed building, it is unclear how the matter could be resolved after consent is granted. **Please provide** a more detailed assessment of the visibility splay shortfalls and propose mitigation to address any significant shortfalls, particularly near cycleways.
9	Attachment 0C Proposed Conditions and Appendix 1 to Conditions – staging, triggers and delivery	Proposed conditions link infrastructure delivery to staging and dwelling thresholds, and the staging plans indicate early delivery of the primary collector network. **Please confirm** that delivery of the external intersection upgrades, the primary collector links (particularly those south of the Village Centre), the active mode connections and the bus infrastructure is secured by conditions tied to identified stage or dwelling triggers and confirm that the proposed conditions do not alter or defer the development triggers established by the Precinct.

No.	Application document and reference	Information requested
		Please identify each respect in which the proposed staging and infrastructure package departs from the binding agreement between the developer, Auckland Council and Auckland Transport, and how each departure is proposed to be addressed.

5. Part B – Design, safety and delivery matters

No.	Application document and reference	Information requested
10	ITA Section 7.7 / Attachment 9R Roading 1 (page 18) / Precinct provision I458.8.2(3)(e) – Jack Lachlan Drive / Whitford-Maraetai Road roundabout (Site A)	The revised roundabout design responds to third party access constraints and removes the separated southbound through lane shown in the PC88 concept. It remains unclear whether pedestrian and cycle crossing facilities are provided in accordance with the Precinct provisions and Auckland Transport's feedback on pedestrian connectivity at this location. **Please confirm** the pedestrian and cycle crossing facilities proposed on each approach, demonstrate how these give effect to I458.8.2(3)(e), and where facilities are not proposed, explain how existing and future pedestrian demand across Whitford-Maraetai Road will be safely accommodated. **Please confirm** that it is feasible to extend the proposed footpath shown on Roading sheet 2 past the kerb and channel on the Whitford-Maraetai Road approach to the roundabout.
11	ITA Section 7.7 – external roundabout upgrades (Sites B, D and E)	Appendix 2 (Stage 2) shows two-lane entries at the Whitford Roundabout (Site B) and the Somerville Roundabout (Site E). **Please provide** justification for the two-lane entries at these roundabouts, including whether protected left turn (slip) lanes would provide a safer outcome for pedestrians and cyclists, and confirm that the proposed geometry remains consistent with the upgrade concepts anticipated by the Precinct. **Please confirm** large vehicle tracking through each external roundabout for the design vehicles adopted, and that SIDRA analysis, road safety audit and Engineering Approval will apply to the final layouts. Where partial widening treatments are proposed, please explain the basis for the extent of widening shown.
12	ITA Sections 7.2 and 7.3 – Jack Lachlan Drive	Auckland Transport sought refinements at Intersections 1 to 3, including boundary adjustments to achieve safe geometry, raised safety concerns

No.	Application document and reference	Information requested
	Intersections 1 to 5	regarding staggered movements at Intersection 4 prior to extension of the collector road to Whitford-Maraetai Road, and identified the need for interim turning provision at Location 5 if the collector extensions are staged. No specific response to these matters was identified in the ITA. **Please respond** to each matter, including any boundary or geometry adjustments proposed at Intersections 1 to 3, an assessment of the interim operation and safety of Intersection 4 prior to the collector road extension, and the interim turning provision proposed at Intersection 5.
13	ITA Section 7.2 / Precinct provision I458.8.2(3)(e) – cycle priority crossings on Jack Lachlan Drive	Auckland Transport sought priority crossing treatment at JL1, two-way cycle crossings across the southern legs of all collector road intersections with Jack Lachlan Drive, and signalisation of the Kahawairahi Drive / Jack Lachlan Drive intersection. **Please confirm**, for JL1 and each collector road intersection with Jack Lachlan Drive, the crossing treatment proposed, whether cyclists and pedestrians hold priority, and how continuity of the bi-directional cycleway is maintained across each side road. **Please also confirm** how the Jack Lachlan Drive cycle facilities integrate with the existing northern greenway and the internal cycle network.
14	ITA Section 7.2 – western end of Jack Lachlan Drive	The ITA states that at the western end of Jack Lachlan Drive a 3 m shared path is proposed, as space constraints affect the feasibility of continuing the bi-directional cycleway. The berm on the southern side rises up, and a number of vehicle crossings climb from the kerb to dwellings that sit above the road. **Please confirm** that it is feasible to build a shared path through this area with an acceptable cross fall that does not require regrading of driveways outside the road reserve. **Please also comment** on whether an off road route to the north of Jack Lachlan Drive could bypass this section and connect with the other parallel pathways.
15	ITA Section 7.2 – active mode links and vesting	The ITA references active mode links to Jack Lachlan Drive and the marina at the northern end of the site. The link to Jack Lachlan Drive appears to travel through a JOAL, which requires specific design and public access consideration. **Please confirm** whether these links are intended to be public and vested, and if so, whether they meet design requirements.
16	ITA Section 7.2 / Attachment 3 Open Space Strategy – staging of the	Auckland Transport identified staging of the walking and cycling network as important given existing constraints on the surrounding network and sought clarity on the timing of pedestrian and cycle connectivity to the ferry terminal.

No.	Application document and reference	Information requested
	walking and cycling network	**Please provide** a staging plan for the walking and cycling network identifying when each key active mode connection is delivered relative to dwelling and stage thresholds and confirm what interim provision applies where a permanent connection is delivered in a later stage. **Please confirm** the staging of the coastal greenway walk and cycle connection to the marina in particular, given it provides a more direct and higher standard connection than the western end of Jack Lachlan Drive. **Please also address** the gap in shared path continuity identified near the school interface and confirm walking and cycling connectivity to and around the future school sites.
17	ITA Section 7.1 / Roading 3 – Road 20 / Whitford-Maraetai Road intersection	The proposed left-in / left-out access at 712 Whitford-Maraetai Road (Road 20) is likely to be an attractive alternative to Jack Lachlan Drive for motorists entering the development from the south, and equally attractive for motorists leaving the site. The temptation to turn right out of Road 20, or to turn left and undertake a U-turn, will be substantial. Demand to turn left from Road 20 to travel north is likely to be limited, and a left-in only arrangement may be a safer outcome. **Please explain** how U-turns would be prevented, and whether a left-in only control, with no exit onto Whitford-Maraetai Road, would still provide the network resilience outcomes sought. No design for this intersection is included in the Roading 3 plan set. **Please provide** a plan and tracking assessment consistent with the other intersections.
18	Roading Plans – right turn provision on Jack Lachlan Drive	**Please confirm** whether a right turn slot from Jack Lachlan Drive into Road 24 (the business road) is proposed, and whether right turn slots are proposed at Karo Road and Mahutonga Avenue. If so, please provide concept plans.
19	ITA Section 7.3 – cul-de-sacs and turning heads	Limited information is provided regarding the proposed public road cul-de-sacs and turning heads. **Please confirm** that the proposed road reserve area at the turning heads provides adequate space for a compliant standard design and provide vehicle tracking as required.
20	ITA Section 7.8 – individual lot access and basement ramps	The application includes individual residential lot development, being standalone, terrace and semi-detached dwellings, with associated vehicle access. The assessment of vehicle crossing widths, separation and number in Section 7.8 does not include these individual lot vehicle crossings.

No.	Application document and reference	Information requested
		Please provide a full assessment of all vehicle crossings proposed, noting that the density and proximity of some of these crossings could create safety issues on the proposed public roads. JOAL long sections are provided, but there is limited detail regarding the basement ramps proposed. **Please provide** an assessment of basement ramp grades, in particular where ramps adjoin proposed public roads. It is not clear that all ramps comply with safety platform requirements.
21	ITA Section 7.9 – accessible parking	The ITA incorrectly states that accessible parking is not required for individual dwellings on individual lots. Accessible parking requirements should be considered for all dwellings proposed, including the standalone and terrace typologies. Accessible parking spaces located in a garage, carport, or on a parking pad directly adjoining the dwelling do not need to be marked as accessible but must meet the dimensional requirements of the standard. **Please provide** a full assessment of accessible parking requirements covering all dwellings proposed.
22	ITA Section 7.9 – parking dimensions and gradients	The ITA only assesses car parking associated with apartment buildings. **Please provide** an assessment of the car parking located in JOALs where no apartment buildings are proposed, and parking associated with individual dwellings, including vehicle tracking where necessary. **Please provide** an assessment of car parking space gradient. There is no reference to this in the ITA, and it is not clear that all JOAL and individual dwelling parking spaces comply with the maximum grade requirements.
23	ITA Section 7.9 – bicycle parking	Bicycle parking for the individual lot dwellings has not been considered. All dwellings without a garage require at least one secure bicycle parking space. **Please assess** bicycle parking requirements for all dwellings and confirm compliance.
24	ITA Section 7.10 – loading and servicing	The ITA notes that loading spaces are proposed for various super lots and that provision complies, but it is not clear where all of these spaces are located on the plans provided. **Please provide** a more detailed assessment of the location and size of the loading spaces proposed and required, demonstrating compliance and that loading activities will not affect the operation of adjacent roads.

No.	Application document and reference	Information requested
		Where loading is proposed in basements, please confirm that the vertical clearance can accommodate the trucks anticipated. **Please provide** an assessment of how waste collection is proposed to occur for the apartment buildings.
25	ITA Section 7.13 – speed management on JOALs	A number of JOALs require speed management, and it is proposed that this be addressed by way of a condition. The general placement and location of speed management on JOALs is typically resolved at resource consent stage. **Please update** the JOAL designs to include the required speed management.
26	ITA Section 7.3 / Attachment 0C Proposed Conditions – bus capable road design	**Please confirm** how the bus capable design of the primary collector network, including kerb to kerb width, geometry, and swept paths for the AT 12.6 m urban bus and school buses, will be secured through detailed design and Engineering Approval, and identify the conditions relied upon. **Please confirm** that likely future bus corridors have been provided for in the road design, including through the Village Centre and toward Pine Harbour, and that public transport operation will not be compromised by on-street parking or cycle facility layouts.
27	ITA Sections 7.2 and 7.3 – bus stops and passenger facilities	The ITA defers bus stop locations to detailed design in consultation with Auckland Transport, and the staging table does not identify when public transport infrastructure will be delivered. **Please provide** indicative bus stop locations across the network, including at the schools, Village Centre and Marina Point; the stop treatment proposed, being in-line or indented, with justification for the approach adopted; provision for shelters and passenger facilities; and the delivery timing or staging triggers for bus infrastructure, including any interim measures required to enable early introduction of bus services.
28	ITA Section 7.3 – school bus provision	**Please provide** vehicle tracking and layout information demonstrating school bus turning, U-turn and layover provision on the school collector roads, and confirm whether bus stop indents or in-line stops are proposed at the school frontages, with reasons for the treatment selected. Provision should be demonstrated on site rather than deferred, noting the operational difficulties experienced where bus infrastructure has been retrofitted at existing schools.
29	ITA Sections 5 and 12.7 – ferry	Jack Lachlan Drive is the primary access route to the Pine Harbour ferry terminal, and existing ferry patronage forms a significant part of the

No.	Application document and reference	Information requested
	capacity, patronage and landside demand	existing transport environment. Auckland Transport has already commissioned higher capacity vessels and berthing improvements, and the developer is contributing toward ferry upgrades under the existing agreement, which is understood to cover the initial trigger levels. **Please quantify and comment on** existing ferry patronage and **confirm** the ferry passenger capacity assumed at each Precinct trigger level and the point at which reassessment of capacity is proposed relative to the staging programme. **Please provide** an assessment of landside demand associated with ferry use, including park and ride demand and on-street parking demand along Jack Lachlan Drive at each stage of development, and confirm how any shortfall or displacement of parking onto the upgraded corridor will be managed.
30	ITA Appendix 1 – SIDRA modelling check	The SIDRA model for the PM peak at the proposed Jack Lachlan Drive / Whitford-Maraetai Road roundabout appears to have reversed the flows for the Whitford-Maraetai Road north approach, using a southbound through flow of 36 vph and a right turn flow of 298 vph, whereas the do minimum model uses a southbound through flow of 312 vph and a right turn flow of 23 vph. **Please check and confirm** the inputs and, if an error is confirmed, provide corrected modelling.
31	ITA Section 7.3 / Attachment 0C Proposed Conditions – design standards and flexibility	**Please confirm** that the final design of roads and intersections will comply with the Auckland Transport Design Manual and the Auckland Council Code of Practice for Land Development and Subdivision, and how refinements to road cross sections, for example kerb widths, will be managed through the Engineering Approval process. **Please confirm** that the indicative streetscape features and cross sections in the ITA and the Streetscape Strategy, and the Appendix 1 Functional Table, are not intended to be fixed as consent conditions, and identify which elements of the road design the applicant considers should be secured by condition.
32	Speed limit Whitford-Maraetai Road	A fast-track proposal to the north of the Jack Lachlan Drive / Whitford-Maraetai Road intersection, together with proposed additional community activities on the land occupied by the pony club, would require a roundabout and would increase pedestrian demand across Whitford-Maraetai Road. The existing 80 km/h speed limit may therefore present safety issues. The applicant is asked to comment on the implications. If the applicant considers the existing speed environment to be closer to 60km/h currently, please provide evidence this is based on.

6. Other matters and advice notes

The following are not information requests but should be reflected in the proposed conditions or noted when conditions are considered.

- The proposed conditions should reflect the other approvals required outside the fast-track process, including encroachment licences for any private utilities located within roads to be publicly vested.
- The proposal departs in some respects from the binding agreement between the developer, Auckland Council and Auckland Transport, and compliance with that agreement remains necessary.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure M:

Wastewater

Chris Garton

05 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Wastewater

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Christopher Garton – Senior Wastewater Specialist
Qualifications & Relevant Experience:	I hold the qualifications of: Master of Science in Environmental Science, Batchelor of Science (Honours) in Geography, Graduate Diploma in Environmental Science, Batchelor of Arts in Philosophy and Politics. I have 1 and a half years of experience as a Senior Wastewater Specialist at Auckland Council and a further 10 years of relevant expertise regarding wastewater including: treatment processes, environment monitoring at wastewater treatment plants, odour sampling and analysis at multiple wastewater treatment plants, resource consent compliance for wastewater, and the environmental and cultural interactions between municipal wastewater infrastructure and the public. This experience was gained in multiple roles while working at Watercare Services Limited. I have prepared expert evidence and technical assessments for resource consent applications and have appeared as an expert witness before consent authorities.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:	
Date:	5/10/2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Beachlands South Fast-Track Substantive Application Wastewater Concept Design and Assessment: Beachlands South, Beachlands, Auckland. Prepared by GWE Consulting Engineers. Version 2. 06/2026.
- Beachlands South Development Integrated Wastewater Servicing Strategy and Discahrge Assessment Report. Rev 2. By Raath and Associates. 20/7/2026.
- Draft Proposed Conditions: Beachlands South Fast Track Application. 26/06/2026.
- Beachlands South: Fast-Track Approval Substantive Application: Assessment of Environmental Effects and Statutory Analaysis. Prepared by Unio Environmental. 26/6/2026.
- Beachlands South – Rules Assessment. Prepared by Unio Environmental. 26/6/2026.
- Beachlands South Fast Track: Infrastructure Report: Prepared for Beachlands South Limited Partnership. Prepared by Harrison Grierson. 24/6/2026.
- Attach 0B2 s67 Response Table. No author. No date.

4.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

- N/A. The applicant has applied appropriately for a wastewater discharge consent for the application to discharge treated wastewater to land onsite.

5.0 Specialist Assessment

5.1 Existing Environment

- A description of the site and the location of the wastewater discharge to land have been provided in the wastewater report prepared by GWE and dated 06/2026. The description is satisfactory.
- From the applicant's soil investigation, the soils in the proposed disposal area are described as being category 5/6 as per Table 5.1 of TP58 with approximately 100 to 240 mm of topsoil. This is typical for this part of the Auckland Region.

5.2 Proposed Wastewater Disposal System (to land for Stage 1)

- The applicant has proposed to discharge tertiary treated wastewater to surface pressure compensating dripper irrigation (PCDI) at a maximum rate of 3mm/day for Stage 1 of the development. This discharge rate accords with the design requirements of Table 9.2 of TP58 which allows for up to 4mm/day for category 5 soils, and up to 3mm/day for category 6 soils. As the soils are category 5/6 then it is appropriate for the applicant to discharge up to the conservative rate of 3mm/day.
- The disposal will only come close to reaching 3mm/day limit towards the end of Stage 1 when the disposal volume is close to the discharge limit.
- The applicant has proposed a 50% reserve field which accords with minimum design requirement of surface laid PCDI lines as per Table 5.3 of TP58.
- The primary field will be 150,000m^2 and the reserve field 75,000m^2
- For tertiary treated wastewater, the disposal field needs to be at least 10m away from surface water features, unless the slope angle is greater than 10˚ and then the distance needs to be greater relative to the angle of the slope up to a maximum of an additional 10m as per Note 3 of Table 5.2 of TP58. The applicant has demonstrated that the disposal field is mostly at least 10m away from surface water features. There is one small section that appears to be closer than the required 10m. This error can be easily corrected as there is plenty of room for the disposal field to be reshaped to make it compliant. A screen shot of the section appears to be too close is provided below (Figure 1). I consider this a minor infraction that can easily be fixed with an amended design.



Figure 1: Taken from plan 'Wastewater Plan' Drawing number 500, Rev 1." GWE.

In summary: The Proposed Wastewater disposal to land system has been designed well and in accordance with the design requirements of TP58. As such, I support the proposed disposal to land for the Stage 1 wastewater flows.

5.3 Disposal to the Coastal Marine Area (Stage 2)

I have not assessed the proposed disposal to the coastal marine area for Stage 2 of the development as the marine environment is not my area of expertise.

5.4 Wastewater Treatment System

The applicant has calculated the design capacity of the required wastewater treatment system using Watercare's Code of Practice for Land Development and Subdivision document. This is the appropriate method to use for the size of the subdivision compared to using TP58. How the applicant has calculated the expected total wastewater volumes is correct.

The applicant has proposed that the pump stations will have 24 hours storage capacity built into their design. Although the designs have not been created yet, this principle is appropriate to account for situations resulting in short term unexpected loss of electricity or some other emergency. A principle design feature of wastewater treatment plants is 24 hours of storage capacity. The applicant has proposed a 100,000 litre buffer storage tank at the treatment plant to add additional storage capacity.

The applicant has proposed to use the 'Combined Works' treatment system as described by Raath and Associates. This is a modular wastewater treatment system and each module will be designed to treat up to 450,000 litres of sewage per day. Stage 1 will include a single modular train, where as stage 2 will require two treatment trains operating in parallel. It is understood that 3 treatment trains will ultimately be required by the end of Stage 2.

The combined works wastewater treatment system operates using conventional biological wastewater methodology of utilising aerobic and anaerobic environments to achieve nutrient reduction. In principle the wastewater treatment system is designed appropriately, but there are no examples of this system operating in New Zealand to date. The applicant provided water quality monitoring data as part of this application from a combined works system in South Africa, and another location. But the original documentation is not in English and is impossible to verify.

The combined works system is Russian designed. There is no problem with this origin as the science of wastewater treatment is universal. However, it is important that the components for this treatment system are not sourced from Russia but can be manufactured in New Zealand or by other countries with favourable trade relations to New Zealand. Having a secure supply chain is critical for any wastewater treatment system. The applicant has not stated where the parts for this system will be sourced from.

The proposed treated wastewater standards in condition 311 are appropriate for the discharge of tertiary treated effluent to land. I will not comment on the water quality standards proposed for condition 313 as these are to the marine environment and this is not my area of expertise.

5.5 Wastewater Network

The construction of the wastewater network and pumpstations is not my area of expertise and as such I have not assessed these.

5.6 Odour

In the Raath and Associates Report there is a section on odour, but it is stated that the design of appropriate odour treatment systems will occur at a detailed design stage of the application. It is suggested that ozone treatment and/or activated carbon treatment could be used. Although activated carbon can be used very effectively to treat odours from wastewater treatment plants, such treatment is uncommon in municipal treatment plants due to the high ongoing operational costs of replacing the activated carbon. Most municipal wastewater treatment plants treat odours via bark-based odour beds and/or rely on extended distances to dilute odours.

I have strong concerns that due to the close proximity of the proposed treatment plant to the proposed dwellings in this development, wastewater related odours will reach residents of these neighbouring dwelling and lead to complaints. The inlet screening waste and sludge form the treatment plant will be removed via trucks. From experience I know that the inlet screening process generates high levels of odour and truck movements of this material to landfill will allow these odours to escape. Odours from sludge can be managed if they are contained in a sucker truck, but this option is not usually available for screened waste.

Raath and Associates have identified the inlet screening section as one of several areas that can be expected to generate odours but are relying heavily on the treatment process and enclosed nature of the facility as reasons for why they do not expect 'significant adverse air quality effects.'

I have much experience managing odours from municipal wastewater treatment plants and I know that even minor odours can cause issues if they reach neighbouring property boundaries. Often neighbours can become hyper-sensitised to specific odours that they recognise as being from a neighbouring wastewater treatment facility and this can cause them much distress.

I am concerned that the applicant has not fully appreciated the close proximity of the neighbouring dwellings and therefore has not sufficiently given thought to the level of odour treatment that will be required such that odours air does not cross the property boundary into the neighbouring properties. As there are no 'Combined Works' treatment systems in New Zealand to date, it is hard to assess the voracity of the applicant's argument that this type of system will generate few odours.

5.7 Sustainable Finance

One of the main issues for community wastewater treatment plants in the Auckland Region relate to sustainable financing to ensure that the network and treatment system are well maintained. Many systems fail due to a lack of routine maintenance and an absence of available funding for emergency repairs. Every wastewater system requires maintenance and repair work to be carried out in a timely

manner or else small problems can very quickly escalate. Having a sustainable financial system to pay for the ongoing wastewater costs is critical to maintain a high level of wastewater treatment.

The applicant has not included any information regarding the ongoing financial arrangements for maintaining the proposed wastewater system. I would expect the financial arrangements to be a condition of consent and am concerned that this is not the case. In the applicant's defence, I think they have not yet got to that level of detail in their planning. However, as this is one of the most critical aspects of the maintaining a sustainable and functional wastewater system, I am concerned that setting up the financial framework for this system has not been proposed as a condition of consent.

5.8 Monitoring

The applicant has proposed 3 monthly wastewater quality monitoring (GWE 2026: Wastewater Report). This is an inadequate frequency given the size of the proposal and the discharge to the coastal marine environment in stage 2.

This application should include the following as conditions of consent:

- Weekly wastewater quality monitoring;
- Daily water flow monitoring via a telemetered system;
- Annual reporting to Auckland Council;
- Audits every 5 years.

5.9 Emergency Discharge

The applicant has not provided information relating to any emergency discharges. These could occur if there was an extended period without electricity and therefore the pump stations would eventually overflow. In this unlikely scenario wastewater will need a discharge pathway and the applicant should apply for a consent to discharge untreated wastewater to the environment in the case of an emergency. Municipal wastewater treatment plants and networks have this emergency option because they cannot control the flow of wastewater from entering their network. As this is a large-scale project, the applicant should apply for the ability to discharge untreated wastewater in an emergency.

6.0 Section 67 Information Gap

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
1. *Information on parts and servicing for the Combined Works Treatment Plant system*	*Details of whether parts can be sourced within New Zealand or if overseas suppliers are relied upon.*	*Cannot accurately assess the long-term risk in operating a 'Combined Works' treatment plant and whether replacement parts will be readily available.*	*Potential for delays to repairs if parts need to come from Russia. (Low risk)*
2. *Information on odour mitigation strategy and viable options*	*Details on how wastewater odours will be treated/managed on site so they do not cause a public nuisance.*	*Cannot accurately assess the social impact on members of the public or whether there is adequate land available to sustainably treat odours.*	*Potential for public complaints related to odour due to the close proximity of the treatment plant to dwellings. (Medium risk)*
3. *Sustainable financial design to maintain the wastewater network, treatment, and disposal systems*	*Details for how wastewater treatment will be financed.*	*Cannot accurately assess the long-term viability/sustainability of a large privately owned wastewater network, treatment and disposal systems.*	*Potential for reduced maintenance and higher risk of wastewater equipment failure leading to a higher risk to the receiving environment. (Medium risk)*
4. *Emergency Discharge consent application*	*Details for how untreated wastewater will be discharged in an emergency event.*	*Cannot accurately assess the environmental impact of where untreated wastewater will go in the event of an emergency*	*Potential for untreated wastewater to flow on to private property. (Medium risk)*

7.0 Recommendation

I recommend that the applicant consider and provide further details related to:

- the supply of parts for the 'Combined Works' treatment system to demonstrate a secure and stable supply chain;
- a comprehensive odour mitigation strategy;

- details on how the wastewater system will be owned, operated, and made financially stable; and
- details of where wastewater will flow in the event of an extended period of electricity (or other) failure in the network or at the wastewater treatment plant.

The stage 1 application to discharge up to 450,000 litres of tertiary treated wastewater to land onsite per day has been designed in accordance with TP58. Aside from a minor infringement (which should be easily fixed) this aspect (discharge to land) of their application is sound and I can support it.

I do not yet support the full application due to the issues raised in this technical memorandum. However, the issues I have raised most likely solvable and it can be expected that the applicant could resolve them.

I cannot support or otherwise Stage 2 of the application as this involves a discharge to the coastal marine area. This is not my area of expertise and therefore I do not offer an opinion either way regarding the discharge.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure N:

Stormwater

Martin Meyer

16 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Stormwater Specialist (Regional Planning - Private)

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Martin Meyer (Senior Stormwater Specialist, SWWWITA, Auckland Council)
Qualifications & Relevant Experience:	I hold the qualifications of: Bachelor of Science in Environmental Science and Physical Geography, Post Graduate Diploma in Science & Technology and have 9 years of experience within three waters. I have prepared expert evidence and technical assessments for resource consent applications and fast-track applications.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	16/10/2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- *Assessment of Environmental Effects and Statutory Analysis dated 26/06/2026 prepared by Unio Environmental*
- *Rules Assessment dated 26/06/26 prepared by Unio Environmental*
- *Stormwater Management Plan, Beachlands South - Version 2 dated 24/06/2026 prepared by Harrison & Grierson*
- *Infrastructure Report dated 24/06/2026 prepared by Harrison & Grierson*
- *Ecological Impact Assessment dated 09/2026 prepared by Viridis Environmental Consultants*

4.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

I consider E8.4.1(A11) not required as a reason for consent, the site is considered appropriately to require a private diversion and discharge consent under E8.4.1(A10) which includes establishing a private stormwater network and discharge to the environment. All impervious areas discharging direct to the environment (and not to the public network) must be authorised under a private consent (where impervious areas exceed 1,000m2 for urban and 5,000m2 for outside urban areas).

The applicant has identified their intention to discharge stormwater under the authorisation of the Regionwide Network Discharge Consent (RWNDC), managed by Healthy Waters. Refer to Healthy Waters memo for this status.

A small portion of the site is currently zoned rurally as 'Future Urban Zone', and direct discharge to the environment from this area is considered private. At this stage Healthy Waters has not confirmed the application can come under the RWNDC due to outstanding issues in particular flooding.

5.0 Specialist Assessment

5.1 *E8 Stormwater - Diversion and Discharge*

The existing site is primarily a resort golf club on a sloping site near the coast. The substantial development of dwellings proposed will involve an extensive stormwater network, and the applicant is seeking this to be authorised via the Regionwide Network Discharge Consent (RWNDC), refer to Healthy Waters memo for more information.

From a regional stormwater perspective, if Healthy Waters are not able to accept the discharge within the RWNDC a regional discharge consent for the entire site may be considered acceptable (where the

reason for non-acceptance is not due to substantial effects issues). At this stage Healthy Waters are seeking further clarification on flooding matters.

A small portion of the site is zoned 'future urban zone', which is considered rural and cannot be authorised by the RWNDC (see Figure 1).

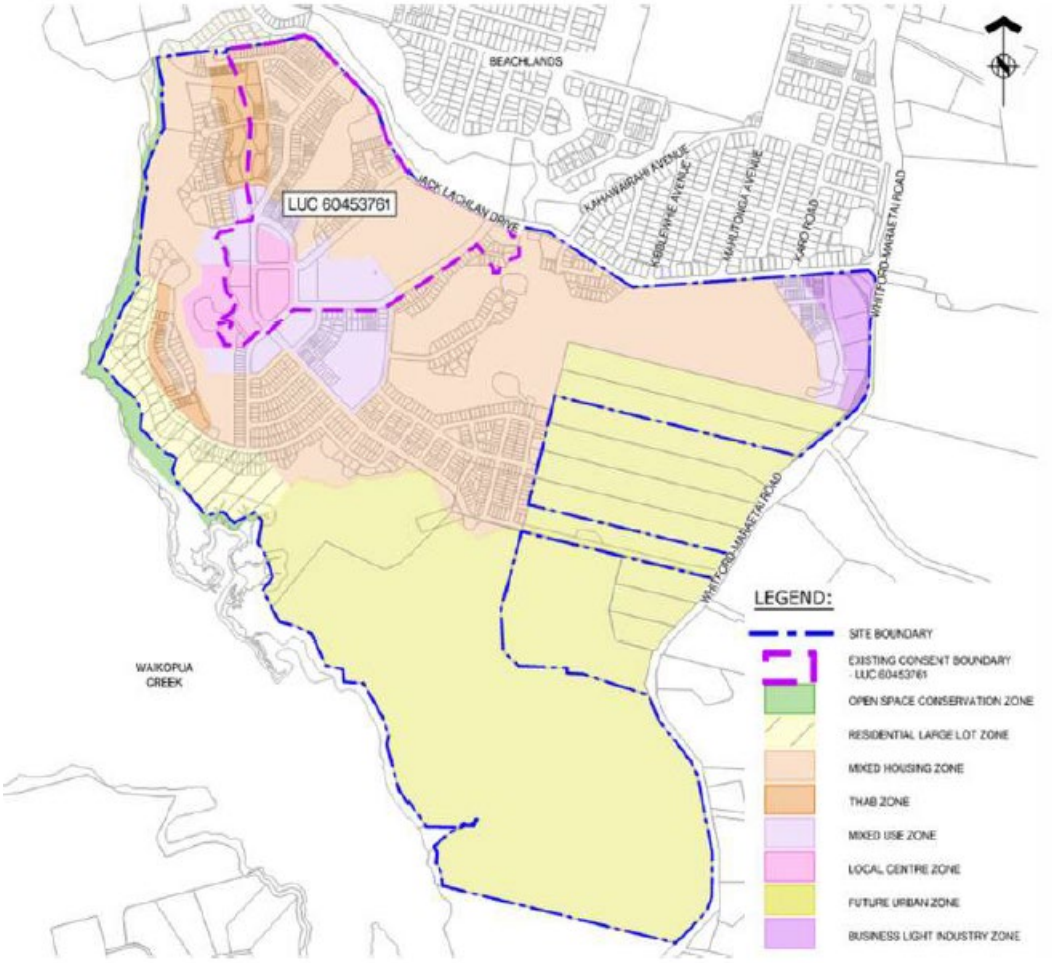


Figure 1 - Dark yellow areas indicate future urban zone within the fast-track area. This area cannot be authorised by the RWNDC and will require a private stormwater discharge permit for impervious areas exceeding 5,000m².

Approximately 108.6 hectares of the fast-track site is within future urban zoned (FUZ) land. However development within this area is limited to access roads, waste management use and some general earth works bordering the live-zoned area.

Road 20 is within the FUZ, and is an eastern entrance road into the site from Whitford-Maraetai Road, and will be treated by Raingarden 04. Road 20 also contains culverts to convey up to 1% AEP flows. Raingarden 04 is sized for 8496m² of impervious area, and will discharge to the environment via rip-rap.

5.2 *E9 Stormwater Quality - High contaminant generating carparks and high use roads*

The planning assessment has identified reasons for consent for the construction of a high contaminant generating carpark 45,325m^2 and 232,426m^2 of high-use roads. Under E9.4.1(A6) and E9.4.1(A7), both controlled activities, these areas require treatment for stormwater quality by a GD01 or GD01 equivalent device.

The SMP identifies pre-treatment and use of proprietary treatment devices may be used prior to additional water quality treatment. GD01 or equivalent treatment is confirmed within the SMP, and the application uses Raingardens and Wetlands throughout the site for water quality treatment.

These high contaminant generating areas are proposed for treatment via GD01 devices, detailed through the lodged application. These are considered to be adequately treated per the controlled activity standards.

5.3 *E10 - Stormwater Management Areas*

The live-zoned area of the site is within a SMAF-1 controlled area. As this area is proposed to come under the RWNDC, the SMP, the Development Engineer working with Healthy Waters will assess the SMAF consenting for this proposal.

5.4 *NES-F 45(4) & 45(5) - diversion or discharge of water within a 100m setback of a natural inland wetland*

27 natural inland wetlands were identified within the Ecological Impact Assessment lodged. This assessment found the majority are highly modified, and relatively small localized wetlands (excluding a coastal fringe wetland).

This proposal involves the reclamation of natural inland wetlands, and changes to catchments of some wetlands. The assessment assumed 100% impervious areas of residential lots, and ignored groundwater contributions. An approach where losses to surface water catchments was assumed to take a similar amount of wetland area, as such some wetlands are expected to have substantial changes in catchment, as per Table 1 below.

Table 1 - Assumed over 50% loss in wetland extents of the following 6 natural inland wetlands.

Wetland ID	Retained wetland extent	Pre-development surface catchment	Post-development surface catchment	Change in catchment	Assumed proportional wetland loss
W28	229.0 m²	38,195 m²	1,720 m²	-95.50%	218.69 m²
W8	149.7 m²	18,466 m²	2,041 m²	-88.95%	133.15 m²
W5	115.8 m²	12,711 m²	4,094 m²	-67.79%	78.50 m²
W22	199.0 m²	59,708 m²	34,864 m²	-41.61%	82.80 m²
W13	90.0 m²	3,491 m²	2,544 m²	-27.13%	24.41 m²
W11	290.0 m²	12,578 m²	11,217 m²	-10.82%	31.38 m²
Total	**1,073.5 m²**				**568.94 m²**

14 natural inland wetlands are proposed for reclamation, of 2,337.9m^2.

Together these losses amount to an estimated 2906.84m^2.

A site was identified as a compensation wetland, 2.943ha currently dominated by invasive exotic wetland vegetation. The applicant proposes to form a larger contiguous wetland system and has opportunities for greater ecological benefit than the some of the losses described above.

Based on the above and in reference to the comments provided by the council freshwater ecologist on the effects on wetland extent and value I agree that the compensation adequately provides for the losses induced by the proposal.

6.0 Section 67 Information Gap

Section 67 information gaps were identified by Healthy Waters on a number of stormwater related matters, including flooding. These matters are directly relevant to the standards of E8, and as such are considered in this assessment. Please refer to the Healthy Waters memo for the detailed s67 matters.

7.0 Recommendation

When considering the future urban zoned area for private diversion discharge, this portion of the site is considered acceptable for a stormwater diversion and discharge consent. E9 matters are also adequately met, and so are the hydrological NES-F matters.

However for the wider site if looking for a private diversion and discharge consent to cover the live-zone (if RWNDC approval does not occur), and due to the extensive nature of the development the standards on downstream flooding and its mitigation must be appropriately managed. At this stage per Healthy Waters commentary, further information is required until the potential flooding effects can be fully

assessed. At this stage the wider site is not considered to be able to come under a private diversion and discharge consent until these issues are addressed. Noting that if addressed Healthy Waters may consider the site appropriate for authorisation under the RWNDC, and therefore may not require a private diversion and discharge consent for this portion of the site.

8.0 Proposed Conditions

I consider the conditions proposed under the stormwater discharge within *Beachlands South Fast Track Application - Draft Resource Consent Conditions, dated 26 June, 2026* to be adequate, (conditions 148-156).

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure O:

Water Supply / Bore

Louwrens Le Roux

05 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Groundwater Take

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Louwrens Le Roux, Senior Specialist – Coastal and Water Allocation, Specialist Unit, Planning & Resource Consents
Qualifications & Relevant Experience:	I hold the qualification(s) of: **Bachelor of Science in Environmental Science & Bachelor of Science Honours in Hydrogeology and** have **12** years of experience in **the relevant field of Hydrogeology.** I have prepared expert evidence and technical assessments for resource consent applications and fast-track applications**.**
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	05/10/2026

3.0 Executive Summary / Principal Issues

The proposed Beachlands South development seeks consent to provide a potable water supply for a large scale residential development and for irrigation of a nine hole golf course in Beachlands, Auckland.

The projected water demand for the development is 1,251m³/day, which is planned to be supplied from the existing Formosa Bore (ID 20758), which has an active water take (WAT60276020), a proposed new groundwater take from recently consented Bore 620 (Bore ID 31755), and water supplied by local water services provider Pine Harbour Living Limited (PHILL).

Based on the information provided and calculations done in relation to the water demand for the site, the applicant has shown that their water demand is reasonable for the scale of the proposed development. Furthermore, there is sufficient water available in the Beachlands Greywacke / Waitemata aquifer system to be allocated for this take.

In terms of the existing water take WAT60276020, from the Formosa Bore, I conclude that it can continue at its currently consented allocation, as the volume sought is unchanged and is supported by historical bore performance. However, there is currently insufficient information to confirm that the proposed Bore ID 31755 can sustainably produce the proposed allocation of 371 m³/day. No aquifer testing has been undertaken to demonstrate bore performance, sustainable yield, or the effects of pumping on the surrounding aquifer system (as bore ID 31755 is yet to be drilled). Thus, there is insufficient available information to verify the sustainable yield and capacity of bore ID 31755.

Several information gaps relating to potential adverse effects of the take on the receiving environment have also been identified, namely:

- The potential interference effects of the take on neighbouring groundwater users have not been assessed. At least 21 bores have been identified within 1 km of production bore ID 31755.
- Limited information has been provided regarding groundwater quality and the potential risk of saline intrusion associated with the proposed abstraction.

These uncertainties prevent a complete assessment of the potential effects of the groundwater take on both the aquifer and surrounding users.

Overall, the proposed groundwater take is not expected to result in significant adverse effects on aquifer recharge, surface water features, or consolidation settlement. However, the absence of aquifer pumping test results, interference assessments, groundwater quality information and saline intrusion investigations, I cannot conclude with confidence that the proposed groundwater abstraction can sustainably provide the requested water supply or in doing so not lead to adverse effects on neighbouring groundwater users or the wider aquifer system.

Therefore, I do not have enough information to currently support the proposed groundwater take application at this stage when considering council's policies under E2.3. I have, however, included condition of consent to try and alleviate the uncertainties identified, should the consent be granted.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- *Beachlands South - Fast-track Approval Substantive Application, Assessment of Environmental Effects and Statutory Analysis*", prepared by Unio Environmental, dated 24 September 2026, Reference 000005.
- *Draft Proposed Conditions – Beachlands South Fast Track Application*, dated 24 September 2026.
- *Beachlands South Fast Track - Infrastructure Report*, prepared by Harrison Grierson, dated 24 June 2026, Document REP001-A2515591.00.cjm
- *Beachlands South Fast-Track Substantive Application Water Supply Concept - Beachlands South, Beachlands Auckland*", prepared by GWE Consulting Engineers, dated June 2026, Version V6, Reference J3021-1
- A Section 67 -Request for Further Information Response document titled "*Attach 0B2 S67 Response Table*", prepared by UNIO Environmental, under the Groundwater take and Bore
- A Section 67 response letter titled "Beachlands South FTAA -2606-1256 – Response to Auckland Council's preliminary groundwater take comments", completed by UNO Environmental, dated 16 October 2026

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

I agree with the applicant's stipulated reasons for consent under rule E6.4.1 (A26) for the two proposed groundwater takes related to this application, these being a replacement take from existing Bore ID 20758 (Formosa Bore), which is currently consented to abstract 300m³/day and 42,000m³/year, and the proposed groundwater take from bore ID 31755 (Bore 620), which seeks to abstract up to 371m³/day and 135,500m³/year.

The applicant has also requested an extension of the lapse date associated with the drilling of bore ID 31755 (Bore 620) under consent LUC60459433. While the application does not specifically identify the relevant statutory basis for this request, an extension of a consent lapse period may be considered under section 125 of the Resource Management Act (RMA). The applicant seeks to extend the lapse date so that it aligns with the lapse duration of five years for the proposed groundwater take from bore ID 31755.

6.0 Specialist Assessment

6.1. Assessment of Water Quantity and the Justification Thereof

The applicant has provided a clear and appropriate assessment of water demand in Sections 3 and 4, and Appendix C of the Water Supply Concept Report (Attachment 11). The applicant has calculated that the proposed development will require approximately 1,136m³/day of water, supplied from:

- 765m³/day from the Pine Harbour Living Limited (PHILL) bulk water supply network;
- 115m³/day from existing consent WAT60276020 (Formosa Bore ID 20758); and
- 371m³/day (135,500m³/year) from the proposed take associated with Bore ID 31755 (620 bore).

The total proposed supply of 1,251m³/day exceeds the projected demand by approximately 10%, providing a reasonable allowance for operational variability, peak demand and future uncertainty. The adopted demand rate of 150L/person/day is considered reasonable for a residential development of this scale and is within the range of 140 to 170 liters per person per day, identified by Watercare as typically used in Auckland. The proposed use of water efficient fixtures and rainwater harvesting may further reduce potable water demand.

While no water use records have been provided for existing consent WAT60276020 since 2014, the applicant has identified a clear and justifiable future use for this allocation. I therefore accept that the proposed demand is generally consistent with the scale and nature of the development.

Initially, the applicant did not provide evidence demonstrating that PHILL was both able and willing to supply the proposed 765 m³/day (279,225 m³/year) required to service the development. In addition, the application lacked sufficient detail regarding the proposed staging of the development, including the timing and sequencing of the various development phases.

These matters were subsequently addressed in the applicant's Section 67 response dated 16 October 2026. The response included evidence confirming that PHILL is willing to supply the development's anticipated water demand of up to 765 m³/day. The applicant also advised that abstraction from ID 31755 will not be required until at least five years after development commences, in this explanation the applicant referenced a map with area highlighted in yellow, which is proposed to be the part of the development that will use water abstracted from the Formosa bore and proposed bore ID 31755.

Overall, I consider the proposed water allocation to be generally reasonable and justified. Based on the information available, the requested allocation does not appear excessive or inefficient, subject to appropriate consent conditions.

However, should the consent be granted, I offer the following comments on consent conditions.

Conditions

I generally agree with the applicant's proposed conditions (Conditions 224-274). However, I recommend:

- Consolidation of the groundwater takes into a single consent;
- Amendments to the Environmental and Water Efficiency Reporting requirements;
- Amendments to the consent duration and expiry provisions, with specific reference to bore ID 31755; and
- Surrender of the existing WAT60276020 consent should a consolidated water take consent be granted.

Additional conditions addressing outstanding environmental effects and information gaps are discussed further in this memo. My recommended conditions are set out in Section 9.0 of this Technical Memorandum.

6.2. Production bore capacity (Policy E2.3.7(g))

Formosa bore (Bore ID 20758)

The applicant does not seek an increase to the existing allocation authorised under consent WAT60276020 (300 m³/day and 42,000 m³/year). Historical airlift and aquifer testing undertaken on the bore indicate that it can supply volumes greater than the proposed abstraction requested by the applicant for this consent. Therefore, I am satisfied that Bore ID 20758 can supply the allocation proposed to be sourced from this bore.

Bore 620 (Bore ID 31755)

Limited information is available for Bore ID 31755 as the bore has not yet been drilled. The applicant relies on geophysical investigations and aquifer mapping to demonstrate that the bore will be capable of supplying the proposed allocation of 371 m³/day (135,500 m³/year).

The geophysical investigations identified the proposed bore location as a favourable groundwater target and estimated a potential yield of between 406 m³/day and 2,843 m³/day, with a predicted sustainable yield of approximately 1,279 m³/day. While these findings suggest that groundwater is likely to be intersected at the proposed location, I do not agree that geophysical investigations can be relied upon to determine bore performance, sustainable yield, or bore efficiency. Geophysics is useful for identifying potentially water bearing structures and favourable drilling locations, but the intersected aquifer hydraulics can only be confirmed through aquifer testing following bore construction.

In addition to the applicant's assessment, I have considered the yields of neighbouring bores within the same hydrogeological setting. The information shows that neighbouring bore airlift yields range from approximately 6 m³/day to 2,580 m³/day. This shows a significant variation in aquifer dynamics and demonstrates the heterogeneous nature of the fractured Greywacke / Waitemata aquifer system. It also demonstrates that bore yields can vary significantly over short distances.

The applicant provided a Section 67 response dated 16 October 2026 in an attempt to address this information gap. However, the response again relied heavily on the geophysical assessment, which predicted a potential yield of between 406 m³/day and 2,843 m³/day and a sustainable yield of approximately 1,279 m³/day. For the reasons outlined above, I maintain that while geophysics is a valuable tool for identifying favourable drilling targets, however it cannot be relied upon to estimate bore yield without confirmation through drilling and aquifer testing, this is not industry best practice.

The applicant also noted that Auckland Council has previously granted groundwater take consents where aquifer testing was undertaken following the granting of consent, citing consent WAT60466055 as an example. While this is correct, I consider each application must be assessed on its own merits and on the evidence available. In my view, decisions regarding the appropriateness of a proposed allocation should be informed by actual bore and aquifer data, including lithological conditions, demonstrated bore yields, and aquifer capacity. In the case of WAT60466055, seven of the ten nearest bores airlift yields showed that they were capable of producing the required water demand. In contrast, for the proposed take from Bore ID 31755, only one of the ten nearest bores showed airlift yields capable of producing the water volume sought by the applicant.

Accordingly, there is currently no direct evidence that shows that Bore ID 31755 can sustainably abstract 371 m³/day. This information gap is significant because Policy E2.3.7(7)(g) of the Auckland Unitary Plan requires consideration of whether the abstraction bore can abstract the quantity of water sought. While the applicant has demonstrated demand for the water and there is allocatable water available in the aquifer, groundwater availability alone does not demonstrate that the requested volume can be practically abstracted from the proposed bore.

Therefore, there is a clear risk associated with granting consent for the full allocation sought and subsequently (potentially after completing the development) establishing that Bore ID 31755 is incapable of producing the required volume of water, this will place the development in difficult water supply situation.

Because Bore ID 31755 forms a significant component of the development's long-term water supply strategy, confidence in the bore's production capability is important when assessing both the appropriateness of the allocation sought and the efficient use of the groundwater resource.

Should consent be granted, I recommend a condition requiring the consent holder to drill Bore ID 31755 and undertake a suitably designed aquifer test within the first five years of the commencement of consent, and prior to the development stage that relies on water from this bore (identified in yellow in figure 1 of the 16 October section 67 response). This would provide certainty regarding the bore's production capability and ensure that sufficient groundwater is available to meet the future water demand of the development, before the development occurs.

Conditions

I recommend that a condition of consent is included that requires the applicant to conduct aquifer testing on Bore ID 31755 following its construction and prior to exercise of the consent. The testing should include:

- a step-drawdown test to assess bore efficiency and pumping characteristics;
- a minimum 24-hour constant-rate pumping test to assess sustainable yield;
- monitoring of drawdown and recovery in the subject bore and, where practicable, nearby bores; and
- assessment by a suitably qualified hydrogeologist confirming the sustainable abstraction rate of the bore in an aquifer test report.

The aquifer test results should be used to validate the geophysical predictions and confirm that Bore ID 31755 is capable of sustainably supplying the proposed allocation. Due to this uncertainty before consenting, I have recommended a consent condition that allows the Council to review, and if necessary, amend the consented allocation withing two months of receiving the aquifer test report, if it is found that the bore cannot abstract the required amount of water to meet the consented quantities.

It is also important that this test is completed in the initial 5 years, should this consent be granted. The aquifer test should also occur before the development described in figure 1 of the section 67 report (highlighted in yellow) begin to occur, to assure water supply for the development.

6.3. Taking is within water availabilities listed in AUP(OP) Appendix 3, Table 1 (E2.2)

The current availability of the Beachlands Greywacke / Waitamata aquifer system is as follows:

Water Availability for Beachland Greywacke / Waitemata aquifer: 746,850 m^3/year	
Total water demand	
Consented allocation	598,000 m^3/year **
Permitted Activity Takes	8,000 m^3/year
AC model S14(3)(b)	4,542 m^3/year
Total water demand	**606,642 m^3/year**
Additional water demanded by applicant	135,500 m^3/year
Remaining availability	**808 m^3/year**

** Includes existing consent WAT60276020

Therefore, there is enough water available for the proposed application, according to current availability.

6.4. *Proposed take's impact on: Recharge to other aquifers (E.2.3 (7)(a)(i), groundwater settlement (Policy E.2.3(.7) (h)) and Surface-water features (E.2.3(.7) (b) & (c))*

Formosa bore (Bore ID 20758)

The abstraction from Bore ID 20758 (Formosa Bore) is not proposed to increase beyond the allocation authorized under consent WAT60276020. Therefore, no additional effects on aquifer recharge, groundwater settlement, or nearby surface water features are anticipated beyond those previously assessed and authorized. As such, I consider the effects of continuing the existing allocation to be no more than negligible.

Bore 620 (Bore ID 31755)

The applicant did not assess the potential effects of the proposed groundwater take on recharge to other aquifers, groundwater consolidation settlement, or nearby surface water features.

As part of the section 67 process, the applicant was asked to assess the proposed takes' effects on recharge to other aquifers, consolidation settlement and impacts on surface water features. In response, the applicant advised that sufficient groundwater is available within the aquifer to support the proposed take. While this addresses water availability, it does not directly address potential effects on aquifer recharge, land settlement, or surface water features.

To address this information gap, I reviewed available information in the area that the Council currently holds, including nearby bore logs, the proposed bore design for Bore ID 31755, and hydrogeological information from nearby groundwater take applications. Bore logs from the surrounding area indicate a geological order comprising Waitemata material followed by greywacke basement rock. For example, nearby bores (bore ID 30597 and 23230) intersect sandstone and mudstone sequences to depths of approximately 175-180 m (Waitemata Group), before encountering greywacke bedrock.

The proposed bore is designed to be cased to approximately 275 m depth, with groundwater abstraction occurring from the deeper Greywacke / Waitemata aquifer system. Therefore, the production zone will be separated from the ground surface by a significant thickness of consolidated, low-compressibility rock.

Given the depth of abstraction and the competent nature of the geological formations present, the proposed groundwater take is unlikely to result in measurable aquifer consolidation or land surface settlement. The Greywacke / Waitemata aquifer system is also the only recognised aquifer management unit expected to be intersected by the proposed bore. As no other aquifers are known to occur above or below the aquifer production zone, the proposed take is not expected to adversely affect recharge to other aquifers.

The applicant did not assess the potential effects of the proposed groundwater take on nearby surface water features. A review of GeoMaps indicates that the nearest permanent stream is located approximately 73 m south of the site. The stream elevation at this location is approximately 50 m RL, while groundwater levels in the nearest bore to the stream (Bore ID 23230) are approximately 5 m RL. This significant

difference in hydraulic head indicates a downward hydraulic gradient from the surface water features towards the underlying groundwater system.

Additionally, groundwater is proposed to be abstracted from Bore ID 31755 at a depth of at least 215m below mean sea level (275m of casing proposed to be installed). Accordingly, the proposed production zone is separated from the nearest surface water feature by more than 215m vertically and by approximately 73 m horizontally. Hence, the abstraction zone is separated from surface water features and shallow groundwater systems by a substantial thickness of relatively low-permeability Waitemata Group sediments and underlying greywacke geology.

Given the marked difference in hydraulic head between the closest surface water feature and the local groundwater table, together with the substantial vertical separation and the presence of low-permeability intervening geological materials, a direct hydraulic connection between the nearest surface water feature and the groundwater system targeted by Bore ID 31755 is considered unlikely. Consequently, any effects of the proposed groundwater take on nearby surface water features are expected to be negligible. Despite the limited response received, my review of the information available to the Council indicates that the proposed take is unlikely to adversely affect recharge to other aquifers, induce land surface settlement through aquifer consolidation, or impact nearby surface water features close to the site.

6.5. The impact in terms of saline intrusion and contamination

Although the applicant states in Section 9.3.4.9 of the Planning Assessment that the proposed groundwater take will not result in saline intrusion, no supporting hydrogeological assessment, monitoring data, or water quality evidence has been provided to validate this conclusion.

Under condition 11 of consent WAT60276020, the consent holder was required to undertake annual groundwater quality monitoring for indicators of saline intrusion. In addition, an initial baseline water quality sample was recommended to confirm that the groundwater was suitable for its intended use. Council records indicate that these monitoring requirements were not fulfilled, and no groundwater quality data has been provided or discussed as part of the current application.

Both Bore ID 20758 and Bore ID 31755 target the fractured Greywacke / Waitemata aquifer system. Fractured rock aquifers are inherently heterogeneous and can exhibit complex groundwater flow paths that are difficult to predict without supporting monitoring data. Given the proposed use of the groundwater for potable water supply and irrigation, it is important that the suitability of the abstracted groundwater is confirmed and that any changes in groundwater quality are identified as early as possible.

The absence of any saline intrusion and water quality monitoring information or assessment of effects in relation to these matters, was highlighted to the applicant as part of the section 67 assessment. In response, the applicant advised that sufficient groundwater is available within the aquifer to support the proposed take. While this addresses water availability, it does not directly address potential effects of the take on saline intrusion and water quality (E.2.3 (7)(d) or the likelihood that the take from bore ID 31755 would cause saline intrusion or other contamination. Additionally in a follow up 67 response dated 16 October 2026 the applicant concluded that saline intrusion risk associated with the water take can be addressed via monitoring conditions. I concur, however due to the nature of saline intrusion in a fractured

aquifer system, it would have been ideal, to have aquifer parameters to do a drawdown calculation to determine if the radius of influence from the proposed take, is likely to reach coast.

In the absence of historical groundwater quality monitoring data and given the close proximity of both production bores to the coast (both at distances of less than 1 km) I consider it appropriate that the consent includes conditions requiring baseline and ongoing groundwater quality monitoring, including monitoring for indicators of saline intrusion. This proposed monitoring will provide confidence that the groundwater remains suitable for its intended use and will enable any adverse changes in water quality to be identified and managed as early as possible.

This is particularly relevant given that the proposed take is proposing to take most of the remaining allocatable water in the aquifer system. The assessment of groundwater availability for the aquifer is based on maintaining residual groundwater throughflow to the coast, in order to protect against saline intrusion and maintain the long-term sustainability of the resource. Thus, continued groundwater quality monitoring is necessary to confirm that the proposed abstraction does not adversely affect aquifer water quality or lead to saline intrusion over time.

Condition

As discussed above, no groundwater quality monitoring data have been provided to demonstrate that the groundwater resource is currently suitable for its intended use or to establish the existing salinity characteristics of the aquifer. Accordingly, I recommend that groundwater quality monitoring and saline intrusion management conditions are included should consent be granted.

Specifically, I recommend that the consent conditions require the following:

- Prior to the commencement of groundwater abstraction under this consent, baseline groundwater quality samples must be collected from Bore ID 20758 and Bore ID 31755.
- The baseline samples must be analysed for a suite of parameters that demonstrate whether the abstracted water is suitable for potable water supply and monitors potential saline intrusion, and the results compared against the current New Zealand Drinking Water Standards and relevant Maximum Acceptable Values (MAVs).
- Groundwater quality samples must also be collected from both production bores on a six-monthly basis, during March and October of each year. These samples must be analysed for electrical conductivity, sulphate and chloride, the most common indicators of saline intrusion.
- During the first two years of the consent, interim groundwater quality trigger levels must be established using available monitoring data from comparable nearby groundwater takes and the baseline water quality results collected from the site.
- Following completion of the initial two-year monitoring period, permanent site-specific trigger levels must be established using the groundwater quality data collected from Bore ID 20758 and Bore ID 31755.

- Where any saline intrusion trigger level is exceeded, the consent holder must implement the saline intrusion response protocol specified in the consent conditions, including investigation, reporting, and any required management actions.

Given that there is large uncertainty surrounding the quality of water associated with the proposed abstraction, I also recommend that provisions should be made in the consent conditions that allows for the review of the allocation should it be found that the water quality is not fit for purpose or that saline intrusion is occurring.

6.6. Assessment of effects on other lawful bore water takes (E2.3. (7) (e) &(f)

Formosa bore (Bore ID 20758)

The proposed allocation for Bore ID 20758 remains unchanged from that authorized under Consent WAT60276020 (300 m³/day and 42,000 m³/year). As no increase in abstraction is proposed, the drawdown and bore interference effects associated with this take are expected to remain unchanged from those previously assessed and authorized. Therefore, no additional adverse effects on neighboring groundwater users are expected as a result of the replacement consent.

Bore 620 (Bore ID 31755)

The applicant has not undertaken a quantitative assessment of potential drawdown interference effects associated with the proposed abstraction from Bore ID 31755.

Section 4.2 of the Water Supply Concept Report (Attachment 11) states that the proposed bore will be drilled to a depth of approximately 600 m and cased to approximately 275 m, which is deeper than existing bores in the area.

On this basis, the applicant concludes that the proposed abstraction is unlikely to adversely affect neighbouring groundwater users. However, no hydrogeological analysis, aquifer testing, or monitoring data has been provided to demonstrate that the proposed bore is not hydraulically connected to surrounding groundwater users or that it would not lead to drawdown in neigbouring bores that will affect their established take. In the absence of such evidence, I do not consider it appropriate to conclude that interference effects will be negligible solely on the basis of bore depth.

The absence of neighboring drawdown interference effects for bore ID 31755 was raised with the applicant through the section 67 further information process. In response, the applicant advised that sufficient water is available within the aquifer to support the proposed take. While this may address the question of water availability, it does not address whether the take from bore ID 31755 would cause adverse interference effects on neighbouring groundwater users, such that it prevented them from exercising their lawfully established water takes.

Additionally in section 67 response dated 16 October 2026, the applicant again re-iterated their stance that due to the proposed depth of the bore no other bores are likely to be affected. As at least five of the ten closest bores are drilled to 180m or more (up to a depth of 246m), hydraulic connection is a possibility as there is not a significant distance between water takes. Hence, I am of the opinion that the applicant

did not provide any evidence that definitively shows that bore ID 31755 is not hydraulically connected to other groundwater takes close to the site.

Council records and GeoMaps indicate that at least 21 bores are located within a 1 km radius of Bore ID 31755. The underlying Greywacke / Waitemata aquifer system is highly fractured and heterogeneous, meaning groundwater flow is typically controlled by localised fracture networks rather than uniform aquifer properties. As a result, hydraulic connectivity between bores can be highly variable and difficult to predict without site-specific testing. This variability is reflected in available bore log data, which indicates neighbouring bore airlift yields ranging from approximately 6 m^3/day to 2,580 m^3/day. Such variation demonstrates the complex and heterogeneous nature of the aquifer system and limits the ability to reliably predict interference effects through conceptual assessment alone.

Given the absence of aquifer testing, there is currently insufficient information to determine the extent of drawdown that may result from the proposed abstraction or the degree to which neighbouring bores may be affected. I consider an aquifer pumping test is necessary to characterise the hydraulic properties of the aquifer and provide a sound basis for assessing interference effects with an appropriate analytical or numeric method. While aquifer testing can be used to assess bore yield, it can also be used to determined aquifer parameters such as transmissivity, storativity, drawdown response and hydraulic connectivity. These parameters are essential for calculating the extent of drawdown from the proposed pumping, and for evaluating potential effects on neighbouring groundwater users over a set time period.

Value would also be gained from monitoring nearby bores during the pumping test, where access can be obtained. Monitoring results from these “observation bores” would provide direct evidence of hydraulic connectivity and enable a more reliable assessment of the extent to which the proposed abstraction may influence groundwater levels in surrounding bores.

Following completion of aquifer testing, I recommend that the applicant undertake a drawdown interference assessment using the aquifer parameters derived from the pumping test. The assessment should evaluate potential effects on groundwater users within at least 1 km of Bore ID 31755 and should consider both predicted aquifer drawdown from the pumping well and in-well drawdown associated with existing authorised abstractions. The purpose of the assessment is to determine whether the proposed take could materially reduce the ability of neighbouring consent holders to exercise their authorised groundwater allocations, consistent with the requirements of Policies E2.3.7(7)(e) and E2.3.7(7)(f) of the Auckland Unitary Plan. This report should be reviewed and approved by the Council.

Given the scale of the proposed allocation and the number of nearby groundwater users, this information is critical to understanding the potential effects of the abstraction. Until such an assessment is undertaken, there remains uncertainty regarding the extent to which the proposed take may affect groundwater levels and bore performance in the surrounding area. The absence of an aquifer test and drawdown interference assessment means the extent of potential effects on neighbouring groundwater users remains uncertain. Without information on hydraulic connectivity or predicted drawdown, it is not possible to determine which nearby bores may be affected, or whether any effects would be less than minor. This uncertainty limits Council's ability to confidently identify potentially affected parties and assess the full extent of effects associated with the proposal.

Consequently, I have recommended a consent condition that allows the Council to review and if necessary, amend the allocation authorised from Bore ID 31755 following receipt and assessment of the aquifer test results and drawdown interference assessment, should the latter identify a greater degree of hydraulic connectivity than currently anticipated. This is to ensure that the final allocated volume does not result in unacceptable adverse interference effects on neighbouring groundwater users, to the extent their owners are prevented from exercising their lawfully established water takes. This, however, might impact the feasibility of water supply to the part of the development requiring water from bore ID 31755.

Therefore, the proposed aquifer test needs to be done within the first five years of the commencement of consent, and prior to the development stage that relies on water from this bore, as identified in figure 1 of the applicant's 16 October Section 67 response (the area highlighted in yellow). With the implementation of this condition Council will have the opportunity to amend the water take should it adversely effects on neighbouring bores to the point where they will not be able to use their lawfully established water supply, and the applicant would be in a better position to confirm if the water take is capable to supply the required water demand.

Condition

I recommend that a condition of consent be included that requires the applicant to conduct an aquifer pumping test following the construction of bore ID 31755 and prior to exercise of the allocation. The test should include:

- a step-drawdown test to assess bore efficiency and pumping characteristics;
- a minimum 24-hour constant-rate pumping test to assess sustainable yield;
- monitoring of drawdown and recovery in the subject bore and, where practicable, nearby bores; and
- assessment by a suitably qualified hydrogeologist confirming the aquifer parameters related to the aquifer test.
- Completion of a "*Neighboring bore interference effects assessment report*". This report should include: all bores within a 1km radius of the production bore, predicted drawdown in neighbouring bores, in-well drawdown in neighbouring bores from their own take, the volume of water remaining in each bore after pumping has occurred, and all assumption and limitations of the calculations.
- The "*Neighboring bore interference effects assessment report*" must be submitted to the Council for certification before the abstraction of water from bore ID 31755 commences.

It is also important that this test is completed in the initial 5 years, should this consent be granted. The aquifer test should also occur before the development described in the figure 1 of the section 67 response ,area highlighted in yellow, is started. This will assure water abstracted from bore ID 31755 will not adversely affect neighbouring bores.

6.7. *Extension of the lapse date of bore ID 31755*

I have no concerns regarding the extension of the lapse date of bore ID 31755 to align with the lapse date of the water take consent.

7.0 Section 67 Information Gap

At the time of writing this Memo I identified the following significant information gaps:

Description of Missing Information

7.1. **Bore ID 31755 Production Capability -** Bore ID 31755 has not been drilled or aquifer tested. While geophysical investigations indicate groundwater is likely present, no direct evidence has been provided demonstrating that the bore can sustainably abstract 371 m³/day (135,500 m³/year), as required by Policy E2.3.7(7)(g).

Risk: High

Why is this information needed:

Without this information, it is not certain that the calculated water demand for the proposed development can be met, with 30% of the demand planned to be supplied by the proposed bore. The applicant has not provided a contingency plan if Bore ID **31755** does not have the capability to sustainably abstract the quantities being sought.

7.2. **Drawdown and Neighbouring Bore Interference Effects -** No assessment of drawdown or interference effects has been undertaken for Bore ID 31755.

Risk: High

Why is this information needed:

Given the presence of at least 21 neighbouring bores within 1 km of Bore ID 31755, and the highly variable yields observed in the local fractured aquifer system, an aquifer pumping test and a neighbouring bore interference assessment are required to demonstrate compliance with Policies E2.3.7(7)(e) and (f), that neighbouring groundwater users are not adversely affected to the extent they are prevented from exercising their lawfully established water takes.

7.3. **Groundwater Quality and Saline Intrusion-** No groundwater quality monitoring data, baseline water quality assessment, or saline intrusion assessment has been provided. This is of particular importance given the scale of the proposed abstraction, the reliance on groundwater for potable supply and the proximity of the production bores to the coast.

Risk: Medium to High

Why is this information needed:

	As the proposed take is to be the potable water supply for the Beachlands South development, it is critical to ensure that the water quality is suitable for the proposed use. Both production bores are in relatively close proximity to the coast; therefore, there is a risk of saline intrusion. Furthermore, the proposed take may increase the risk of saline intrusion, potentially impacting water quality for all groundwater users in the area. Therefore, I consider it appropriate that ongoing monitoring is undertaken to provide an early warning system should the quality of the water supply change

8.0 Recommendation

Based on the information currently available, I do not have enough information to support the proposed groundwater take application at this stage. The applicant has generally demonstrated a legitimate demand for water associated with the proposed development, and the requested allocation is currently within the available groundwater allocation limits for the Beachlands Greywacke / Waitemata aquifer system.

However, several significant information gaps remain concerning the reliability of the proposed water supply; the production capability of Bore ID 31755; potential interference effects on neighbouring groundwater users from the proposed take at bore ID 31755; and groundwater quality and potential saline intrusion. These matters introduce significant uncertainty regarding the availability and long-term sustainability of the proposed take and whether it may have adverse effects on neighbouring groundwater users and the environment. Hence with available information, the effects of proposed take, especially from bore ID 31755, cannot be considered as less than minor on the receiving environment. The applicant has failed to address the request for further information under section 67 which may have addressed these gaps.

Should it be decided that the consent be granted, I recommend that the conditions detailed in section 9of this memo are imposed. These conditions will ensure that the resulting water take (which may not necessarily be what is currently being sought) is sustainable in the long term, and that the effects on the environment and neighbouring users are less than minor.

9.0 Proposed Conditions

I recommend the following set of conditions:

SPECIFIC CONDITIONS GROUNDWATER TAKE CONSENT WATxxx

Should consent be granted, I recommend the following conditions be imposed:

Activity in accordance with plans

1. This consent must be carried out in accordance with the documents and drawings and all supporting additional information submitted with the application, detailed below, and all referenced by Auckland Council ('the Council') as resource consent number WATxxx, including:

    - Beachlands South - Fast-track Approval Substantive Application, Assessment of Environmental Effects and Statutory Analysis", prepared by Unio Environmental, dated 24 September 2026, Reference 000005.
    - Draft Proposed Conditions – Beachlands South Fast Track Application, dated 24 September 2026.
    - Beachlands South Fast Track - Infrastructure Report, prepared by Harrison Grierson, dated 24 June 2026, Document REP001-A2515591.00.cjm
    - Beachlands South Fast-Track Substantive Application Water Supply Concept - Beachlands South, Beachlands Auckland", prepared by GWE Consulting Engineers, dated June 2026, Version V6, Reference J3021-1
    - A Section 67 -Request for Further Information Response document titled "Attach 0B2 S67 Response Table", prepared by UNIO Environmental, under the Groundwater take and Bore

Use of Consent

2. Under section 125 of the RMA, this consent lapses five years after the date it is granted unless:

    (a) The consent is given effect to; or

    (b) The Council extends the period after which the consent lapses.

3. The consent holder must pay the Council an initial consent compliance monitoring charge of $816 (inclusive of GST), plus any further monitoring charge or charges to recover the actual and reasonable costs incurred to ensure compliance with the conditions attached to this consent.

    Advice note:

    The initial monitoring deposit is to cover the cost of inspecting the site, carrying out tests, reviewing conditions, updating files, etc., all being work to ensure compliance with the resource consent(s). In order to recover actual and reasonable costs, monitoring of conditions, in excess of those covered by the deposit, should be charged at the relevant hourly rate applicable at the time. The consent holder will be advised of the further monitoring charge. Only after all conditions of the resource consent(s) have been met, will the Council issue a letter confirming compliance on request of the consent holder.

Commencement and duration of consent

4. The taking of water permit WAT***** must only commence upon surrender of existing consent WAT60276020, which is held by the applicant.

5. The consent holder must notify the Council within one week of the commencement of groundwater abstraction under consent WATxxx.

Advice Note:

The notification of the commencement of groundwater abstraction should be submitted to monitoring@aucklandcouncil.govt.nz.

6. The taking of water permit WATxxx expires on **31 May 2052**, unless it has lapsed, been surrendered, or been cancelled at an earlier date pursuant to the RMA.

Advice Note:

A regional consent, such as a groundwater take permit, is linked to the person or organisation listed as the consent holder, and does not automatically transfer to the new landowner when a property is sold.

A consent holder's interest may be transferred - in whole or in part - to another person or organisation for water take consents. The original consent holder remains responsible for compliance with the consent conditions and all related fees until the Council receives the completed and signed transfer form a Notice of Transfer of a resource consent. Further information on the notice application can be found in the link below:

https://www.aucklandcouncil.govt.nz/building-and-consents/resource-consents/making-change-to-resource-consent/Pages/transfer-resource-consent.aspx

Authorised Use

7. The take and use of groundwater from the Beachlands Greywacke / Waitemata aquifer is authorised in the manner set out below:

   (a) The take is from a 150mm diameter, 107mm deep bore (ID 20758) at map reference 1777853 mE, 5914738 mN, or a bore certified by the Council to be a replacement of the production bore.

   (b) The take is from a 200mm diameter, 600mm deep bore (ID 31755) at map reference 1778404 mE, 5913528 mN, or a bore certified by the Council to be a replacement of the production bore.

(c) The take must only be used for potable water supply to the proposed development and irrigation of a 5-hectare golf course hectares, on land legally described as Lot 2 DP 501271, Lot 100 DP 504488, Lot 4 DP 54105, Lot 9 DP 54105 and Lot 10 DP 54105 at 110 Jack Lachlan Drive and 620, 712, 758 and 770 Whitford-Maraetai Road, Beachlands.

Advice Note:

A replacement bore will require a resource consent application pursuant to s9(2) of the RMA.

Changes to the listed land use activities utilising the water take may require an application to change the conditions pursuant to s127 of the RMA.

Authorized quantities

8. The abstraction from bore ID 20758 (Formosa bore) must comply with the following:

(a) The total daily abstraction must not exceed 300 cubic metres.

(b) The total volume of water abstracted in each 12-month period, commencing 1 July of any year and ending 30 June of the following year, must not exceed 42,000 cubic metres.

9. The abstraction from bore ID 31755 (Boe 620) must comply with the following:

(a) The total daily abstraction must not exceed 371 cubic metres.

(b) The total volume of water abstracted in each 12-month period, commencing 1 July of any year and ending 30 June of the following year, must not exceed 135,500 cubic metres.

10. If any limits specified in **Conditions 8 or 9** are exceeded, the consent holder must provide the Council with a report detailing:

(a) The reason for the exceedance and the mitigation measures proposed to ensure future compliance.

(b) A timeframe for implementing the mitigation measures.

The report must be submitted to the Council within one (1) month of the identified exceedance.

Advice Note:

The exceedance notifications report should be submitted to monitoring@aucklandcouncil.govt.nz.

Contact details

11. Within 10 days of the consent being granted, the consent holder must provide to the Council, the details of a nominated contact person, including their full name, their role with respect to the consent (for example, consent holder, tenant, site manager), a valid email address and mobile phone number that the Council may contact if required, regarding water use data. The contact details must be kept up-to-date, and the Council must be notified of any changes within 10 working days of the change occurring.

Advice Note:

The contact person may be someone other than the consent holder, for example, a site manager or tenant. However, overall responsibility for compliance with consent conditions remains with the consent holder.

Bore construction for water level measurements

12. Provision at the top of both production bore ID 20758 and production bore ID 31755 (or a replacement bore certified by the Council), must be made and maintained so that a probe can be lowered vertically into the bores between the riser tube and casing, to measure the static water level/water level in the bores.

Advice Note:

Access to the wellhead for water level measurement can be achieved by having an access tube of at least 2 centimetres internal diameter extending from the top of the bore to the submersible pump. In order to keep out foreign matter, the tube should be fitted with an easily removed plug.

Bore construction for water quality sampling

13. Provision at the top of both production bore ID 20758 and production bore ID 31755 (or a replacement bore certified by the Council), must be made and maintained so that a sample of water can be collected from the bores for water quality analysis. A tap or hand valve must be fitted as close to the pump outlets as possible and before the water enters any storage tank or filter. The tap or valve must have at least 0.3 metre clearance above ground level or any other obstruction to allow a sample bottle to be filled.

Advice Note:

Access to the wellhead for water sampling can be achieved by having a tap or hand valve fitted as close to the pump outlet as possible and before the water enters any storage tank or filter. The tap

or valve should have at least 0.3m clearance above ground level or any other obstruction to allow a sample bottle to be filled.

Installation of water meter

14. Prior to exercise of this consent, a water meter with a visual tumbler display and an electronic pulse output connected to a data logger and telemetry device, must be installed, verified in-situ for accuracy and maintained at the outlet of both pumps (production bore ID 20758 and production bore ID 31755) to the satisfaction of the Council. The water meters and recording device or system must:

- Be fit for the purpose and water it is measuring;
- Measure the volume of water taken at 60-minute intervals, with an accuracy of +/- 5% of the actual volume taken;
- Transmit the volume of water taken in real time. The telemetry device must transmit logged data at intervals of no more than 60 minutes to the Council's Hydrotel water database (or to any replacement database required in writing by Council) in a format that is compatible with the Council systems;
- Be tamper-proof and sealed;
- Be installed (water meter) on the outlet pump;
- Have systems and equipment in place to ensure continued operation in the event of a power outage;
- Have backup storage;
- Be safely accessible;
- Be installed and maintained in accordance with the manufacture's specifications.

Prior to exercise of this consent, the consent holder must contact monitoring@aucklandcouncil.govt.nz, or to any preplacement email address identified in writing by the Council, to arrange set-up of the telemetry devices to ensure logged data is transmitting to the Council correctly. Water meter verification must be completed by a Suitably Qualified and Experienced Professional (SQEP) for meter installation and verification.

Advice Note:

The Council interprets a SQEP to be a person that has obtained a relevant NZQA recognised qualification in the verification and installation of water meters.

Verification of water meter/device accuracy

15. The water meters and any device or system used to record water take volume, must be verified in-situ as accurate by a SQEP at the following times:

- Prior to the exercise of this consent.
- Within 5 working days of the water meter being serviced or replaced.
- By 31 December of the fifth year from the commencement of consent, and thereafter at five yearly intervals.

The water meters, their verification and evidence of their accuracy must be in accordance with the Resource Management (Measurement and Reporting of Water Takes) Regulations 2020 (or any equivalent regulations that may replace them) and a copy of the verifications must be provided to the Council within 10 working days of the meter/devices being verified as accurate.

Water meter verification must be completed by a SQEP for meter installation and verification. The verification of the water meter must be to the installation specifications listed in **Condition 14.**

Advice Note:

The Council interprets a SQEP to be a person that has obtained a relevant NZQA recognised qualification in the verification and installation of water meters.

Water meter readings

16. Water meter measurements of water abstraction from the outlet of the pump from production bore ID 20758 and production bore ID 31755, must be recorded daily at 60-minute intervals, commencing before pumping starts for the day and finishing at the end of pumping for the day. Daily records of the measurements must be provided electronically to the Council by the end of the next day (unless otherwise agreed by the Council).

In the event of failure of the data logger, telemetry unit and/or associated electronic devices, the water meter must be read manually at daily intervals until the devices are repaired and records kept of the date, time and corresponding water meter reading. The Council must be notified of this problem within three working days of having identified the issue.

If no water is taken during any period, then the current meter reading must still be recorded.

Advice note:
For any issues with the submissions of compliance data or documentation, including access to the Water Use Data Management System, contact monitoring@aucklandcouncil.govt.nz.

Water level readings

17. Water levels in production bore ID 20758 and production bore ID 31755 must be measured twice a year in March and October of each year, and records kept of the date, time and corresponding water level for the production bore, in accordance with **Condition 18** below.

    The results of each water level reading must be submitted to the Council at monitoring@aucklandcouncil.govt.nz by no later than the 7th day of the following month in which the reading was undertaken.

18. The static water levels must be measured from the top of surface elevation, and must be recorded to the nearest 0.01 of a meter (nearest cm). Both bores must be monitored after pumping water levels have fully recovered to non-pumping levels. Recovery to non-pumping levels must be verified by taking a series of three or more water levels made over a half hour period that are all within 0.02m of each other and are not showing a rising or falling head. If there is a difference of more than 0.02m, then the bore must be allowed to recover further from any pumping, until the groundwater level has stabilised.

Water reporting

19. The following information must be entered, at the frequency and date specified, to the Council's *Water Use Data Management System* or to any replacement database identified in writing by the Council.

Information	**Frequency**	**Due Dates for reporting**
Water take meter readings, time and date	Daily	Daily
Water level readings Including time and date	Twice a year in March and October	The results of each water level reading must be submitted to the Council at monitoring@aucklandcouncil.govt.nz by no later than the 7th day of the following month in which the reading was undertaken.
Water quality data	Before commence ment of the consent,	The results of the sampling must be submitted to the Council at

	and once yearly in March	monitoring@aucklandcouncil.govt.nz within a month of receiving the laboratory results.
Saline intrusion monitoring	Twice a year in March and October	The results of the sampling must be submitted to the Council at monitoring@aucklandcouncil.govt.nz within a month of receiving the laboratory results.

Advice Note:

The web address for Council's on-line Water Use Data Management System is:

http://aklc.hydrotel.co.nz/hydrotel/cgi-bin/WudmsWebServer.cgi

Your WUDMS customer number is Pxxx for consent WATxxx, and the default password is 1234. For the link to work properly you need to ensure that the Council has your up-to-date email address for contact purposes. An on-line manual explaining how to enter and submit your water readings is available at the web address specified above.

For any issues with the submissions of compliance data or documentation, including access to the Water Use Data Management System, contact monitoring@aucklandcouncil.govt.nz.

Production bore water chemistry sampling

20. A water sample must be collected from production bore ID 20758 and production bore ID 31755, or a replacement bore certified by the Council, prior to the commencement of groundwater abstraction, and yearly thereafter in the month of March, and the samples analysed for the following parameters:

(a) Conductivity at 25°C (mS/m)

(b) Chloride (CI)

(c) Sulphate (SO_4)

(d) Temperature of water sample at the head of the bore

(e) pH

(f) Potassium (K)

(g) Silica (SiO_2)

(h) Nitrate nitrogen (NO_3-N)

(i) Total Alkalinity ($CaCO_3$)

(j) Calcium Hardness ($CaCO_3$)

(k) Magnesium Hardness ($CaCO_3$)

(l) Boron (B)

(m) Manganese (Mn)

(n) Sodium (Na)

(o) E.coli

(p) Total Coliform

(q) Enterococci

The bore purging, sample bottles and filling, sample transport and handling, laboratory measurements, data processing and quality assurance must be in accordance with "*National Environmental Monitoring Standards-Water Quality Part 1 sampling, Measuring, Processing and Archiving of Discrete Groundwater Quality Data*" (March 2019 or latest edition) at www.nems.org.nz, or the equivalent as approved in writing by the Council.

The water sample analysis results, along with a report detailing whether the abstracted water is of suitable quality for the proposed activity, must be submitted to the Council at monitoring@aucklandCouncil.govt.nz within 30 days of their receipt from the laboratory.

21. If any constituent analysed exceeds the applicable maximum acceptable value (MAV) or operational limit specified in the Water Services (Drinking Water Standards for New Zealand) Regulations 2022, or any subsequent amendment or replacement of those standards, the consent holder must:

(a) Notify the Council within a week of becoming aware of the exceedance.

(b) Undertake repeat sampling and analysis of the non-compliant constituent(s) at weekly intervals for a period of four consecutive weeks following receipt of the initial exceedance result.

(c) Provide the results of the repeat sampling programme to the Council within 20 working days of completion of the sampling programme.

(d) Where the repeat sampling confirms an ongoing exceedance of the relevant drinking water

standard, prepare and submit a Groundwater Quality Exceedance Report to the Council within two months of confirmation of the exceedance.

(e) The Groundwater Quality Exceedance Report must, as a minimum, include:

i. Identification of the constituent(s) exceeding the applicable drinking water standard;

ii. An assessment of the likely cause and source of the exceedance;

iii. An assessment of any risks associated with the continued use of the groundwater for potable supply purposes;

iv. Details of any proposed mitigation, management, treatment, infrastructure upgrades, or operational changes required to ensure the groundwater is suitable for its intended use; and

v. Where necessary, proposed amendments to the groundwater abstraction regime and/or monitoring programme.

(f) Any mitigation measures identified in the approved Groundwater Quality Exceedance Report must be implemented within a timeframe agreed to by Council.

The Council must be notified of exceedances of the relevant MAV values and the "Groundwater Quality Exceedance Report" submitted to monitoring@aucklandCouncil.govt.nz.

Should the water quality of abstracted water not be treatable to an acceptable standard for potable water usage, the Council at its discretion, may review the granted water allocations for the proposed use.

Saline intrusion water quality sampling

22. A water quality sample must be collected from production bore ID 20758 and production bore ID 31755 twice a year in October and March. The samples must be analysed for the following constituents:

- Electrical Conductivity at 25°C (mS/m)
- Chloride (Cl)
- Sulphate (SO4)
- Sodium (Na)

The samples must be collected from each of the production bores at the end of the daily pumping cycle before the pumps are switched off.

The bore purging, sample bottles and filling, sample transport and handling, laboratory measurements, data processing and quality assurance must be in accordance with "National Environmental Monitoring Standards-Water Quality Part 1 Sampling, Measuring, Processing and Archiving of Discrete Groundwater Quality Data" (March 2019 or latest edition) at www.nems.org.nz or the equivalent as approved in writing by the Council.

The results of the analyses must be submitted to the Council at monitoring@aucklandcouncil.govt.nz in a pdf digital format by no later than the 7th day of the following month in which the sample was collected.

Interim saline intrusion trigger levels

23. The interim saline intrusion trigger levels for key parameters for production bore ID 20758 and production bore ID 31755, are as follows:

- Electrical conductivity – 60 mS/m
- Chloride – 44 g/m^3
- Sulphate – 10 g/m^3

Final saline intrusion trigger levels

24. Within two years of the commencement of exercise of the consent, final saline intrusion trigger levels for production bore ID 20758 and production bore ID 31755 must be determined, based on the results of first two years of twice-yearly saline intrusion water quality sampling required under **condition 22** (baseline data). The final trigger levels must be calculated as the mean plus three standard deviations (SD) of the baseline data.

Advice Note:

The final saline intrusion trigger levels replace the Interim Trigger Levels.

Groundwater (saline intrusion trigger) exceedance report

25. If the water quality samples taken from production bore ID 20758 and production bore ID 31755, in accordance with **Condition 22** (Saline intrusion water quality sampling) exceed the set trigger levels specified in **Conditions 23 or 24**, then:

a) the Council must be notified as soon as possible and no later than five working days after

becoming aware of the exceedance;

b) sampling of the relevant production bore (or its replacement) must be undertaken weekly with the results reported to the Council within five working days of the sample being taken;

c) if any of the saline intrusion trigger levels are still being exceeded 20 working days after the initial breach, then within 40 working days of the initial breach, a Groundwater Saline Intrusion Trigger Exceedance Report prepared by a suitably qualified and experienced hydrogeological professional, must be submitted to the Council for written approval. The Report must:

   i. assess the reasons for and significance of the exceedance in terms of saline intrusion of the aquifer and any declining groundwater levels;

   ii. include a review of all available data, including groundwater levels, groundwater use and groundwater quality;

   iii. assess whether the exceedance was caused by the exercise of consent; and any proposed mitigation measures that may be required in the event that adverse environmental effects are identified. Such measures should consider a reduction of the pumping rate.

d) all recommendations specified in the Report (if such is required), and any other actions directed by the Council, must be implemented to the satisfaction of the Council and must continue for as long as the groundwater monitoring is considered to be indicative of saline intrusion and/or on-going declining groundwater levels by the Council.

The saline intrusion trigger levels may be changed if agreed to in writing by the Council. The Council reserves the right to review the allocation granted to the applicant should the initial sampling or follow-up sampling indicate that saline intrusion is occurring.

Aquifer pumping test

26. Prior to the use and any abstraction from Bore ID 31755 authorized by this consent, and before the start of the development highlighted in yellow in figure 1 of the section 67 response from the applicant dated 16 October 2026 and within, the consent holder must undertake a 24-hour duration constant rate aquifer test on Bore ID 31755 (or an alternative production bore approved in writing by the Council).. This aquifer test must be done The testing should include:

- a step-drawdown test to assess bore efficiency and pumping characteristics;
- a minimum 24-hour constant-rate pumping test to assess sustainable yield;

- monitoring of drawdown and recovery in the subject bore and, where practicable, nearby bores; and

- assessment by a suitably qualified hydrogeologist confirming the sustainable abstraction rate of the bore in an aquifer test report.

Neighboring bore interference effects assessment report

27. Within one month of completion of the aquifer pumping test, the consent holder must provide the Council with a report prepared by a Suitably Qualified and Experienced Professional (SQEP) in a hydrogeological field for certification. The report (Neighboring Bore Interference Effects Assessment Report) must include, but is not limited to:

    (a) Details of the aquifer test methodology and results;

    (b) Pumping rates, elapsed time data, and groundwater level measurements;

    (c) Groundwater level monitoring results from any observation bores;

    (d) Derived aquifer parameters, including transmissivity and storativity;

    (e) An assessment of the sustainable yield of the production bore, including whether it supports the consented groundwater take;

    (f) Identification of any measures required to align the consented allocation with the demonstrated sustainable yield (for example, drilling another bore); and

    (g) an assessment of drawdown interference effects resulting from the consented groundwater take on neighbouring bores.

    This report must include an assessment of the effects of the proposed water take from Bore ID 31755 in terms of:

    (a) drawdown effects on all neighbouring bores within a 1km radius of the production bore;

    (b) in-well drawdown in neighbouring bores from their own take;

    (c) the volume of water remaining in each bore after pumping has occurred; and

    (d) all assumption and limitations of the calculations.

28. If the aquifer test demonstrates that the sustainable yield of the production bore is less than that consented or that that drawdown interference effects on neighbouring bores are such that other groundwater users is limited in their ability to abstract their lawfully established water takes, then

the Council may review the rate and volume of abstraction authorised by this consent.

The aquifer test results and drawdown interference report must be submitted to the Council at monitoring@aucklandcouncil.govt.nz.

Water Use Efficiency and Environmental Monitoring Report

29. A Water Efficiency and Environmental Monitoring Report must be submitted to the satisfaction of the Council in December 2030, and at 5-year intervals thereafter.

The report must assess the water use over the previous reporting period against best practice with respect to the efficient use of water for the purpose consented. This report must include, but not be limited to:

(a) provision of annual summary of water usage in relation to the water consented.

(b) details of the progress on the development.

(c) Details of water use in relation to the development in the monitoring period up to the submission of the Water Use Efficiency and Environmental Monitoring Report.

(d) reasons why annual water use may have varied over the previous five years.

(e) comparison of the site's water use against industry best practice usage for the same activity.

(f) details of water quantities that are proposed to be used in the next five years.

(g) information demonstrating equipment and decision making (e.g., rainwater harvesting system and water saving measurements are implemented) and any changes planned for the coming five years.

(h) water conservation steps taken (e.g., leak detection).

(i) demonstrate the measures that have been implemented to ensure the abstraction limit is not breached, for example, sensors, alarms, shut off activation, etc., maintenance or contingency plan.

(j) a summary of all water level, water quality and saline intrusion data and how this data relates to the health of the aquifer system.

Review Condition

30. Pursuant to Section 128 of the RMA, the conditions of this consent may be reviewed by the Manager Resource Consents South at the Consent Holder's cost:

In December 2031 and subsequently at intervals of not less than five years thereafter, in order:

- To deal with any adverse effect on the environment which may arise or potentially arise from the exercise of this consent and which it is appropriate to deal with at a later stage or
- To vary the quantities, monitoring, operating and reporting requirements and performance standards in order to take account of information, including the results of previous monitoring and changed environmental knowledge, on: water availability, including alternative water sources; actual and potential water use; groundwater levels; efficiency of water use; groundwater quality; and the relationship of Māori with water.

Advice Note:

Under section 128 of the RMA the conditions of this consent may be reviewed by the Manager Resource Consents South at the consent holder's cost in the following circumstances:

To provide compliance with rules in any regional plan relating to use of water, water or air quality etc. (refer section 128(1) (b) of the RMA) that have been made operative since the commencement of consent.

To provide compliance with any relevant national environmental standard that has been made since the commencement of consent.

Lapse date extension to bore ID 31755

Condition 1: Bore location and construction
The bore is to be generally (within 10 m of the specified location) located and constructed as detailed below:

Name	Bore ID	NZTM Easting (mE)	NZTM Northing (mN)	Depth (m)
Beachlands South Limited Partnership	31755	1778404	5913528	600
Bore diameter (mm)	**Aquifer**	**Casing depth (m)**	**Casing material**	**Grouting**

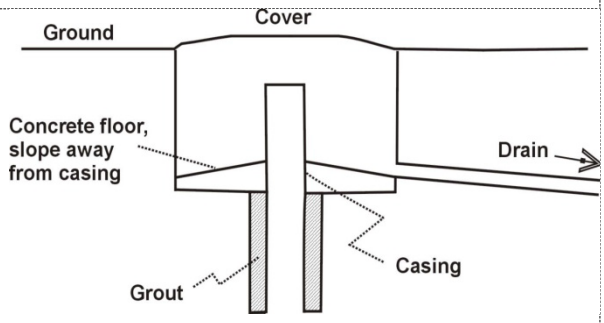
200	Beachlands Greywacke	275	Sch 40 Steel	275

Condition 2: Bore completion date
The bore must be completed within 30 days of the commencement of its construction.

Condition 3: Bore design, construction, maintenance, and record keeping
The bore must be constructed, maintained (periodically checking the integrity of the headworks), tested, and records kept (drilling log), in accordance with the application submitted and NZS 4411:2001, Environmental Standard for Drilling of Soil and Rock. Adequate provisions for groundwater water level measurement and water sampling must be provided at the bore head.

Advice note: Bore headworks

Bore headworks constructed in accordance with the diagram and explanation provided below will be considered to meet the NZS 4411:2001 Section 2.5.5.3-5.

Above ground	*Below ground*
• *The top of the casing shall extend at least 0.3m above the natural ground level or pump house floor, whichever is the lower* • *A concrete pad of 0.3m radius and 0.1m thick, graded to drain surface water away from the bore, is to be constructed around the bore head*	

Advice note: Water level measurement and water quality sampling

NZS 4411:2001 Section 2.5.5.7 (water level measurement) can be met by strapping a 20mm diameter (minimum) tube (polypipe) to the main riser, power and support stay for the pump, the provision of a hole in the headworks of a minimum of 20mm diameter and a removable, screw-type cap. Provision at the top of the bore for water quality sampling can be achieved by fitting a tap or hand valve as close to the pump outlet as possible and before the water enters any storage tank or filter. It should have at least 0.3 metre clearance above ground level or other obstruction to allow a sample bottle to be filled.

Condition 4: Water take consent
The abstraction of groundwater from Bore ID 31755 (other than for the aquifer pumping test) must not commence until a water take consent has been obtained by the consent holder for the proposed abstraction.

Condition 5: Bore identification
Bore identification number 31755 must be permanently affixed, in a clearly visible location and in a form that will remain legible, to the bore head structure.

Condition 6: Information to be supplied to the Council
The following information must be supplied to the Council, within 20 working days of completion of the bore:

a. the drilling log.

b. a digital photograph(s) legibly showing:

- the bore number affixed to the bore head structure;
- the length of the casing protruding above the concrete pad; and
- the concrete pad around the bottom of the bore head.

c. an annotated map, or aerial photograph, that accurately and clearly shows the physical location and coordinates for the bore.

d. the following as-built details for each bore –

Name	Bore ID	NZTM Easting (mE)	NZTM Northing (mN)	Depth (m)
	31755			
Bore diameter (mm)	**Aquifer**	**Casing depth (m)**	**Casing material**	**Grouting**

Advice note: Aerial Photograph

An aerial map can be downloaded from Auckland Council's web site if an aerial photograph is required.

Condition 7: Lapse date
The consent must lapse five years from the decision to grant unless given effect to prior to that date.

Advice Notes

Advice note 1: Email contact details

All information required by the Council in this consent can be sent to monitoring@aucklandcouncil.govt.nz.

Advice note 2: Drinking water standards

The consent holder is advised that groundwater supplied for human consumption should meet the requirements of the Drinking Water Standards for New Zealand (2022), the Health Act 1956, as amended by the Health (Drinking Water) Amendment Act 2007 (HDWAA) and any other Ministry of Health requirements, such as those contained in the Health (Drinking Water) Amendment Act 2007.

Advice note 3: Compliance with regional rules

There are regional rules that cover the ongoing use, maintenance, restoration, alteration, replacement or decommissioning of the bore which must be complied with. These rules are detailed in the Auckland Unitary Plan (Operative in Part).

Advice note 4: Avoiding contamination of aquifer

The consent holder is advised to install a non-return valve of acceptable NZ Standards on the proposed bore to prevent the backflow of water into the bore.

Advice note 5: Use of water

The taking and use of water is regulated by s14(3)(b) of the RMA and the Auckland Unitary Plan. If your proposed water take is not provided for by s14(3)(b) or by a permitted activity rule in the AUP(OP) then you require a resource consent to lawfully take and use water. See Chapter E7 of the AUP(OP).

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure P:

Healthy Waters and Flood Resilience

Hillary Johnston

20 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 TECHNICAL SPECIALIST MEMO – HEALTHY WATERS & FLOOD RESILIENCE

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Hillary Johnston – Healthy Waters Fast Track Lead
Qualifications & Relevant Experience:	I hold the qualification of Bachelor of Science in Environmental Science and Geography and have 12 years of experience in regulatory stormwater assessments. I am a Certified Environmental Practitioner, a full member of the Environmental Institute of Australia and New Zealand, a member of WaterNZ, and an associate member of Engineering New Zealand. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation, and fast-track applications, and have appeared as an expert witness for Council before consent authorities and the Environment Court on multiple occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	20 October 2026

3.0 DOCUMENTS REVIEWED

This memorandum has been prepared based on documentation provided prior to 20 October 2026 including:

- *Beachlands South, Fast-track Approval Substantive Application, Assessment of Environmental Effects and Statutory Analysis*, dated 26 June 2026 and prepared by Unio Environmental
- *Beachlands South – Rules Assessment*, dated 26 June 2026, and prepared by Unio Environmental
- Attachment 2: *Beachlands South Overall Masterplan* – Revision A, dated 15 June 2026 and prepared by Jasmax
- Attachment 9: *Beachlands South Fast Track, Infrastructure Report* (including appendices), dated 24 June 2026, and prepared by Harrison and Grierson
- Attachment 9F: *Stormwater Management Plan, Beachlands South* – Version 2, dated 24 June 2026, and prepared by Harrison and Grierson
- Attachment 9V: *Stormwater Drawings* – Rev A, dated April 2026, and prepared by Harrison and Grierson
- Attachment 9W: *Stormwater Drawings* – Rev A, dated June 2026, and prepared by Harrison and Grierson
- Attachment 9X: *Stormwater Drawings* – Rev A, dated April 2026, and prepared by Harrison and Grierson
- Attachment 9Y: *Stormwater Drawings* – Rev A, dated May 2026, and prepared by Harrison and Grierson
- Attachment 9ZD: *Scheme Plans 1* – Rev A, dated 25 May 2026, and prepared by Harrison and Grierson
- Attachment 9ZE: *Scheme Plans 2* – Rev A, dated 25 May 2026, and prepared by Harrison and Grierson
- '*S67 – Stormwater Assessment – Downstream Flood Effects: Beachlands South Fast Track Consent'* memo dated 19 October 2026, and prepared by Harrison and Grierson

4.0 ADDITIONAL REASONS FOR CONSENT NOT INCLUDED IN AEE / INCORRECT REASONS FOR CONSENT

The Applicant's Agent has identified the following reasons for consent under Chapter E8 of the AUP:

- E8.4.1(A10) – The proposal involves the discharge of stormwater runoff from impervious areas within the project area not otherwise provided for by Table E8.4.1. This is a discretionary activity.
- E8.4.1(A11) – The proposal involves the diversion and discharge of stormwater runoff from a new stormwater network within the project area. This is a discretionary activity.

The Application outlines that stormwater management for the development is intended to be authorised under Auckland Council's Regionwide Network Discharge Consent (RWNDC). The proposed Stormwater Management Plan (SMP) has been prepared to support this approach and identifies the development as a *Greenfield* under the RWNDC framework. It is understood that the SMP is an evolution of the SMP originally prepared in support of Private Plan Change 88 (PPC88), and has been further refined to support the current fast-track application.

Compliance with the RWNDC objectives and requirements, in particular flooding effects on finished floor levels downstream of the proposed development, has been a key area of discussion between HWFR and the Applicant. This is further discussed in more detail in the following sections of this memo. The Applicant's assessment outlined in the additional memo (dated 19 October 2026) indicates that there are

potential solutions available that would result in no increases in flooding to properties downstream of the development. However, as these solutions have not been finalised, HWFR have recommended additional conditions of consent to ensure this outcome can be secured. If these conditions cannot be complied with, the development will not be able to be authorised under the RWNDC as it would not be compliant with Objective O3.1 of Schedule 2 which requires '*Avoid the increase of existing flooding or creation of new flooding of habitable floors as a result of urban development and intensification*'.

If the proposed development will not result in impacts to existing floor levels downstream and the SMP is adopted under the RWNDC, a separate private stormwater diversion and discharge consent is not required for impervious areas which discharge to the proposed public stormwater network. However, consent may still be required for any sites which discharge directly to the receiving environment via private stormwater network. Any decision issued should clearly identify where stormwater discharges and diversions are authorised by the granted approvals, and where stormwater discharges are intended to rely on separate authorisation under the RWNDC.

5.0 SPECIALIST ASSESSMENT

The Applicant, Beachlands South Limited Partnership, has applied for consents and approvals to establish the Beachlands South development – a master planned mixed-use community comprising of residential and commercial development, visitor accommodation, education facilities, open space and ecological restoration areas, and associated subdivision, earthworks, and infrastructure.

The development is primarily proposed on land that was rezoned through PPC88 which was made operative 21 January 2025. The plan change introduced the Beachlands South Precinct (I458) and includes the implementation of a Stormwater Management Area – Flow 1 (SMAF) overlay.

Existing Environment

The site includes approximately 268ha of land which is primarily occupied by the Formosa Golf Course and Resort. The hydrology of the site includes a network of permanent and intermittent streams, wetlands, floodplains, overland flow paths. Existing flood hazard features, including flood-prone areas and overland flow paths, are present across of the site and have influenced the layout and design of the proposed development (Figure 1)



Figure 1. Existing Flood Hazards, development site (Auckland Council GeoMaps, extracted September 2026)

Engagement with the Applicant

HWFR representatives have engaged extensively with the Applicant's Agents including Stormwater Engineers throughout the pre-application and fast-track approvals application processes. This has included a number of general project overview briefings, specific stormwater focused briefing meetings, as well as more detailed discussion on matters raised by HWFR as part of preliminary S67 recommendations.

A wide range of technical clarifications have been discussed with remaining key areas of interest discussed in the following sections of this memo.

Flooding Effects

Assessment Scenarios

HWFR have engaged in ongoing discussion with the Applicant's Engineers on the precinct provisions relating to flooding effects and mitigation of the effects of climate change. HWFR initial position, based on the interpretation of the AUP I458 Beachlands South provisions, was that when assessing the effects of flooding that the pre-development scenario would *not* include climate change with the post-development scenario including both climate change and maximum probable development.

Following discussions with the Applicant's Engineers, review of the PPC88 stormwater joint witness statement (JWS), and review of the relevant sections of the PPC88 decision report, HWFR acknowledges that the precinct provisions are ambiguous and do not provide clear direction to support HWFR initial position.

Considering the above, HWFR agree with the Applicant's Engineers that, for the purpose of this application, the effects of climate change are considered in both pre-development and post-development scenario in line with the approach generally accepted by HWFR for assessing flood related effects of development within existing urban zoned land. Therefore, the approach undertaken by the Applicant's Engineers is accepted in this context.

HWFR will seek the Applicant's Engineers to provide additional assessments on the potential effects of climate change. However, these would be undertaken as a suite of additional comparative scenario assessments and can be completed following the decision on this application, but prior to any authorisation of stormwater discharges from the proposed development under the RWNDC.

Areas of Interest

HWFR have identified key areas of interest in relation to remaining matters in discussion, these are outlined within Figure 2 and Figure 3. Within the areas of interest, the flood mapping provided by the Applicant's Engineers indicates flooding encroaching around building footprints with several finished floor levels appearing to be set relatively low in relation to both the existing stream banks and the mapped flood levels (Figure 3). This includes residential buildings at 167 – 189 Jack Lachlan Drive (along the true left bank) and commercial building at 190 Jack Lachlan Drive. Further areas of interest include the Jack Lachlan Drive bridge crossing and the Pine Harbour Marina Wastewater Pump Station.

The SMP for the development identified increases in flood levels downstream of the development across all modelled scenarios. In Section 6.3.5 of the SMP it is concluded that these increases will have an immaterial impact due to the existing high flood levels in the receiving environment and due to minimal changes in flood hazard classification.



Figure 2 – Increase in 1% AEP flooding with area of concern circled in red (Figure reproduced from SMP)



Figure 3. 167 – 189 Jack Lachlan Drive, indication of existing stream level relative to floor level (Google Street View, 2026)

As part of preliminary engagement, HWFR recommended that the Applicant provide further information to support the conclusions in the SMP. The Applicant's Engineer provided further information on the increases in flooding within the highlighted area of interest within Attachments 9F.1 and 9F.2 of the application. This information is generally limited to the existing residential properties at 167-189 Jack Lachlan Drive and does not include the commercial building at 190 Jack Lachlan Drive, the Jack Lachlan Drive bridge crossing, or the Pine Harbour Marina Wastewater Pump Station. While the Applicant's Engineers have provided some response information for the commercial building at 190 Jack Lachlan Drive this does not include an assessment of potential effects against the observed increases in flooding at this location.

The information within Attachments 9F.1 and 9F.2 of the application demonstrated that increases in stream peak flood levels for the 1% AEP rainfall event including 3.8-degree climate change may result in an increase flooding to the existing building floor levels at 169 and 189 Jack Lachlan Drive. At 169 Jack Lachlan Drive the modelled increase was indicated as 31mm (from 29mm to 60mm). At 189 Jack Lachlan Drive the modelled increase was indicated as 28mm (from 210mm to 238mm).

Following further discussions with the Applicant's Engineer, an additional memo (dated 19 October 2026) was prepared by the Applicants Engineer's to further address concerns in relation to the finished floor levels of the existing buildings at 167-189 Jack Lachlan Drive. The Applicant's Engineers undertook further investigation and modelling , identifying that additional flood management solutions could be provided within the proposed development to mitigate the potential impacts to existing buildings at 167-189 Jack Lachlan Drive. While the additional memo focused on these properties only, the additional mitigation solutions may also address the potential increases in flooding to 190 Jack Lachlan Drive, the Jack Lachlan Drive bridge crossing, and the Pine Harbour Marina Wastewater Pump Station.

At this stage, the solutions presented have not been finalised and are considered conceptual only. HWFR requires further validation to be carried out as part of the subsequent design stages and have

recommended conditions of consent be included that secure the outcome of the solutions put forward, being that the proposed development will result in no impacts to finished floor levels downstream.

To confirm that the model is fit for purpose and to appropriately interrogate any observed differences between the pre-development and post-development scenarios, HWFR recommends that the Applicant provides the hydraulic model, including the accompanying model build report, to HWFR for review. HWFR notes that the model review will be required prior to authorisation of discharges under the RWNDC to validate that the proposed development meets the necessary requirements.

Damming Effects

It is proposed to achieve peak flow attenuation of post-development flows from the development by utilising existing road embankments and associated culverts under Jack Lachlan Drive. No information is currently available to inform the design, construction, or condition of these existing structures, with the Auckland Council GeoMaps indicating the existing culverts were constructed sometimes in the 1990s. The culverts were likely installed to maintain the conveyance of the existing watercourses under the road embankment rather than to provide peak flow attenuation as their intended primary or secondary function. Therefore, the current peak flow attenuation provided by the existing culverts is considered to be due to the structures being inadvertently undersized relative to the upstream catchment.

HWFR understands that further to the proposed upgrade of the road corridor, the Applicant is not proposing to carry out any additional physical works on the existing embankments or culverts. However, the Applicant is proposing to utilise the existing embankments and culverts to provide attenuation of post-development peak flows and utilise this arrangement to mitigate potential effects from flooding on the downstream receiving environment.

There are two culverts located under Jack Lachlan Drive downstream of the proposed development which are outlined in Figure 5 and Figure 4 below. The flood assessment provided by the Applicant's Engineers indicates that the proposed development will reduce the flood levels upstream of the Western Culvert. Based on the earthworks plans presented in Attachment 9L, the reduction in flood levels does not appear to be due to the proposed development increasing the storage volume upstream of the culvert embankment. Instead, the reduction in peak flood levels appears to be due to the reduction in the post-development catchment area discharging to this location, as outlined in the 19 October 2026 memo. Overall, the development is considered to maintain the pre-development function of this culvert and no further assessments are required at this location subject to verification of the model results.

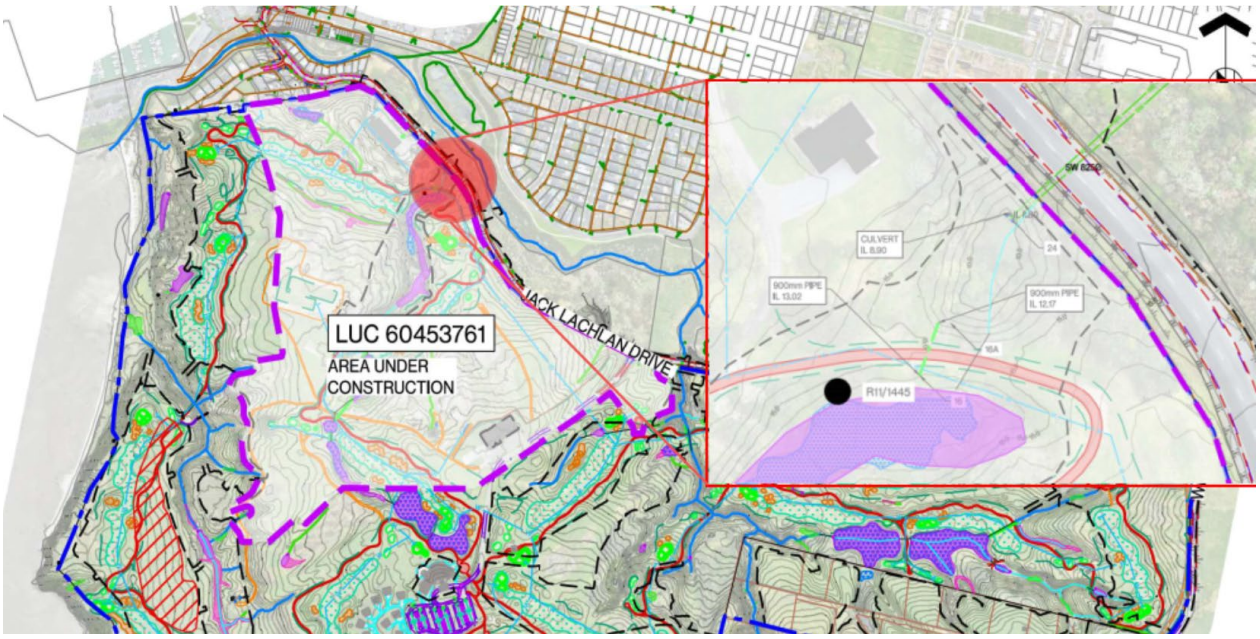


Figure 4. Western Culvert

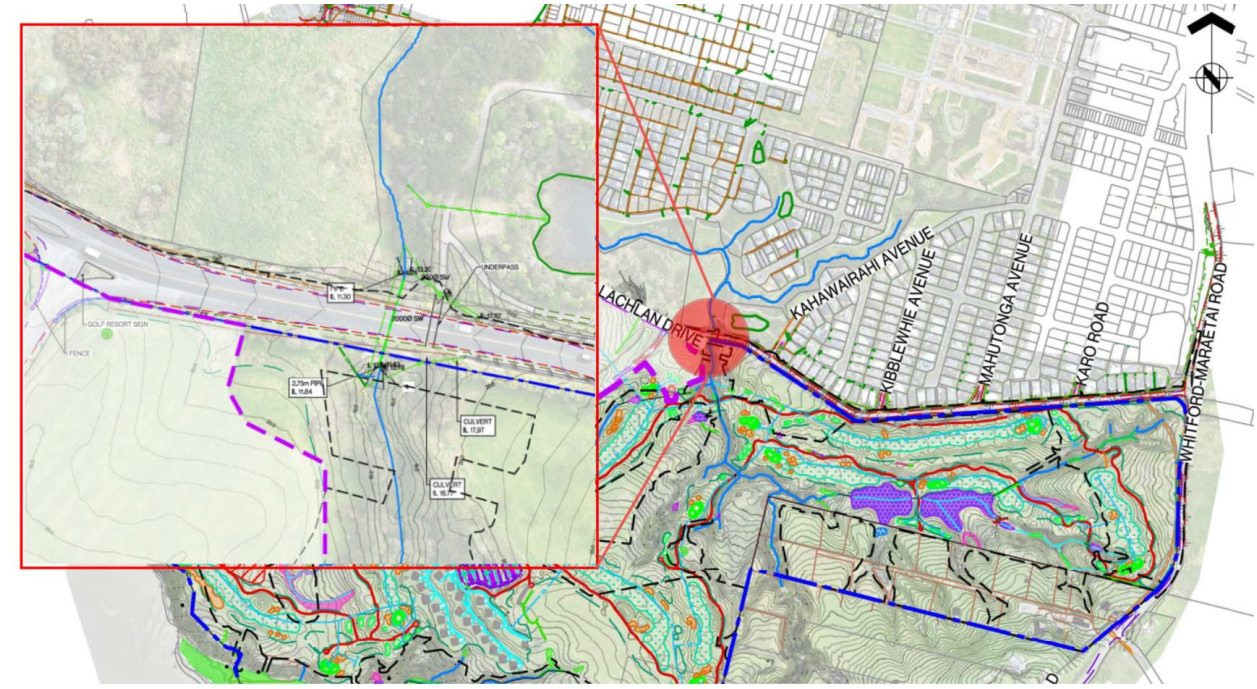


Figure 5. Eastern Culvert

At the location of the Eastern Culvert, the flood assessment provided by the Applicant's Engineers with the application indicated an increase in peak flood levels exceeding 500mm across all modelled scenarios. The Applicant's Engineer has not provided detail on the changes in post-development ponded depth or volume. The Applicant's Engineer has also not identified the existing embankment height.

Additional information provided by the Applicant's Engineer in the 19 October 2026 memo suggests that further mitigation could be implemented within the development that would result in a lower peak flood level increase. However, as these solutions have not been finalised they are only considered conceptual at this stage.
Based on the information provided to date, HWFR has residual concerns with regards to the Jack Lachlan Drive Eastern Culvert and recommends that the Applicant's Engineer provides further information prior to decision being made on this application to establish whether the existing structure will become a dam, ensure that appropriate consents have been applied for in this regard, and that the potential effects from the proposed development have been adequately assessed and can be managed and/or mitigated.

HWFR has assumed that should the Panel determine that the existing embankment and culvert is considered a dam, that the Applicant would apply for the relevant consent/s and provide any necessary supporting information. HWFR considers that this additional information should also include determination of whether the existing structure would qualify as a *Large Dam* under the New Zealand Building Act 2004. This is considered relevant to Council as an asset owner as it could result in ongoing financial obligations in order to ensure that the structure is operated and maintained in a way that meets the necessary legal and regulatory requirements. The Council does not wish to accept ownership of a Large Dam due to the ongoing associated financial obligations.

It is understood that a regulatory damming specialist has been engaged to review the application on behalf of Council who have provided advice on whether the Jack Lachlan Drive embankment and culvert are considered a dam, and whether additional consent/s are required.

Irrespective of the final decision made by the Panel on whether the existing embankment and culvert will be considered as a dam, HWFR recommends the following is provided by the Applicant:

- A condition assessment of the existing embankment and culvert and an assessment of the potential downstream effects if the embankment and culvert were to fail resulting in a sudden and uncontrolled release of ponded water, which could be addressed by carrying out a Dam Potential Impact Classification (PIC) assessment.

This is due to the limited information currently available on the design, construction, or condition of the existing embankment and culvert including the geotechnical and structural integrity of the overall structure. Therefore, it is unclear whether the existing embankment and culvert are suitable to accommodate the post-development increases in peak flood levels and volumes and deliver the proposed peak flow attenuation function without increasing the downstream risk to life to people and risk of damage to property and infrastructure.

Overland Flow Paths

HWFR have identified several locations where proposed overland flow paths traverse private lots and where the associated flood hazards exceed ARR H1 classification. Areas where flood hazards exceed ARR H1 classifications can be unsafe for the public, noting that some areas of proposed public roads are subject to ARR H5 classification which is considered unsafe for people, vehicles, and buildings.

The Applicant's Engineers have not demonstrated that sufficient space and easement width has been set aside for the overland flows traversing private lots and have not addressed overland flow paths will be managed to ensure flood risk to people, property, and infrastructure is tolerable or acceptable.

On this basis, HWFR recommends that the Applicant provides further information to demonstrate that the overland flow paths can be managed in a way that does not create risks to people and property. Should the Panel determine that the request from HWFR is not necessary then HWFR recommends a condition of consent to ensure that a detailed overland flow path report is prepared prior to Engineering Plan Approval (EPA) that demonstrates compliance with the relevant Council standards and ensures safe management of overland flows is provided for.

Public Assets

Land size and configuration

HWFR have raised concerns that the provided engineering plans do not provide sufficient information to enable HWFR to confirm that adequate land size and configuration have been set aside to accommodate public stormwater management devices such that these can meet the relevant Council guidelines and standards including the Stormwater Code of Practice and GD01. HWFR also advised the Applicant that the land should be free of retaining structures.

Other than confirmation that the design will meet the relevant Council guidelines no further information has been provided by the Applicant's Engineers. On this basis, HWFR cannot confirm that sufficient space has been provided to accommodate the necessary design outcomes, including the operation and maintenance activities, without incurring significant traffic management and establishment costs. Therefore, HWFR has recommended additional consent conditions to secure this outcome at Engineering Plan Approval stage (EPA), noting that any approvals of departures from design standards are at the discretion of HWFR as the future asset owner, and devices which cannot be practicably maintained cannot be accepted in public ownership.

Land ownership

HWFR advised the Applicant that any land proposed to be vested for stormwater purposes be identified as 'Land in Lieu of Reserve for Drainage Purposes' rather than 'Local Purpose (Drainage) Reserve'. This terminology enables the land to be transferred under the Local Government Act instead of the Reserves Act and is preferred for the ease of ongoing processes associated with routine operation, maintenance, renewal, and upgrade activities associated with stormwater infrastructure, while still enabling the land to be vested for drainage purposes. HWFR understand that the Applicant will update the scheme plans to reflect this and this is accepted by HWFR.

HWFR advised the Applicant's Agents that the public stormwater devices including associated ancillary structures and maintenance access should be located completely within the parcel proposed to be vested. Access easements over third party land cannot be accepted due to potential ongoing challenges with accessing devices for inspections and disruption to private landowners, over whose land the proposed access easement is granted, during maintenance operations. HWFR recommends that the scheme plans are updated to incorporate access tracks into the parcels proposed to be vested. Should the Panel determine that the request from HWFR is not necessary then HWFR recommends an advice note to be added to Condition 162.

6.0 SECTION 67 INFORMATION GAP

At the time of writing this Memo we have identified the following information gaps:

S67 Matters

Flooding effects

HWFR recommends that the Applicant's Engineer provide a copy of the hydraulic model for interrogation, together with the model build information. The modelling information will enable HWFR to confirm that the model is fit for purpose, to verify the potential downstream flooding effects of the development, and to confirm whether the proposed stormwater management approach can achieve the intended outcomes including avoiding increased flooding of existing habitable floors.

Damming

In relation to the proposed reliance on the existing Jack Lachlan Drive embankment and Eastern Culvert for peak flow attenuation, HWFR recommends that the Applicant provides:

- A condition assessment of the existing embankment and culvert; and
- An assessment of the potential downstream effects if the embankment and culvert were to fail resulting in a sudden and uncontrolled release of ponded water. This could be addressed by carrying out an equivalent Dam Potential Impact Classification (PIC) assessment.

This information is necessary as the proposal relies on the existing embankment and culvert to provide attenuation of post-development flows, while limited information is currently available regarding the design, condition, and structural or geotechnical integrity of these structures. The information is required to demonstrate that the proposed attenuation can be achieved without resulting in an unacceptable increase in risk to people, property, or downstream infrastructure.

OLFP Assessment / further information

HWFR recommends further assessment of the proposed overland flow paths including confirmation that sufficient space is available to safely convey predicted flows within the development and that appropriate provision can be made for overland flow paths traversing private lots.
This information is necessary to demonstrate that the proposed development can safely accommodate overland flows and that the design can achieve an acceptable level of flood risk without relying on future design changes that may materially affect the proposed site layout.

Operation and maintenance access

HWFR requests further information demonstrating that sufficient land has been provided for the operation and maintenance of proposed public stormwater management devices. In particular, the plans should demonstrate provision for:

- Sufficient maintenance access around the perimeter of each device;
- Access for equipment and/or machinery required to undertake maintenance activities; and
- Appropriate laydown and drying areas for maintenance activities.

This information is necessary to demonstrate that the proposed stormwater devices can be practicably operated and maintained over their design life and that sufficient land has been allocated for the infrastructure proposed to vest in Council, without relying on access over third-party land or future departures from Council design requirements.

7.0 RECOMMENDATION

Overall, HWFR does not oppose the proposed development from a stormwater and flooding perspective, subject to the satisfactory resolution of the outstanding matters identified through the section 67 process and compliance with the recommended conditions of consent.

Significant engagement has occurred with the Applicant's Engineers, and additional information provided during this process has identified that there are feasible additional flood mitigation measures can potentially be implemented within the proposed development extents to address the potential downstream flooding effects of the development. In particular, additional mitigation has been identified that could avoid increases in flooding of existing habitable floors downstream. While aspects of this mitigation remain subject to further design and validation, HWFR considers that the intended outcomes could potentially be secured through conditions of consent.

Residual matters remain including the proposed reliance on the existing Jack Lachlan Drive embankment and culvert for peak flow attenuation, and the detailed management of overland flow paths. These matters should be resolved through the outstanding section 67 response and/or the recommended conditions of consent, as applicable.

8.0 PROPOSED CONDITIONS

HWFR have reviewed the proposed conditions of consent and only provide comments on conditions relevant to its area of expertise. HWFR seek the opportunity to review any further conditions that are put forward by the Applicant's Agent or recommended by other specialists that relate to the proposed public stormwater management devices.

Conditions relating to the management of private stormwater assets only have been commented on in respect of compliance with the overarching SMP, and therefore RWDNC.

HWFR may provide further recommendations on the proposed conditions of consent following resolution of the matters identified under section 67.

Condition	HWFR Comment – 09.10.2026
DISTRICT LAND-USE CONSENT CONDITIONS (LUCXXXX) AND REGIONAL EARTHWORKS CONDITIONS (LUCXXXX)	
~~[107] Stormwater runoff from all impervious areas other than roofs must be either:~~ ~~(a) Treated at source by a stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or~~ ~~(b) Treated by a communal stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)' that is I458~~	Do not support the exclusion of roof runoff from treatment requirements. This approach is not consistent with the RWNDC, which requires stormwater quality management for all impervious areas. Consider revising the condition to require stormwater treatment in accordance with the approved SMP, rather than exempting roof runoff by default: The recommended amendments to this condition are relevant if the Applicant is seeking authorisation under the RWNDC.

~~Beachlands South Auckland Unitary Plan Operative in Part 29 designed and authorised to accommodate and treat stormwater from the site; or~~ ~~(c) Where alternative devices are proposed, the device must demonstrate it is designed to achieve an equivalent level of contaminant or sediment removal performance to that of 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'~~ [107] All stormwater runoff from impervious surfaces within the site shall be managed in accordance with an approved Stormwater Management Plan (SMP). The consent holder shall ensure that all stormwater management devices are constructed, operated, and maintained in accordance with the approved SMP and any subsequent amendments approved by Council.	
[108] New buildings, and additions to buildings must be constructed using inert cladding, roofing and spouting building materials that do not have an exposed surface made from contaminants of concern to water quality (i.e. zinc, copper and lead).	Condition supported. Condition 150 duplicates similar requirements. Condition 150 preferred over Condition 108.
[109] All new dwellings must designed to have non-potable water requirements (for toilets, laundry and gardens) supplied by rainwater tanks (or bladders) ~~sized in accordance with the table below~~ implemented in accordance with an approved SMP. Rain tank/bladder capacity for attached housing and apartment typologies can be provided in either individual or as communal rainwater systems. *Alternatively* [109] All new dwellings must designed to have non-potable water requirements (for toilets, laundry and gardens) supplied by rainwater tanks (or bladders) sized in accordance with the table below. Rain tank/bladder capacity for attached housing and apartment typologies can be provided in either individual or as communal rainwater systems.	Do not support this condition. The prescribed bedroom / tank-size ratios are not clearly aligned with the hydrology mitigation requirements of the RWNDC. It may be more appropriate for the condition to require non-potable water requirements to be implemented in accordance with an approved SMP, rather than specifying fixed storage volumes. *Alternatively* should this condition remain, an advice note could be added which clarifies that compliance with this condition does not constitute compliance with the RWNC.

<table>
<tr><td><u>Advice note: Compliance with this condition does not constitute hydrology mitigation requirements of the RWNDC.</u></td><td></td></tr>
<tr><td>[110] All new buildings (except dwellings as provided for in condition [106] above must be designed to have non-potable water requirements supplied by rainwater tank. Rainwater tanks can be provided as either individual or communal rainwater systems.

<u>Advice note: Compliance with this condition does not constitute hydrology mitigation requirements of the RWNDC.</u></td><td>Condition supported. It is recommended that an advice note is added which clarifies that compliance with this condition does not constitute compliance with the RWNC.</td></tr>
<tr><td>[112] The minimum sizes for rainwater tanks (or bladders) shall be as set out below:

All dwellings except apartments
<table><tr><th>Dwelling type</th><th>Minimum tank (or bladder)</th></tr><tr><td>1 bedroom (includes Studio)</td><td>1000L</td></tr><tr><td>2 bedroom</td><td>2000L</td></tr><tr><td>3 bedroom</td><td>3000L</td></tr><tr><td>4+bedrooms</td><td>5000L</td></tr></table>
Apartments
<table><tr><th>Dwelling type</th><th>Minimum tank (or bladder)</th></tr><tr><td>1 bedroom (includes Studio)</td><td>1000L</td></tr><tr><td>2 bedroom</td><td>2000L</td></tr><tr><td>3 bedroom</td><td>2000L</td></tr><tr><td>4 bedroom</td><td>2000L</td></tr><tr><td>5+ bedrooms</td><td>2500L</td></tr></table></td><td>Refer comments under Condition [109].</td></tr>
<tr><td colspan="2">STORMWATER DISCHARGE CONDITIONS (DISXXXX)</td></tr>
<tr><td>[149] Prior to the commencement of any discharge of any post development stormwater from the site, the SMP referenced in Condition 1 must be certified by the Council. The SMP must be prepared by the Consent Holder in consultation with Ngāi Tai ki Tāmaki (as required by Condition [XX]) and submitted to Auckland Council (Healthy Waters) for certification. The SMP must be consistent with the relevant objectives of the Council's Regionwide Network Discharge Consent. The SMP must include:

(a) Details of any feedback provided by Ngāi Tai ki Tāmaki on the design of stormwater management devices; and
(b) Identification of any Ngāi Tai ki Tāmaki feedback not incorporated, with reasons.

Advice Note: Certification of the SMP by Auckland Council</td><td>Condition supported.</td></tr>
</table>

(Healthy Waters) in accordance with this condition does not, of itself, constitute adoption of the SMP under the Council's Regionwide Network Discharge Consent.	
[149A] The development must not result in an increase in existing flooding, or the creation of new flooding, of any existing habitable floor downstream of the development. *Advice Note: Compliance with Condition [149A] shall be demonstrated through providing a copy of the hydraulic model and supporting model build information to Auckland Council for review and verification.*	Additional recommended condition and advice note. This condition will ensure the intended outcome of the development. Compliance with this condition will enable the authorisation under the RWDNC to be sought.
[149B] Prior to the commencement of any discharge of any post development stormwater from the site, the Consent Holder shall undertake an inspection of the existing private basin outlets identified in the SMP and provide written confirmation from a suitably qualified and experienced practitioner that the outlets are in sound structural and operational condition. Where the inspection identifies any outlets that are damaged, obstructed, or otherwise not fit for purpose, the Consent Holder shall repair, upgrade, or replace the outlets as necessary.	Additional recommended condition. In accordance with the assessment provided in Section 5 above, an additional condition is recommended requiring an assessment of the existing culverts ('private basin outlets') within the development site.
[149C] Prior to the commencement of any discharge of any post development stormwater from the site, the Consent Holder shall undertake a condition assessment of the existing Jack Lachlan Drive Eastern Culvert embankment and culvert structure. The condition assessment shall be undertaken by a suitably qualified and experienced engineer and shall include: i. Evaluation of the structural integrity, condition, and functionality of the embankment and culvert; and ii. Assessment of the potential downstream effects that could occur in the event of embankment	Additional recommended condition. In accordance with the assessment provided in Section 5 above, an additional condition is recommended requiring a condition assessment of the existing Jack Lachlan Drive Eastern Culvert embankment and culvert structure and an assessment of the potential downstream effects if the embankment and culvert were to fail. This assessment could be addressed by carrying out a Dam Potential Impact Classification (PIC) assessment. This is assessment is sought as information is not currently available on the design, construction, or condition of the existing embankment and culvert.

and/or culvert failure. The assessment shall be submitted to the Council for certification. Any remedial works identified by the assessment as necessary to ensure the ongoing integrity and performance of the embankment and culvert shall be completed to the satisfaction of the Council prior to the commencement of any discharge of post-development stormwater from the site. *Advice note: A Dam Potential Impact Classification (PIC) assessment, prepared by a suitably qualified and experienced engineer, may be used to satisfy the assessment of the potential downstream effects that could occur in the event of embankment and/or culvert failure.*	
[150] The Consent Holder shall ensure that new buildings under this consent must be constructed using cladding, roofing and spouting building materials that avoid the use of contaminant generating building products which have: (a) Exposed surfaces(s) or surface coating of metallic zinc or any alloy containing greater than 10% zinc; or (b) Exposed surfaces(s) or surface coating of metallic copper or any alloy containing greater than 10% copper; or (c) Exposed treated timber surface(s) or any roof material with a copper containing or zinc-containing algaecide.	Condition supported.
[151] For all stormwater management devices (including but not limited to ponds, wetlands, outlet structures, and outfalls), the Consent Holder must engage a SQEP to prepare an OMP setting out the principles for the general operation and ongoing maintenance of the stormwater system and associated management devices.	Condition supported.
[152] For any stormwater devices intended to vest in Auckland Council, a Draft OMP must be submitted to Healthy Waters for approval at the time of application for	Condition supported.

Engineering Plan Approval (EPA). The Draft OMP must be prepared in accordance with the Healthy Waters Operation and Maintenance Plan Template (6 July 2023) or any subsequent updates.	
[153] The OMP required by Condition [151] and Condition [152] must include, but not be limited to: (a) A detailed technical data sheet; (b) All requirements as defined within Auckland Council's Stormwater Management Devices Design Guidelines Manual (TP10) and/or Guideline Document 2016/001 (GD01), as applicable; (c) Clear identification of responsibility for both short-term and long-term maintenance of the stormwater devices; (d) A programme for regular maintenance and inspection of the stormwater system; (da) A programme for regular monitoring of the northern spillway of Stormwater Pond 1 outlining potential maintenance and performance solutions, if required, to ensure flow discharge from the subject site is in accordance with the Stormwater Management Plan certified under Condition [XX]. (e) A programme for the collection and disposal of debris and sediment from the stormwater management devices; (f) A programme for post-storm maintenance; (g) A programme for inspection and maintenance of outfall erosion; (h) General inspection checklists for all components of the stormwater system, including roadside catchpits, recharge pits, and outfalls; (i) A programme for inspection and maintenance of vegetation associated with the stormwater devices; and (j) A methodology for the ongoing control and eradication of established pest species and invasive weeds within both terrestrial and	Condition supported. It has been assumed that this condition sets out the inclusions for the OMP required by both Condition [151] and Condition [152] also. Amendments sought to provide clarity.

aquatic areas of the stormwater device. *Advice Note: For stormwater assets to vest in Council, the OMP must be consistent with Healthy Waters' operational requirements and approved prior to construction commencing on those devices.*	
[153A] The OMP required by Condition [151] must include, but not be limited to the inspection, operation, maintenance, repair, and renewal requirements for all privately owned stormwater infrastructure, including culverts, outfalls, basins, wetlands, and any other stormwater management devices or structures that contribute to stormwater conveyance, flood management, or attenuation outcomes .	Additional recommended condition. This condition is recommended to clarify some of the inclusions for the OMP required by Condition 151, to ensure that privately owned stormwater management devices that provide a key function achieve ongoing flood management and attenuation.
[154] The stormwater management system must be managed in accordance with the final OMP. Any amendments to the OMP must be submitted to the Council for certification, in writing prior to implementation. The OMP must be updated and submitted upon request to the Council for confirmation.	Condition supported.
[154A] The consent holder must maintain the public stormwater devices until either 80% of the lots within the subdivision discharging to the device have been developed, or for a period of five (5) years from the date of issue of the final certificate pursuant to section 224(c) of the RMA, whichever occurs first. The consent holder must maintain the devices in accordance with the Operation and Maintenance Plan certified by the Council under [Condition 152].	Additional recommended condition. This is a common condition used by HWFR intended to ensure that stormwater devices proposed for future vesting in Council ownership are appropriately maintained during the establishment period, when the risk of sediment accumulation, vegetation establishment, and construction-related damage is highest. The condition helps ensure that devices are functioning as designed and are transferred to Council in good operational and physical condition.
[154B] Any deficiencies identified by the Council during the maintenance period, including the asset damage, sediment accumulation, litter or debris accumulation, and deficient planting, that prevent device from operating in accordance with its approved design and function must be remedied by the consent holder at its expense. *Advice Notes:*	Additional recommended condition. This is a common condition used by HWFR intended to ensure that stormwater devices proposed for future vesting in Council ownership are appropriately maintained during the establishment period, when the risk of sediment accumulation, vegetation establishment, and construction-related damage is highest. The condition helps ensure that devices are functioning as designed and are transferred to Council in good operational and physical condition.

• *A bond will be required at the time of the application for certificate pursuant to section 224(c) of the RMA to secure compliance with this condition. The bond amount shall be certified by the relevant Council asset owner.* • *All proposed stormwater wetlands and raingardens shall be fitted with a gross pollutant trap. Maintenance access to all stormwater wetlands, raingardens, and associated structures shall be designed and constructed in accordance with SWCoP and GD01, to the satisfaction of the relevant Council asset owner.*	
[155] A maintenance record for the stormwater management system certified under Condition [XX] must be provided to the Council on request. The maintenance record must provide details of all maintenance including inspections and servicing for the preceding three years.	Condition supported.
[156] A residential stormwater operation and maintenance manual must be created by the Consent Holder for any privately owned and operated stormwater device within individually owned lots. This manual must be provided to owner(s) of the lot(s). This manual must also include standard detail drawings of the stormwater devices with recommendations in terms of impervious area discharge. A consent notice will be entered onto the title of the lot to require the correct operation and maintenance of the stormwater device in perpetuity.	Condition supported. Minor amendment suggested to clarify that this condition is in relation to the operation and maintenance of devices within individually owned lots, such as stormwater tanks etc.
SUBDIVISION CONDITIONS (SUBXXXX)	
[162] Easements in gross for the purposes identified on the scheme plans referenced in Condition [1] and Appendix 1 to the conditions, must be created and included in a memorandum of easements endorsed on the survey plan and be granted or reserved. The Consent Holder must meet the costs for the preparation, review, and registration of the easement instruments on the relevant records of title. *Advice Note:* *The rights and powers granted by any easement created in favour*	Advice note recommended to allow HWFR to review and certify access arrangement of the easements.

of Auckland Council for access to, and operation and maintenance of, public stormwater management devices shall be reviewed and certified by the relevant Council asset owner prior to the easement instrument being finalised.	
[163] The Consent Holder must obtain written confirmation from Council (Healthy Waters) that the proposed drainage reserves and stormwater devices shown as '~~Local Purpose (Drainage) Reserve to Vest~~ Land-in-lieu of reserve to vest (drainage purposes)' on the approved plans referenced in Condition [1] and Appendix 1 to the conditions shall or shall not vest in the Council ~~as 'Land-in-lieu of reserve to vest (drainage purposes).'~~. (a) If the 'Land-in-lieu of reserve to vest (drainage purposes)' is to vest then, in accordance with s239, these reserves must vest free of encumbrances, transformers and structure unless the structure is associated with stormwater devices. The Consent Holder must meet all costs associated with the vesting of the reserves. (b) If the 'Land-in-lieu of reserve to vest (drainage purposes)' is not to vest then the land will fall under the obligation of an Incorporated Society or equivalent legal body (Society), as per Condition [XX]. *Advice Note: Plans approved under Resource Consent do not constitute an Engineering Plan approval and should not be used for the purposes of constructing public works in the absence of that approval. If the Consent Holder wishes to retain any private structures, rights or encumbrances on land to be vested, it will require a certificate of acceptance from the Manager Land Advisory Services under section 239(2) on behalf of the local board.*	Amendments sought. The condition currently references two different forms of land vesting. HWFR has requested that the scheme plans are amended to reference only '*land in lieu of reserve to vest (drainage purposes)*'. Amendments to this condition are recommended to align with that request and to provide clarity regarding the intended vesting arrangement. The condition is otherwise supported.
[163A] Except where associated with culvert headwalls and stormwater outlets, there must be no retaining walls located within 'Land-in-lieu of reserve to vest (drainage purposes)' vested in Council.	Additional condition recommended to ensure that Council is not vested with retaining walls that create ongoing structural, maintenance, inspection, asset management, and liability obligations within drainage reserve land.

[166] Where the Consent Holder proposes to provide private wastewater, water supply and stormwater services for the Project, the infrastructure shall be constructed in accordance with the engineering plans referenced in Condition [1] and Appendix 1 to the conditions and be constructed to a public standard. The infrastructure required to service each superlot, stage or part thereof shall be constructed and operational prior to the issue of a s224(c) certificate.	Condition supported.
[168] Prior to commencement of any public infrastructure or public road works required for the development (as indicated on the approved plans in Condition [1]), the Consent Holder must provide design plans and specifications for any works required in respect to this consent which are proposed to vest, to the satisfaction of the Council. Details of the SQEP who will act as the Consent Holder's representative for the duration of the development must also be provided with the application for any Engineering Plan Approval.	Condition supported.
[169] A pre-construction meeting must be held by the Consent Holder, prior to commencement of the construction of any stormwater reserves and/or stormwater devices intended to be vested as public, that: (a) Is arranged five Working Days prior to initiation of the construction of any intended public stormwater assets on the site; (b) Is located on the subject area; (c) Includes representation from the Council, including but not limited to Auckland Council Healthy Waters – Operations Team; and (d) Includes representation from the site stormwater engineer (or) contractors who will undertake the works and any other relevant parties.	Condition supported.
[170] The following information must be made available before or at the meeting:	Condition supported.

(a) Timeframes for key stages of the works authorised under this consent; (b) Contact details of the site contractor and site stormwater engineer; and (c) Construction plans approved (signed/stamped) by the Council. *Advice Note: To arrange the pre-construction meeting required by this consent, please contact the Council on email at monitoring@aucklandcouncil.govt.nz.*	
[171] Where infrastructure is proposed to form part of a public reticulation network, any engineering plans submitted for approval must detail all the proposed public infrastructure works associated with the subdivision stage or part thereof, and be in accordance with current Council Engineering Standards and Guidelines, including but not limited to: • Public Stormwater Reticulation • Public Stormwater Management Devices • Public Wastewater Reticulation • Public Water Reticulation • Public Reserves	Condition supported. Minor amendment sought for clarification.
[172] The engineering plans must include but not be limited to the following information: (a) As part of the application for Engineering Plan Approval, a registered engineer must: i. Certify that the proposed stormwater system or devices proposed have been designed in accordance with the Council's Code of Practice for Land Development and Subdivision: Chapter 4 – Stormwater or as otherwise approved in the SMP. ii. Certify that the proposed water supply and wastewater system have been designed in accordance with the approved Engineering Plans referenced	Condition supported. Advice notes recommended to clarify the design outcomes of any proposed public stormwater devices.

in Condition [1] and Appendix 1 to the conditions. iii. Provide a statement that the proposed infrastructure has been designed for the long-term operation and maintenance of the asset. iv. Confirm that all practical measures are included in the design to facilitate safe working conditions in and around the asset. (b) The proposed stormwater system must be designed to identify health and safety risks for the public, operating personnel, contractor and Council employees. (c) The proposed stormwater system must have an asset life of a minimum of 100 years. (d) Require the design of infrastructure and devices (including communal devices) to be efficient and effective, with consideration given to whole lifecycle costs, ease of access and operation, and integration with the built and natural environment. *Advice Notes:* • *Maintenance access to all stormwater management devices and associated structures shall be designed and constructed to the satisfaction of Healthy Waters and Flood Resilience* • *A gross pollutant trap (GPT) must be installed upstream of all stormwater management devices such that stormwater runoff passes through the GPT prior to entering the device.* • *High-flow bypass to all stormwater management devices shall be designed to the satisfaction of Healthy Waters and Flood Resilience.*	
[172A] At Engineering Plan Approval the Consent Holder must prepare an overland flow path management report and submit to Council for review and approval. The overland flow path management report must	In absence of further information on overland flow paths sought to be included within the S67, an additional condition is recommended.

demonstrate compliance with the overland flow path management requirements of the Auckland Transport Design Manual and the Auckland Council Stormwater Code of Practice unless otherwise approved by Council.	
[175] Where Auckland Council Healthy Waters has accepted the reticulated stormwater network as acceptable for vesting as public, the Consent Holder must design and construct connections to the public stormwater reticulation network to serve the development in accordance with the requirements of the utility provider and the approved engineering plans as required by Condition [1] and Appendix 1 to the conditions. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA. *Advice Notes:* • *Acceptable forms of evidence include Engineering Approval Completion Certificates.* • *Public connections are to be constructed in accordance with the Stormwater Code of Practice.* • *Alterations to the public stormwater reticulation network require Engineering Plan Approval.*	Condition supported.
[179] Prior to the issue of the section 224(c) certification for a stage, superlot or part thereof, all hard and soft landscape works proposed within the local purpose drainage reserves within the stage, superlot or part thereof which are to be vested must be implemented and be in accordance with the Beachlands South Open Space Strategy and any Engineering Plan Approval. *Advice Note: Practical completion will be determined by the Manager Parks Planning prior to the issue of the certificate required under 224(c) to demonstrate development of the drainage reserve has been satisfactorily implemented and to formalise the commencement of the maintenance period.*	Condition supported.

[197] The necessary easements for each lot, as shown on the approved scheme plan(s), shall be included in a memorandum of easements endorsed on the survey plan and must be created, granted or reserved as necessary. The Consent Holder shall meet the costs for the preparation, review, and registration of the easement instruments on the relevant records of title. Any other required easements needed to facilitate the development shall also be included on the survey plan. These easements may include (but are not limited to) the following: (a) Right to convey electricity, water and telecommunications (both standard and in Gross) (b) Right to drain stormwater and sewage (both standard and in Gross) (c) Maintenance (d) Right of Way (e) Maintenance and Eave Overhang (f) Party Wall *Advice Note:* *The rights and powers granted by any easement created in favour of Auckland Council for access to, and operation and maintenance of, public stormwater management devices shall be reviewed and certified by the relevant Council asset owner prior to the easement instrument being finalised.*	Advice note recommended to allow HWFR to review and certify access arrangement of the easements.
[206] A Consent Notice pursuant to section 221 of the RMA must be registered on the Records of Title of any lot to require the correct operation and maintenance of any privately owned and operated stormwater device in accordance with the OMP as required by Conditions [150] to [155] of SUBXXX. This condition must be registered as a consent notice on the record(s) of title of the relevant lots to ensure that it is complied with on a continuing basis.	*Condition supported – for the maintenance of private devices but links to overall RWNDC compliance*

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure Q:

Damming Water / Dam Safety

Don Tate

09 October 2026

Application and property details	
Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Dam Safety

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Don Tate
Qualifications & Relevant Experience:	I hold the qualification of: Bachelor of Civil Engineering and have 40 years of experience in dam design and engineering including dam safety and geotechnical engineering. I am a full member and a fellow of Engineering New Zealand and a Chartered Professional Engineer(CPEng). I have prepared expert evidence and technical assessments for multiple resource consent applications for dams and have appeared as an expert witness before consent authorities and the Environment Court on several occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	9 October 2026

3.0 Executive Summary / Principal Issues

N/A

4.0 Documents Reviewed

The following documents within the substantive application have been reviewed in preparing this memorandum:

- Attachment 9F Stormwater management Plan Template – Beachlands South (Ver. 2), dated 24 June 2026.
  - Attachment 9G (Appendix A of the above)
  - Attachment 9H (Appendix B of the above)
- Attachment 9J, Existing Topographical Plan/Features

I have focused on sub catchments 1 and 2, which are proposed to discharge under Jack Lachlan Drive.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

N/A

6.0 Specialist Assessment

Damming Water / Dam Safety

My review has only just commenced and following recent discussions the focus is on whether the 2 road embankment crossings are dams by the AUP and Building Act definitions. The applicant has stated they consider they do not meet the dam definition.

It appears that the proposed works rely upon the damming of water behind the Jack Lachlan Drive Road Embankment. Effects of changing the use of the road embankment asset (to dam water), do not appear to have been considered by the applicant:

- *The Jack Lachlan Drive Road Embankment does not currently meet definition of a Dam under the AUP OP.*
- *The proposed works would add a primary function to the embankment, of impounding / attenuating / throttling water, which would mean that the embankment would meet the definition of a Dam under the AUP OP.*

If the proposed works are to use the road embankment as a dam (to attenuate floodwaters from the development), then consent to Dam Water (AUP OP Chapter E7, Activity A35) should be sought. This consent would require supporting information which at this stage I have not defined.

It should also be confirmed whether (or not) the structure would meet the definition of a Classifiable Dam, under the Building (Dam Safety) Regulations 2022.

7.0 Section 67 Information Gap

At the time of writing this Memo I have identified information gaps related to using the Jack Lachlan Drive embankment to dam water:

At present, the Jack Lachlan Drive embankment acts as an inadvertent dam in two separate locations shown in Figure 1 (denoted Embankment 1 and Embankment 2). During flood events, the embankments temporarily form two existing stream basins (Figure 1).

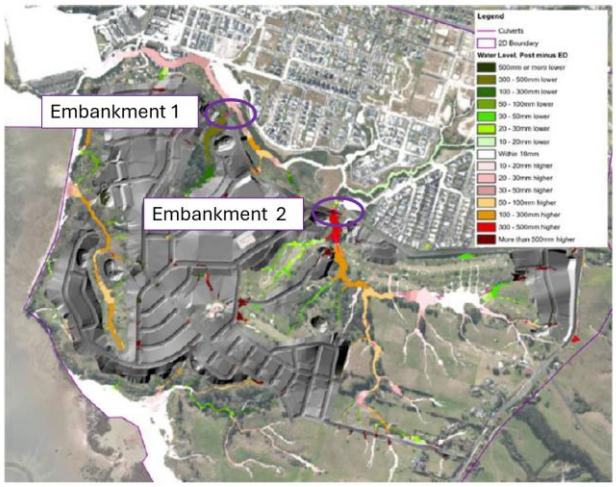


Figure 1: Difference in 1% AEP flood depth and extents, resulting from the proposed development (Annotations to Figure 30 within the Stormwater Management Plan)

Not currently a dam:

Chapter J of the Auckland Unitary Plan Operative in Part (AUP OP), defines a dam as "*a structure which temporarily impounds surface water as its primary function*". The definition specifically excludes culverts and their headwalls, which are generally considered appurtenant structures to a dam embankment.

MBIE's Guide to Complying with the Dam Safety Regulations, highlights that road embankments can have dual functions:

> "*It is possible that a road … embankment could have a dual function as a road … embankment and a dam, however this would need to be assessed on a case-by-case basis*"

In this case, the road embankments weren't specifically designed to retain water. While the embankments do currently impound surface water to some degree, impounding surface water is not currently a primary function of either road embankment 1 or 2.

Proposed to act as a Dam

It appears that the proposed works would lead the impoundment/attenuation/throttling of surface water, to become a primary function of both embankment 1 and 2. The proposed works are therefore intending to use the Jack Lachlan Drive road embankment as a dam.

This conclusion was reached noting that:

1. The executive summary of the Stormwater Management Plan states that:

"The Project utilises existing culverts within the northern catchments to throttle flows to the downstream watercourse. Site-specific 2-D flood modelling concluded that no augmentation of these structures is required to mitigate flood risk impacts".

2. Section 6.1 Principles of stormwater management, within the same document states that:
   "Surplus attenuation above the 50% AEP storm, i.e. during the 10% AEP and 1% AEP storm to be attenuated within the existing stream basins upstream of the two existing Jack Lachlan culverts prior to off-site discharge."

Specific to the two embankments we note:

Embankment 1

The proposed works are shown to reduce peak flood depths, within the embankment 1 reservoir upstream of Jack Lachlan Drive.

- This could be a result of peak inflows and/or peak inflow volumes to the embankment 1 reservoir being reduced (as a result of the proposed development). If this is the case, then the embankment 1 embankment is not actually proposed to be relied upon to attenuate floodwaters, and therefore the proposed works would not be using the road embankment as a dam.
- However, if the reduction in peak flood depths is a result of the reservoir upstream of Jack Lachlan Drive being modified to store a greater volume of water (or store water at a higher elevation). And/or the proposal is relying on attenuation from embankment 1 (over and above what is currently inadvertently present). Then embankment 1 would be being proposed to be used as a dam.

There appears to be insufficient information available to confirm which case is occurring here.

Embankment 2

The proposed works are shown to increase peak flood depths by 300mm to 500mm, within the embankment 2 reservoir upstream of Jack Lachlan Drive. The proposed works are therefore relying on the ability of embankment 2 to retain additional water (over and above what would currently inadvertently be present). It therefore appears that the proposed works intend to use embankment 2 as a dam, and to also store additional water, at a higher level behind the embankment.

It therefore seems that the applicant should be seeking consent to dam water behind Jack Lachlan Drive.

Description of Missing Information

The proposed works have not applied for consent to dam water, or provided any assessment against the relevant provisions within AUP OP, chapter E7 Taking, using, damming and diversion of water and drilling. The most relevant activity would be: Dams not otherwise listed or not meeting the permitted activity standards or controlled activity standards (A35). Consent for such an activity generally requires additional information including:

1. *Assessment of the downstream effects, that could result if the dam were to fail/breach (often for large dams, this is termed a Potential Impact Classification Assessment).*
2. *Assessment of geotechnical aspects of the embankment (slope stability, ability to retain water), to a degree appropriate for the Potential Impact Classification of the dam.*
3. *Assessment of hydraulic operation of the culvert through the embankment, and any overflow spillway(s), to a degree appropriate for the Potential Impact Classification of the dam.*

4. *The road embankment may need modification to allow it to safely retain additional water, and/or safely act as a dam.*
5. *A plan for routine inspections of the structure.*

At this stage I have not considered whether all of the above are applicable in this particular situation.

Regardless of whether the structures are considered dams. If additional water is proposed to be retained within the structures (or if water is proposed to be retained at a higher level), the potential impacts of a failure/breach of the embankments should be considered (as an effects-based assessment under the RMA).

Confirmation of whether the structures would meet the definition of a Classifiable Dam in terms of the Building (Dam Safety) Regulations 2022 should also be provided.

8.0	Recommendation
N/A	

9.0	Proposed Conditions
N/A	

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure R:

Watercare Services Limited

Anna Jennings

19 October 2026

Watercare Services Limited
73 Remuera Road, Remuera,
Auckland 1050, New Zealand
Private Bag 92521, Victoria Street West,
Auckland 1142, New Zealand
Telephone +64 9 442 2222
www.watercare.co.nz

19 October 2026

Adonica Giborees
Principal Project Lead, Auckland Council
adonica.giborees@aucklandcouncil.govt.nz

Dear Adonica

Re: Watercare comments on the Beachlands South Fast-Track (FTAA-2606-1256) substantive application at 110 Jack Lachlan Drive and Whitford-Maraetai Road, Beachlands

Executive Summary

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Beachlands South fast-track substantive application (**the Application**), made under section 53 of the Fast-track Approvals Act 2024 (**Act**).

2. Watercare's preferred servicing outcome is for the Beachlands South Project to connect to the public wastewater network from Stage 1, aligning with its ongoing investment in wastewater infrastructure within the Beachlands catchment and its objective to provide public wastewater servicing from the outset of the Project.

3. As the Application proposes interim private wastewater servicing, prior to reassessment for connection to the public network, Watercare's assessment of the Application has focused on the pathway to public wastewater servicing and the measures necessary to preserve a feasible transition to the public wastewater network.

4. Watercare seeks greater certainty that the Application establishes a clear and enforceable framework for assessing connection to the public wastewater network at the Stage 1 and Stage 2 servicing decision points.

5. Appropriate provisions are also required to manage the technical, operational, financial and asset acceptance risks associated with interim private infrastructure, while preserving a practicable public connection option and supporting coordination between the respective infrastructure programmes.

Introduction

6. Beachlands South Limited Partnership (**the Applicant**) proposes a staged, large-scale urban development of approximately 2,000 residential dwellings together with a 150-room hotel and conference venue, community and commercial activities (including offices and industrial activities), protected ecological restoration areas, walking and cycling networks, and community facilities, while enabling the potential development of two schools (**the Project**). The Application includes all associated earthworks and infrastructure including transport facilities, intersection upgrades and roading, telecommunications, power, and water supply, stormwater, and wastewater infrastructure (including any treatment or storage facilities, drainage, pipes, pump stations, outfalls and discharges as well as coastal structures).

7. The zoning of the Project area is a range of live zones and Future Urban Zone under the Auckland Unitary Plan (**AUP**).

8. Watercare's comments in this letter are based on the Application as at today's date, in particular the following documents:

    - Applicant's section 67 Response Table, including the 'WWTP & Networks' responses addressing future public wastewater servicing, transition and potential vesting of wastewater assets.
    - Beachlands South Fast-track Substantive Application, Wastewater Concept Design and Assessment, GWE Consulting Engineers, Version V2, Final - Approved for Issue, June 2026 (updated wastewater report / Attachment 10).
    - Beachlands South Fast-track Substantive Application - Assessment of Environmental Effects and Statutory Analysis (Attachment 0B), including the wastewater servicing and future-vesting discussion.
    - Proposed Conditions of Consent and Appendix 1 to the Conditions (Attachments 0C and 0C1), to the extent relevant to wastewater servicing and the supporting wastewater plans and documents.
    - Wastewater servicing drawings forming Attachments 9Z and 9ZA, as identified in the substantive application and referred to in the Applicant's section 67 response.
    - Beachlands South Wastewater Solution Presentation to Auckland Council and Specialists (Attachment 22 - 6), as part of the consultation material supporting the substantive application.
    - Beachlands South Fast -Track Panel Presentation document provided by Auckland Council as part of the Fast-track application documentation package received for review.

9. Any amendment to the Application will require further review and comment from Watercare.

10. Watercare's review of the above documents has been limited to public wastewater servicing, programme alignment, future connection to the Watercare network, and the potential future vesting and acceptance of the wastewater infrastructure. Watercare has not undertaken a technical assessment of the adequacy or environmental effects of the Applicant's proposed private wastewater treatment plant, land disposal system or marine outfall; or any proposed private water servicing arrangements. These matters are outside the scope of Watercare's review and are for Auckland Council and its relevant specialists to make comments on.

11. All servicing advice is based on the best available information at the time and may change if updated network modelling or programme and/or funding reviews indicate materially different outcomes.

Watercare's purpose and statutory obligations

12. Watercare is New Zealand's largest provider of water and wastewater services, operating as a council-controlled organisation owned by Auckland Council with the purpose embodied in the Māori whakatauki *"Ki te ora te wai, ka ora te whenua, ka ora te tangata"* (When the water is healthy, the land and the people are healthy), reflecting the connection between its services and the wellbeing of the community and local environment.

13. Watercare is required to manage its operations efficiently, with a focus on minimising overall costs while maintaining long-term asset integrity. These obligations are subject to economic regulation under the Watercare Charter, with oversight provided by the Commerce Commission as the appointed Crown monitor. Watercare must also give effect to the relevant aspects of Auckland Council's Long-term Plan and act consistently with other council plans and strategies, including the Auckland Plan 2050 and the Auckland Future Development Strategy 2023-2053 (**FDS**).

14. Watercare works collaboratively with the wider council group to support areas of growth identified by the council, acting consistently with the FDS for major infrastructure development and ensuring alignment of infrastructure projects with other utilities. Watercare is committed to fully recovering growth-related costs so that growth pays for growth.

Watercare Growth Servicing Policy

15. Watercare's Growth Servicing Policy 2026[1] sets out Watercare's approach to servicing growth. The Project area, except for the proposed wastewater treatment plant site, is live zoned. The Project is considered under Category 2 of the policy as the Project area is within Watercare's existing area of service for wastewater and contiguous with our network.

Watercare's comments

Previous consultation/engagement with Watercare

16. Watercare has engaged with the Applicant regarding the Project over an extended period. This engagement has included various meetings and discussions regarding the proposed development, its anticipated wastewater servicing requirements, development staging, and the timing of infrastructure required to support growth at Beachlands.

17. On 17 November 2023, Watercare and the Applicant entered into a Heads of Agreement to support ongoing engagement and coordination in relation to the development. The agreement establishes a collaborative framework under which the parties will operate on a 'no surprises' basis, meet regularly, and share relevant information in a timely manner.

18. Through this engagement, the Applicant has provided information regarding its anticipated development programme and staging, which Watercare has taken into account when considering the planning and timing of wastewater infrastructure upgrades at Beachlands.

19. Watercare has continued to engage with the Applicant as the wastewater servicing approach has evolved. In parallel, Watercare has been progressing the planning, consenting and delivery of additional public wastewater capacity at Beachlands and has sought, where practicable, to align its infrastructure programme with the Applicant's anticipated development programme.

20. This previous engagement, including the Heads of Agreement and discussions regarding infrastructure planning, should not be interpreted as confirmation that wastewater capacity is currently available, or will be available in the future. Nor does it constitute approval of a particular connection arrangement, Engineering Plan Approval **(EPA),** or acceptance by Watercare of the

[1] Watercare Growth Servicing Policy 2026

Applicant's proposed private wastewater infrastructure for future vesting. Those matters remain subject to the applicable Watercare assessment and approval processes at the relevant time.

Wastewater capacity at Beachlands

21. The Beachlands wastewater catchment is currently subject to wastewater treatment and network capacity constraints and is identified by Watercare as an area where additional infrastructure investment is required to support future growth.

22. Watercare is actively progressing the planning and work necessary to secure a future discharge consent for the Beachlands Wastewater Treatment Plant (**WWTP**), which will enable future upgrades to the facility. The status of this consent application is addressed in more detail below.

23. Watercare is actively progressing the design and delivery of the WWTP capacity upgrade to service the full extent of the Project proposed under the fast-track approvals process, as well as other developments within the Beachlands WWTP catchment. This work considers the Applicant's proposed programme and staging requirements.

24. The Watercare business case for pre-tender design works associated with the Beachlands WWTP capacity upgrade has recently been approved. The Beachlands WWTP capacity upgrade is also included within Watercare's 10-Year Capital Investment Programme.

25. The planned infrastructure upgrades are expected to provide sufficient wastewater treatment capacity to accommodate forecast growth within the Beachlands catchment, including the Project.

Beachlands WWTP discharge consent

26. Watercare's Beachlands WWTP discharge consent application was lodged on 17 June 2024. It seeks consent for the discharge of treated wastewater from the Beachlands WWTP, via an overland flow system, to the farm pond and then a tributary of the Te Puru Stream, and to groundwater. It was placed on hold on 17 October 2025 to provide Watercare sufficient time to review the concerns raised by Auckland Council in the Section 42A report, undertake further assessments, and develop options to address these matters raised.

27. Watercare intends to provide Auckland Council with the necessary information to recommence processing of its discharge consent application in early 2027. In preparation for this, Watercare is currently undertaking work to improve treatment plant performance and collect the sampling, monitoring, and testing data required to support the consent application.

28. Watercare is also continuing to work closely with mana whenua and Auckland Council to ensure relevant environmental, cultural, and regulatory considerations are appropriately reflected in the application.

29. Subject to the statutory approvals process, Watercare currently anticipates that the discharge consent will be granted by mid-2027.

30. Accordingly, the current treatment capacity constraint should not be interpreted as an absence of a viable public wastewater servicing solution for the Project. Rather, the primary consideration is

ensuring alignment between the Applicant's development programme and the timing of the additional wastewater capacity being delivered through Watercare's planned infrastructure upgrades and approval of the associated discharge consent.

Applicant's proposed wastewater servicing pathway

31. Watercare acknowledges that the Applicant has proposed a private wastewater servicing pathway to enable development to proceed while public wastewater capacity is being delivered.

32. A staged and centralised private wastewater servicing strategy is proposed to service the development. The staged approach to wastewater servicing comprises initial land-based discharge followed by a transition to marine discharge. This has been assessed by the Applicant as the Best Practicable Option (**BPO**) on the basis that it aligns infrastructure delivery with development staging, delays marine discharge until required, and provides a flexible long-term servicing solution.

33. The technical and environmental adequacy of the proposed private treatment plant, land-disposal system and marine outfall are matters for Auckland Council and its relevant specialists and are outside the scope of Watercare's comments. Watercare's technical interest is the interface between the Applicant's proposed servicing pathway and Watercare's planned public wastewater infrastructure.

Two wastewater positions

34. The updated wastewater report [2] conveys two relevant positions:

    (a) Section 11.5 records the Applicant's current BPO assessment that connection to the public wastewater network is not practicable due to the absence of proximate infrastructure with capacity and identifies the marine outfall as the preferred long-term discharge pathway at full development. Also refer to the discussion of BPO in section 6 of the updated wastewater report.

    (b) In contrast, section 3.3 of the wastewater report expressly provides for a future reassessment of a connection to Watercare's reticulated wastewater network prior to the construction of the marine outfall. It states that, if agreement can be reached with Watercare, public connection will be preferred over the marine outfall, and that the marine outfall will only be progressed if public connection is confirmed as not practicable when the relevant trigger thresholds are reached. Watercare notes that the option of connecting directly to the public reticulated network has previously been assessed and determined to be impracticable due to network capacity constraints. However, a connection to the Beachlands WWTP via a rising main remains a potentially feasible servicing option and warrants further consideration as part of any future assessment of public wastewater servicing.

[2] Beachlands South Fast-track Substantive Application, Wastewater Concept Design and Assessment, GWE Consulting Engineers, Version V2, Final - Approved for Issue, June 2026 (updated wastewater report / Attachment 10).

35. On their face, these two positions are difficult to reconcile. The BPO assessment at section 6 discounts public wastewater servicing from further consideration based on current capacity and programme assumptions and identifies the staged private treatment and marine outfall solution as the BPO for the development. However, section 3.3 expressly contemplates that public wastewater servicing may become practicable before Stage 2 and, if so, that it would be preferred over the marine outfall. On that basis, the BPO conclusion appears necessarily conditional on public wastewater servicing remaining impracticable when the Stage 2 servicing decision is made.

Uncertainty within the proposal

36. The subsequent Panel Presentation document[3] identifies a more developed public servicing option, involving collection through the development network, pumping from a central pump station and conveyance via an approximately 4 km rising main to the Beachlands WWTP, with subsequent WWTP upgrading to accommodate full Project flows. The Application should reconcile this option with the wastewater report's BPO assessment and identify the basis on which public connection will be reconsidered at both Stage 1 and Stage 2.

37. Section 3.3 of the wastewater report anticipates trigger thresholds, monitoring, reporting and a Wastewater Management Plan to govern progression between servicing stages and reassessment of public connection. The relevant plan and corresponding operative consent framework have not been adequately established in the material reviewed.

38. This uncertainty makes it difficult for Watercare to provide comprehensive comments on the application. Clarification is therefore required regarding the Applicant's intended public wastewater servicing strategy and the circumstances under which any future reassessment of connection to Watercare's network would be undertaken.

39. The proposed approach does not presently provide sufficient certainty as to how Watercare's existing, committed, or planned public infrastructure capacity will be considered when the relevant development or hydraulic trigger is reached. Watercare seeks greater certainty that the status and practicability of planned public capacity will be fully assessed by the Applicant before material and potentially irreversible investment is made in private servicing infrastructure.

Public connection

40. The wastewater report discounts public connection partly on the basis that the necessary public wastewater upgrades are not currently programmed. That assumption does not reflect Watercare's position or the current state of Watercare's upgrade project. As outlined above, Watercare is actively progressing the planning, consenting and delivery of public servicing solutions and capacity upgrades at the Beachlands WWTP.

41. Watercare does not express a view on the environmental merits of the Applicant's proposed private treatment and discharge system. However, in light of the matters above, the current BPO assessment should not be treated as establishing that the private wastewater pathway will remain the BPO when the relevant servicing decisions are made.

[3] Beachlands South Fast Track Panel Presentation document provided by Auckland Council as part of the Fast-track application documentation package received for review

42. The Assessment of Environmental Effects and Statutory Analysis report[4] states that the collection system is being designed to Watercare's Code of Practice with the intent that wastewater assets are suitable for future vesting, while identifying future connection to Watercare's public network as an alternative servicing pathway. This clarification is helpful, but an intention to design for future vesting is not the same as Watercare having reviewed or accepted the detailed design, network configuration, construction or future condition of those assets.

43. While it is recommended that any interim servicing solution be designed in accordance with Watercare's standards to maximise the potential for future asset transfer, any future vesting would remain subject to Watercare's requirements and approval at the relevant time.

44. Any future transition requirements are not provided for under this Application. Therefore, if this option is to be undertaken in the future, then the necessary approvals will need to be obtained from Watercare at the time.

Pump stations

45. The updated wastewater report identifies three pump stations for Stage 1 and up to nine pump stations at full development. Watercare does not express a view in this response on whether that configuration is appropriate for a privately owned and operated system. However, if any of the pump stations, rising mains or associated reticulation are intended or reasonably anticipated to be offered for future vesting in Watercare**,** a key issue is that these assets may be privately constructed, operated and maintained for a significant period outside Watercare's normal processes for infrastructure intended for public ownership.

46. While the Applicant proposes to design the pump stations and associated infrastructure to Watercare's Code of Practice, the assets would not be subject to Watercare's standard approval, monitoring, commissioning, or assurance processes, and there is no clear framework for managing performance, maintenance, or operational issues while they remain privately owned. Watercare should not be expected to later inherit assets it has had no formal ability to approve, inspect, audit, or monitor, particularly where a high number of pump stations could create avoidable operational complexity, resilience risks, maintenance and renewal requirements, and increased whole-of-life costs.

Future connection

47. As stated in the updated wastewater report, connection to Watercare's public wastewater system should be reassessed before progression to the proposed marine outfall, with the public connection option preferred if agreement can be reached with Watercare. That reassessment is particularly important given that the public servicing option subsequently presented in the panel presentation document is more developed than the public network option assessed in the BPO analysis within the wastewater report. Accordingly, this option should be reconsidered as part of the servicing review at both the Stage 1 and Stage 2 wastewater servicing decision points.

[4] Beachlands South Fast-track Substantive Application - Assessment of Environmental Effects and Statutory Analysis (Attachment 0B), including the wastewater servicing and future-vesting discussion.

48. A key risk of the proposed interim private servicing arrangement is that it may become a long-term or permanent outcome if connection to the public network is not achieved. This could occur where Watercare does not accept vesting of the assets or where significant asset upgrades or replacement are required before connection. In that scenario, responsibility for the ongoing operation, maintenance, renewal and management of the infrastructure would remain with the asset owner. Connection to the public wastewater network from Stage 1 would avoid this risk and provide greater long-term servicing certainty.

49. Watercare considers that coordination with the Applicant should occur at each significant wastewater servicing decision point for both Stage 1 and Stage 2 of the Project.

Watercare's programme and infrastructure investment consideration

50. Watercare's planned Beachlands WWTP upgrade incorporates forecast demand associated with the Project. The Applicant's development programme and servicing decisions therefore have direct implications for the scale, timing and efficient utilisation of Watercare's planned investment.

51. The Applicant's proposed servicing strategy retains the possibility of permanent private wastewater treatment and discharge, including a marine outfall, notwithstanding Watercare's concurrent planning and investment in public infrastructure upgrades. In the absence of coordinated decision points, there is a risk of expenditure on infrastructure capacity that is not ultimately utilised, resulting in inefficient or stranded investment and implications for Watercare's catchment-wide infrastructure planning.

52. These considerations are also relevant in the context of the AUP. In particular, the Regional Policy Statement promotes the efficient development, operation, maintenance and upgrading of infrastructure, while recognising the value of investment in existing infrastructure. The potential for servicing decisions associated with the Project to undermine the efficient use of existing and planned public wastewater infrastructure is therefore a broader planning consideration, extending beyond Watercare's own investment programme.

53. Where a timing difference emerges between the Applicant reaching a private-servicing trigger at Stage 1 as well as Stage 2 of the Project and the anticipated availability of Watercare's planned wastewater infrastructure upgrades, the parties should engage before an irreversible long-term servicing decision is made. This will ensure that the status and expected delivery of the public solution can be properly considered.

Bulk and local water supply

54. Watercare does not currently provide reticulated potable water supply services to the Beachlands/Maraetai area.

55. The Applicant is proposing a privately owned and operated water supply servicing solution. Watercare defers to Auckland Council for comments in relation to the regulation of any proposed private water supply servicing. Additionally, the private water supply would be subject to regulation by Taumata Arowai as the water services regulator.

Outstanding public wastewater servicing matters that require further consideration under section 67 of the Act

56. Watercare provided input into Auckland Council regarding further information required from the Applicant in relation to wastewater servicing for the Project. This included clarification of the proposed public wastewater servicing strategy for the Project, associated infrastructure requirements and the proposed arrangements for future connection to Watercare's public wastewater network.

57. Auckland Council subsequently requested further information from the applicant, who responded through an updated application package submitted to the Panel and Auckland Council.

58. The Applicant's updated information provides greater clarity regarding its proposed private wastewater servicing strategy and identifies a future decision point for reconsideration of a public wastewater connection, namely, prior to the proposed marine outfall being constructed. However, Watercare considers that the following matters remain to be addressed through the Application and consent framework:

    (c) Public servicing strategy: clarification of the intended public wastewater servicing pathway, including reconciliation of the updated wastewater report and panel presentation document, consideration of the public rising-main option, and establishment of a clear framework for assessing public connection at the Stage 1 and Stage 2 decision points.

    (d) Decision and monitoring framework: provide the Wastewater Servicing Management Plan and supporting consent framework envisaged in section 3.3, including development and flow monitoring, thresholds and reporting. This should also include Watercare engagement and process for reassessing the Watercare Servicing Pathway before relevant private-servicing commitments.

    (e) Transition methodology: a concept-level strategy identifying how any future transitions and connection to public wastewater servicing would occur. This should include the anticipated point and method of connection, required conveyance infrastructure, interfaces with the private collection network, and the staging and commissioning requirements necessary to enable connection to the public wastewater network.

    (f) Asset assurance and acceptance: where future vesting is contemplated, confirmation that the proposed pump station configuration of nine pump stations at the full development has been appropriately assessed and optimised having regard to operational requirements, network resilience, maintenance and whole-of-life cost considerations; the Applicant should establish an agreed pathway with Watercare setting out the process, timing and requirements for engagement on design, construction, commissioning, asset assurance and any future transfer of assets. Such matters fall outside the scope of the current consent process, and any future vesting would remain subject to Watercare's requirements and approval at the relevant time.

    (g) Ongoing coordination between the Applicant and Watercare, including confirmation of the Applicant's current development programme and timely advice of material changes to staging, wastewater demand or the intended servicing pathway, to support alignment with Watercare's planned public infrastructure upgrades.

59. Detailed engineering design and final connection or vesting approvals may be addressed through Watercare's subsequent processes. The Application should nevertheless demonstrate a credible and practicable transition pathway, supported by appropriately framed conditions and/or agreements, rather than deferring the existence of that pathway to an unspecified future process.

60. Watercare considers that these matters should be addressed because the Application contemplates a future transition from private wastewater servicing to public wastewater servicing prior to implementation of the proposed marine outfall should a public servicing solution become available. The consent framework therefore needs to preserve a credible opportunity for that option to be reconsidered at the relevant decision points, without implying any commitment by Watercare to provide servicing or accept vesting of infrastructure that has been privately developed and operated.

61. Any future connection and vesting of assets would remain subject to Watercare's requirements and approval processes in place at the relevant time.

Overall Watercare position

62. Watercare's concern is that the Applicant's proposed wastewater strategy retains the ability to ultimately proceed with a permanent private servicing solution, including the marine outfall. This is occurring while Watercare is concurrently planning and progressing public wastewater infrastructure that takes the anticipated wastewater demand from the Project into account in its scoping and investment case.

63. If the respective programmes and servicing pathways are not appropriately coordinated, there is a risk that Watercare could incur significant planning, design and infrastructure expenditure to provide capacity for anticipated demand from the Project that may ultimately not connect to the public network.

64. This could result in inefficient or stranded investment and have wider implications for Watercare's infrastructure planning and investment decisions.

65. This concern is particularly relevant given that Watercare's planning has been informed by the development programme provided by the Applicant and Watercare is seeking, where practicable, to align delivery of additional public capacity with that programme.

66. In light of the above, the consent conditions (refer to Annexure A- Proposed Conditions of Consent) should ensure that, before any commitment is made to the relevant stages of the private servicing scheme, the public connection option is properly reassessed. The reassessment should have regard to the then-current status and anticipated availability of Watercare's planned infrastructure, the Applicant's development programme, and the technical practicability of connection. It should also consider the implications of the servicing decision for infrastructure already being planned or progressed by Watercare.

67. Watercare has identified these matters so that the Panel has a clear understanding of the relationship between the Applicant's proposed private servicing pathway and the public infrastructure being planned and progressed by Watercare. This includes an understanding of how the proposed private servicing pathway relates to Watercare's broader infrastructure planning. It also includes an understanding of the potential public infrastructure planning and investment consequences if the development ultimately remains permanently privately serviced.

Future approvals

68. Nothing in this letter obliges Watercare to issue any other approvals that may be required for the Project. Such approvals may include authorising the vesting of any infrastructure, approving a connection to Watercare's networks, or approving a "works over" application for works on or near Watercare assets.

69. EPA will be required to construct any new public wastewater infrastructure that is proposed to be vested to Watercare, or for any alteration to existing public wastewater infrastructure.

70. In addition to the EPA, separate Watercare approvals will be required at the relevant stage for connection to the public wastewater network and the vesting of wastewater assets.

71. Watercare trade waste approvals, consents or agreements may also be required for individual activities within the development before any trade waste is discharged to the public wastewater system.

Conclusion

72. Watercare is progressing public wastewater upgrades in Beachlands and considers the Applicant's wastewater servicing should remain coordinated with this programme, including reassessment of public network connection opportunities before committing to private solutions. Consent conditions should preserve a practicable future public connection and provide for ongoing coordination with Watercare. Any future connection or vesting would remain subject to available capacity, Watercare's technical requirements, and separate approval and asset acceptance processes.

73. Watercare remains available to work with the Applicant and Auckland Council as the Project and Watercare's wastewater infrastructure programme progress.

Yours faithfully,



Anna Jennings
Manager – Major Developments
Watercare Services Limited

Address for correspondence:
Shabneez Hussain
Senior Major Development Programme Lead
Phone: +64 212206591
Email: fasttrack@water.co.nz

DRAFT PROPOSED CONDITIONS

BEACHLANDS SOUTH FAST TRACK APPLICATION

26 June 2026

CONTENTS

CONTENTS **1**

INTRODUCTION **4**

A. GENERAL CONDITIONS APPLICABLE TO ALL CONSENTS (BUNXXXX) **7**

ACTIVITY IN ACCORDANCE WITH THE APPLICATION 7
LAPSING OF CONSENT 7
MONITORING DEPOSIT 7
STAGING AND IMPLEMENTATION 7
MANAGEMENT PLANS 8
PRE-COMMENCEMENT MEETING 9
CULTURAL INDUCTION 11
MANA WHENUA CONSULTATION AND IMPLEMENTATION 11
ACCIDENTAL DISCOVERY PROTOCOL 12

B. DISTRICT LAND-USE CONSENT CONDITIONS (LUCXXXX) AND REGIONAL EARTHWORKS CONDITIONS (LUCXXXX) **15**

Construction Management Plan (CMP) *15*
Construction Noise and Vibration Management Plan (CNVMP) *16*
Construction Traffic Management Plan (CTMP) *19*
Erosion and Sediment Control Plan (ESCP) *20*
Chemical Treatment Management Plan (ChTMP) *21*
Adaptive Management Plan – Earthworks ..... ***Error! Bookmark not defined.***
GEOTECHNICAL AND EARTHWORKS 24
PROTECTED ASSETS 28
ECOLOGY 30
Ecological Protected Area Network *30*
Lizard and Bat Management Plan (LBMP) *32*
Marine Ecology *33*
DESIGN, LAYOUT AND FINISHING OF BUILDINGS 34
LANDSCAPE DESIGN DRAWINGS, SPECIFICATIONS AND MAINTENANCE REQUIREMENTS 36
WASTE MANAGEMENT PLAN (WMP) 38
LIGHTING 38
SUSTAINABILITY 39
TRANSPORTATION AND ROADING 40
INFRASTRUCTURE REQUIREMENTS 44

C. CONTAMINATED LAND DISCHARGE CONDITIONS (DISXXXX) **45**

DURATION OF THE CONSENT 45

D. STREAMWORKS CONDITIONS (LUSXXXX) **50**

Native Fish Management Plan (NFMP) *50*
Riparian Planting Plan (RPP) *51*

In-Stream Structures *51*

E. STORMWATER DISCHARGE CONDITIONS (DISXXXX) **53**

Stormwater Management Plan (SMP) *53*

OPERATION AND MAINTENANCE MANUAL FOR THE STORMWATER MANAGEMENT DEVICES 53

F. SUBDIVISION CONDITIONS (SUBXXXX) **56**

SUPERLOT SUBDIVISION 56

General Conditions *56*

SECTION 223 CONDITION REQUIREMENTS 56

Survey Plan *56*

Easements in Gross *57*

LOCAL PURPOSE DRAINAGE RESERVES AND STORMWATER DEVICES TO VEST 57

OPEN SPACE AREAS 57

Roads to Vest *58*

SECTION 224 CONDITION REQUIREMENTS 58

Infrastructure Provision *58*

Pre-Commencement: Engineering Plan Approval *58*

Pre-Construction Meeting: Public Stormwater Assets *59*

Public Infrastructure *59*

WASTEWATER RETICULATION NETWORKS 60

WATER RETICULATION NETWORKS 61

STORMWATER RETICULATION NETWORKS 62

UTILITIES 62

GEOTECHNICAL COMPLETION REPORT 62

IMPLEMENTATION OF LANDSCAPE WORKS FOR LOCAL PURPOSE DRAINAGE RESERVES 63

IMPLEMENTATION OF LANDSCAPE WORKS FOR OPEN SPACES TO BE VESTED AS PUBLIC RESERVES 63

(a) Areas subject to the EPAN and/or any additional areas proposed to be planted as part of any ecological offsetting or compensation proposition; *63*

(b) Areas subject to the Significant Ecological Area – Terrestrial overlay; *63*

(c) High Value Terrestrial Planting areas; *63*

(d) Wetland Margin Buffer Planting areas; *63*

(e) Indicative Native Revegetation areas; and *63*

(f) Identified archaeological sites *63*

PUBLIC ROADS 64

ROADING 66

ONGOING OBLIGATIONS 67

COMPLETION CERTIFICATE 68

INDIVIDUAL LOT SUBDIVISION 69

GENERAL CONDITIONS 69

SECTION 223 CONDITION REQUIREMENTS 69

EASEMENTS 69

SECTION 224 CONDITION REQUIREMENTS 70

COMMONLY OWNED ACCESS LOTS (COALS) 70

Water and Wastewater Reticulation Networks *70*

Stormwater Reticulation Networks *70*

Utilities *70*

Vehicle Crossings *70*

G. CONDITIONS ON AIR DISCHARGE **74**

H. CONDITIONS OF RENEWED FORMOSA BORE WATER PERMIT **79**

I. CONDITIONS OF PROPOSED 620 WHITFORD MARAETAI ROAD BORE WATER PERMIT **86**

J. CONDITIONS ON COASTAL STRUCTURES, OCCUPATION AND ACTIVITIES 93

K. CONDITIONS OF WASTEWATER TREATMENT PLANT AND DISCHARGE OF TREATED WASTEWATER [DISXXX].....97

L. CONDITIONS OF WILDLIFE APPROVAL 101

M. CONDITIONS OF HERITAGE NEW ZEALAND POUHERE TAONGA ACT AUTHORISATION 105

INTRODUCTION

The conditions have been organised by consent type and consent number and have followed the below structure:

A. General conditions which are applicable to all consents, which are referenced as BUNXXXX.
B. Specific land-use conditions relating to district plan consents (Ref: LUCXXXX) and regional earthworks conditions (Ref: LUCXXXX).
C. Specific contaminated land discharge permit conditions, referenced as DISXXXX.
D. Specific streamworks conditions, referenced as LUSXXXX.
E. Specific stormwater discharge consent conditions, referenced as DISXXXX.
F. Specific subdivision conditions, referenced as SUBXXXX.
G. Air Discharge Conditions
H. Formosa Bore Water Permit
I. 620 Whitford Maraetai Road Bore Water Permit
J. Coastal Permits
K. Wastewater Treatment Plant and Discharge
L. Wildlife Act Approvals
M. Heritage NZ Pouhere Taonga Authorisations

Below is a definition table of all the acronyms used across all conditions:

DEFINITIONS	
Term	Definition
AMP	Archaeological Management Plan
AVMPP	Archaeological Vegetation Management and Planting Plan
Auckland Transport	Auckland Transport or any replacement Road Controlling Authority
Auckland Transport Engineering Standards	The Auckland Transport Code of Practice 2013 or any later replacement or update to that document dated prior to the date of this consent
AUP(OP)	Auckland Council Unitary Plan (Operative in Part)
BMP	Biodiversity Management Plan
CBMP	Coastal Bird Management Plan
ChTMP	Chemical Treatment Management Plan
CMA	Coastal Marine Area
CMP	Construction Management Plan
CNVMP	Construction Noise and Vibration Management Plan
COAL	Commonly Owned Access Lot
Council	Auckland Council (including Council's Monitoring Officer)
CSMP	Contaminated Site Management Plan
CTMP	Construction Traffic Management Plan
EMP	Ecological Management Plan
ESCAMP	Erosion and Sediment Control Adaptive Management Plan
ESCP	Erosion and Sediment Control Plan

FMP	Fauna Management Plan
FPMMP	Fish Passage Monitoring and Maintenance Plan
GD05	Auckland Council's Guideline Document GD2016/005 'Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region', incorporating its latest amendments.
HNZPT	Heritage New Zealand Pouhere Taonga
LBMP	Lizard and Bat Management Plan
NFMP	Native Fish Management Plan
NSAAT	No Stopping At All Times
OMP	Operation and Maintenance Plan
Project	The Beachlands South development enabled by these consents
RMA	Resource Management Act 1991
RPP	Riparian Planting Plan
Site	The site identified as follows:

Property Addresses	Legal Description	Title	Area
(a) 110 Jack Lachlan Drive	Lot 2 DP 501271	748626	170.475 Ha
(b) 620 Whitford-Maraetai Road	Lot 100 DP 504488	759265	79.9444 Ha
(c) 712 Whitford-Maraetai Road	Lot 4 DP 54105	NA6C/674	4.7518 Ha
(d) 758 Whitford-Maraetai Road	Lot 9 DP 54105	NA6C/678	6.1403 Ha
(e) 770 Whitford-Maraetai Road	Lot 10 DP 54105	NA56A/632	6.8665 Ha

SMP	Stormwater Management Plan
SQEP	Suitably Qualified and Experienced Person
SVR	Site Validation Report
TDR	Transport Design Report
TDSMR	Transport Development and Subdivision Monitoring Plan
TMP	Travel Management Plan
Watercare	Watercare Services Limited
Working Days	Working Days as defined in Section 2 of the Resource Management Act 1991

WMP	Waste Management Plan
WSMP	Wastewater Servicing Management Plan
WdMP	Wildlife Management Plan

A. GENERAL CONDITIONS APPLICABLE TO ALL CONSENTS (BUNXXXX)

Activity in accordance with the application

[1] The development must proceed in general accordance with the information and plans submitted with the application and formally approved by the Environmental Protection Authority on XXXXX, including all supporting and additional information submitted and included in Appendix 1 to these conditions. In the event that any of the provisions of the documents conflict with the requirements of these conditions of consent, the conditions of consent shall prevail.

Lapsing of consent

[2] The consents related to the development shall lapse fifteen years after the date of commencement unless given effect to prior or unless specified otherwise below.

Monitoring deposit

[3] The Consent Holder must pay the Council an initial consent compliance monitoring charge of $5,000 (inclusive of GST), plus any further monitoring charge or charges to recover the actual and reasonable costs incurred to ensure compliance with the conditions attached to these consents.

Advice Note: The initial monitoring deposit is to cover the cost of all work to ensure compliance with the resource consents, including inspecting the Site, carrying out tests, reviewing conditions, updating files, etc. In order to recover actual and reasonable costs, monitoring of conditions in excess of those covered by the deposit shall be charged at the relevant hourly rate applicable at the time. The Consent Holder will be advised of the further monitoring charge. Only after all conditions of the resource consents have been met will the Council issue a letter confirming compliance on request of the Consent Holder.

Staging and Implementation

[4] The Project is enabled through a suite of interrelated subdivision, land use and regional resource consents to achieve an integrated outcome. The Project will be implemented in a number of stages. The Project may be implemented in any stage order and for a sub-precinct, full stage, or part thereof. The following consent conditions apply to each individual stage to the extent relevant to that stage. The extent of each stage may be as determined by the Consent Holder provided that all relevant consent conditions are complied with at each stage and the required infrastructure for each stage will be provided.

[5] Except as provided for in these conditions, prior to any building being occupied for an individual stage or part of a development that is being progressed the required infrastructure shall be constructed and operational. Upon completion of a stage or part of a development that is being progressed, an updated staging plan must be provided to Council documenting:

(a) all previously implemented stages

(b) the remaining stages to be completed and the anticipated timeframe for each stage to be completed.

Management Plans

[6] All management plans must be prepared by a SQEP, unless otherwise specified below.

[7] Management plans may be submitted in parts or in stages to address particular activities or to reflect the staged implementation of the Project. Management plans submitted must clearly show the integration of activities and their management with adjacent stages and interrelated activities.

[8] The management plans required under the following conditions must be submitted to Council in electronic copy form for certification that the management plan(s) meet the objective(s) specified and give effect to the relevant consent conditions to which each plan relates:

(a) A CNVMP – refer Condition [XX]

(b) A CMP – refer Condition [XX]

(c) A CTMP – refer Condition [XX]

(d) An ESCP – refer Conditions [XX and XX]

(e) A ChTMP – refer Condition [XX]

(f) SMP – refer Condition [XX]

(g) A NFMP - refer Condition [XX]

(h) A RPP - refer Condition [XX]

(i) A BMP – refer Condition [XX]

(j) LBMP – refer Condition [XX]

(k) A WMP – refer Condition [XX]

~~(k)~~(l) A WSMP – refer Condition [XX]

~~(l)~~(m) A WdMP – refer Condition [XX]

~~(m)~~(n) A CSMP – refer Conditions [XX to XX]

~~(n)~~(o) AMP – refer Condition [XX]

~~(o)~~(p) AVMPP - refer Condition [XX]

~~(p)~~(q) TDSMR - refer Condition [XX]

~~(q)~~(r) TMP - refer Condition [XX]

~~(r)~~(s) CBMP - refer Condition [XX]

~~(s)~~(t) TDR - refer Condition [XX]

Advice Note: The Consent Holder is encouraged to discuss the approval of any management plans with their allocated monitoring officer as early as possible. Any management plans submitted under this condition must be sent to the Consent Holder's allocated Council monitoring officer and to the monitoring@aucklandcouncil.govt.nz inbox. The Consent Holder should seek confirmation from the monitoring officer that the management plan has been received.

Advice Note: For the purpose of compliance with conditions of consent, "the Council" refers to the Council monitoring inspector unless otherwise specified. To identify your allocated officer please email monitoring@aucklandcouncil.govt.nz

[9] Works to which a management plan relates must not commence until the Consent Holder has received written certification from Council.

Advice Note: Council must avoid unreasonable delay when determining certification for a submitted management plan.

[10] The Consent Holder must implement the certified management plan(s), and all works must be carried out in general accordance with the latest version of the certified management plan(s).

[11] The Consent Holder may amend a certified management plan(s) to provide updated information or reflect changes in design, construction methods or the management of effects. Any material change must be consistent with the objective(s) of the relevant management plan and the requirements of the relevant conditions of this consent, and must be submitted to Council for certification.

[12] The Consent Holder must ensure that copies of all certified management plans are available on Site and can be provided to Council officers on request.

Pre-commencement Meeting

[13] Prior to the commencement of enabling works, construction and / or earthworks for each

main stage of the Project on the Site, the Consent Holder must hold a pre-commencement meeting that:

(a) Is located on the Site;

(b) Is scheduled not less than 5 Working Days before the anticipated commencement of any enabling works, construction and / or earthworks;

(c) Includes representation from the contractors who will undertake the works;

(d) Includes Council representatives, including the Compliance and Monitoring officer;

(e) Includes the Project archaeologist;

(f) Includes the Project arborist; and

(g) Includes an Auckland Transport representative.

[14] The purpose of the meeting addressed in Condition [14] is to discuss the erosion and sediment control measures, earthworks methodologies, relevant management plans, timeframes for the work, and to ensure all parties are aware of and familiar with the relevant consent conditions.

[15] The following information must be made available for the meeting addressed in Condition [14] at least 5 Working Days before the meeting:

(a) Timeframes for key stages of the works;

(b) Name and telephone number of the Project manager and the Site owner for monitoring and communication purposes;

(c) Resource consent conditions;

(d) ESCP and ChTMP;

(e) CNVMP;

(f) CMP;

(g) CTMP;

(h) CSMP;

(i) Contact details of the Site contractor and Site civil engineer;

(j) Construction plans approved (signed/stamped) by the Council, care of the Council's Development Engineer, if applicable.

Advice note: To arrange the pre-construction meeting please contact Council by email (monitoring@aucklandcouncil.govt.nz). All information required by the Council and listed in that condition should be provided 10 days prior to the meeting.

Cultural induction

[16] At least 15 Working Days prior to the planned commencement of earthworks, and on further occasions as may be agreed by the Consent Holder and Ngāi Tai ki Tāmaki, the Consent Holder must invite Ngāi Tai ki Tāmaki to give a cultural induction of the Site to all relevant contractors involved with earthworks and construction associated with this Project.

[17] The Consent Holder must notify the Council and Ngāi Tai ki Tāmaki in writing at least 5 Working Days prior to earthworks activities commencing on Site.

Mana Whenua Consultation and Implementation

[18] The Consent Holder must maintain ongoing consultation with Ngāi Tai ki Tāmaki who have asked to be consulted on an ongoing basis throughout the design and development phases of the Project.

[19] Should kōiwi (human remains) be unearthed or other major activators arise, a rāhui will be discussed with (and if suitable invoked by) Ngāi Tai ki Tāmaki to allow appropriate holistic mitigation measures to be implemented.

[20] Should cultural material discoveries occur, the landowner will consider resourcing for a Pou Whenua, kōhatu, or Ngāi Tai marker, where appropriate, to be installed to mark the significance of the whenua.

[21] The Consent Holder shall regularly demonstrate cultural competency of their employees and contractors (including archaeologists) upon request from Ngāi Tai ki Tāmaki and will regularly wānanga with Ngāi Tai ki Tāmaki either onsite or at Umupuia Marae for general/site cultural induction purposes.

[22] The Consent Holder must, prior to commencement of bulk earthworks and on an ongoing basis for that activity, invite Ngāi Tai ki Tāmaki to undertake cultural monitoring of bulk earthworks. The details of such monitoring may be agreed as between the Consent Holder and Ngāi Tai ki Tāmaki, and must include as a minimum the first scraping of topsoil to identify potential archaeological features, and inspection of the erosion and sediment controls and measures upon installation.

[23] The Consent Holder shall contact Ngāi Tai ki Tāmaki where any New Zealand native trees are proposed to be removed. If the tree specimen is a healthy native tree that cannot be replanted within the Project site, the Consent Holder shall where possible relocate the tree outside the Project site. If from the outset the trees cannot be relocated or replanted, the Consent Holder shall engage with Ngāi Tai ki Tāmaki to assess the trees to determine

suitability for carving or other cultural purpose. Should any of the above outcomes not be achievable then the trees shall be mulched and returned within the project landscaping or, the mulch delivered to Umupuia Marae at 153 Maraetai Coast Road.

[24] The Consent Holder shall engage with Ngāi Tai ki Tāmaki regarding the design, engagement and procurement of 'Cultural Markers' consistent with I458 Beachlands South Precinct Plan 4 – Cultural Landscape.

Advice note: The identification of sites of significance or sites of interest is an opportunity of wayfinding and an opportunity to educate the community and visitors of the cultural importance of this landscape and will provide the opportunity to incorporate story telling, footprints, design, and development of cultural elements into the Project area.

Accidental Discovery Protocol

[25] If, at any time during Site works, sensitive materials (kōiwi / human remains, an archaeological site, a Māori cultural artefact, a protected NZ object, contamination or a lava cave greater than 1m in diameter) are discovered, then the AUP(OP) Accidental Discovery Protocol Rule outlined in Standard E11.6.1 and E12.6.1 of the AUP(OP) must be followed if an Archaeological Authority from HNZPT is not otherwise in place.

[26] Prior to any works progressing on 758 Whitford Maraetai Road and 770 Whitford Maraetai Road, the Consent Holder shall submit an Archaeological Management Plan for the proposed works on these sites, for certification by the Council.

Advice notes for all consents

1. *For more information on the resource consent process with Council see the Council's website: www.aucklandcouncil.govt.nz. General information on resource consents, including making an application to vary or cancel consent conditions can be found on the Ministry for the Environment's website: www.mfe.govt.nz.*

2. *The Consent Holder is responsible for obtaining all other necessary consents, permits, and licences, including those under the Building Act 2004. This consent does not remove the need to comply with all other applicable Acts (including the Property Law Act 2007 and the Health and Safety at Work Act 2015), regulations, relevant Bylaws, and rules of law. This consent does not constitute building consent approval. Please check whether a building consent is required under the Building Act 2004.*

3. *The Consent Holder is reminded that a waste management plan (WMP) is required to be prepared for any multi-unit development, comprising ten or more residential and/or*

commercial units, under the Auckland Council Solid Waste Bylaw 2012 ('the Bylaw'). Assistance in determining the contents of the WMP as required by the Bylaw can be found within the Auckland Design Manual located at this link: http://www.aucklanddesignmanual.co.nz

4. *The Council acknowledges that the management plans referred to in the consent conditions are intended to provide flexibility both for the Consent Holder and the Council for the management of the relevant activities. Accordingly, the management plans may need to be reviewed over time.*

5. *Certification of any management plan by the Council relates only to those aspects of the management plan that are relevant under the Resource Management Act 1991. The certification does not amount to an approval or acceptance of suitability by the Council of any elements of the management plan that relate to other legislation, for example, but not limited to, the Building Act 2004, the Heritage New Zealand Pouhere Taonga Act 2014, or the Health and Safety at Work Act 2015.*

6. *The proposal may require engineering approval to be obtained from the Council. See the Council's website http://www.aucklandcouncil.govt.nz for more information on the engineering approval process, or call (09) 301 0101 and ask to speak to a Development Engineer from your local service centre.*

7. *Pumping and/or boosting of the public water supply may be required for internal plumbing design. Details will be required with the building consent application.*

8. *The adequacy of the public water supply to provide for firefighting, as required by SNZ PAS 4509:2008, will need to be tested prior to lodgement of a building consent application for the proposal. Confirmation of adequacy should be in the form of a written report from the NZ Fire Service. Any shortfalls in the adequacy of the public supply should be addressed.*

9. *Any outdoor lighting required as part of the development, including during demolition, earthworks and construction, is required to comply with the requirements of Chapter E24 of the AUP(OP).*

10. *In relation tooperationalnoise, any future activities in the building (including but not limited to noise generated from the retail tenancies, roof terrace activities/events, and any mechanical plant) should be designed/managed to comply with standards E25.6.8 (external) and E25.6.9 (between units) of the AUP(OP), at all times, except as otherwise provided for by the conditions of consent.*

11. *The Consent Holder is advised that the discharge of pumped groundwater to a stormwater*

system or waterbody will need to comply with any other regulation, bylaw or discharge rule that may apply.

12. *In the event that the Consent Holder discovers asbestos containing materials (ACM) on the Site:*

    - *You have obligations under the relevant regulations for the management and removal of asbestos, including the need to engage a Competent Asbestos Surveyor to confirm the presence or absence of any ACM.*
    - *Work may have to be carried out under the control of person holding a WorkSafe NZ Certificate of Competence (CoC) for restricted works.*
    - *If any ACM is found, removal or demolition will have to meet the Health and Safety at Work (Asbestos) Regulations 2016.*
    - *Information on asbestos containing materials and your obligations can be found at http://www.worksafe.govt.nz*.

    If ACM is found on Site, you may be required to remediate the Site and carry out validation sampling. Dependent on the amount of soil disturbance a further resource consent application may be required.

13. *Reference to any technical documents in these conditions of consent (such as GD05 and Healthy Waters Operation and Maintenance Plan Template), include any updates to those documents.*

B. DISTRICT LAND-USE CONSENT CONDITIONS (LUCXXXX) AND REGIONAL EARTHWORKS CONDITIONS (LUCXXXX)

Duration of Regional Earthworks Consent

[27] The regional earthworks component of consent LUCXXXX expires 25 years from the date it is granted unless it has been surrendered or cancelled at an earlier date pursuant to the RMA.

Construction Management Plan (CMP)

[28] The Consent Holder must prepare and submit a CMP to the Council at least 15 Working Days prior to the planned commencement of works for certification in accordance with Conditions [XX to XX].

The objectives of the CMP are to:

(a) Identify the Best Practicable Option (within the limits set under the conditions of consent) and define the procedures to ensure adverse effects associated with construction activities are minimised;

(b) Inform the duration, frequency and timing of works to manage disruption; and

(c) Require timely management of complaints.

[29] The CMP must include specific details relating to avoiding, remedying or mitigating adverse effects on the environment and neighbouring properties from earthworks, demolition and construction, and the management of all works associated with this Project (where they are not already managed by the CNVMP, ESCP or CTMP) as follows:

(a) Contact details of the appointed contractor or project manager (phone number, email, postal address);

(b) A general outline of the construction programme for each stage, including an explanation of how works involving vegetation removal will be timed to avoid clearing bird habitat during bird breeding season;

(c) Applicable conditions relating to the management of construction matters (including but not limited to those on dust, erosion and sedimentation);

(d) Programme of works and hours of operation;

(e) Relevant details for the management of dust on Site (as per the guidance of Appendix 4 of the Ministry for the Environment's Good Practice Guide for Assessment and Managing Dust, 2016);

(f) The circumstances when the Consent Holder shall offer the wash-down of the

exterior of immediately adjacent dwellings to remove any potential construction-related dust;

(g) Management processes for earthworks on Site to minimise erosion and sediment effects as per Condition [XX] and as guided by Council's guideline document 005 Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region, 2016/005 (GD05);

(h) Details of the construction hoardings and other measures to be adopted to maintain areas of the Site that are visible from public places and private property in a tidy condition; and

(i) Details of the approach to be undertaken for the unloading and stockpiling of materials on Site (including any necessary reference to the CNVMP or CTMP).

(j) Details of the proposed construction yards including temporary screening when adjacent to residential areas;

(k) Details of the proposed construction lighting;

(l) Measures to mitigate flood hazard effects such as siting stockpiles out of floodplains, minimising obstruction to flood flows, actions to respond to warnings of heavy rain;

(m) Measures to address the storage of fuels, lubricants, hazardous and/or dangerous materials, along with contingency procedures to address emergency spill response(s) and clean up;

(n) Location and procedures for the refuelling and maintenance of plant and equipment to avoid discharges of fuels or lubricants to watercourses;

(o) The use of wheel-wash facilities at construction yard exit points and the timely removal of any material deposited or spilled on public roads;

(p) Procedures for incident management;

(q) Methods for providing for the general health and safety of the general public;

(r) Procedures for responding to complaints about construction works.

Construction Noise and Vibration Management Plan (CNVMP)

[30] The Consent Holder must prepare a CNVMP with reference to Annex E2 of NZS 6803:1999 Acoustics – Construction Noise and Appendix B of DIN 4150-3:1999 *"Structural vibration – Part 3 Effects of vibration on structures"* and submit it to the Council at least 15 Working Days prior to the planned commencement of works for certification in accordance with Conditions [XX to XX].

The objectives of the CNVMP are to:

(a) Identify the Best Practicable Option for managing all construction noise and vibration to avoid, remedy or mitigate adverse effects;

(b) Define the procedures to be followed, and the alternative strategies to be adopted, when construction activities cannot practically achieve full compliance with the consented noise and vibration standards;

(c) Ensure that any property damage caused by vibration from construction activities is identified and repaired;

(d) Inform the duration, frequency and timing of the works to manage disruption; and

(e) Require frequent and effective engagement with affected receivers and timely management of complaints.

[31] The CNVMP must include specific details of measures to avoid, remedy or mitigate adverse noise and vibration effects on the environment and neighbouring properties from earthworks, demolition and construction, and the management of all works associated with this development as follows:

(a) Contact details of the appointed contractor or project manager (phone number, email, postal address);

(b) A general outline of the construction programme for each stage;

(c) The applicable Site noise and vibration criteria set out in Conditions [XX] and [XX];

(d) Identification of surrounding noise and / or vibration sensitive receivers and measures by which neighbours will be advised of upcoming construction processes;

(e) Specific identification of vibration sensitive receivers where there is a risk of exceeding the vibration criteria set out in Condition [XX], in respect of which building condition survey reports must be prepared by the Consent Holder, if reasonable access is provided by the building owner/occupier, prior to and after the completion of earthworks activities;

(f) Details about the works, including:

  (i) When the higher noise and vibration levels can be expected;

  (ii) The likely sources or causes of noise and vibration and a description of the anticipated equipment and processes;

  (iii) Methods for monitoring and reporting on noise and vibration; and

  (iv) Hours of operation.

(g) The procedure for monitoring construction noise and vibration at the most exposed

surrounding buildings and structures (including to monitor vibration at Watercare's critical infrastructure and any vibration sensitive receivers where there is a risk of exceeding the vibration criteria set out in Condition [XX]);

(h) The processes for repairing any damage caused by construction activities;

(i) Requirements and specifications for acoustically effective barriers at and/or within Site boundaries and/or additional localised screening around individual noisy machinery;

(j) Details of practicable noise and vibration mitigation measures to be applied during the various stages of the construction period;

(k) Procedures for ensuring that all contractors and operators on Site are aware of the requirements to minimise noise and vibration effects as far as practicable on neighbouring properties;

(l) The process to record and investigate all construction noise and / or vibration complaints that includes the following steps being taken as soon as practicable:

(i) Acknowledge receipt of the concern or complaint within 24 hours and record:

a. Time and date the complaint was received and who received it;

b. Time and date of the activity subject to the complaint (estimated where not known);

c. The name, address and contact details of the complainant (unless they elect not to provide them);

d. The complainant's description of the activity and its resulting effects; and

e. Any relief sought by the complainant (e.g. scheduling of the activity).

(ii) Identify the relevant activity and the nature of the works at the time of the complaint;

(iii) If a complaint relates to building damage, inform the on-duty Site manager as soon as practicable;

(iv) Review the activity noise and / or vibration levels and the mitigation and management measures in place;

(v) Record the findings and recommendations in a complaints register that is provided to the project manager after each and every complaint and make available to Council upon request; and

(vi) Report the outcomes of the investigation to the complainant within 10

Working Days of the complaint being received, identifying where the relief sought by the complainant has been adopted or the reason(s) otherwise.

Construction Traffic Management Plan (CTMP)

[32] The Consent Holder must prepare a CTMP and provide it to Council at least 15 Working Days prior to the planned commencement of works for certification in accordance with Conditions [XX to XX]. The objective of the CTMP is to ensure that during demolition, earthworks and construction activities the surrounding road network (including the footpaths) operates safely and efficiently for all road users, including pedestrians. The CTMP must be prepared in accordance with the New Zealand Guide to Temporary Traffic Management.

[33] The CTMP must include specific details relating to avoiding, remedying or mitigating adverse effects on the environment from demolition, earthworks, construction and management of all works associated with this development, and setting out procedures to be followed which ensure compliance with the conditions of consent, as follows:

(a) Contact details of the appointed contractor or project manager (phone number, email, postal address);

(b) A general outline of the construction programme for each stage;

(c) Details of Site access / egress over the entire construction period and any limitations on truck movements. All egress points should be positioned to achieve appropriate sight distances;

(d) Plans showing areas where stockpiles, and storage of equipment (including contractor parking) will occur so that any obstruction of public places (e.g. roads) is minimised;

(e) Plans showing the location of any Site offices, worker facilities and worker car parking required during the construction period;

(f) An overview of measures that will be adopted to prevent unauthorised public access during the construction period;

(g) Location of traffic signs on surrounding streets and proposed signage for traffic management purposes during demolition and construction;

(h) Construction dates, hours of operation and any restrictions on Site access at certain times;

(i) Measures to ensure satisfactory vehicle and pedestrian access is maintained to adjacent properties at all times;

(j) Measures to ensure that appropriate access arrangements are maintained along Jack Lachlan Drive or via an alternative route within the Beachlands area during the reconstruction of XX Jack Lachlan Drive.

(k) Temporary protection measures to be installed to minimise any damage to public roads, footpaths, berms, kerbs, reserves or other public assets within 30m of any construction ingress or egress point utilised as a result of the demolition, earthworks and construction activities;

(l) The process to record and investigate all traffic complaints; and

(m) Identification of routes to be used by heavy vehicles for construction and/or earthworks with Council and Auckland Transport prior to commencement of works, including any specific non-working or non-movement hours or specification of routes to not be used to manage vehicular and pedestrian traffic near education facilities, particularly during peak pick up and drop off times.

Erosion and Sediment Control Plan (ESCP)

[34] An annual ESCP prepared in accordance with GD05, including any amendments to this document, must be submitted to Council no later than 1 August of any year when bulk earthworks are proposed on site, for certification in accordance with Conditions [XX to XX]. Earthworks activity on the Site must not commence until written certification from the Council is provided that the ESCP meets the requirements of GD05 and contains sufficient detail to address the following matters.

(a) Specific erosion and sediment control works (location, dimensions, capacity);

(b) Supporting calculations and design drawings;

(c) Catchment boundaries and contour information;

(d) Details of construction methods;

(e) Timing and duration of construction and operation of control works (in relation to the staging and sequencing of earthworks);

(f) Details relating to the management of exposed areas (e.g. grassing, mulching);

(g) Monitoring and maintenance requirements;

(h) Pumping and dewatering management plan for civil infrastructure related earthworks (if required);

[35] Within 10 Working Days followingimplementation and completionofthespecific erosion and sediment controls required by the ESCP and prior to the commencement of the earthworks activity, a SQEP must provide written certification to the Council that the erosion and

sediment control measures have been constructed in accordance with the certified plans and GD05. Written certification must be in the form of a report or any other form acceptable to the Council.

Advice Note: Certification of the sediment and erosion control structure(s) should contain sufficient details to address the following matters:

- *Detailson the contributing catchment area*
- *Retention volume of structure (dead storage and live storage measured to the top of the primary spillway)*
- *Dimensions and shape of structure*
- *Position of inlets/outlets*

[36] At least 15 Working Days prior to the commencement of any earthworks on the Site associated with development of any of the stormwater wetland ponds on the Site, an ESCP specific to these works and prepared in accordance with GD05, including any amendments to the ESCP, must be submitted to the Council for written certification. Land disturbance must not commence until the Council has certified that the ESCP satisfactorily meets the requirements of GD05. The plan must contain sufficient details to address the following matters:

(a) Specific details of any temporary stream diversion methodology, including location, type, and capacity in accordance with GD05, and confirmation that appropriate fish screens must be installed on any pumps;

(b) Details of a fish removal and relocation plan;

(c) Confirmation of any further erosion and sediment control measures dimensions, capacities) associated with the stormwater channel works;

(d) Supporting calculations and design drawings as necessary; and

(e) Monitoring and maintenance requirements.

Advice Note: In the event that minor amendments to the ESCP are required, any such amendments must be limited to the scope of this consent. Any amendments which affect the performance of the ESCP may require an application to be made in accordance with section 127 of the RMA. Any minor amendments must be provided to the Council prior to implementation to confirm that they are within the scope of this consent.

Chemical Treatment Management Plan (ChTMP)

[37] Prior to the commencement of earthworks activity on the Site, a ChTMP must be prepared in accordance with GD05 and submitted to Council at least 15 Working Days prior to the

planned commencement of earthworks for certification in accordance with Conditions [XX to XX]. No earthwork activities may commence until the measures referred to in that plan have been put in place.

The ChTMP must include as a minimum:

(a) Specific design details of a chemical treatment system based on a rainfall activated dosing methodology for the sediment retention pond(s) or other impoundment devices utilised throughout the earthworks;

(b) Monitoring, maintenance (including post-storm) and contingency programme (including a record sheet);

(c) Details of optimum dosage (including assumptions);

(d) Results of initial chemical treatment trial;

(e) A spill contingency plan; and

(f) Details of the person or bodies that will hold responsibility for long term operation and maintenance of the chemical treatment system and the organisational structure which will support this system.

(g) Bench testing to determine the appropriate flocculant to use. Bench testing must include organic flocculants to determine their effectiveness.

Erosion and Sediment Control Adaptive Management Plan (ESCAMP)

[38] No less than 20 Working Days prior to the commencement of any earthworks at the Site, an ESCAMP must be prepared in general accordance with Auckland Council's guidance document "Erosion and Sediment Control Adaptive Management Plan Guidance Document", July 2020 (Auckland Council reference RC3.2.22), and provided to the Council for written certification. The ESCAMP must address monitoring requirements and changes to management procedures in response to the results of monitoring, and must include but is not limited to, the following details:

(a) Provision of a Freshwater Baseline Report prepared by a suitably qualified and experienced Ecologist and/or Water Quality Scientist and provided to the Council for written certification, no less than 20 Working Days prior to any earthworks or streamworks commencing. The purpose of the Freshwater Baseline Report is to confirm pre-construction baseline environmental conditions of the receiving environment and include pre-construction in stream monitoring results.

The Freshwater Baseline Report must include as a minimum, information on the following matters:

- sediment quality such as description of sediment inputs, transport, substrate composition and embeddedness.
- water quality measurements such as total suspended solids (TSS) and turbidity.
- actual and potential inanga (Galaxias maculatus) spawning habitat.
- identify the pre-construction condition of any Erosion Prone Streams against which to measure construction effects and possible mitigation measures.
- The presence of any threatened aquatic species or habitat, susceptible to sediment discharge.

(b) Details of weather forecasting and monitoring, including implementation of an onsite rain gauge with a telemetered system that provides text and email notifications;

(c) Trigger levels for water quality and rainfall events (actual and forecasted events);

(d) Details of an ongoing monitoring and sampling regime for the receiving environment, including turbidity and / or TSS monitoring downstream within the receiving environment;

(e) An automated monitoring regime (inlet and outlet TSS and / or turbidity) on at least 2 sediment retention ponds per catchment throughout the duration of earthworks at the site, and a manual sampling regime for all remaining sediment retention ponds and decanting earth bunds;

(f) Management responses when a trigger level is exceeded, including the ability to reduce exposed area; and

(g) Reporting to Council.

Advice Note: Turbidity results can be substituted providing a correlation between TSS and turbidity has been established. Any proposed revisions to the AMP must be submitted to the Council for written certification prior to formalising and implementing the revised Plan.

[39] An appropriate efficiency of sediment retention ponds and/or decanting earth bunds should be established where efficiency measurements are only activated when inlet samples indicate high sediment loadings. i.e., the efficiency of a pond need not be scrutinised when both inlet and outlet samples show low TSS / NTU.

Advice Note: Further guidance on preparation of an Adaptive Management Plan can be found in Auckland Council guidance document - Erosion and Sediment Control Adaptive Management Plan Guidance Document, Report to support preparation of Adaptive Management Plans, RC 3.2.22, July 2020.

[40] All monitoring and management procedures as detailed within the certified ESCAMP

required by Condition [XX], and any subsequent revisions, must be implemented on an ongoing basis throughout the duration of all earthworks activities on site.

Advice Note: The AMP is a live document, and updates are expected to address unforeseen circumstances or changes in the earthworks methodology as the site responds though its adaptive

[41] An earthworks area which has been stabilised as a result of a trigger level exceedance or a management response as defined and required by the certified ESCAMP (required under Condition [XX]) and any subsequent revisions certified by the Council, can only be re-opened for earthworks on the written certification of the Council.

[42] As a result of observed inefficiencies upon site inspection or identified within the site reporting, Council may request that the AMP be updated to address those inefficiencies. If such a request is made by the Council, the revised plan must be submitted to the Council within 5 Working Days of the request. The updated AMP must not be implemented without the Council's certification.

[43] The maximum area of exposed earth associated with bulk earthworks at any one time throughout the duration of the project when exercising this consent must be no greater than 20 hectares across the Project and 15 hectares within each catchment.

Advice note: This limit applies to "bulk" earthworks only and not to "post-construction" subdivision or development related earthworks.

Geotechnical and Earthworks

[44] General ground conditions shall be inspected and tested by a SQEP as they are exposed during earthworks to confirm they are compatible with the assumed ground model.

[45] Geotechnical slope stabilisation requirements for Lots 528-534 (inclusive), 537, 538, 539, 545, 546, 547 and 561 to 570 (inclusive) as identified on the subdivision scheme plans referenced in Condition [1] and Appendix 1 to the conditions shall be designed by a SQEP to meet the Auckland Code of Practice for Land Development and Subdivision and certified by Council. The certified geotechnical stabilisation requirements shall be implemented prior to the construction of any dwellings on these lots commencing.

[46] Prior to the approval of any building consent for construction of a basement within the Project area, the Consent Holder shall submit a geotechnical assessment from a SQEP for certification by the Council.

[47] Prior to the approval of any building consent for construction of a retaining wall exceeding

3m in height above ground level within the Project area, the Consent Holder shall submit a geotechnical assessment from a SQEP for certification by the Council.

[48] Prior to construction commencing on the wastewater dripper irrigation field, the Consent Holder shall submit a geotechnical assessment from a SQEP that confirms that the sites are suitable from a geotechnical perspective for the design and construction of the proposed works, for certification by the Council.

[49] Prior to construction commencing on the proposed access road at 712 Whitford Maraetai Road, the Consent Holder shall submit a geotechnical assessment from a SQEP that recommends the design and construction measures required to manage any geotechnical effects, for certification by the Council.

[50] Prior to works commencing on 758 and 770 Whitford Maraetai Road the Consent Holder shall submit a geotechnical assessment from a SQEP that confirms that the sites are suitable from a geotechnical perspective for the design and construction of the proposed works, for certification by the Council

[51] Prior to the commencement of each stage of earthworks, the Consent Holder shall provide a written statement to Council, prepared by a SQEP, demonstrating that ground settlement effects are unlikely to have detrimental ground settlement effects on previously completed building works and infrastructure. This should be based on a geotechnical engineering assessment and should also be validated by a GSMCP on the completion of earthworks.

[52] During earthworks, all necessary action must be taken to minimise dust generation and sufficient water must be available and used where needed to dampen exposed soil, and / or other dust suppressing measures must be available to minimise dust formation and discharge beyond the Site boundaries.

[53] All earthworks must be managed to ensure that they do not lead to any uncontrolled instability or collapse affecting either the Site or adversely affecting any neighbouring properties. In the event that uncontrolled collapse or instability does occur, it must be rectified and remediated as soon as reasonably practicable at the Consent Holder's expense.

[54] The Consent Holder must engage a SQEP to supervise all excavations, retaining and foundation construction. The SQEP's contact details must be provided in writing to the Council at least 10 Working Days prior to commencement of any excavations, retaining or foundation construction on Site.

[55] Earthworks on the subject Site must not be undertaken between 1 May and 30 September in

any year, without the submission of a 'Request for winter works' to, and approval by, Council. All requests must be renewed annually prior to the approval expiring and no works must occur until written approval has been received from Council. All winter works will be re-assessed monthly or as required to ensure that adverse effects are not occurring in the receiving environment and approval may be revoked by Council upon written notice to the Consent Holder.

Advice Note: Any 'Request for winter works' will be assessed against criteria in line with the information required to assess a comprehensiveapplication. Principally that will focus onthe level of risk, the propensity to manage that risk with contingency planning and a 'track record' of good compliance with consent requirements. Each 'Request for winter works' submitted, should include the following:

- *Description of works proposed to be undertaken between 1 May and 30 September and the duration of those works.*
- *Details of proposed measures to prevent sediment discharge from these specific works, particularly during periods of heavy rainfall.*
- *Details of area(s) already stabilised.*
- *Revised erosion and sediment control plan detailing stabilisation to date and timeline/staging boundaries showing proposed progression of stabilisation.*
- *Contact details for contractor who will undertake stabilisation of the Site including date(s) expected on Site.*
- *Alternatives/contingencies proposed if the contractor referred to above becomes unavailable.*
- *Details of Site responsibilities, specifically who is responsible for erosion and sediment controls and stabilisation processes over the specified period.*

[56] There must be no deposition of earth, mud, dirt or other debris on any public road or footpath resulting from earthworks activity on the Site. In the event that such deposition does occur, it must immediately be removed. In no instance may roads or footpaths be washed down with water without appropriate erosion and sediment control measures in place to prevent contamination of the stormwater drainage system, watercourses and / or receiving waters.

[57] The operational effectiveness and efficiency of all erosion and sediment control measures specifically required by the ESCP (required by Condition [XX] must be maintained throughout the duration of the earthworks activity, or until the Site is permanently stabilised

against erosion. A record of any maintenance work must be kept and be supplied to Council on request.

*Advice Note: As a guide, maintenance of the erosion and sediment control measures should seek to ensure that the accumulated sediment be removed from sediment retention devices prior to reaching 20% of total storage capacity. Sediment removed from treatment devices should be placed on stable ground where it cannot re-enter the device or be washed into any watercourse. Where maintenance work is required to ensure the effectiveness of these erosion and sediment control measures, the record should include the date, time and details on the nature of any maintenance. The Site manager (or equivalent) will need to ensure regular inspections of these measures, and particularly within 24 hours after any rainstorm event. Where it is identified that erosion and sediment control measures have become ineffective and maintenance is required, Council should be contacted on (*monitoring@aucklandcouncil.govt.nz*).*

[58] All erosion and sediment control measures must be constructed and maintained in general accordance with GD05, except where a higher standard is detailed in these conditions, in which case the higher standard must apply.

[59] All sediment retention ponds and decanting earth bunds (or other impoundment devices utilised throughout the earthworks) must be chemically treated in accordance with the ChTMP (Condition [XX]). All measures required by the ChTMP must be put in place prior to commencement of the earthworks activity and be maintained for the duration of the earthworks activity.

[60] Earthworks must be progressively stabilised against erosion at all stages of the earthworks activities and must be sequenced to minimise the discharge of sediment to surface water in accordance with the certified ESCP (required by Condition [XX]).

Advice Note: Earthworks must be progressively stabilised against erosion during all stages of the earthworks activity. Interim stabilisation measures may include:

- *the use of waterproof covers, geotextiles, or mulching*
- *top-soiling and grassing of otherwise bare areas of earth*
- *aggregate or vegetative cover that has obtained a density of more than 80% of a normal pasture sward*

It is recommended that you discuss any potential measures with the Council's monitoring officer who may be able to provide further guidance on the most appropriate approach to take. Please contact the Council for more details. Alternatively, please refer to Council Guideline Document GD05.

[61] Notice must be provided to the Council at least 2 Working Days prior to the removal of any erosion and sediment control measures specifically required by the ESCP.

[62] Upon completion or abandonment of earthworks on the Site, all areas of bare earth must be permanently stabilised against erosion in accordance with GD05.

[63] The Consent Holder must take all necessary measures to control silt contaminated stormwater at all times during the earthworks and during construction.

[64] All earthworks must be managed to ensure that no debris, soil, silt, sediment or sediment-laden water is discharged beyond the Site to either land, stormwater drainage network, watercourses or receiving waters. In the event that a discharge occurs, works must cease immediately and the discharge mitigated and / or rectified.

[65] There must be no obstruction of access to public footpaths, berms, private properties, public services / utilities, or public reserves, resulting from the demolition, earthworks and construction activity, unless otherwise authorised by the Council or Auckland Transport. All materials and equipment must be stored within the Site's boundaries, unless as otherwise authorised by Council and / or Auckland Transport.

[66] All machinery associated with the earthworks activity must be operated in a way which ensures that spillages of hazardous substances such as fuel, oil, grout, concrete products and any other contaminants are prevented from entering a waterbody.

Protected assets

[67] Any damage to public roads, footpaths, berms, kerbs, drains, reserves or other public asset as a result of the earthworks and construction activity must be repaired and restored to the original condition of the asset. This includes, but is not limited to, assets identified in the pre-commencement process required under Conditions [XX to XX]. The costs of rectifying such damage and restoring the assets to their original condition must be met by the Consent Holder.

[68] Adequate provision must be made during earthworks associated with construction to protect any existing public stormwater, wastewater or water supply networks that traverse or pass close to the Site. Any damage to the networks must be repaired by the Consent Holder as soon as reasonably practicable at their cost.

Advice note: The general requirements in this condition are additional to the specific requirements of other conditions regarding potential damage caused by vibration to Watercare's infrastructure or potential damage to First Gas Limited's gas pipeline which traverses the Site.

Earthworks Completion

[69] Upon completion of earthworks, the Consent Holder must provide to the Council an as-built overland flow path plan prepared by a SQEP. The layout plan must be in general accordance with the approved resource consent and include:

(a) As-built cross sections including the ponding areas with levels before overtopping; and

(b) As-built longitudinal plan and cross sections for the overland flow path locations.

[70] On completion of works, a Geotechnical Completion Report (GCR) (including a statement of professional opinion for the suitability of the site for the intended development) signed by a chartered geo-professional (as defined in Section 1.2.2 of NZS4404:2010) shall be provided to Council. The GCR must demonstrate earthworks are stable and suitable for development of the Project.

Noise

[71] All construction and earthworks activities on the subject site must comply with the New Zealand Standard 6803:1999 for Acoustics – Construction Noise as far as practicable unless otherwise provided for in a CNVMP.

[72] Noise arising from construction work activities on the Site, except as otherwise provided for in the CNVMP required by Condition [XX], must not exceed the noise limits specified in Tables E25.6.27.1 and E25.6.27.2 of the AUP(OP) decreased by 5 dB when measured 1m from the most exposed façade of any building that is occupied during the works. Noise from construction work activity must be measured and assessed in accordance with the requirements of New Zealand Standard NZS 6803:1999 Acoustics – Construction Noise.

[73] All construction works on the Site must be designed and conducted to ensure that construction vibration from the Site does not exceed:

(a) The guideline vibration limits set out in German Standard DIN 4150-3:1999 Structural Vibration – Effects of vibration on structures when measured from any adjacent building in accordance with the DIN Standard; and

(b) The vibration human comfort limits specified in Table E25.6.30.1 of the AUP(OP) as far as practicable and unless otherwise provided for in the CNVMP.

[74] Noise and vibration monitoring must occur during the first use of high noise and high vibration causing construction activities (e.g. excavators operating within 35m of a dwelling outside of the Site) or compactors operating within 20m of a building outside the Project

area) in each stage of construction, and in response to a reasonable complaint being received. Monitoring must be undertaken by a suitably qualified person and results must be made available to Auckland Council upon written request.

Construction hours for earthworks and construction

[75] Construction and earthworks activities may be carried out at any time subject to compliance with the relevant construction noise standards, measured at the boundary of an occupied dwelling outside the site.

Complaints Register

[76] The Consent Holder must maintain a complaints register that is to be made available to Auckland Council on request. The complaints register must record any complaints and require the following steps to be taken as soon as practicable:

(a) Acknowledge receipt of the concern or complaint within 24 hours and record:

(i) Time and date the complaint was received and who received it;

(ii) Time and date of the activity subject to the complaint (estimated where not known);

(iii) The name, address and contact details of the complainant (unless they elect not to provide this);

(iv) The complainant's description of the activity and its resulting effects; and

(v) Any relief sought by the complainant (e.g. scheduling of the activity).

(b) Identify the relevant activity and the nature of the works at the time of the complaint.

(c) Review the management measures in place.

(d) Record the findings and recommendations.

(e) Report the outcomes of the investigation to the complainant within 10 days of the complaint being received.

The complaints register must continue until construction works are completed on the Site, and Council sign-off has been provided confirming that all construction-related consent conditions have been met.

Advice note: A complaints register maintained in accordance with this condition may be used to demonstrate compliance with the complaints-related requirements of the CMP and CNVMP conditions.

Ecology

Ecological Protected Area Network

[77] Pest and invasive vegetation removal within the Ecological Protected Area Network shall be permitted.

[78] Vegetation alteration or removal within the Ecological Protected Area Network (excluding high value terrestrial and wetland vegetation) to form pedestrian and cycle paths shall be permitted.

[79] Vegetation alteration or removal within the Ecological Protected Area Network (excluding high value terrestrial and wetland vegetation) for routine operation, maintenance and repair of existing tracks or paths shall be permitted.

[80] A final Riparian Planting Plan and Biodiversity Management Plan must be prepared by the Consent Holder in accordance with AUP standards I458.9(1) and (2) and be submitted to the Council for certification prior to any works (other than those permitted by conditions [76] to [78]) commencing within the EPAN. These plans shall specify the timing that the required planting and proposed works will be given effect to.

[81] A final Archaeological Vegetation Management Plan must be prepared by the Consent Holder in accordance with I458.9(3) and be submitted to the Council for certification prior to any works (other than those permitted by the above conditions of consent) commencing within the EPAN. These plans shall specify the timing that the required planting and proposed works will be given effect to.

[82] The Consent Holder shall ensure that any boardwalk or path proposed to be constructed over a stream is constructed to comply with the following requirements of AUP standard E3.6.1.16:

(a) Piles must not be located in, on or under the bed of the stream;

(b) The total span of the boardwalk or path over the stream must not exceed 30m

(c) During construction bed disturbance upstream or downstream of the structure must not exceed 10m either side, excluding the length of the structure; and

(d) Any required erosion or scour management works must not exceed 5m in length either side of the structure.

[83] The Consent Holder shall ensure that any stormwater device or stormwater wetland within the EPAN or within 5m of a stream shall be designed in conjunction with an ecological SQEP and submitted to Council for certification prior to construction commencing on the device or wetland.

[84] The Consent Holder shall repair the slip within the EPAN in accordance with Plan

A2314380.00-SK02 Rev B drawn by Harrison Grierson. As part of any future land maintenance within the EPAN, the Consent Holder may repair any land slip or land instability issue, subject to the preparation of a remediation plan and methodology that is to be submitted to Council for certification, prior to any remediation works being undertaken. Any disturbed areas within the EPAN as a result of the above works are to be replanted with suitable species and in accordance with the Biodiversity Management Plan.

[84A] The Consent Holder must implement the Ecological Offset Plan within the EPAN in accordance with Plan A2515591.00-0013 Rev E drawn by Harrison Grierson including the addition of approximately 2.9ha of coastal fringe wetland restoration.

[85] A minimum 5m building setback must be provided from the High Value Terrestrial Planting and Wetland Margin Buffer Planting as shown on AUP I458.1.2 Precinct Plan 2. No buildings, structures or parts of a building shall be constructed within this 5m wide setback.

Lizard and Bat Management Plan (LBMP)

[86] The Consent Holder must prepare and submit a LBMP by a suitably qualified and experienced ecologist/herpetologist to the Council at least 15 Working Days prior to the planned commencement of any vegetation removal works on Site, for certification in accordance with Conditions [XX to XX]. The objectives of the LBMP are to ensure:

(i) The population of each species of native lizard present on the site at which vegetation clearance is to occur must be maintained or enhanced, either on the same site or at an appropriate alternative site; and

(ii) The habitat(s) that lizards are transferred to (either on site or at an alternative site, as the case may be) will support viable native lizard populations for all species present pre-development.

[87] The LBMP must address the following (as appropriate):

- Credentials and contact details of the ecologist/herpetologist who will implement the plan.
- Timing of the implementation of the LBMP.
- A description of methodology for survey, trapping and relocation of lizards rescued, including but not limited to: salvage protocols, relocation protocols (including the method used to identify suitable relocation site(s)), nocturnal and diurnal capture protocols, supervised habitat clearance/transfer protocols, artificial cover object protocols, and opportunistic relocation protocols.

- A description and map of the relocation site; including discussion of:
    - provision for additional refugia, if required e.g. depositing salvaged logs, wood or debris for newly released skinks that have been rescued;
    - any protection mechanisms (if required) to ensure the relocation site is maintained (e.g.covenants, consent notices etc);
    - any weed and pest animal management to ensure the relocation site is maintained as appropriate habitat.
    - a plan/map detailing the location of the salvage and relocation sites
- Monitoring methods, including but not limited to: baseline surveying within the site, baseline surveys outside the site to identify potential release sites for salvaged lizard populations and lizard monitoring sites, ongoing annual surveys to evaluate translocation success, pre and post – translocation surveys, and monitoring of effectiveness of pest control and/or any potential adverse effects on lizards associated with pest control.
- A post-vegetation clearance search for remaining lizards.

Advice Note: Please note that it is recommended that the lizard rescue plan is undertaken in conjunction with the vegetation clearance operations (and contractor) for an integrated approach (on the same day),to enable the physical search for gecko's following felling of trees and shrubs, and to rescue any skinks from ground cover vegetation and terrestrial retreats.
All native lizards are absolutely protected under the Wildlife Act 1953 under which it is an offence to disturb, harm, or remove them without a permit from the Minister of Conservation.
For further information on lizards that are protected under the Wildlife Act and determination of a suitable new habitat please contact the Council's Environmental Services team on (ecologicaladvice@aucklandcouncil.govt.nz).

Marine Ecology

[88] Vegetation removal within the CMA must be undertaken outside the main native bird breeding season (September to January inclusive) except where a suitably qualified ecologist has confirmed to the Consent Holder in writing that vegetation is clear of any native nesting birds, eggs, or chicks.

[89] Should an active nest be found, a 50 m exclusion zone must be demarcated for any Threatened or At Risk native bird species, and a 20 m exclusion zone for any Not Threatened native bird species. Works must remain outside of this zone until the chicks have fully fledged.

[90] Prior to the coastal walkway becoming operational a final Coastal Bird Management Plan, addressing the following, is to be submitted to Council for certification:

(a) The control of mammalian predators along the coastal margin including dogs and domestic cats;

(b) The enhancement of existing nesting and roosting sites in the adjacent coastal marine area including elevation and expansion of shell banks and invasive weed and mangrove management;

(c) The enhancement and maintenance of high-quality coastal bird foraging habitat in the inter-tidal mud/sand flats within the adjacent coastal marine area including selective mangrove management;

(d) Controls to minimise disturbance to roosting or nesting coastal birds; and

(e) A framework for monitoring and adaptive management.

[91] Prior to discharge from the coastal outfall treated wastewater commencing, the consent holder shall undertake a marine monitoring programme to establish a baseline, with regular routine monitoring commencing thereafter, as required by the following condition.

[92] Prior to the discharge from the coastal outfall treated wastewater commencing a Marine Monitoring Plan (MMP) must be developed that includes:

(a) Routine monitoring requirements to monitor benthic ecology, sediment and water quality in the vicinity of the proposed wastewater outfall.

(b) Monitoring of potential effects to subtidal and intertidal seagrass extent and quality in the Whitford embayment that can be attributed to effects from nutrient enrichment.

(c) An adaptive monitoring approach that allows for the future inclusion of EOC monitoring subject to the development of national guidance and changes to monitoring frequency and / or scale depending on observed effects.

(d) The process required to determine sampling frequencies and review of the MMP.

Design, Layout and Finishing of Buildings

[93] Prior to thecommencement of construction of the above ground structuresandelevationsof each building within each stage of the development, the Consent Holder must prepare a site plan and architectural drawings of the façade components and a Materials Schedule and Specifications for the proposed external cladding and glazing systems, including surface finishes and colour scheme. The detailed drawings and Materials Schedule must be in general accordance with the Beachlands South Architectural Plans relevant to each sub-Precinct (as referenced in Condition [1]) and be submitted to the Council for certification of compliance with this condition.

The information provided must include:

(a) Architectural plans including details of façade treatment / architectural features, and the proposed building reference typology from the Design Controls & Design Guidelines for Residential Precincts;

(b) Materials schedule and specification

(c) A report demonstrating how compliance with the Architectural Plans for the relevant sub-Precinct has been achieved.

[94] The Consent Holder may change the location of each of the dwellings within an individual lot within either the Residential - Mixed Housing Urban or Residential - Terrace House and Apartment Building zones, provided each dwelling complies with the Beachlands South Precinct Standard I458.6.17, except where this consent has granted an infringement to the standards. Any change in dwelling location within an individual lot must be illustrated on the site plan required to be submitted for Condition [90].

[95] The housing typologies within the Beachlands South Housing Typologies document (as referenced in Condition [1]) may be constructed on the residential lots specified in this Typologies document, in accordance with the identified lot size. The final design for each lot shall be submitted to the Council for certification of compliance with this condition.

[96] Dwellings on the vacant lots (300m^2 or more) are permitted subject to compliance with the AUP standards I458.6.17(a) to (h) inclusive. Should any proposed dwelling on these vacant lots infringe AUP standards I458.6.17(a) to (h) inclusive, a new consent or s127 variation consent will be required.

[96A] Prior to the issue of building consent for any dwelling or building on an individual residential lot requiring a new vehicle crossing or basement access ramp, the Consent Holder must submit plans to Council demonstrating that:

(a) the vehicle crossing complies with AUP E27 width, number and separation requirements;

(b) the vehicle crossing achieves the required separation form intersections;

(c) any basement access ramp complies with the applicable AUP E27 gradient, transition and safety platform requirements; and

(d) pedestrian and cyclist visibility at the access is achieved.

Advice Note: Any non-compliances to the AUP E27 requirements will require a new consent or s127 variation consent.

Landscape Design Drawings, Specifications and Maintenance Requirements

[97] At least 20 Working Days prior to the planned commencement of any landscaping works (excluding landscaping on private lots, earthworks, drainage and retaining works) authorised by this consent, the Consent Holder must provide a set of detailed landscape design drawings and supporting written documentation which have been prepared by a SQEP for the stage or part of the development proposed to be progressed to the Council for certification of general compliance with the Beachlands South Open Space Strategy Landscape Drawings prepared by Studio Pacific Architecture and Jasmax referenced in Condition [1]. No landscaping activities on these publicly accessible areas may commence until the certification referred to in this condition has occurred.

[98] At a minimum, this information must include landscape design drawings, specifications and maintenance requirements including:

(a) Existing vegetation to be retained as part of the development;

(b) Any vegetation to be removed;

(c) Stream restoration and riparian planting;

(d) Details of how the Consent Holder has engaged with Ngāi Tai ki Tāmaki and incorporated their values into the landscaped areas of the Project, as required by Condition [XX];

(e) An annotated planting plan(s) which detail the proposed location and extent of all areas of planting;

(f) Annotated cross-sections and / design details with key dimensions to illustrate that adequate widths and depths are provided within planter boxes and garden beds to support the intended planting;

(g) A plant schedule based on the planting plans detailing height and/or grade and or density at time of planting;

(h) Details of draft specification documentation for any specific drainage, soil preparation, tree pits, staking, irrigation and mulching requirements;

(i) An annotated pavement plan and related specifications, detailing proposed levels

and the materiality and colour of all proposed hard surfacing;

(j) A landscape maintenance plan (report) and related drawings and specifications for all aspects of the finalised landscape design, including in relation to the following:

i. Irrigation (if necessary)
ii. Weed and pest control
iii. Plant replacement
iv. Inspection timeframes
v. Contractor responsibilities

(k) Details of any wayfinding signage to be implemented to ensure clear and simple Site navigation for residents and members of the public is provided.

Advice notes: Site navigation on public roads to be vested in Council should be in general accordance with Auckland Transport's Wayfinding and Signage Design Guide (available online at https://at.govt.nz/about-us/manualsguidelines/transport-design-manual-signage/) unless otherwise agreed by Council.

Where roads will vest in Council, the streetscape landscape plans may be subject to minor changes during the engineering plan approval stage of the subdivision.

Landscaping associated with public roads, open spaces and reserves will be considered for engineering plan approval when the lots are created, and land is to be vested at the time of subdivision. It is advisable that any landscaping as part of the land use consent be designed in accordance with Auckland Council standards and in particular "The Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape.

[99] Before each stage of the development or part of the development proposed to be progressed is occupied, the Consent Holder must implement the certified landscape design under Condition [XX] for that stage or part of the development proposed to be progressed and thereafter maintain the landscaping (both planting and hard surfaces) in accordance with the certified landscape maintenance plan which must specify the timeframe that ongoing maintenance is required for.

Advice Note: Landscaping associated with public roads, open spaces and reserves will need to be in accordance with Auckland Council standards and in particular "The Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape" and receive separate engineering plan approval when lots are to be created, and land is vested at the time of subdivision and will need to be in accordance with certified landscaping plans under

the subdivision.

[100] Prior to the occupation of buildings in sub-precinct A, final design and landscape plans for the Fairway Reserve area as indicated in the Beachlands South Open Space Strategy (referenced in condition 1) shall be submitted to Council for certification. The Fairway Reserve must comply with standard I458.6.8(2) to (5).

[101] Prior to the occupation of any building in the Sub-precinct A (Marina Point) and Sub-Precinct D (Coastal), the relevant section of the indicative coastal pathway as shown on AUP I458.10.5 Precinct Plan 5 must be formed to a minimum width of 3m to link the relevant stage of development with the Pine Harbour Ferry terminal. This coastal pathway must be maintained by way of an appropriate legal protection mechanism. For the purposes of this standard, 'occupation' means occupation and use for the purposes permitted by the resource consent but not including occupation by personnel, engaged in construction, fitting out or decoration.

Waste Management Plan (WMP)

[102] The Consent Holder must prepare a WMP for each apartment building and commercial building and submit it to Council at least 15 Working Days prior to the occupation of each apartment building or commercial building, for certification.

[103] The purpose of the WMP is to outline the methodology for refuse and recycling storage and disposal from the site, to ensure that the servicing requirements of the overall site and stage of the development are adequately provided for without causing odour/visual nuisance or personal safety issues.

[104] The WMP must contain sufficient detail to address the size and design of the bin storage area, access arrangements for residents, the location of refuse bins and other bins during storage and collection, the frequency of service, and the volume of waste to be provided for.

Advice Notice: Assistance in preparing the contents of the WMP can be found within the Auckland Design Manual.

Lighting

[105] Prior to the lodgement of Building Consent for a dwelling that requires lighting under AUP(OP) rule E27.6.3.7, the Consent Holder must provide a **Lighting Plan and Certification/ Specifications** for the Stage or part of the development proposed to be progressed and prepared by a qualified Lighting Engineer, to the Council. Lighting is required to be provided in accordance with this rule.

Sustainability

[106] Prior to the first building consent application for each dwelling or commercial building (over 1,000m^2 in gross floor area (excluding retail and industrial buildings), the consent holder shall provide the Council with a Building Sustainability Statement outlining the building sustainability measures included for each proposed building or group of buildings. The Building Sustainability Statement may include the following measures:

(a) Energy efficiency

(b) Thermal comfort

(c) Ventilation and Indoor Air Quality

(d) Water efficiency

(e) Building Orientation

Advice Note

The Building Sustainability Statement may be prepared for an individual building or group of buildings.

[107] Stormwater runoff from all impervious areas other than roofs must be either:

(a) Treated at source by a stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or

(b) Treated by a communal stormwater management device or system that is sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)' that is I458 Beachlands South Auckland Unitary Plan Operative in Part 29 designed and authorised to accommodate and treat stormwater from the site; or

(c) Where alternative devices are proposed, the device must demonstrate it is designed to achieve an equivalent level of contaminant or sediment removal performance to that of 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'

[108] New buildings, and additions to buildings must be constructed using inert cladding, roofing and spouting building materials that do not have an exposed surface made from contaminants of concern to water quality (i.e. zinc, copper and lead).

[109] All new dwellings must designed to have non-potable water requirements (for toilets, laundry and gardens) supplied by rainwater tanks (or bladders) sized in accordance with the table below. Rain tank/bladder capacity for attached housing and apartment typologies can

be provided in either individual or as communal rainwater systems.

[110] All new buildings (except dwellings as provided for in condition [106] above must be designed to have non-potable water requirements supplied by rainwater tank. Rainwater tanks can be provided as either individual or communal rainwater systems.

[111] All new buildings must be fitted with water efficient fixtures, to a minimum 3 Star standard for shower heads, 4 Star standard for toilets, and a minimum 5 Star standard for kitchen taps and bathroom hand wash taps (as rated (under the Water Efficiency Labelling Scheme (WELS)).

[112] The minimum sizes for rainwater tanks (or bladders) shall be as set out below:

All dwellings except apartments

Dwelling type	**Minimum tank (or bladder)**
1 bedroom (includes Studio)	1000L
2 bedroom	2000L
3 bedroom	3000L
4+bedrooms	5000L

Apartments

Dwelling type	**Minimum tank (or bladder)**
1 bedroom (includes Studio)	1000L
2 bedroom	2000L
3 bedroom	2000L
4 bedroom	2000L
5+ bedrooms	2500L

Transportation and Roading

[113] The Consent Holder shall ensure that the number of accessible parking spaces provided comply with the requirements of standard E27.6.3.2A of the AUP(OP). The accessible parking dimensions shall be designed in accordance with the New Zealand Standard for Design for Access and Mobility – Buildings and Associated Facilities (NZS: 4121 – 2001).

[114] Prior to occupation of any dwelling within each stage of the development or part of the development proposed to be progressed, the bicycle parking requirements specified in AUP(OP) standard E27.6.2(5) must be provided. The bicycle parking shall be designed and provided in accordance with AUP(OP) standard E27.6.2(5).

[115] Prior to occupation of any commercial building that requires end of trip facilities in accordance with AUP(OP) Standard E27.6.2(7), the required end of trip facilities must be constructed.

[116] Prior to the occupation of any building within a stage of the development or part of the development proposed to be progressed, all internal roading, intersections, accessways, footpaths, cycleways, bus stops and associated transport infrastructure required to serve that stage or part-stage must be completed for that stage or part of the development proposed to be progressed.

[117] In accordance with Special Information Requirement I458.9(5) a Transport Monitoring Report shall be prepared for every 500 dwellings or residential lots cumulatively within the precinct (e.g., 500, 1,000, 1,500, and 1,900). At each of these thresholds, a Transport Monitoring Report must be submitted to Council.

[118] In accordance with Special Information Requirement I458.9(7) a Travel Management Plan shall be prepared and submitted to Council for each commercial activity greater than 500m2, prior to the occupation of building.

[119] In accordance with Special Information Requirement I458.9(9) a Transport Design Report is required for any new road intersection or upgrading of existing road intersection identified on Precinct Plan 6, prior to construction commencing on these intersections.

School Transport Management Plan

[119A] Prior to occupation of any school activity, the Consent Holder must submit a School Transport Management Plan to Council for certification, prepared by a suitably qualified transport specialist and following consultation with Auckland Transport, the school operator and the Ministry of Education where applicable.

The objective of the School Transport Management Plan is to ensure that school-related transport activity can be safely and efficiently accommodated within the school site, adjoining road frontages and surrounding transport network.

The School Transport Management Plan must address, as relevant to the school activity proposed:

(a) school access points by mode;

(b) school bus access, circulation, turning, layover and stop locations;

(c) pick-up and drop-off arrangements;

(d) staff, visitor and mobility parking;

(e) pedestrian and cycle access routes and crossing points;

(f) frontage management and any no-stopping or parking controls required;

(g) measures to manage the co-location of primary and secondary school activities;

(h) school travel demand management measures; and

(i) monitoring and review of the plan following commencement of school operation.

The certified School Transport Management Plan must be implemented for the duration of the school activity, unless amended with Council certification.

[120] In accordance with Special Information Requirement I458.9(10) the ongoing monitoring of dwelling numbers shall be maintained in accordance with this Special Information Requirement and provided to Council upon request.

[121] All parking and loading spaces and associated manoeuvring spaces shall comply with AUP(OP) Standard E27.6.3.

[121A] Prior to the issue of building consent for any building containing a basement or ground-level vehicle access for buildings within CM3, VC1, VC3 and VC4, the Consent Holder must submit redesigned complying plans demonstrating that either:

(a) the relevant vehicle access achieves the pedestrian and cyclist visibility splays required by Auckland Transport Practice Note 07 or any equivalent Auckland Transport standard applicable at the time of detailed design; or

(b) the relevant access has been redesigned or relocated so that the required visibility splays are achieved.

[122] The following Road upgrades as shown on Engineering Plans A2515591-3500 Rev A to A2515591-3625 Rev A (inclusive) by Harrison Grierson and Ferry Capacity upgrades must be carried out and be operational in accordance with the timing outlined below:

(a) Prior to the occupation of any of the lots or dwellings within Stage 1 (including Stage 1A and Stage 1B)**

i. Site A on Precinct Plan 6: Upgrade of Whitford-Maraetai Road/Jack Lachlan Drive intersection;

ii. Upgrade of Jack Lachlan Drive between the western site Collector Road intersection and the western extent of the site frontage to provide two-way cycling facilities and a footpath along the southern side of the road; and

iii. Upgrade of Jack Lachlan Drive between the western extent of the site frontage to the creek bridge at the western end of Jack Lachlan Drive to provide a 3m active mode facility along the southern side of the road.

(b) Prior to the occupation of any dwellings or residential lots (except up to 68 residential lots delivered in accordance with (a)):

i. Upgrade of Jack Lachlan Drive between the western site Collector Road intersection to the eastern extent of the Whitford-Maraetai Road/Jack Lachlan Drive intersection to provide two-way cycling facilities along the full length of one side of the road; and a footpath on both sides of the road, except between the western site Collector intersection and the site /

Kahawairahi Drive intersection, where the footpath on the northern side of the road is not required; and

ii. Site (B) on Precinct Plan 6: Upgrade of Whitford Park Road / Whitford Road / Whitford-Maraetai Road roundabout to provide an additional traffic lane on the Whitford Road (western) approach and an additional lane on the Whitford-Maraetai Road (eastern) approach ; and

iii. Site (E) on Precinct Plan 6: Upgrade of Somerville Road / Whitford Road / Point View Drive roundabout to provide a double north-west bound through-lane for additional capacity.

(c) Prior to the occupation of more than 500 dwellings or residential lots:

i. Site (D) on Precinct Plan 6: Provision of an additional left-turn approach lane on the northbound approach to the Whitford Park Road / Saleyard Road / Sandstone Road roundabout *

* means if the Whitford Bypass is operational or under construction these upgrades are not required.

** means those lots identified on Plan A2515591.00-1000 Rev A, A2515591.00-1003 Rev A, A2515591.00-1004 Rev A, A2515591.00-1009 Rev A and A2515591.00-1010 Rev A referenced in Condition [1] provided that these lots have vehicle access to and from Jack Lachlan Drive via a public road.

(d) Ferry Upgrades

(a)	Prior to the occupation of more than 250 dwellings or residential lots	Provision for a total capacity of at least 600 ferry passengers from Pine Harbour during the two-hour peak period between 0620 – 0820 on weekdays.
(b)	Prior to the occupation of more than 500 or residential Lots	Provision for a total capacity of at least 700 ferry passengers from Pine Harbour during the two-hour peak period between 0620 – 0820 on weekdays.
(c)	Prior to the occupation of more than 850 dwellings or residential lots	Provision for a total capacity of at least 825 ferry passengers from Pine Harbour during the two-hour peak period between 0620- 0820 on weekdays.
(d)	Prior to the occupation of more than 1500 dwellings or residential lots	Provision for a total capacity of at least 950 ferry passengers from Pine Harbour during the two-hour peak period between 0620 – 0820 on weekdays.
(e)	Prior to the occupation of more than 1900 dwellings or	Provision for a total capacity of at least 1150 ferry passengers from Pine Harbour during the two-hour

	residential lots	peak period between 0620 – 0820 on weekdays.

Infrastructure Requirements

[123] The infrastructure required for each stage (as set out in Condition [5]) of the development or part of the development being progressed in general accordance with the engineering plans referenced in Condition [1], and shall be constructed and operational prior to the occupation of any building within that stage or part of the development being progressed.

Commented [A1]: Cannot see the infrastructure requir for each stage set out at condition 5.

C. CONTAMINATED LAND DISCHARGE CONDITIONS (DISXXXX)

Duration of the Consent

[124] Resource consent DISXXXX (discharge of contaminants) will expire 15 years from the date of issue unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

Pre-commencement

[125] The Consent Holder must inform Council, in writing, at least 10 Working Days prior to the commencement of any earthworks of potentially contaminated land authorised by this consent. For areas within the Site which a Detailed Site Investigation (DSI) has not yet been undertaken, a DSI must be submitted to Council at least 10 Working Days prior to the commencement of any earthworks of potentially contaminated land. The DSI must:

(a) Detail sampling undertaken to characterise the land's contamination profile in accordance with the contamination assessments referenced in Condition [1] and Appendix 1 to the conditions prepared by Tonkin and Taylor;

(b) Include a map of sampling locations and tabulated sampling results;

(c) Include an interpretation of the sampling results against the relevant Soil Contaminant Standards (SCS health) for the protection of human health as set out in the National Environment Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES:CS) and the Permitted Activity soil acceptance criteria detailed by Standard E30.6.1.4 of the AUP(OP);

(d) Be prepared in accordance with the Contaminated Land Management Guidelines No.1 & No.5: (Ministry for the Environment, Revised 2021); and

(e) Be prepared by a SQEP.

[126] Prior to the commencement of any earthworks of potentially contaminated land, all approved erosion and sediment control measures must be constructed and carried out.

Detailed Site Investigation and Remediation Action Plans

[127] If the DSI referred to in Condition [1] or produced under these conditions indicate elevated concentrations of contaminants above health-based Soil Contaminant Standards (SCS) for Residential land use, as set out in the NES:CS and/or AUP(OP) PA Criteria set out in Table E30.6.1.4.1, at least 10 Working Days prior to the commencement of disturbance of potentially contaminated land the Consent Holder must submit an updated Global Contamination Site Management Plan (CSMP)/Remediation Action Plans (RAPs) to Council.

[128] The new/ updated CSMP/RAPs as required by Condition [XX] must:

(a) Detail the procedures and controls required during and following the works to minimise potential effects on human health and the environment as a result of actual and potential soil contamination;

(b) Detail how the surface soils are to be remediated to achieve compliance with the relevant (SCS health for the protection of human health as set out in the NES:CS and the Permitted Activity soil acceptance criteria detailed by Standard E30.6.1.4 of the AUP(OP));

(c) Be prepared in accordance with the Contaminated Land Management Guidelines No.1 (Ministry for the Environment, revised 2021);

(d) Detail validation sampling or other verification to be undertaken following remedial works to demonstrate that the works have achieved the remediation targets for the protection of human health and to minimise contaminant discharges; and

(e) Be prepared by a SQEP.

Dust

[129] During earthworks all necessary action must be taken to prevent dust generation and sufficient water must be available to dampen exposed soil, and/or other dust suppressing measures must be available to minimise dust formation. Discharges of dust must not cause offensive or objectionable effects beyond the boundary of the site. The Consent Holder must ensure that dust management during the excavation works generally complies with the Good Practice Guide for Assessing and Managing Dust (Ministry for the Environment, 2016).

Managing Asbestos

[130] The disturbance of soil where asbestos has been found to be present must avoid discharges of dust beyond the boundary of the subject site and be undertaken in accordance with the NZ Guidelines for Assessing and Managing Asbestos in Soil (BRANZ, 2017) or any updates to this document and the CSMP.

Advice Note: Asbestos Containing Materials – If you are demolishing any building that may have asbestos containing materials (ACM) in it:

a. *You have obligations under the relevant regulations for the management and removal of asbestos, including the need to engage a Competent Asbestos Surveyor to confirm the presence or absence of any ACM.*
b. *Work may have to be carried out under the control of a person holding a WorkSafe NZ Certificate of Competence (CoC) for restricted works.*

c. *If any ACM is found, removal or demolition will have to meet the Health and Safety at Work (Asbestos) Regulations 2016.*

d. *Information on asbestos containing materials and your obligations can be found at www.worksafe.govt.nz.*

If ACM is found on site following the demolition or removal of the existing buildings you may be required to remediate the site and carry out validation sampling.

[131] In the event of the accidental discovery of contamination during earthworks which has not been previously identified, the Consent Holder must immediately cease the works in the vicinity of the contamination hotspot and notify the Council and engage a SQEP to assess the situation (including possible sampling and testing) and decide on the best option for managing the material. This may include sampling and revision to the relevant DSIs, RAPs & Global CSMP.

[132] Any perched groundwater, or surface water encountered within the excavation area located within contaminant impacted areas requiring removal must be considered potentially contaminated, and therefore, for the protection of the human health and the environment, the impacted water must either be:

(a) disposed of by a licenced liquid waste contractor; or

(b) pumped to sewer, providing the relevant permits are obtained; or

(c) discharged to the site's stormwater system or surface waters provided testing demonstrates compliance with the Australian and New Zealand Environment Conservation Council (ANZECC) Guidelines for Fresh and Marine Water Quality (2000) for protection of 80 percent of freshwater species, with the exception of benzene where the 95 percent protection level shall apply, and the water is free from petroleum hydrocarbons.

Site Validation and Monitoring Plans

[133] Within three months of the completion of earthworks on each stage of work, a Site Validation Report (SVR) (where remediations are required) or otherwise a Work Completion Report (WCR) must be submitted to the Council for review and certification. The SVR must be prepared by a suitably qualified and experienced practitioner, in accordance with the Contaminated Land Management Guidelines No.1, Ministry for the Environment (revised 2021).

The SVR must contain sufficient detail to address the following matters:

(a) A summary of the remediation and other earthworks undertaken, including the locations and dimensions of excavations and the volume of soil excavated;

(b) Conditions of the final site contamination profile for each proposed lot, including details and results of further testing and validation testing undertaken (with a map of sampling locations and tabulated sampling results) and interpretation of the results in the context of the NESCS and Chapter E30 of the AUPOP);

(c) Details and results of any other contamination testing undertaken during the works (including any sampling undertaken on materials re-used on site or imported to site);

(d) Records/evidence of the volumes and disposal locations for any material containing elevated levels of contaminants removed from the site;

(e) Records of any unexpected contamination encountered during the works and response actions, if applicable;

(f) If applicable, any onsite encapsulation locations and details;

(g) Any on-going monitoring and/or management measures required to minimise risks to human health or the environment as a result of the final site contamination profile;

(h) Reports of any complaints, health and safety incidents related to contamination, and/or contingency events during the earthworks; and

(i) A statement certifying that all works have been carried out in accordance with the requirements of the DSI/RAP, CSMP and consent conditions, otherwise providing details of relevant approved variations or breaches, if applicable.

[134] In case of a WCR, the WCR must contain sufficient detail to address the following matters:

(a) A summary of the earthworks undertaken, including the locations and dimensions of excavations and the volume of soil excavated;

(b) Conditions of the final site contamination profile including details and results of further testing undertaken (with a map of sampling locations and tabulated sampling results) and interpretation of the results in the context of the NESCS and Chapter E30 of the AUP(OP);

(c) Records/evidence of the volumes and disposal locations for any material containing elevated levels of contaminants removed from the site;

(d) Records of any unexpected contamination encountered during the works and response actions, if applicable;

(e) Reports of any complaints, health and safety incidents related to contamination, and/or contingency events during the earthworks; and

(f) A statement certifying that all works have been carried out in accordance with the requirements of the CSMP and consent conditions, otherwise providing details of relevant approved variations or breaches, if applicable.

[135] Should contaminant impacted soil/material be contained onsite, within three months of completion of the remediation works and prior to a certificate under section 224(c) of the RMA being issued for subdivision of the Site, sub-precinct, stage or part thereof, an Ongoing Monitoring and Management Plan (OMMP) must be submitted to the Council for review and certification. The OMMP must contain but is not limited to the following:

(a) A map showing the locations of the capping

(b) Descriptions of the capping layer

(c) Ongoing monitoring and maintenance of the capping layer

(d) Management measures required to minimise risks to human health or the environment if undertaking minor soil disturbance work that may penetrate the capping layer

D. STREAMWORKS CONDITIONS (LUSXXXX)

Duration of Consent

[136] The streamworks consent LUSXXXX as it relates to permanent structures within the stream bed (i.e. culverts, weirs, boardwalks, erosion and scour protection, and habitat enhancement structures) must expire 35 years from the date of issue under s123 of the RMA unless they have been surrendered or cancelled at an earlier date pursuant to the RMA.

Native Fish Management Plan (NFMP)

[137] The Consent Holder must prepare and submit a NFMP to the Council at least 15 Working Days prior to the planned commencement of streamworks on the site, for certification in accordance with Conditions [XX to XX]. The objective of the NFMP is to avoid, remedy or mitigate the potential adverse effects of the Project on native fish. The NFMP must be prepared by a SQEP and must include:

(a) The outcomes of consultation with Ngāi Tai ki Tāmaki.

(b) Methodologies to capture fish within any impacted stream habitat or justification there is no habitat for native fish present at the time of construction.

(c) Fishing effort anticipated.

(d) Details of the relocation site.

(e) Storage and transport measures including the best practice for prevention of predation and death during capture.

(f) Euthanasia methods for diseased or pest species (if relevant); and

(g) An assessment on the habitat availability of the relocation site to support fish at the time of streamworks.

[138] Native fish capture and relocation as set out in the certified NFMP, must only be undertaken by a suitably qualified and experienced freshwater ecologist. The freshwater ecologist must also be onsite during all streamworks to ensure any remaining native fish not caught during de-fishing are salvaged.

[139] The Consent Holder must provide a Fish Salvage Report detailing the relocation site, the species and number of freshwater fauna relocated prior to and during dewatering, to the Council within 15 days of completion of the native fish capture and relocation and upload the results into NIWA's New Zealand Native Freshwater Fish database.

Riparian Planting Plan (RPP)

[140] The Consent Holder must prepare and submit a final RPP to the Council at least 15 Working Days prior to the planned commencement of any earthworks that will involve works within a stream or riparian yard on the site, for certification in accordance with Condition [XX to XX]. The RPP must be in accordance with the Beachland South Precinct Special Information requirement I458.9(1).

In-Stream Structures

[141] At least 20 Working Days prior to construction or installation of any in-stream structures, the Consent Holder must submit to the Council for certification the final design and location of the in-stream structures. In-stream structures include:

i) Culverts and culvert crossings;

ii) Weirs;

iii) Stormwater devices and Stormwater Wetlands/Ponds;

iv) Pedestrian boardwalks and debris screen;

v) Erosion and scour protection within the bed of the channels, including at the inlet or outlet of the culverts and at the outlet of weirs or stormwater outfalls; and

vi) Habitat enhancement structures (where applicable).

[142] In-stream structures must not be installed until written certification from Council has been provided to confirm that the final design of the structures required by Condition [XX] will provide for fish passage. The final design details of the structures must include as a minimum:

(a) Plan, cross-section and long-section details (where applicable) for the location and orientation of the structures.

(b) Length, height, width and orientation of structures when measured from the bed and edge of the low-flow channel.

(c) For culverts, details to demonstrate that the length of the structure will be minimised to the length required to provide for the road crossing.

(d) Details for the provision of fish passage of fish species that are likely to reach this extent of the catchment.

(e) Details of the monitoring and maintenance requirements of the in-stream structures to manage any erosion or instability that may affect the function of the stream

channel or structures, cause erosion of the downstream Stage 1 channel, or cause a barrier to fish passage.

[143] Within 20 Working Days following completion of the installation of each culvert and/or weir structure, the Consent Holder must submit to the Council the information required by regulations 62, 63 (culverts) and 64 (weirs), of the National Environmental Standard for Freshwater (2020), specifying the time and date of collection.

[144] Within 20 Working Days following completion of the installation of each culvert and/or weir structure, the Consent Holder must submit a FPMMP to the Council for certification. The FPMMP must specify the ongoing monitoring and maintenance measures of the culvert and weir structures.

[145] The objectives of the FPMMP are to ensure:

(a) instream structures (culverts and weirs) do not impede fish migration and that habitat accessibility remains intact;

(b) fish passage for species that would likely reach this extent of the catchment is maintained, and does not reduce over the lifetime of the structures.

[146] The FPMMP is to include the following detail and processes:

(a) Specific aspects of the structure to be monitored to ensure that the structure's provision for the passage of targeted fish species does not reduce over its lifetime.

(b) Programme and frequency of routine monitoring and maintenance.

(c) Method and timing of visual inspection of the structure following a significant natural hazard, or events that may otherwise affect the structure's provision for fish passage of targeted fish species.

(d) Record keeping of monitoring results including photos,

(e) Follow up actions including the preparation of as-built plans and supporting information, further steps, and remediation measures.

[147] If any of the routine monitoring or visual inspections identify that provision for fish passage of targeted fish species has been reduced, or the culverts or weir structures are damaged, the Consent Holder must undertake maintenance or remediation works as soon as practicable to remedy the issues identified. The Consent Holder must maintain a record of monitoring and maintenance works, that can be supplied to the Council on request.

E. STORMWATER DISCHARGE CONDITIONS (DISXXXX)

Duration of Consent

[148] The stormwater discharge consent DISXXXX expires 35 years from the date of granting unless it has been surrendered or cancelled at an earlier date pursuant to the RMA.

Stormwater Management Plan (SMP)

[149] Prior to the commencement of any discharge of any post development stormwater from the site, the SMP referenced in Condition 1 must be certified by the Council. The SMP must be prepared by the Consent Holder in consultation with Ngāi Tai ki Tāmaki (as required by Condition [XX]) and submitted to Auckland Council (Healthy Waters) for certification. The SMP must be consistent with the relevant objectives of the Council's Regionwide Network Discharge Consent. The SMP must include:

(a) Details of any feedback provided by Ngāi Tai ki Tāmaki on the design of stormwater management devices; and

(b) Identification of any Ngāi Tai ki Tāmaki feedback not incorporated, with reasons.

Advice Note: Certification of the SMP by Auckland Council (Healthy Waters) in accordance with this condition does not, of itself, constitute adoption of the SMP under the Council's Regionwide Network Discharge Consent.

Roofing Materials

[150] The Consent Holder shall ensure that new buildings under this consent must be constructed using cladding, roofing and spouting building materials that avoid the use of contaminant generating building products which have:

(a) Exposed surfaces(s) or surface coating of metallic zinc or any alloy containing greater than 10% zinc; or

(b) Exposed surfaces(s) or surface coating of metallic copper or any alloy containing greater than 10% copper; or

(c) Exposed treated timber surface(s) or any roof material with a copper containing or zinc-containing algaecide.

Operation and Maintenance Manual for the Stormwater Management Devices

[151] For all stormwater management devices (including but not limited to ponds, wetlands, outlet structures, and outfalls), the Consent Holder must engage a SQEP to prepare an OMP

setting out the principles for the general operation and ongoing maintenance of the stormwater system and associated management devices.

[152] For any stormwater devices intended to vest in Auckland Council, a Draft OMP must be submitted to Healthy Waters for approval at the time of application for Engineering Plan Approval (EPA). The Draft OMP must be prepared in accordance with the Healthy Waters Operation and Maintenance Plan Template (6 July 2023) or any subsequent updates.

[153] The OMP must include, but not be limited to:

(a) A detailed technical data sheet;

(b) All requirements as defined within Auckland Council's Stormwater Management Devices Design Guidelines Manual (TP10) and/or Guideline Document 2016/001 (GD01), as applicable;

(c) Clear identification of responsibility for both short-term and long-term maintenance of the stormwater devices;

(d) A programme for regular maintenance and inspection of the stormwater system;

(da) A programme for regular monitoring of the northern spillway of Stormwater Pond 1 outlining potential maintenance and performance solutions, if required, to ensure flow discharge from the subject site is in accordance with the Stormwater Management Plan certified under Condition [XX].

(e) A programme for the collection and disposal of debris and sediment from the stormwater management devices;

(f) A programme for post-storm maintenance;

(g) A programme for inspection and maintenance of outfall erosion;

(h) General inspection checklists for all components of the stormwater system, including roadside catchpits, recharge pits, and outfalls;

(i) A programme for inspection and maintenance of vegetation associated with the stormwater devices; and

(j) A methodology for the ongoing control and eradication of established pest species and invasive weeds within both terrestrial and aquatic areas of the stormwater device.

Advice Note: For stormwater assets to vest in Council, the OMP must be consistent with Healthy Waters' operational requirements and approved prior to construction commencing on those devices.

[154] The stormwater management system must be managed in accordance with the final OMP. Any amendments to the OMP must be submitted to the Council for certification, in writing prior to implementation. The OMP must be updated and submitted upon request to the Council for confirmation.

[155] A maintenance record for the stormwater management system certified under Condition [XX] must be provided to the Council on request. The maintenance record must provide details of all maintenance including inspections and servicing for the preceding three years.

[156] A residential stormwater operation and maintenance manual must be created by the Consent Holder for any privately owned and operated stormwater device. This manual must be provided to owner(s) of the lot(s). This manual must also include standard detail drawings of the stormwater devices with recommendations in terms of impervious area discharge. A consent notice will be entered onto the title of the lot to require the correct operation and maintenance of the stormwater device in perpetuity.

F. SUBDIVISION CONDITIONS (SUBXXXX)

Superlot Subdivision

General Conditions

[157] The superlot fee simple subdivision must be in general accordance with the Beachlands South Scheme Plans including the relevant Superlot and Staging Plans referenced in Condition [1] and Appendix 1 to the conditions with each stage being a separate superlot.

[158] Where minor variations to the scheme plans or stage/superlot areas are proposed, the Consent Holder must submit amended scheme plans and/or staging/superlot plans to detail the proposed amendments to Council for written certification.

[159] The subdivision of any superlot stage (or part thereof) may occur concurrently or independently and in any order, provided that each superlot (or part thereof) has the necessary infrastructure (roads, including vehicle access to a public road network, wastewater, water supply, stormwater, electricity and telecommunications) as set out in the Engineering Drawings referenced in Condition [1] and Appendix 1 to the conditions and any resulting balance lot has access to a legal road.

[160] All roads, stormwater, wastewater, and water supply infrastructure must be in general accordance with the Engineering Drawings referenced in Condition [1] and Appendix 1 to the conditions. Where the Consent Holder requires that matters of detail within the Engineering Drawings and design are adjusted to meet the needs of the subdivision in compliance with the Auckland Council Code of Practice for Land Development and Subdivision, the Consent Holder must seek the prior approval of the Council's Regulatory Engineering Team Leader.

Section 223 Condition Requirements

Survey Plan

[161] The Consent Holder must submit a survey plan for each stage, superlot or part thereof in accordance with the approved resource consent subdivision scheme plans referenced in Condition [1] and Appendix 1 to the conditions. The survey plan must show all roading, COALs, infrastructure, easements in gross (or otherwise), all proposed lots to vest in Council (including roads, accessways and reserves), and all proposed lots to be held in common ownership as well as any other information identified on the approved subdivision scheme plans relevant to the superlot.

Easements in Gross

[162] Easements in gross for the purposes identified on the scheme plans referenced in Condition [1] and Appendix 1 to the conditions, must be created and included in a memorandum of easements endorsed on the survey plan and be granted or reserved. The Consent Holder must meet the costs for the preparation, review, and registration of the easement instruments on the relevant records of title.

Local Purpose Drainage Reserves and Stormwater Devices to Vest

[163] The Consent Holder must obtain written confirmation from Council (Healthy Waters) that the proposed drainage reserves and stormwater devices shown as 'Local Purpose (Drainage) Reserve to Vest' on the approved plans referenced in Condition [1] and Appendix 1 to the conditions shall or shall not vest in the Council as 'Land-in-lieu of reserve to vest (drainage purposes).'

(a) If the 'Land-in-lieu of reserve to vest (drainage purposes)' is to vest then, in accordance with s239, these reserves must vest free of encumbrances, transformers and structure unless the structure is associated with stormwater devices. The Consent Holder must meet all costs associated with the vesting of the reserves.

(b) If the 'Land-in-lieu of reserve to vest (drainage purposes)' is not to vest then the land will fall under the obligation of an Incorporated Society or equivalent legal body (Society), as per Condition [XX].

Advice Note: Plans approved under Resource Consent do not constitute an Engineering Plan approval and should not be used for the purposes of constructing public works in the absence of that approval. If the Consent Holder wishes to retain any private structures, rights or encumbrances on land to be vested, it will require a certificate of acceptance from the Manager Land Advisory Services under section 239(2) on behalf of the local board.

Open Space Areas

[164] The Consent Holder must obtain written confirmation from Council (Manager Land Advisory Services) that any of the proposed open space areas identified in the Beachlands South Open Space Strategy and on the scheme plans referenced in Condition [1] shall or shall not be acquired by the Council or vested in the Council (esplanade reserves or ecological areas). If the open space(s) are not acquired by Council or do not vest in Council then the land will fall under the obligation of the Residents Society or equivalent legal body (Society).

Advice Note: Plans approved under Resource Consent do not constitute an Engineering Plan approval and should not be used for the purposes of constructing public works in the absence of that approval. If the Consent Holder wishes to retain any private structures, rights or encumbrances on land to be vested, it will require a certificate of acceptance from the Manager Land Advisory Services under section 239(2) on behalf of the local board.

Roads to Vest

[165] The proposed roads to vest shown on the approved scheme plans for each stage, superlot or part thereof referenced in Condition [1] and Appendix 1 to the conditions must vest in the Council as a public road, except for any roads that are to remain in private ownership. The Consent Holder must meet all costs associated with the vesting of the roads.

Advice Note: The Consent Holder is advised that the national Addressing Standard (AS/NZS 4819:2011) requires that all new public roads and extensions to existing roads and any private road (rights of way or common access lots) that serve more than five allotments and created through a subdivision consent will require a road name. All road names must be approved by Council. In order to minimise disruption to construction and survey works, the Consent Holder is advised to obtain any road name prior to applying for a section 223 certificate. For more details refer to:
https://www.aucklandcouncil.govt.nz/building-and-consents/types-resource-consents/subdivision-of-property/Pages/road-naming.aspx

Section 224 Condition Requirements

Infrastructure Provision

[166] Where the Consent Holder proposes to provide private wastewater, water supply and stormwater services for the Project, the infrastructure shall be constructed in accordance with the engineering plans referenced in Condition [1] and Appendix 1 to the conditions and be constructed to a public standard. The infrastructure required to service each superlot, stage or part thereof shall be constructed and operational prior to the issue of a s224(c) certificate. For wastewater infrastructure, Conditions [173]–[173E] also apply.

[167] Where the Consent Holder proposes to provide public wastewater, water supply and stormwater services for the Project, the below conditions that refer to public infrastructure or assets that are to be vested public shall apply.

Pre-Commencement: Engineering Plan Approval

[168] Prior to commencement of any public infrastructure or public road works required for the development (as indicated on the approved plans in Condition [1]), the Consent Holder must provide design plans and specifications for any works required in respect to this consent which are proposed to vest, to the satisfaction of the Council. Details of the SQEP who will act as the Consent Holder's representative for the duration of the development must also be provided with the application for any Engineering Plan Approval. Where wastewater infrastructure is proposed to vest in Watercare, Condition [173B] also applies.

Pre-Construction Meeting: Public Stormwater Assets

[169] A pre-construction meeting must be held by the Consent Holder, prior to commencement of the construction of any stormwater reserves and/or stormwater devices intended to be vested as public, that:

(a) Is arranged five Working Days prior to initiation of the construction of any intended public stormwater assets on the site;

(b) Is located on the subject area;

(c) Includes representation from the Council, including but not limited to Auckland Council Healthy Waters – Operations Team; and

(d) Includes representation from the site stormwater engineer (or) contractors who will undertake the works and any other relevant parties.

[170] The following information must be made available before or at the meeting:

(a) Timeframes for key stages of the works authorised under this consent;

(b) Contact details of the site contractor and site stormwater engineer; and

(c) Construction plans approved (signed/stamped) by the Council.

Advice Note: To arrange the pre-construction meeting required by this consent, please contact the Council on email at monitoring@aucklandcouncil.govt.nz.

Public Infrastructure

[171] Where infrastructure is proposed to form part of a public reticulation network, any engineering plans submitted for approval must detail all the proposed public infrastructure works associated with the subdivision stage or part thereof, and be in accordance with current Council Engineering Standards, and, in the case of wastewater infrastructure, Condition [173B], including but not limited to:

- Public Stormwater Reticulation
- Public Wastewater Reticulation

- Public Water Reticulation

- Public Reserves

[172] The engineering plans must include but not be limited to the following information:

(a) As part of the application for Engineering Plan Approval, a registered engineer must:

i. Certify that the proposed stormwater system or devices proposed have been designed in accordance with the Council's Code of Practice for Land Development and Subdivision: Chapter 4 – Stormwater or as otherwise approved in the SMP.

ii. ~~ii)~~ Certify that the proposed water supply and wastewater system have been designed in accordance with the approved Engineering Plans referenced in Condition [1] and Appendix 1 to the conditions and, in the case of wastewater infrastructure, Condition [173B].

iii. Provide a statement that the proposed infrastructure has been designed for the long-term operation and maintenance of the asset.

iv. Confirm that all practical measures are included in the design to facilitate safe working conditions in and around the asset.

(b) The proposed stormwater system must be designed to identify health and safety risks for the public, operating personnel, contractor and Council employees.

(c) The proposed stormwater system must have an asset life of a minimum of 100 years.

(d) Require the design of infrastructure and devices (including communal devices) to be efficient and effective, with consideration given to whole lifecycle costs, ease of access and operation, and integration with the built and natural environment.

Wastewater Reticulation Networks

[173] The Consent Holder must construct a wastewater reticulation network to serve each superlot, stage or part of the development. Wastewater generated by the Project may be serviced by:

a. the Watercare Servicing Pathway; or

b. the Private Wastewater Servicing Pathway,

subject to Conditions [173A]–[173E].

For the purposes of these conditions:

(i) **Watercare Servicing Pathway** means a wastewater servicing arrangement approved by Watercare under which wastewater generated by the Project is conveyed to infrastructure owned or operated by Watercare for treatment and discharge,

including through Project-specific infrastructure, to the Beachlands Wastewater Treatment Plant or another connection point approved by Watercare.

(ii) **Private Wastewater Servicing Pathway** means the centralised private wastewater treatment and discharge system authorised by these consents, comprising the Stage 1 land disposal pathway and, if implemented in accordance with these conditions, the Stage 2 marine discharge pathway.

The wastewater infrastructure required to service each superlot, stage, or part thereof must be constructed before the issue of a certificate under section 224(c) of the RMA for that superlot, stage or part thereof. In addition, a certificate from a SQEP confirming that works have been satisfactorily undertaken and completed must be provided when applying for a certificate for the relevant stage under section 224(c).

Advice Notes:

- *The Consent Holder is responsible for providing all Project-specific infrastructure required to implement the Watercare Servicing Pathway at its cost, including any Project pump station, dedicated rising main, connection works and associated land or easement requirements necessary to convey wastewater from the Project to the point of connection approved by Watercare.*
- *Nothing in these conditions requires Watercare to fund or construct Project-specific wastewater infrastructure, or to accelerate the delivery of any Watercare infrastructure project.*
- *Nothing in these conditions constitutes approval by Watercare of a connection, Engineering Plan Approval, or acceptance of any wastewater asset for vesting. Any such approval or acceptance remains subject to Watercare's applicable requirements and approval processes, and compliance with Watercare's Code of Practice does not of itself require Watercare to accept an asset for vesting.*

~~[173] the development with a sewer system and a wastewater treatment plant, in accordance with the approved engineering plans as required by Condition [1] and Appendix 1 to the conditions and the staged wastewater treatment and reticulation network set out in the GWE Wastewater Concept Design Report. Certification from the XXX that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA. Alternatively, the consent holder may connect to Watercare's network should it have sufficient capacity and the required approvals are obtained from Watercare.~~

~~*Advice Notes:*~~

- *Acceptable forms of Evidence from ~~the Utility Providers~~Watercare include a Certificate of*

Acceptance.

- *Plans approved under resource consent do not constitute an Engineering Plan Approval.*

*Approval and **must not be relied upon** for the purposes of constructing public reticulation works in the absence of that approval.*

- *Any person wishing to connect to the public water and/or wastewater network must also obtain approval to such connection under the Water Supply and Wastewater Network Bylaw 2015 (Bylaw). Under the Bylaw an application to connect to a network may be refused in specified circumstances, including where there is insufficient capacity in the network to accommodate the connection.*
- *Any alterations to the public wastewater reticulation network require Engineering Plan Approval. Additional approval is required from Watercare~~/Veolia~~ as part of the Engineering Plan Approval process.*
- *Public connections are to be constructed in accordance with the Water and Wastewater Code of Practice.*

Wastewater Servicing Management Plan

[173A] Where the Consent Holder intends to service any part of the Project by the Private Wastewater Servicing Pathway, the Consent Holder must, prior to commencing detailed design of the wastewater reticulation network, prepare and submit to the Council for certification a Wastewater Servicing Management Plan (**WSMP**). The WSMP must be certified before any detailed design for the private wastewater reticulation network, including associated pump stations and rising mains, is approved for construction.

The WSMP must include:

a. a wastewater integration strategy identifying, at concept level:

i. the anticipated point and method of any future connection to Watercare's wastewater system;

ii. the Project-specific infrastructure, land and easements required to implement the Watercare Servicing Pathway;

iii. how the Project's wastewater reticulation would interface with that pathway; and

iv. how any transition from private to Watercare servicing would occur;

b. the current development staging and forecast wastewater demand;

c. the method for monitoring occupied dwelling unit equivalents or equivalent connected load and wastewater flows;

d. the reporting requirements and procedures for identifying when the Stage 2

triggers in condition [173D] are approaching;

e. the process for obtaining and taking account of updated information from Watercare at each wastewater servicing review required by these conditions;

f. identification of any wastewater assets intended or reasonably anticipated to be offered to Watercare for future vesting, and the processes for inspection, maintenance, record keeping and ongoing asset assurance while those assets remain in private ownership;

g. the process for managing and decommissioning any private wastewater infrastructure made redundant by a subsequent transition to the Watercare Servicing Pathway;

h. the process for reviewing the availability and practicability of the Watercare Servicing Pathway before implementation of the Private Wastewater Servicing Pathway for Stage 1;

i. the trigger thresholds, monitoring and reporting requirements for the Stage 2 wastewater servicing review;

j. the process and assessment methodology for the Stage 2 wastewater servicing review, including consideration of Watercare's then-current capacity, infrastructure programme, discharge approvals, and connection requirements; and

k. the process for implementing any transition from private wastewater servicing to the Watercare Servicing Pathway.

A draft WSMP must be provided to Watercare at least 40 working days before the final WSMP is submitted to the Council. The final WSMP must include any Watercare comments received within that period and identify how they have been addressed.

The WSMP must be reviewed and, where necessary, updated following any material change to the development programme or intended wastewater servicing pathway, and when required by conditions [173C] and [173D]. Any material amendment must be provided to Watercare for comment and submitted to the Council for certification.

Wastewater reticulation design

[173B] The permanent wastewater reticulation network, including gravity sewers, pump stations and rising mains, must be designed and constructed in accordance with Watercare's Code of Practice for Land Development and Subdivision (Wastewater) applicable at the time of detailed design.

Stage 1 wastewater servicing review

[173C] Before implementation of wastewater servicing for Stage 1, the certified WSMP must be reviewed, updated and submitted to the Council for certification in accordance with Condition [173A]. The updated WSMP must assess, using then-current information, whether the Watercare Servicing Pathway is reasonably practicable by the date the required Stage 1 wastewater capacity is needed, and identify the wastewater servicing pathway to be implemented for Stage 1. Where the review determines that the Watercare Servicing Pathway is reasonably practicable by that date, the Watercare Servicing Pathway must be implemented, subject to obtaining the necessary Watercare approvals. Otherwise, the Private Wastewater Servicing Pathway may be implemented for Stage 1.

Stage 2 wastewater servicing review

[173D] Before implementation of wastewater servicing for Stage 2, the certified WSMP must be reviewed, updated and submitted to the Council for certification in accordance with Condition [173A]. Where the Private Wastewater Servicing Pathway has been implemented for Stage 1, the review must occur before the earlier of:

a. occupation of 500 dwelling unit equivalents or an equivalent wastewater load; or

b. measured average dry weather flow exceeding 85% of the Stage 1 treatment capacity of 450 m^3/day over a rolling six-month period; or

c. commencement of construction of any additional private wastewater treatment capacity required for Stage 2 or the marine outfall.

The updated WSMP must assess, using then-current information, whether the Watercare Servicing Pathway is reasonably practicable for Stage 2, and identify the wastewater servicing pathway to be implemented. Where the review determines that the Watercare Servicing Pathway is reasonably practicable, the Watercare Servicing Pathway must be implemented, subject to obtaining the necessary Watercare approvals. Otherwise, the Private Wastewater Servicing Pathway may be implemented for Stage 2.

Transition to Watercare servicing

[173E] Where the Watercare Servicing Pathway is implemented after the Private Wastewater Servicing Pathway has commenced:

a. the transition must be undertaken in accordance with the certified WSMP and the connection and commissioning arrangements approved by Watercare;

b. all wastewater assets proposed to be vested will be reassessed under the current standards and any remedial or replacement works must be undertaken prior to any transition;

c. all associated growth and connection charges will be payable at the time of connection to Watercare;

d. wastewater flows approved by Watercare for connection must be transferred to the Watercare wastewater system once the relevant connection is commissioned and available to receive those flows; and

e. the corresponding private wastewater treatment and discharge must cease as soon as reasonably practicable following that transfer.

The WSMP must be updated to identify how any private wastewater infrastructure that is no longer required will be decommissioned, repurposed or otherwise managed.

Water Reticulation Networks

[174] The Consent Holder must construct a water reticulation network to serve the development in accordance with the approved engineering plans as required by Condition [1] and Appendix 1 to the conditions. Certification from the Council that works have been satisfactorily undertaken must be provided when applying for a certificate under ~~the~~ section 224(c) of the RMA.

Advice Notes:

- *Acceptable forms of evidence that the works have been satisfactorily undertaken include a Certificate of Acceptance.*
- ~~*Any person wishing to connect to the public water and/or wastewater network must also obtain approval to such connection under the Water Supply and Wastewater Network Bylaw 2015 (Bylaw). Under the Bylaw an application to connect to a network may be refused in specified circumstances, including where there is insufficient capacity in the network to accommodate the connection. Any alterations to the public water reticulation network require Engineering Plan Approval. Additional approval is required from Watercare/ Veolia as part of the Engineering Plan Approval process.*~~
- *Sufficient water supply is required to ensure an acceptable water supply for each lot, including for fire-fighting purposes.*
- ~~*Public connections are to be constructed in accordance with the Water and Wastewater Code of Practice.*~~
- ~~*Plans approved under resource consent do not constitute an Engineering Plan Approval and **must not be relied upon** for the purposes of constructing public reticulation works in the absence of that approval*~~.

Commented [A2]: Not relevant, Watercare does not provide water services in the area.

Stormwater Reticulation Networks

[175] Where Auckland Council Healthy Waters has accepted the reticulated stormwater network as acceptable for vesting as public, the Consent Holder must design and construct connections to the public stormwater reticulation network to serve the development in accordance with the requirements of the utility provider and the approved engineering plans as required by Condition [1] and Appendix 1 to the conditions. Certification from the utility provider that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.

Advice Notes:

- *Acceptable forms of evidence include Engineering Approval Completion Certificates.*
- *Public connections are to be constructed in accordance with the Stormwater Code of Practice.*
- *Alterations to the public stormwater reticulation network require Engineering Plan Approval.*

Utilities

[176] The Consent Holder must make provision for telecommunications and electricity to serve the development in accordance with the requirements of the respective utility providers. These utilities must be underground. Certification from the utility providers that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.

Advice Note: The Consent Holder may also provide gas servicing to the lot(s), but this is not a requirement of the AUP(OP) and no proof is required at time of section 224(c). Any gas lines are required to be installed underground.

Geotechnical Completion Report

[177] A Geotechnical Completion Report from a SQEP must be provided when applying for a certificate under section 224(c) of the RMA to confirm that Lots 528-534 (inclusive), 537, 538, 539, 545, 546 and 547 as identified on the subdivision scheme plans referenced in Condition [1] and Appendix 1 are stable and suitable for residential development.

[178] Development on these lots must be undertaken in accordance with the recommendations of the Geotechnical Completion Report.

Implementation of Landscape Works for Local Purpose Drainage Reserves

[179] Prior to the issue of the section 224(c) certification for a stage, superlot or part thereof, all hard and soft landscape works proposed within the local purpose drainage reserves within the stage, superlot or part thereof which are to be vested must be implemented and be in accordance with the Beachlands South Open Space Strategy and any Engineering Plan Approval.

Advice Note: Practical completion will be determined by the Manager Parks Planning prior to the issue of the certificate required under 224(c) to demonstrate development of the drainage reserve has been satisfactorily implemented and to formalise the commencement of the maintenance period.

Implementation of Landscape Works for Open Spaces to be Vested as Public Reserves

[180] Prior to the issue of the section 224(c) certification for a stage, superlot or part thereof, all hard and soft landscape works proposed within any open space that is to be vested as public reserve within the stage, superlot or part thereof must be implemented and be in accordance with the Beachlands South Open Space Strategy and any Engineering Plan Approval.

This condition only applies to open spaces that are to be vested as public reserve and does not apply to any open spaces that are to remain in private ownership or under the control of the Residents Society. For these open spaces, all hard and soft landscape works proposed within the stage, superlot or part thereof must be implemented and be in accordance with landscape design approved under Condition [X], prior to the issue of the section 224(c) certification.

Ecologically Protected Area

[181] Any application for subdivision within the precinct must include the following on the subdivision scheme plan, as identified on Precinct Plan 2:

(a) Areas subject to the EPAN and/or any additional areas proposed to be planted as part of any ecological offsetting or compensation proposition;

(b) Areas subject to the Significant Ecological Area – Terrestrial overlay;

(c) High Value Terrestrial Planting areas;

(d) Wetland Margin Buffer Planting areas;

(e) Indicative Native Revegetation areas; and

(f) Identified archaeological sites.

[182] The areas listed in condition [180] above must be legally protected and maintained by a covenant (or other legal protection mechanism) on the Certificate of Title for each site within the precinct where they are not vested with the Council.

The covenant (or other legal protection mechanism) must require the areas listed in condition [180] above to be revegetated, maintained, restored and enhanced in accordance with the Biodiversity Management Plan required in condition [78].

The covenant (or other legal mechanism) must require every landowner within the precinct to be a member of a Residents Society (or similar) that will manage the areas listed in condition [180] above and contribute a proportional sum each year to ensure the Biodiversity Management Plan is implemented on an on-going basis.

Public Roads

[183] The public road network and intersection upgrades referenced on the Engineering Plans in Condition [1] and Appendix 1 to the conditions must detail all works associated with the proposed roads and intersection upgrades required for each stage, superlot or part thereof, and be in accordance with current Council Engineering Standards.

[184] The engineering plans must include but not be limited to the following information:

(a) The information regarding the detailed design of all roads and road network activities provided for by this resource consent.

(b) As part of the application for Engineering Plan Approval, a SQEP must:

i) Certify that all public roads and associated structures/facilities or access ways have been designed in accordance with the Auckland Transport's Engineering Standards

ii) Provide traffic calming as required by road safety requirements of local residential roads.

(c) Vehicle tracking for all intersections and mid-block horizontal curves according to the Auckland Transport Engineering Standards (Design Code Urban and Rural Roadway Design).

(d) Kerb lines, pedestrian crossings, footpaths, parking bays, traffic calming, No Stopping At All Times lines, road markings, locations of all new intersections.

(e) (e) Provide detail cross sections and long sections for the proposed roads.

(f) Traffic calming measures in the form of speed tables or other approved treatments

are required to moderate speeds to ensure appropriate sight lines are achieved.

(g) Provision of pram crossings at appropriate road intersections complete with tactile pavers as per Auckland Transport Engineering Standards. Visibility and sight distance assessment should be provided at all proposed pram crossing locations.

(h) Road markings and signage plans must be provided for all relevant locations as per Auckland Transport Engineering Standards.

(i) Detailed design of all street lighting, street furniture and other structures/facilities on the roads to be vested in Auckland Transport (including traffic calming devices, tree pits, raingardens and safety measurements, marking and street signs etc.) and must be designed in accordance with the Auckland Transport Engineering Standards.

(j) Visibility assessment of all proposed roads; in particular the visibility at intersections and forward visibility around bends must be designed in accordance with Auckland Transport's Engineering Standards.

(k) Pavement and surfacing for all proposed roads, parking areas, footpaths and pedestrian crossing points must be designed in accordance with Auckland Transport's Engineering Standards.

(l) Visitor parking on roads, and any associated changes to carriageway width, to be confirmed in consultation with Auckland Transport.

(m) The system must cater for stormwater run-off from the site being developed in accordance with the SMP.

(n) Details of fire hydrants to be installed. Any fire hydrants must be designed in accordance with the Council's Water and Wastewater Code of Practice for Land Development and Subdivision.

(o) Information relating to gas, electrical and/or telecommunication reticulation including ancillary equipment.

Advice Note: If the Engineering Plan Application drawings require any permanent traffic or parking restrictions, then the Consent Holder must submit a resolution report for approval by Auckland Transport Traffic Control Committee to legalise these restrictions. The resolutions, prepared by a qualified traffic engineer, will need to be approved so that the changes to the road reserve can be legally implemented and enforced. The resolution process requires external consultation to be undertaken in accordance with Auckland Transport's standard procedures.

An engineering completion certificate certifying that the proposed roads and/ or the ancillary

structures on the roads to be vested in Auckland Council have been constructed in accordance with approved requirements must be provided when applying for a certificate under section 224(c) of the RMA (if there is 224c component) to Council.

The Engineering Plan Application forms including lodgement and fees can be found at the following Council website: https://www.aucklandcouncil.govt.nz/building-and-consents/engineering-approvals/Pages/default.aspx

[185] Certification from Auckland Transport that the road works relevant to the particular stage, superlot or part thereof have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.

[186] Any footpath, kerb or crossing in a legal road damaged as a result of the construction work must be repaired, reinstated or reconstructed in accordance with the Auckland Transport Engineering Standards.

[187] Public lighting on the roading network to be vested shall be provided in accordance with the designated Road Classification and Sub-Categories identified by Auckland Transport Street Lighting in the provision of a Lighting Design Brief specific to the Project. Additionally, any existing intersections that interface directly with the Beachlands South Development, the lighting design shall ensure that an integrated public lighting system is provided for both vehicular and pedestrian traffic to maintain road safety considerations.

[188] The lighting design for the public roads proposed as part of the Project and any impacted existing intersections that interface directly with the Project area shall demonstrate compliance with the current version of the Auckland Transport's Engineering Standards and any Specific Requirements as defined in the Lighting Design Brief.

Roading

[189] The Consent Holder must construct all public roads as identified on the engineering plans in Condition [1] to the road controlling authority's standards to provide access to the dwellings, buildings and carparks within the proposed development. All roads intended to vest in the road controlling authority must be designed to meet the design speed requirements of that authority. The required roading may be provided on a staged basis in accordance with Condition [1] or as otherwise agreed with the Council.

Advice Notes:

- *Acceptable forms of evidence include Engineering Approval Completion Certificates.*
- *Constructionof public roading requires an Engineering Plan Approval.*

- *Design of public roads must include (but is not limited to), road pavement, pedestrian footpaths, cycle ways, street lighting, street furniture, road marking, traffic calming devices, road stormwater drainage, raingardens, etc. where required.*
- *Plans approved under resource consent do not constitute an Engineering Plan Approval and should not be used for the purposes of constructing public works in the absence of that approval.*

The Consent Holder is advised that the New Zealand Addressing Standard (AS/NZS 4819:2011) requires all newpublic roadsand all extensions toexisting roadsto have a road name. All road names must be approved by the Council. In order tominimise disruption to constructionand survey works, the Consent Holder is advised to obtain any road name approval before applying for a section 223 certificate.

Ongoing Obligations

[190] Prior to issue of a s224(c) certificate for respective stages of the development, the Consent Holder must establish a Residents Society or societies or equivalent legal body (Society or societies) to enable the potential private ownership of utilities and other elements of the development as set out below.

A. To own, operate, manage, ~~and maintain~~, repair, renew and upgrade the assets of the Project that will not be vested, which may include (but are not limited to) the following:

(a) The EPAN areas

(b) Open Space areas

(c) Pedestrian and cycle paths

(d) The Coastal Pathway

(e) COALs

(f) Infrastructure

~~(f)~~(g) Any private wastewater system

[191] The following requirements must be met in order to satisfy this condition:

(a) The common asset is required to remain in the ownership of the Society, except with the prior approval of the Council.

(b) The structure, functions and rules of the Society must include provision for the following:

i. Requirement for all lot owners to automatically be and remain a member of the Society for so long as they are a registered proprietor of a lot;

ii. Requirement that the Society must not be disestablished without the prior

written consent of the Council;

iii. Requirements for all lot owners to fulfil the obligations of a member, as set out in the Rules of the Society;

iv. The Society will be responsible for the maintenance of landscaping, infrastructure operation, maintenance, repair, renewal, upgrades and where relevant reconsenting, asset management plans, and similar matters as they pertain to the common asset;

v. Ongoing compliance with the relevant resource consent, bylaw, or other requirements of the Council;

vi. Securing consent renewals for any private wastewater system including network discharge consents and treated wastewater discharge consents;

vii. A method of management of the Society's future affairs, and for the raising of levies from members from time to time to adequately finance any future maintenance, ~~and~~ renewal, upgrade and reconsenting obligations. The Rules shall identify a process for setting, collecting and enforcing the payment of levies.

viii. In the event that the Watercare Servicing Pathway is to be implemented after the establishment of a private wastewater system, mechanisms for the raising of funds from members to adequately finance:

- the payment of future Infrastructure Growth Charges that may be payable to Watercare,
- any required upgrades or replacement of wastewater assets prior to vesting with Watercare,
- the future decommissioning of any redundant private wastewater infrastructure, and
- ~~vi.~~ the infrastructure works required to enable future connections to the public wastewater network.

(c) All costs associated with the establishment of the Society must be borne by the Consent Holder.

(d) A copy of the document(s) describing the functions, powers, duties and liabilities of the Society must be provided to the Council. The document(s) must evidence each

of the requirements above and that the ongoing operation, maintenance and repair obligations of this condition will be adequately provided for.

(e) The requirement to maintain ongoing membership of the Society must be detailed in a consent notice which will be recorded against the Records of Title of the relevant lots pursuant to section 221 of the RMA.

Completion Certificate

[192] The application for a certificate under section 224(c) of the RMA must be accompanied by certification from a suitably qualified and experienced surveyor or engineering professional that all the conditions of subdivision consent SUBXXXX relevant to the particular stage, superlot or part thereof have been complied with, and identify all those conditions that have not been complied with and are subject to the following:

(a) a consent notice to be issued in relation to any conditions of this consent to which section 221 applies;

(b) a bond, as required by conditions of this consent, to be entered into by the subdividing owner in compliance with the relevant conditions of this subdivision consent; and

(c) a completion certificate has been issued in relation to any conditions to which

section 222 applies.

Individual Lot Subdivision

General Conditions

[193] The individual lot fee simple subdivision shall be in general accordance with the Beachlands South Subdivision Scheme Plans as referenced in Condition [1] and Appendix 1 to the conditions.

[194] Where minor variations to the subdivision scheme plans are proposed, the Consent Holder must submit the amended subdivision scheme plans to Council for written certification.

[195] Each individual lot must have access to a road or COAL and be connected to the reticulated stormwater, wastewater and water supply network and be connected to power and telecommunications services.

Section 223 Condition Requirements

[196] The Consent Holder shall submit to Council for approval, under section 223 of the RMA, a survey plan in general accordance with the relevant scheme plan(s) in Condition [1] and Appendix 1 to the conditions. The survey plan must include the specific details outlined on the approved scheme plans on each survey plan of subdivision for each lot.

Easements

[197] The necessary easements for each lot, as shown on the approved scheme plan(s), shall be included in a memorandum of easements endorsed on the survey plan and must be created, granted or reserved as necessary. The Consent Holder shall meet the costs for the preparation, review, and registration of the easement instruments on the relevant records of title. Any other required easements needed to facilitate the development shall also be included on the survey plan. These easements may include (but are not limited to) the following:

(a) Right to convey electricity, water and telecommunications (both standard and in Gross)

(b) Right to drain stormwater and sewage (both standard and in Gross)

(c) Maintenance

(d) Right of Way

(e) Maintenance and Eave Overhang

(f) Party Wall

Section 224 Condition Requirements

[198] Prior to the release by the Council of the section 224(c) certificate for each lot, the Consent Holder must comply with the following conditions to the satisfaction of Council.

Commonly Owned Access Lots (COALs)

[199] The Consent Holder must construct COALs as identified on the engineering plans in Condition [1] to the road controlling authority's standards to provide access to the dwellings, buildings and carparks within the proposed development. The required COALs may be provided on a staged basis in accordance with Condition [1] and Appendix 1 to the conditions or as otherwise agreed with the Council.

Infrastructure

Water and Wastewater Reticulation Networks

[200] The Consent Holder must design and construct the water and wastewater reticulation networks, to serve each lot, in accordance with the engineering plans approved as part of this consent.

Stormwater Reticulation Networks

[201] The Consent Holder must design and construct the stormwater reticulation network to serve each lot in accordance with the engineering plans approved as part of this consent.

Utilities

[202] The Consent Holder must make provision for telecommunications and electricity to the lots in accordance with the requirements of the respective utility operators. These utilities must be underground. Certification from the utility providers that works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c).

Vehicle Crossings

[203] The Consent Holder must provide new vehicle crossings for the respective stage for any dwellings that require a vehicle crossing. The crossing(s) must be designed and formed in accordance with the requirements of Auckland Transport. The new crossings must maintain an at-grade (level) pedestrian footpath across the length of the crossing, using the same materials, kerbing, pavings, patterns and finish as the footpath on each side of the crossing. Certification that works have been satisfactorily undertaken must be provided when

applying for a certificate under section 224(c). No vehicle crossings shall be provided for any allotment that has not been authorized to accommodate an on-lot car-parking space.

[204] Where vehicle crossings are completed and signed off by Auckland Transport as part of the underlying road vesting process, it may not be possible to obtain an approval letter and completion certification from Auckland Transport for the vehicle crossings. In this instance, evidence of the Engineering Approval Completion Certificate for the public road will suffice.

Advice Notes:

- *An approval letter and completion certificate from Auckland Transport is required to be submitted to the Council as a verification that Auckland Transport has completed approval and a final vehicle crossing inspection before this condition is considered fulfilled, except where not possible as per the condition above.*
- *Works within the road reserve require prior approval from Auckland Transport. The Consent Holder should contact Auckland Transport as soon as possible to ensure any required approvals are issued prior to construction.*
- *A vehicle crossing approval permit is required to be obtained from Auckland Transport for these works. For more details refer to Vehicle crossing application Vehicle crossing application (Auckland Transport)*
- *Note that any redundant vehicle crossings are required to be reinstated as berm and/or footpath and the kerbs replaced.*
- *The relevant information may form part of any Engineering Plan approval for the underlying Super-Lot subdivision, or combined with any other stage.*

Consent notices

Geotechnical - Coastal Lots

[205] A consent notice must be registered on the record(s) of title to be issued for Lots 528-534 (inclusive), 537, 538, 539, 545, 546 and 547 to ensure that development is undertaken in accordance with the Geotechnical Completion Report as required by Condition [176]. The specific name and date of the Geotechnical Completion Report provided must be referenced in the consent notice.

This condition must be registered as a consent notice on the record(s) of title of the relevant lots to ensure that it is complied with on a continuing basis

Stormwater devices

[206] A Consent Notice pursuant to section 221 of the RMA must be registered on the Records of Title of any lot to require the correct operation and maintenance of any privately owned and operated stormwater device in accordance with the OMP as required by Conditions [150] to [155] of SUBXXX.

This condition must be registered as a consent notice on the record(s) of title of the relevant lots to ensure that it is complied with on a continuing basis.

Resident's Society

[207] A Consent Notice pursuant to section 221 must be registered on the Records of Title of each lot created by this subdivision to require owners of each lot to be members of a Resident's Society as required by Condition [191] to be registered against the record of title of each lot created by this subdivision.

The consent notice shall include the following requirements:

1. Membership of Residents' Society

The owner for the time being of the lot shall automatically become and remain a member of the Residents' Society Incorporated (or similar body) and shall comply with the rules of that Society.

2. Contribution to Shared Costs

The owner shall be responsible for the payment of levies or contributions as determined by the Residents' Society for the ongoing operation, maintenance, repair, renewal, upgrade, reconsenting and management of shared assets, including (but not limited to):

- The EPAN areas
- Open Space areas
- Pedestrian and cycle paths
- The Coastal Pathway
- COALs
- Infrastructure
- Private roads and accessways
- Stormwater facilities (if privately owned including detention/retention devices)
- Wastewater systems (if privately owned)

- In the event that the Watercare Wastewater Servicing pathway is to be implemented after the establishment of a private wastewater system:

    - Infrastructure Growth Charges
    - Decommissioning of redundant infrastructure
    - Works required to enable future connections to the public wastewater network.

- Landscaping, planting, and common open space areas

3. Ongoing Effect

- The obligations under this consent notice are binding on the owners of the lots on an ongoing basis and shall run with the land.

- The consent notice shall be prepared to the satisfaction of Auckland Council and registered against the title of each lot prior to the issue of the section 224(c) certificate.

This condition must be registered as a consent notice on the record(s) of title of the relevant lots to ensure that it is complied with on a continuing basis.

Covenant

[208] The Consent Holder must enter into a section 108 covenant under the Resource Management Act 1991 in favour of Auckland Council. The covenant must be registered on the Records of Title of each lot created by this subdivision to protect and maintain the EPAN as required by Condition [182] of SUBXXX.

G. CONDITIONS ON AIR DISCHARGE

General conditions

[209] The Wastewater Treatment Plant is to be constructed and operated in accordance with the plans and supporting technical reports referenced in condition [1] and Appendix 1 to the conditions.

[210] Under section 125 of the RMA, this consent lapses five years after the date it is granted unless:

(a) The consent is given effect to; or

(b) The Council extends the period after which the consent lapses.

[211] Air discharge consent number [XX] expires 35 years after the consent is issued unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

[212] The Consent Holder must pay the Council an initial consent compliance monitoring charge of $[XX] inclusive of GST, plus any further monitoring charge or charges to recover the actual and reasonable costs incurred to ensure compliance with the conditions attached to this consent.

[213] Access to the relevant parts of the property must be maintained and be available at all reasonable times to enable the servants or agents of the Council to carry out inspections, surveys, investigations, tests, measurements or take samples whilst adhering to the Consent Holder's health and safety policy.

Limit Conditions: Air Discharges

[214] All processes associated with the wastewater treatment plant (WWTP) must be operated, maintained, supervised, monitored and controlled in accordance with the Air Quality Management Plan certified in accordance with Condition [X] to ensure that all emissions authorised by this consent are maintained at the minimum practicable level.

[215] Discharges of contaminants into air from the WWTP must not cause:

(a) Odour that is noxious, dangerous, offensive or objectionable effect beyond the boundary of the Site, in the opinion of an enforcement officer.

(b) Visible emissions (other than water vapour/steam or heat haze) that cause a dangerous, offensive or objectionable effect, in the opinion of an enforcement officer.

Advice Note: Air discharge limits

Condition [213] is to be assessed by suitably trained Council enforcement officers in accordance with the procedures outlined in the Good Practice Guides for Odour (Ministry for the Environment, 2016), including consideration of the FIDOL factors (frequency, intensity, duration, offensiveness and location) for amenity effects (dust, odour and visible emissions).

Process Conditions

[216] Within one month of WWTP commencing treatment, the Consent Holder must provide to the Council a report from a SQEP, which verifies that the design and installation of the waste water treatment plant and odour control system (including the odour extraction and treatment system) are in accordance with Conditions [202] and [210].

[217] Air discharges from any solids screening and storage and sludge dewatering and storage must be extracted to an emission control system (including an activated carbon scrubber) and discharged from a stack at least 3 m above ground level or the apex height of the nearest building within 20 meters, without obstruction of the vertical discharge of air.

Monitoring and Reporting conditions

[218] Within 3 months of exercising this resource consent, The Consent Holder shall:

(a) Operate and maintain a weather station on the site to measure and record the air temperature, wind direction and wind velocity on a continuous basis (at no less than 10-minute intervals). The weather data shall be retained for at least the duration of the resource consent.

(b) Weather data of any period shall be provided to Auckland Council within 5 Working Days of a request.

(c) The weather station shall be located on the site in a location which, as far as is practicable, is unaffected by surrounding structures or vegetation or other features for the purpose of ensuring the most accurate measurements as practicable on the site.

(d) The weather station shall be installed and operated in accordance with AS/NZS 3580.14:2014 (Methods for sampling and analysis of ambient air - Meteorological monitoring for ambient air quality monitoring applications).

[219] The Council must be notified as soon as practicable in the event of any significant discharge to air, which results or has the potential to result in a breach of air quality conditions or adverse effects on the environment. The following information must be supplied:

(a) Details of the nature of the discharge including any wind conditions as recorded under condition [216] during the incident timeframe.

(b) An explanation of the cause of the incident.

(c) Details of remediation action taken.

Advice Note: Significant discharges

Significant discharges to be notified to Council in accordance with this condition include abnormal discharges arising from unexpected failures of the WWTP (including emission control systems). An email to monitoring@aucklandcouncil.govt.nz should be sent detailing the nature of the issue and what contingency measures are to be implemented to minimise potential air quality effects.

[220] All air quality complaints that are received must be recorded and notified to the Council on request. The recorded complaint details must include:

(a) The date, time, location and nature of the complaint.

(b) The name, phone number and address of the complainant, unless the complainant elects not to supply these details.

(c) Weather conditions, including wind speed and direction, at time of the complaint.

(d) Any remedial actions undertaken.

Air Quality Management Plan

[221] Prior to the commissioning of the WWTP, an Air Quality Management Plan (AQMP) must be submitted to the Council for certification, to confirm that the activities undertaken in accordance with the AQMP will achieve the objectives of the plan and compliance with the relevant consent conditions. Any subsequent review of the AQMP must also be submitted to the Council for certification. The Consent Holder must meet the costs of the production, certification, monitoring and review of the AQMP.

[222] The purpose of the AQMP is to document the monitoring, management and operational procedures, methodologies and contingency plans required to comply with the conditions of this consent. The AQMP may be a sub-section of a wider Environmental Management Plan, and must incorporate a series of monitoring, management and operational procedures, methodologies and contingency plans, and together shall accurately record all information required to comply with the conditions of this consent. The AQMP must include the following:

(a) Identification of all point sources for discharges of contaminants into air, including a map and schematic diagram showing the location of each source;

(b) Procedures to minimise discharges of contaminants into air (including odour), including details of the inspection, maintenance, monitoring and contingency procedures in place for the waste water treatment plant.

(c) The operating parameters of odour control equipment and the frequency and scope of the regular checks to be performed on emissions control equipment; including testing of the carbon bed saturation;

(d) Procedures for the monitoring of odour, including details of inspection procedures, recording requirements and contingency measures;

(e) The identification of staff responsibilities;

(f) The procedures for the receipt, recording and handling of air quality complaints received.

[223] The AQMP must be reviewed on an annual basis and any subsequent changes to the certified AQMP must be submitted to the Council for certification prior to implementation. The Council will advise the Consent Holder in writing if any aspects of the AQMP are considered to be inconsistent with achieving the provisions of this consent.

Advice Note: Air Quality Management Plan

The Council acknowledges that the Air Quality Management Plan is intended to provide flexibility both for the Consent Holder and the Council for the management of the air discharges. Accordingly, the Air Quality Management Plan may need to be reviewed over time. Any reviews should be in accordance with the stated objectives of the management plan and limited to the scope of this consent.

Certification of the Air Quality Management Plan by the Council relates only to those aspects of the management plan that are relevant under the RMA. The certification does not amount to an approval or acceptance of suitability by the Council of any elements of the management plan that relate to other legislation, for example, but not limited to, the Building Act 2004 or the Health and Safety at Work Act 2015

Field Odour Surveys

[224] The consent holder must engage a Suitably Qualified and Experienced Person (SQEP) to undertake a field odour survey within 6 months of the commissioning of the operation and within 6 months of the Stage 2 becoming operative. The purpose is to establish the extent of odour effects beyond the site boundary (including the potential for chronic and acute effects).

[225] The odour survey must be conducted in general accordance with guidance set out in the Ministry for the Environment Good Practice Guide for Assessing and Managing Odour.

[226] The SQEP must prepare a report for the consent holder detailing their findings and recommendations. The consent holder must submit the SQEP's report to the Auckland Council within 1 month of receipt and not later than three months following completion of the survey.

Advice Note: Field Odour Surveys

The intent of this condition is for field odour surveys to take place in adjacent properties as well as public land, where approval for access can be sought from landowners and/or occupiers.

H. CONDITIONS OF RENEWED FORMOSA BORE WATER PERMIT

General Conditions

[228] The proposed groundwater take and use must be carried out in accordance with the Water Supply Assessment prepared by GWE and referenced in Condition [1] and Appendix 1 to the conditions.

Monitoring Fee

[229] The Consent Holder must pay the Council an initial consent compliance monitoring charge of $796 (inclusive of GST), plus any further monitoring charge or charges to recover the actual and reasonable costs that have been incurred to ensure compliance with the conditions attached to this consent.

Advice note:

[230] *The initial monitoring charge is to cover the cost of inspecting the site, carrying out tests, reviewing conditions, updating files, etc, all being work to ensure compliance with the resource consent. In order to recover actual and reasonable costs, inspections, in excess of those covered by the base fee paid, shall be charged at the relevant hourly rate applicable at the time. The Consent Holder will be advised of the further monitoring charge or charges as they fall due. Such further charges are to be paid within one month of the date of invoice. Only after all conditions of the resource consent have been met, will the Council issue a letter confirming compliance on request of the Consent Holder.*

Commencement and duration of consent

[231] The taking of water for this permit expires on 31 December 2061, unless it has lapsed, been surrendered, or been cancelled at an earlier date pursuant to the RMA.

[232] The applicant must notify the Council, within one week of the commencement of groundwater abstraction for this permit.

Advice Note:

[233] *The notification of the commencement of groundwater abstraction should be submitted to monitoring@aucklandcouncil.govt.nz.*

Lapse Date

[234] The consent will lapse 5 years after the granting of consent if the consent has not been given effect to.

Authorised Use

[235] The take and use of groundwater from the AUP(OP) Beachlands Aquifer is authorised in the manner set out below:

[236] The take is from the existing Formosa bore:

Bore ID	Bore Name	Consent number	Proposed depth (m)	Proposed location	Stage
To complete	To complete	To complete	To complete	To complete	To complete

Authorised quantities

[238] The abstraction in accordance with consent WATXXX must comply with the following:

(a) The total daily abstraction must not exceed 115 cubic metres.

(b) The total volume of water abstracted in each 12-month period, commencing 1 July of any year and ending 30 June of the following year, must not exceed 42,000 cubic metres.

[239] If any limits specified in **condition [233]** are exceeded, the Consent Holder must provide the Council with a report detailing:

(a) The reason for the exceedance and the mitigation measures proposed to ensure future compliance.

(b) A timeframe for implementing the mitigation measures.

[240] The report must be submitted to the Council within 1 month of the identified exceedance.

Advice Note:

The exceedance notifications report should be submitted to monitoring@aucklandcouncil.govt.nz.

Contact details

[241] Within 10 Working Days of the consent being granted, the Consent Holder must provide to the Council, the details of a nominated contact person, including their full name, their role with respect to the consent (for example, Consent Holder, tenant, site manager), a valid email address and mobile phone number that the Council may contact if required, regarding water use data. The contact details must be kept up-to-date, and the Council must be notified of any changes within 10 Working Days of the change occurring.

Advice Note:

The contact person may be someone other than the Consent Holder, for example, a site manager or tenant. However, overall responsibility for compliance with consent conditions remains with the Consent Holder.

Installation of water meter

[242] A water meter with a visual tumbler display and an electronic pulse output connected to a data logger and telemetry device, must be installed and maintained on the production bore prior to the abstraction of groundwater, to the satisfaction of Council. The water meters and recording device/systems must:

(a) be fit for the purpose and water it is measuring;

(b) measure the volume of water taken, with an accuracy of +/- 5% of the actual volume taken;

(c) transmit the volume of water taken in real time. The telemetry device must transmit logged data at intervals of no more than 60 minutes to the Council Consents and Compliance Water portal of the Hydrotel database (or to any replacement database required in writing by Council) in a format that is compatible with Council systems;

(d) be tamper-proof and sealed;

(e) installed (water meter) on the outlet pump;

(f) have systems and equipment in place to ensure continued operation in the event of a power outage;

(g) have backup data storage;

(h) be safely accessible;

(i) be installed and maintained in accordance with the manufacturer's specifications.

[243] Prior to exercise of this consent, the Consent Holder must contact

environmentaldata@aucklandcouncil.govt.nz or to any replacement email address identified in writing by the Council, to arrange set-up of the telemetry device to ensure logged data is transmitting to the Council correctly.

Advice Note:

As per the Resource Management (Measurement and Reporting of Water Takes) Amendment Regulations 2020, a water permit holder (resource Consent Holder) is required to record measurements of their water abstraction at 15-minute intervals and electronically provide to Council daily records of the measurements by the end of the next day (unless otherwise agreed by Council) starting on the following date for a water permit that allows water to be taken at the rate specified:

(a) 3 September 2022 for a water permit for ≥20 litres/second;

(b) 3 September 2024 for a water permit for ≥10 but <20 litres/second;

(c) 3 September 2026 for a water permit for ≥5 but <10 litres/second.

Verification of water meter/device accuracy

[244] The water meters and any device or system used to record water take volume, must be verified in-situ as accurate by a SQEP at the following times:

(a) Prior to the exercise of this consent.

(b) Within 5 Working Days of the water meter being serviced or replaced.

(c) By 30 June of the fifth year from the commencement of consent, and thereafter at five yearly intervals.

(d) The water meters, their verification and evidence of its accuracy must be in accordance with the Resource Management (Measurement and Reporting of Water Takes) Regulations 2020 (or any equivalent regulations that may replace them) and a copy of the verifications must be provided to the Council within 10 Working Days of the meter/devices being verified as accurate.

Bore construction for water level measurements

[245] Provision at the top of the bore for water level measurements must be made and maintained so that a probe can be lowered vertically into the bore between the riser tube and casing to measure the static water level in the bore.

Advice Note:

Access to the wellhead for water level measurement can be achieved by having an access

tube of at least 2 centimetres internal diameter extending from the top of the bore to the submersible pump. In order to keep out foreign matter, the tube should be fitted with an easily removed plug.

Bore construction for sampling

[246] Provision at the top of the bore for water quality sampling must be made and maintained so that a sample of water can be taken from the bore for water quality analysis. A tap or hand valve must be fitted as close to the pump outlet as possible and before the water enters any storage tank or filter. The tap or valve should have at least 0.3 metre clearance above ground level or any other obstruction to allow a sample bottle to be filled. This condition must be implemented within three months from the granting of the consent.

[247] A photograph of the water meters showing the meter reading, must be provided to the Council annually by the first week of July.

Advice note:

This photo must be provided to the following email address monitoring@aucklandcouncil.govt.nz

Water meter readings

[248] Water meter measurements of water abstraction from the outlet of the pumps must be recorded daily at 15-minute intervals, commencing before pumping starts for the day and finishing at the end of pumping for the day. Daily records of the measurements must be provided electronically to the Council by the end of the next day (unless otherwise agreed by the Council).

[249] In the event of failure of the data logger, telemetry unit and/or associated electronic devices, the water meter must be read manually at daily intervals until the devices are repaired and records kept of the date, time and corresponding water meter reading. If no water is taken during any period, then the current meter reading must still be recorded.

Advice note:

For any issues with the submissions of compliance data or documentation, including access to the Water Use Data Management System, contact monitoring@aucklandcouncil.govt.nz.

Water level readings

[250] Water levels in the production bores must be measured at quarterly intervals in the

following months: June, September, December and March each year, and records kept of the date, time and corresponding water level for the production bores, in accordance with criteria specified in the advice note below. The results of each quarterly water level reading must be submitted to the Council at monitoring@aucklandcouncil.govt.nz by no later than the 7th day of the following month in which the reading was undertaken.

Advice Note:

The static water level shall be measured from the top of surface elevation, and shall be recorded to the nearest 0.01 of a meter (nearest cm). The bore shall be monitored after pumping water levels have fully recovered to non-pumping levels. Recovery to non-pumping levels shall be verified by taking a series of three or more water levels made over a half hour period that are all within 0.02m of each other and are not showing a rising or falling head. If there is a difference of more than 0.02m, then the bore shall be allowed to recover further from any pumping, until the groundwater level has stabilised.

Environmental Monitoring and Water Efficiency Report

[251] An Environmental Monitoring and Water Efficiency Report must be submitted to the satisfaction of the Council in June 2031, and at 5-year intervals thereafter. This report must provide a summary and analysis of the past water use, and water quality and level monitoring for the previous reporting period.

[252] The report must also assess the water use over the previous five-year reporting period, against best practice with respect to the efficient use of water for the purpose consented. This report must include, but not be limited to:

(a) Annual summary of water usage in relation to the water consented.

(b) comparison of the site's water use against the industry best practice usage for the same activity.

(c) reasons why annual water use may have varied over the previous five years.

(d) information demonstrating decision making and any changes planned for the coming five years

(e) water conservation steps taken (e.g., leak detection).

(f) demonstrate the measures that have been implemented to ensure the abstraction limit is not breached. These could be sensors, alarms, shut off activation, etc. Maintenance or contingency plan.

[253] The report must assess the effects of the water take on the aquifer and be prepared by a

SQEP.

Review Condition

[254] Pursuant to Section 128 of the RMA, the conditions of this consent may be reviewed by the Council at the Consent Holder's cost in December 2029 and subsequently at intervals of not less than five years thereafter in order:

(a) To deal with any adverse effect on the environment which may arise or potentially arise from the exercise of this consent and which it is appropriate to deal with at a later stage or

(b) To vary the quantities, monitoring, operating and reporting requirements and performance standards in order to take account of information, including the results of previous monitoring and changed environmental knowledge, on: water availability, including alternative water sources; actual and potential water use; groundwater levels; efficiency of water use; groundwater quality; and the relationship of Māori with water.

(c) To deal with non-compliances or inefficiencies on the applicant's site related to water.

I. CONDITIONS OF PROPOSED 620 WHITFORD MARAETAI ROAD BORE WATER PERMIT

General Conditions

[255] The proposed groundwater take and use must be carried out in accordance with the Water Supply Assessment prepared by GWE and referenced in Condition [1] and Appendix 1 to the conditions.

Monitoring Fee

[256] The Consent Holder must pay the Council an initial consent compliance monitoring charge of $796 (inclusive of GST), plus any further monitoring charge or charges to recover the actual and reasonable costs that have been incurred to ensure compliance with the conditions attached to this consent.

Advice note:

The initial monitoring charge is to cover the cost of inspecting the site, carrying out tests, reviewing conditions, updating files, etc, all being work to ensure compliance with the resource consent. In order to recover actual and reasonable costs, inspections, in excess of those covered by the base fee paid, shall be charged at the relevant hourly rate applicable at the time. The Consent Holder will be advised of the further monitoring charge or charges as they fall due. Such further charges are to be paid within one month of the date of invoice. Only after all conditions of the resource consent have been met, will the Council issue a letter confirming compliance on request of the Consent Holder.

Commencement and duration of consent

[257] The taking of water for this permit expires on 31 December 2061, unless it has lapsed, been surrendered, or been cancelled at an earlier date pursuant to the RMA.

[258] The applicant must notify the Council, within one week of the commencement of groundwater abstraction for this permit.

Advice Note:

The notification of the commencement of groundwater abstraction should be submitted to monitoring@aucklandcouncil.govt.nz.

Lapse Date

[259] The consent will lapse 5 years after the granting of consent if the consent has not been given

effect to.

Authorised Use

[260] The take and use of groundwater from the AUP(OP) Beachlands Aquifer is authorised in the manner set out below:

(a) The take is from the proposed bore on 620 Whitford Maraetai Road and is to be certified by Council:

Bore ID	Bore Name	Consent number	Proposed depth (m)	Proposed location	Stage
31755	To complete	To complete	600	NZTM: 1778404 mE, 5913528 mN	To complete

Authorised quantities

[261] The abstraction in accordance with consent WATXXX must comply with the following:

(a) The total daily abstraction must not exceed 371 cubic metres.

(b) The total volume of water abstracted in each 12-month period, commencing 1 July of any year and ending 30 June of the following year, must not exceed 135,500cubic metres.

[262] If any limits specified in **condition [256]** are exceeded, the Consent Holder must provide the Council with a report detailing:

(a) The reason for the exceedance and the mitigation measures proposed to ensure future compliance.

(b) A timeframe for implementing the mitigation measures.

[263] The report must be submitted to the Council within 1 month of the identified exceedance.

Advice Note:

The exceedance notifications report should be submitted to monitoring@aucklandcouncil.govt.nz.

Contact details

[264] Within 10 Working Days of the consent being granted, the Consent Holder must provide to the Council, the details of a nominated contact person, including their full name, their role with respect to the consent (for example, Consent Holder, tenant, site manager), a valid email address and mobile phone number that the Council may contact if required, regarding

water use data. The contact details must be kept up-to-date, and the Council must be notified of any changes within 10 Working Days of the change occurring.

Advice Note:

The contact person may be someone other than the Consent Holder, for example, a site manager or tenant. However, overall responsibility for compliance with consent conditions remains with the Consent Holder.

Installation of water meter

[265] A water meter with a visual tumbler display and an electronic pulse output connected to a data logger and telemetry device, must be installed and maintained on the production bore prior to the abstraction of groundwater, to the satisfaction of Council. The water meters and recording device/systems must:

- be fit for the purpose and water it is measuring;
- measure the volume of water taken, with an accuracy of +/- 5% of the actual volume taken;
- transmit the volume of water taken in real time. The telemetry device must transmit logged data at intervals of no more than 60 minutes to the Council Consents and Compliance Water portal of the Hydrotel database (or to any replacement database required in writing by Council) in a format that is compatible with Council systems;
- be tamper-proof and sealed;
- installed (water meter) on the outlet pump;
- have systems and equipment in place to ensure continued operation in the event of a power outage;
- have backup data storage;
- be safely accessible;
- be installed and maintained in accordance with the manufacturer's specifications.

[266] Prior to exercise of this consent, the Consent Holder must contact environmentaldata@aucklandcouncil.govt.nz or to any replacement email address identified in writing by the Council, to arrange set-up of the telemetry device to ensure logged data is transmitting to the Council correctly.

Advice Note:

As per the Resource Management (Measurement and Reporting of Water Takes) Amendment Regulations 2020, a water permit holder (resource Consent Holder) is required to record measurements of their water abstraction at 15-minute intervals and electronically provide

to Council daily records of the measurements by the end of the next day (unless otherwise agreed by Council) starting on the following date for a water permit that allows water to be taken at the rate specified:

(a) 3 September 2022 for a water permit for ≥20 litres/second;

(b) 3 September 2024 for a water permit for ≥10 but <20 litres/second;

(c) 3 September 2026 for a water permit for ≥5 but <10 litres/second.

Verification of water meter/device accuracy

[267] The water meters and any device or system used to record water take volume, must be verified in-situ as accurate by a SQEP at the following times:

- Prior to the exercise of this consent.
- Within 5 Working Days of the water meter being serviced or replaced.
- By 30 June of the fifth year from the commencement of consent, and thereafter at five yearly intervals.

[268] The water meters, their verification and evidence of its accuracy must be in accordance with the Resource Management (Measurement and Reporting of Water Takes) Regulations 2020 (or any equivalent regulations that may replace them) and a copy of the verifications must be provided to the Council within 10 Working Days of the meter/devices being verified as accurate.

Bore construction for water level measurements

[269] Provision at the top of the bore for water level measurements must be made and maintained so that a probe can be lowered vertically into the bore between the riser tube and casing to measure the static water level in the bore.

Advice Note:

Access to the wellhead for water level measurement can be achieved by having an access tube of at least 2 centimetres internal diameter extending from the top of the bore to the submersible pump. In order to keep out foreign matter, the tube should be fitted with an easily removed plug.

Bore construction for sampling

[270] Provision at the top of the bore for water quality sampling must be made and maintained so that a sample of water can be taken from the bore for water quality analysis. A tap or hand valve must be fitted as close to the pump outlet as possible and before the water enters any

storage tank or filter. The tap or valve should have at least 0.3 metre clearance above ground level or any other obstruction to allow a sample bottle to be filled. This condition must be implemented within three months from the granting of the consent.

[271] A photograph of the water meters showing the meter reading, must be provided to the Council annually by the first week of July.

Advice note:

This photo must be provided to the following email address monitoring@aucklandcouncil.govt.nz

Water meter readings

[272] Water meter measurements of water abstraction from the outlet of the pumps must be recorded daily at 15-minute intervals, commencing before pumping starts for the day and finishing at the end of pumping for the day. Daily records of the measurements must be provided electronically to the Council by the end of the next day (unless otherwise agreed by the Council).

[273] In the event of failure of the data logger, telemetry unit and/or associated electronic devices, the water meter must be read manually at daily intervals until the devices are repaired and records kept of the date, time and corresponding water meter reading. If no water is taken during any period, then the current meter reading must still be recorded.

Advice note:

For any issues with the submissions of compliance data or documentation, including access to the Water Use Data Management System, contact monitoring@aucklandcouncil.govt.nz.

Water level readings

[274] Water levels in the production bores must be measured at quarterly intervals in the following months: June, September, December and March each year, and records kept of the date, time and corresponding water level for the production bores, in accordance with criteria specified in the advice note below. The results of each quarterly water level reading must be submitted to the Council at monitoring@aucklandcouncil.govt.nz by no later than the 7th day of the following month in which the reading was undertaken.

Advice Note:

The static water level shall be measured from the top of surface elevation, and shall be

recorded to the nearest 0.01 of a meter (nearest cm). The bore shall be monitored after pumping water levels have fully recovered to non-pumping levels. Recovery to non-pumping levels shall be verified by taking a series of three or more water levels made over a half hour period that are all within 0.02m of each other and are not showing a rising or falling head. If there is a difference of more than 0.02m, then the bore shall be allowed to recover further from any pumping, until the groundwater level has stabilised.

Environmental Monitoring and Water Efficiency Report

[275] An Environmental Monitoring and Water Efficiency Report must be submitted to the satisfaction of the Council in June 2031, and at 5-year intervals thereafter. This report must provide a summary and analysis of the past water use, and water quality and level monitoring for the previous reporting period.

[276] The report must also assess the water use over the previous five-year reporting period, against best practice with respect to the efficient use of water for the purpose consented. This report must include, but not be limited to:

- Annual summary of water usage in relation to the water consented.
- comparison of the site's water use against the industry best practice usage for the same activity.
- reasons why annual water use may have varied over the previous five years.
- information demonstrating decision making and any changes planned for the coming five years
- water conservation steps taken (e.g., leak detection).
- demonstrate the measures that have been implemented to ensure the abstraction limit is not breached. These could be sensors, alarms, shut off activation, etc. Maintenance or contingency plan.

[277] The report must assess the effects of the water take on the aquifer and be prepared by a SQEP.

Review Condition

[278] Pursuant to Section 128 of the RMA, the conditions of this consent may be reviewed by the Council at the Consent Holder's cost in December 2029 and subsequently at intervals of not less than five years thereafter in order:

(a) To deal with any adverse effect on the environment which may arise or potentially arise from the exercise of this consent and which it is appropriate to deal with at a later

stage or

(b) To vary the quantities, monitoring, operating and reporting requirements and performance standards in order to take account of information, including the results of previous monitoring and changed environmental knowledge, on: water availability, including alternative water sources; actual and potential water use; groundwater levels; efficiency of water use; groundwater quality; and the relationship of Māori with water.

(c) To deal with non-compliances or inefficiencies on the applicant's site related to water

J. CONDITIONS ON COASTAL STRUCTURES, OCCUPATION AND ACTIVITIES

[279] This consent authorises the construction, occupation and use of the Coastal Marine Area (CMA) with the structures proposed as part of the Project referenced in Condition [1] and Appendix 1 of the conditions, including the relevant engineering plans and Wastewater Concept Report prepared by GWE, include the following:

- A treated wastewater discharge pipe extending 2km into the CMA below the seabed;
- A treated wastewater discharge outlet structure extending from below the seabed to above the seabed;
- The construction of a temporary piled cofferdam to enable the construction of the outlet structure; and
- Any required stormwater discharge outfall structures.

General

[280] The Consent Holder must notify the Council and Ngāi Tai ki Tāmaki in writing of the date of the proposed commencement of works, at least 10 Working Days prior to the proposed start date.

[280A] The Consent Holder must not commence construction of the treated-wastewater marine outfall unless the Private Wastewater Servicing Pathway may be implemented for Stage 2 in accordance with Condition [173D].

Marine Construction Management Plan

[281] A minimum of 20 Working Days prior to the proposed commencement of works within the CMA, including below the seabed, a finalised Marine Construction Management Plan (MCMP) to include construction, piling, thrusting, construction methodology for the cofferdam and any excavation or disturbance of the CMA including the seabed must be submitted for certification by the Council.

[282] The MCMP must specify the following:

(a) Construction timetable for the works;
(b) A schedule for reporting to the Council on the total volume of removed material associated with construction;
(c) A schedule for notifying the Harbourmaster's office about construction operations.
(d) Details of how coastal construction operations will be managed;
(e) Confirmation of the disposal site for the extracted seabed material;
(f) A detailed construction and cofferdam construction methodology, including the methods to avoid/minimise the redistribution of the excavated sediment during

construction within the coastal marine area including reduce / minimise risk of vessels hitting marine mammals and coastal seabirds;

(g) Site management, including details of:

i) site access, including methods to clearly identify and delineate all entry and exit points to the coastal marine area;

ii) the bunding or containment of fuels and lubricants to prevent the discharge of contaminants;

iii) spill kit of on-site and maintained on barges and vessels at all times;

iv) a spill contingency plan in the event that there is any discharge of contaminants to the coastal marine area;

v) site reinstatement upon completion of the construction activities.

[283] Refuelling of vessels must be undertaken with care during all stages of proposed works

[284] The Consent Holder must undertake works in accordance with the approved Marine Construction Management Plan required under the above condition.

Water Quality Monitoring

[285] Water quality monitoring must be undertaken during the construction of the cofferdam. Monitoring should include the following components:

(a) Near surface water quality samples should be collected down-current on the ebb tide at least 50 and 200 m from the point of the coffer dam location.
(b) Water quality samples should be collected at a 'control' site. Typically, this would be on the up-current side of the construction.
(c) Samples should be collected at least once a week.
(d) Samples should be collected on the ebbtide and at 2-3 hours after high tide.
(e) Samples should be collected following a period of time when dredging has been carried out for at least two hours.
(f) TSS or turbidity should be <50 g/m3/NTU above the control site at 200 m down-current

Biosecurity

[286] The Consent Holder must ensure that any piles or structures brought to the site and/or relocated off-site to other coastal marine areas are free of encrusting marine organisms prior to reusing or taking to site.

[287] A biosecurity management plan must be prepared by a suitably qualified practitioner prior to the cofferdam works commencing to prevent any marine biosecurity risks. The biosecurity management plan must be made available to the Council or iwi monitoring nominee on request.

Marine Mammal Management Plan

[288] The Consent Holder must develop a Marine Mammal Management Plan (MMMP), which must include monitoring and mitigation measures employed during works to manage effects on these marine mammal species. Mitigation measures to be including in the MMMP shall include the following:

(a) Measures to control noise at source through the use of a soft, sacrificial dolly on top of the pile;

(b) Use of a bubble curtain around the piling, such as Bubble Tubing from Canadian Pond, if this is found to be practicable,;

(c) Limiting piling to day light hours to allow for observations of marine mammals and penguins.;

(d) Use of an observer, or observers, during the piling to watch for marine mammals and penguins entering the safe piling zones. Should marine mammals or penguins be identified, work shall stop until the all clear is given;

(e) Observations shall start a minimum of 30 minutes prior to the commencement of piling.

(f) Piling shall adopt a soft start procedure that is 30 minutes in duration.

[289] A record book of marine mammal observations must be maintained onboard each vessel and made available to the Council or iwi monitoring nominee on request.

Exclusive and Non Exclusive Occupation

[290] Exclusive occupation applies to that part of the CMA where the outlet structure rises from below the seabed to above the seabed and a small safety area around this structure. The exact area of exclusive occupation shall be defined on a plan and submitted to Council for certification once these works are completed.

[291] Occupation, being non-exclusive occupation, of the CMA applies to the area where the treated wastewater pipe is located below the seabed. The exact area of non-exclusive occupation shall be defined on a plan and submitted to Council for certification once these works are completed.

[292] The Consent Holder may, for safety and security reasons, temporarily restrict public access to parts of the non-exclusive occupation area for maintenance, repair or monitoring purposes.

Post construction

[293] The Council must be notified in writing of the date of completion of the construction activities, within two Working Days of the completion of the construction and reinstatement activities.

[294] Within one month of the completion of the consented construction activities a complete set of "as built" plans shall be supplied to the Council.

[295] A copy of the "as built" plans shall be provided to the Hydrographic Office (Chief Hydrographer, National Topo/Hydro Authority, Land Information New Zealand, Private Box 5501, Wellington) within one month of the completion of the construction activities.

Maintenance Requirements

[296] The structures must be maintained in a good and sound condition, and any repairs that are necessary must be made, subject to obtaining any necessary resource consents.

Duration

[297] The duration to occupy the CMA with, and use the structures must expire on 31 December 2061 (35 years) unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

Lapsing

[298] The construction duration to construct the structures, must lapse on 31 December 2036 (10 years) unless it has been surrendered or been cancelled at an earlier date pursuant to the RMA.

Review Condition

[299] Under section 128 of the RMA the conditions of this consent may be reviewed by the Manager Resource Consents at the Consent Holder's cost on a 5 yearly basis to deal with any adverse effect on the environment which may arise or potentially arise from the exercise of this consent and which it is appropriate to deal with at a later stage, in particular adverse effects on coastal environment or surrounding environment.

K. CONDITIONS OF WASTEWATER TREATMENT PLANT AND DISCHARGE OF TREATED WASTEWATER [DISXXX]

Wastewater Treatment Plant

[300] Where the Private Wastewater Servicing Pathway is implemented, ~~T~~the wastewater treatment plant shall be constructed in accordance with engineering drawing A2515591.00-5200 Rev A drawn by Harrison Grierson and the Wastewater Concept Design Report referenced in Condition [1] and Appendix 1 of the conditions.

[301] The wastewater treatment plant may be constructed in stages in order to progressively treat the volume of wastewater generated by ~~from~~ the project. Additional treatment capacity required for Stage 2 must not be constructed unless the Private Wastewater Servicing Pathway may be implemented for Stage 2 in accordance with Condition [173D].

[302] **[Deleted]** ~~Alternatively, should sufficient capacity become available within Watercare's wastewater network, the consent holder may discharge its wastewater to the Watercare network subject to obtaining approval from Watercare.~~

Treated Wastewater Disposal Field Discharge – Interim Solution

Pre-commencement meeting

[303] Where the Private Wastewater Servicing Pathway is implemented for Stage 1, ~~P~~prior to the installation of the wastewater disposal field within the area proposed in the Wastewater Concept Report prepared by GWE and referenced in Condition [1] and Appendix 1 to the conditions, the Consent Holder must hold a pre-start meeting that:

(a) is located on the subject site.

(b) Is scheduled not less than five days and not more than 20 days before the anticipated installation of the disposal field.

(c) includes Auckland Council Compliance Monitoring officer(s).

(d) includes representation from the project manager, the project ecologist, Ngāi Tai ki Tāmaki, and the contractors who will undertake the installation.

[304] The following information must be made available at the pre-commencement meeting:

(a) Timeframes for key stages of the works authorised under this consent,

(b) Resource consent conditions,

(c) Contact details of all the relevant project personnel,

(d) Installation methodology,

(e) The LBMP, and

(f) The BMP.

Advice Note:

To arrange the pre-start meeting please contact the Council to arrange this meeting on monitoring@aucklandcouncilgovt.nz, or 09 301 01 01. The conditions of consent should be discussed

at this meeting. All additional information required by the Council should be provided 2 days prior to the meeting.

Note that this pre-start meeting is separate to the overall pre-start meeting in condition [14]. The Consent Holder can opt to combine the meetings provided that the wastewater works will commence within 20 Working Days of the meeting.

Installation of Wastewater Disposal System

[305] A SQEP ecologist must be engaged to monitor, direct and supervise works during the installation of the wastewater disposal system, dripper lines and fixings within the proposed disposal area.

[306] All invasive plants must be eradicated prior to installation of the wastewater disposal system within the proposed disposal area.

Pest Management

[307] The Consent Holder must provide a Pest Plant and Pest Animal Management Plan (PPPAMP), written by a SQEP, which applies to the proposed disposal area and EPAN to Council for certification.

[308] The PPPAMP must specify:

(a) existing pest species as listed under the Auckland Regional Pest Management Plan 2019–2029 (RPMP) or subsequent versions, including but not limited to pest plants, possums, rats, mustelids, and ungulates.
(b) methodologies of control including why these methodologies are suitable for the purpose and the environment in which they are being used.
(c) timeframes for control and eradication.
(d) where pest management will be carried out on the site, any chemical control proposed to be used and methodologies associated with this.
(e) details of record keeping and monitoring in terms of herbicides and vertebrate toxic agents used or other methods of control (e.g. shooting, trapping).

Advice Note:

Pest plant control is defined as, that there are no fruiting and / or flowering individuals of pest plant species present within the specified area and any mature pest plant species present are dead. In addition, there shall be no areas where pest plant species are smothering and / or out-competing native vegetation including suppressing the natural regeneration processes.

Pest Animal Control is defined as meeting Council's minimum requirements and national standard

best practice methods for control of these species to an acceptable level.

Mitigation Measures

[309] No imported mulch, bark, woodchip, compost, or similar organic material shall be placed within areas of native vegetation protected by the EPAN. Any natural leaf-litter must be retained wherever possible.

Advice Note:

This requirement is to avoid the introduction of pathogens or weed species and to prevent disturbance of existing indigenous groundcover.

Wastewater volume

[310] Where the Private Wastewater Servicing Pathway is implemented for Stage 1, ~~T~~the volume of treated wastewater discharged to the wastewater disposal field must not exceed 450,000 litres per day.

Discharge quality standards

[311] Where the Private Wastewater Servicing Pathway is implemented for Stage 1, ~~T~~the quality of treated wastewater immediately before it is discharged to the wastewater disposal field must not exceed the standards specified below.

Treated Wastewater Discharge Conditions – For Full Build Out

Parameter	**Units**	**Discharge standard**
5-day Biochemical Oxygen Demand (BOD_5)	g O_2/m^3	< 15
Total suspended solids (TSS)	g/m^3	< 20
Faecal coliforms (FC)	MPN (or CFU)/100ml	< 200
Total ammoniacal nitrogen (NH_4 + NH_3)	g/m^3	< 8
Total nitrogen (TN)	g/m^3	< 15

[311A] While the Private Wastewater Servicing Pathway is operating for Stage 1, the Consent Holder must monitor and report:

a. occupied dwelling unit equivalents or equivalent connected load; and

b. average dry weather flow received by the wastewater treatment plant,

in accordance with the certified WSMP and to a frequency sufficient to identify when the Stage 2 trigger thresholds in Condition [173D] are approaching or have been reached.

Wastewater volume

[312] Where the Private Wastewater Servicing Pathway is implemented for Stage 2 in accordance with Condition [173D], ~~T~~the volume of treated wastewater discharged via the coastal outfall discharge pipe must not exceed 4,000,000 litres per day.

Discharge quality standards

[313] Where the Private Wastewater Servicing Pathway is implemented for Stage 2 in accordance with Condition [173D], ~~T~~the quality of treated wastewater immediately before it is discharged to the coastal outfall pipe must not exceed the standards specified below.

Parameter	**Units**	**Discharge standard**
5-day Biochemical Oxygen Demand (BOD_5)	g O_2/m^3	< 15
Total suspended solids (TSS)	g/m^3	< 20
Faecal coliforms (FC)	MPN (or CFU)/100ml	< 200
Total ammoniacal nitrogen (NH_4 + NH_3)	g/m^3	< 8
Total nitrogen (TN)	g/m^3	< 15

Duration of the consent

[314] This consent will expire on 31 January 2041 unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

Lapse date

[315] Under section 125 of the RMA, this consent lapses five years after the date it is granted unless:

(a) The consent is given effect to; or

(b) The Council extends the period after which the consent lapses.

L. CONDITIONS OF WILDLIFE APPROVAL

Approved activity

Activity

i. Catch alive and liberate protected wildlife for the purpose of salvage, to protect lizards from adverse effects associated with earthworks, excavation and vegetation removal/replanting.

ii. Incidentally kill protected wildlife, as a result of unsuccessful salvage or any activities undertaken in relation to the Beachlands South development, provided all reasonable steps are taken in accordance with this approval to avoid killing wildlife.

Species

i. Copper skink *Oligosoma aeneum*

ii. Forest gecko *Mokopirirakau granulatus*

iii. Elegant gecko *Nautilnus elegans*

Methods

In accordance with the conditions specified in this Authority and the Draft Lizard and Invertebrate Management Plan attached to this application.

Personnel authorised (Project Ecologist)

[1] [Name] – lizards may only be handled by [Name], or under their direct supervision.

Term

[2] 10 years from the date of approval.

Adherence to approved application

[3] The Authorised Activity must be undertaken in accordance with the LBMP required by resource consent condition [84].

Timing

[4] Lizard capture, handling and relocation must only be undertaken between 1 October and 30 April when lizards are most active.

Capture and handling methods

[5] Capture and handling methods must involve only techniques that minimise the risk of infection or injury to the animal and shall follow those described in the Herpetofauna inventory and monitoring toolbox.

Incidental discovery

[6] The Department of Conservation (DOC) Operations Manager for Auckland is to be contacted immediately (auckland@doc.govt.nz) for further advice if wildlife other than copper skink, forest gecko, and/or elegant gecko are located within the footprint of the development or within the release site.

Death of wildlife

[7] If any lizards should die as a result of or in the process of carrying out the Approved Activity of catch alive and liberate for the purpose of salvage, the Approval Holder must:

(a) inform the Auckland DOC Operations Manager (auckland@doc.govt.nz) within 48 hours, chill the body if it can be delivered within 72 hours, or freeze the body if delivery will take longer than 72 hours; and

(b) send the body to Massey University wildlife postmortem service for necropsy OR as otherwise advised by the Auckland DOC Operations Manager, along with details of the animal's history; and

(c) pay for any costs incurred in investigation of the death of any lizard; and

(d) if required by the DOC Auckland Operations Manager, cease the Approved Activity for a period determined by the DOC Operations Manager.

Euthanasia

[8] If any lizards are found injured during exercise of the Approved Activity, the Approval Holder must contact the Project Ecologist for advice on management of the lizard. The Approval Holder is authorised to euthanise injured lizard(s) on recommendation of the Project Ecologist or a veterinarian.

Reporting

[9] Annual reports summarising lizard salvage and relocation activities are to be prepared and submitted to DOC within 30 days from the completion date of the work in each period described in Condition [4]. Specifically, this report is to include:

(a) Results of lizard salvage and relocation work. Should native lizards be found, then the

following also is to be included in the report:

i. Photos of lizard salvage methods utilised;

ii. Photos of lizards captured (including photos of the salvage and relocation areas); and,

iii. A map showing the location of each lizard upon capture and upon release, and

iv. The species and number of any lizards detected, captured, and released, and

v. The results of all surveys and monitoring.

(b) Descriptions of how lizard management activities outlined in the LBMP were followed, including conditions detailed in the Approval and associated resource consent conditions;

(c) An Amphibian and Reptile Distribution Scheme (ARDS) card detailing information relating to captured lizards (also to be provided to herpetofauna@doc.govt.nz); and,

(d) A brief summary regarding the outcomes of the LBMP, including any improvements/changes that should be implemented in future.

Habitat reporting

[10] For the life of this Approval, the Approval Holder must provide annual reports to DOC on the following activities:

(a) Baseline lizard survey at restoration planting area

(b) Photo record of lizard habitat development

(c) Occupancy of plantings by native lizards

(d) Number location and size of eco-stacks (rock and/or woody debris)

(e) Number and location of artificial tree shelters.

Variations

[11] The Approval Holder may apply to the Director-General for variations to this Approval in accordance with clause 7(2) of Schedule 7 of the Fast-track Approvals Act 2024.

Cancellation

[12] The Director-General may revoke this Approval in whole or any part at any time (pursuant to clause 7(4) of Schedule 7 of the Fast-track Approvals Act 2024) if:

(a) The Approval Holder breaches any of the conditions of this Approval.

(b) In the Director-General's opinion, the exercise of this Approval has caused, or is likely to cause, any unforeseen adverse effects on lizards.

If the Director-General intends to revoke this Approval in whole or in part, the Director-General will give the Approval Holder such prior notice as the Director-General considers reasonable and necessary in the circumstances.

Costs

[13] The Approval Holder must pay the Department of Conservation's standard charge-out rates for any staff time and mileage required to monitor compliance with this Approval and to investigate any alleged breaches of the terms and conditions of it.

Liabilities

[14] The approved earthworks and vegetation works contractor agrees to exercise the Approval at its own risk and releases, to the full extent permitted by law, the Director-General and the Director-General's employees and agents from all claims and demands of any kind and from all liability which may arise in respect of any accident, damage, or injury occurring to any person or property arising from the exercise of the Approval.

Compliance with the Director-General's Notices and Directions

[15] The Approval Holder must comply with all statutes, bylaws, and regulations, and all notices, directions, and requisitions of the Director-General of Conservation and any competent authority relating to the exercise of the Approval.

M. CONDITIONS OF HERITAGE NEW ZEALAND POUHERE TAONGA ACT AUTHORISATION

Authority Number:

Determination Date: **Expiry Date:**

Authority Holder: Beachlands South Limited Partnership

Postal Address: 12 Tapora Street, Quay Park, Auckland 1010

Archaeological Sites: List recorded sites and potential subsurface archaeological sites

Location: Legal Description of all parcels

Section 45 Approved Person:

Landowner Consent: To be provided/ Landowner consent has been provided to Heritage New Zealand Pouhere Taonga to satisfy clause 6(1) of Schedule 8 Fast-track Approvals Act 2024**.**

Determination

The FTAA Expert Consenting Panel grants/declines an archaeological authority pursuant to section 81 of the Fast Track Approvals Act 2024 and section 48 of the Heritage New Zealand Pouhere Taonga Act 2014 in respect of the archaeological sites described above, within the areas specified in the location above, to [authority holder] for [description of proposal/works] (archaeological works), subject to the following conditions:

CONDITIONS OF AUTHORITY

No.	Condition
Before Works	
1	**Start Work Notification** The Authority Holder must advise Heritage New Zealand Pouhere Taonga (HNZPT) and [Ngāi Tai ki Tāmaki] of the date when archaeological works will begin at least two Working Days before archaeological works start.

2	**Archaeological Management Plan** The authority must be exercised in accordance with the Archaeological Management Plan (AMP). The purpose of the AMP is to outline procedures for day-to-day activities that may affect archaeological sites, including provisions for: (a) Methods to protect sites from damage; (b) procedures for any archaeological investigation or recording of archaeological information; (c) the role, responsibility and level of authority of the s45 approved person and any other person appointed to undertake archaeological work on their behalf. Names and contact details of all other persons whom the s45 approved person appoints must be stated in the management plan; (d) timeframes for archaeological work; (e) protocols for the unexpected discovery of archaeological material; (f) on-site briefing by the s45 approved person (who may appoint a person to carry out the briefing on their behalf) for contractors about the archaeological work required and how to identify archaeological sites during works. The management plan must state who will be carrying out the briefings; (g) the responsibilities of contractors with regard to notification of archaeological sites; (h) requirements for stand down periods to enable archaeological work; (i) mechanisms for dispute resolution; (j) emergency contact details for the s45 approved person, Heritage New Zealand Pouhere Taonga, and Iwi. The AMP must be submitted to HNZPT for approval prior to the commencement of any earthworks. No earthworks shall commence until HNZPT has given its written approval of the AMP.

	The Authority Holder may update the AMP by submitting the amended AMP in writing to HNZPT for its written approval. **OR if AMP is approved prior to grant** All works must be undertaken in accordance with the Archaeological Management Plan prepared by [name] titled "*Title*" dated [date prepared] (AMP). The Authority Holder may update the AMP by submitting the amended AMP in writing to HNZPT for its written approval.
	Archaeological Research and Mitigation Strategy The Authority Holder shall prepare an Archaeological Research and Mitigation Strategy (Strategy). The Strategy shall include: (a) the research objectives that archaeological investigations should address and the methodologies to be followed to achieve those objectives. The research objectives shall be informed by regional and national research themes. (b) Provision for review and feedback by [tangata whenua] prior to submission to HNZPT, including for any potential amendments after approval At least 20 Working Days before starting Project Works, the Strategy shall be submitted to HNZPT for written approval. The approved Strategy shall be implemented and complied with for the duration of the Authority. The Authority Holder may update the Strategy by submitting the amended Strategy in writing to HNZPT for written approval. **OR if Strategy is approved prior to grant** All works must be undertaken in accordance with the Archaeological Research and Mitigation Strategy prepared by [name] titled "*Title*" dated [date prepared] (Strategy).

	The Authority Holder may update the Strategy by submitting the amended Strategy in writing to HNZPT for its written approval.
4	**Landowner Consent** The Authority Holder must provide HNZPT with the written consent of all landowners of the land subject to this Authority prior to any archaeological works commencing.
5	**Site Briefing** The Authority Holder must ensure that all contractors working on the project are briefed on site by the section 45 approved person (who may appoint a person to carry out the briefing on their behalf) prior to any archaeological works commencing. The briefing must include the possibility of encountering archaeological evidence, how to identify possible archaeological sites, the archaeological work required by the conditions of this authority, and contractors' responsibilities with regard to discovering archaeological evidence.
During Works	
6	**Tikanga** Archaeological work must be undertaken in conformity with any tikanga Māori protocols agreed between the Authority Holder and [tangata whenua]
7	**Kōiwi Discovery** If any kōiwi (human remains) are encountered, all works must cease within 20 metres of the discovery. HNZPT, New Zealand Police, and [tangata whenua] must be advised immediately. Any steps following must be undertaken in accordance with Guidelines for Kōiwi Tangata/Human Remains (AGS8 2014) and no further work in the area may take place until future actions have been agreed by all parties.

8	**Monitoring** Any earthworks that may affect an archaeological site must be monitored by the section 45 approved person, who may appoint a person to carry out the monitoring on their behalf in accordance with accepted archaeological practice, the AMP, and the Strategy.
9	**Investigation** Any archaeological evidence encountered during the exercise of this Authority must be investigated, recorded and analysed in accordance with accepted archaeological practice. An archaeological investigation must be carried out in accordance with the Strategy prior to earthworks commencing. The aims of the investigation shall be to investigate, research and analyse archaeological evidence in accordance with accepted archaeological practice to gather information about the historical and cultural heritage of New Zealand. Prior to any earthworks, an archaeological investigation must be undertaken, in accordance with section 52(2) of the Act, based on the Strategy. The aims of the investigation shall be to investigate, research and analyse archaeological stratigraphy, features and remains in accordance with accepted archaeological practice to gather information about the historical and cultural heritage of New Zealand. The building must be investigated, recorded and analysed prior to demolition to document and recover information about construction, alteration and use through time. This is to be undertaken to a minimum standard of Level I/II/III recording as defined in Guidelines for the Investigation and Recording of Buildings and Standing Structures (AGS1 2018).
10	**Protection of Sites** The authority holder shall take the following measures to ensure that sites are protected:

	(a) Sites shall be clearly marked by the s45 approved person who may appoint a person to carry out this activity on their behalf prior to works commencing; (b) No vehicles or machinery shall traverse or be parked on sites. (c) Sites shall be covered with clean fill to a minimum depth of X and not disturbed during works; (d) No excavations shall take place within Y metres of [specify sites /areas].
11	**Annual Reporting – if authority duration is longer than 5 years** Annually from the date of issue of this authority, the Authority Holder must submit to Heritage New Zealand Pouhere Taonga a written report containing a summary of the progress of the activity and any archaeological findings.
After Works	
12	**Work Completion Notification** The Authority Holder shall advise HNZPT and [tangata whenua] of the completion of archaeological works within five Working Days of completion.
13	**Completion of Archaeological Siteworks** Within 20 Working Days of the completion of on-site archaeological work associated with this authority, the Authority Holder shall ensure that: (a) An interim report, to the satisfaction of HNZPT, following the Archaeological Report Guideline (AGS12 2023) is submitted to HNZPT for inclusion in the HNZPT Archaeological Reports Digital Library. (b) Site records are updated or submitted to the NZAA Site Recording Scheme.
14	**Archaeological Records** Within 12 months of the completion of the on-site archaeological work, the Authority Holder shall ensure that a final report, completed following the

	Archaeological Report Guideline (AGS12 2023), is emailed to HNZPT for inclusion in HNZPT's Archaeological Reports Digital Library, and to [tangata whenua]. A copy must also be provided to the NZAA Central Filekeeper.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure S:

Growth Infrastructure Funding and Finance

Brigid Duffield

10 September 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Growth Infrastructure Funding and Finance

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Brigid Duffield
Qualifications & Relevant Experience:	I am employed as Chief Advisor Growth Infrastructure Funding and Finance within the Policy, Planning & Governance directorate at Council. I have been working in this role for 5+ years. I support Council group with expertise in funding and financing aspects for the alignment of significant infrastructure programmes. This is achieved through working with Crown and Crown entities, and other significant stakeholder groups to align strategic infrastructure investment for growth in the Auckland region. Prior to my current position, I have held senior global commercial and consulting roles including Commercial Manager for Tāmaki Regeneration focusing on development and its financing and funding (2015 to 2019). I have a Masters in Land Economy from Cambridge University (1991) and have held executive roles focusing on the commercial implications of choices and decisions (1999 to 2004). I have been a Strategic Consultant and Director at PwC (and independently) and have worked with many businesses to achieve successful commercial planning (1994 to 1999, 2004 to 2015). These roles have been predominantly private sector based but have more recently moved into the public sector in both local and central government.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:	*Brigid Duffield*
Date:	10 Sept 2026

3.0 Executive Summary / Principal Issues

Beachlands South proposes a significant urban development comprising approximately 2,000 dwellings together with commercial, employment, educational, open space and supporting infrastructure. The proposal includes substantial transport, water, wastewater, stormwater and utility infrastructure required to support the future community

The proposal should demonstrate that supporting infrastructure can be funded, financed, delivered, operated, maintained and renewed over the long term, and that it will support a well-functioning urban environment for future residents.

The application relies on a combination of developer-delivered infrastructure, private servicing arrangements and wider network improvements. Further information is required regarding infrastructure funding responsibilities, ownership arrangements, long-term operational obligations, reliance on future public investment and residual risks.

Particular consideration should be given to the proposed private water and wastewater servicing model, including whether the current legislative and regulatory framework provides sufficient oversight, governance, customer protection, service continuity and long-term stewardship arrangements for infrastructure of this scale.

This memorandum focuses on infrastructure funding, servicing and long-term stewardship matters. It does not seek to weigh the broader strategic, economic, recreational or other considerations that may also be relevant to decision-making on the proposal.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Fast Track Approval Application documents

5.0	Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

N/A

6.0	Specialist Assessment

1. Beachlands South proposes a significant urban development comprising approximately 2,000 dwellings together with commercial, employment, educational, open space and supporting infrastructure. The proposal includes substantial transport, water, wastewater, stormwater and utility infrastructure required to support the future community.
2. The proposal should demonstrate that the infrastructure required to support this growth can be funded, financed, delivered, operated, maintained and renewed over the long term. Assessment should consider whether the proposed infrastructure arrangements will support a well-functioning urban environment, including reliable access to essential services and supporting infrastructure for future residents, businesses and visitors, while clearly identifying and appropriately allocating any financial exposure or long-term obligations that may arise for Auckland Council, Auckland Transport, Watercare, future ratepayers and the wider community.
3. The application relies on a combination of developer-delivered infrastructure, private servicing arrangements and wider network improvements. Further information is required regarding infrastructure funding responsibilities, reliance on future public investment, ownership arrangements, operational responsibilities, long-term renewal obligations, and the extent to which future costs, liabilities or infrastructure risks may ultimately fall to the public sector or future residents.
4. Particular attention should be given to the proposed private water and wastewater servicing model. A full understanding of the legislative and regulatory position applying to private water and wastewater services is recommended, noting that much of New Zealand's framework has evolved around publicly owned network utilities. Assessment should consider whether the current framework provides adequate oversight, governance, customer protection, service continuity and long-term stewardship arrangements for infrastructure of this scale. Any shortcomings may create residual risks for future residents, property owners, environmental and public health outcomes and, in some circumstances, Auckland Council and future ratepayers. Consideration should also be given to whether effective mechanisms exist to intervene and resolve issues should service, governance or financial failures occur, or whether there are circumstances where risks may exist without a clear pathway for remediation.
5. Assessment should also consider whether identified risks can realistically be managed through consent conditions. Ongoing requirements for monitoring, reporting or compliance certification do not necessarily address underlying issues relating to governance, ownership, financial sustainability, service continuity or future asset performance. Where the effectiveness of a servicing model relies on long-term oversight or intervention, consideration should be given to whether a clear legislative pathway, responsible agency, funding mechanism and practical ability exist to identify and resolve problems if they arise. Particular caution should be exercised where the proposed mitigation approach relies on ongoing monitoring by Auckland Council or other

public agencies where the powers, responsibilities or practical ability to remedy issues may be uncertain.

6. The application should demonstrate that supporting infrastructure can be funded, delivered and sustained over the long term, that future residents will be supported by a well-functioning urban environment, and that the proposal will not create inappropriate financial exposure, unfunded obligations or pressure to accelerate infrastructure investment by Auckland Council, Auckland Transport or Watercare. Based on the information currently available, further information is required to fully understand these matters and the residual risks associated with the proposal.
7. Assessment should also consider the extent to which the proposal relies on future infrastructure, services or investment that are outside the Applicant's control. This includes transport infrastructure, public transport services, community facilities, parks, open space, utility infrastructure and other public services that may be assumed to support the development over time. The proposal should demonstrate that it remains viable and capable of supporting a well-functioning urban environment if these investments, services or facilities are delayed, reprioritised or do not eventuate. The assessment should not assume that future public infrastructure, public funding, public ownership or public sector intervention will occur unless there is a clear and committed pathway for delivery.
8. The matters raised above are consistent with issues currently being considered by Auckland Council through its work programme on responding to unanticipated development, including infrastructure sequencing, funding responsibilities, ownership models, servicing arrangements, infrastructure affordability and residual public sector risk. These matters should be adequately understood and assessed as part of the Panel's consideration of the proposal. See 8 September Policy, Planning and Development Committee Report and Minutes on Responding to Unanticipated Development.

7.0 Section 67 Information Gap			
Information gap	**Nature of deficiency**	**Decision-making impact**	**Risk / uncertainty created**
Infrastructure funding and delivery responsibilities	Insufficient information regarding who will fund, finance, deliver, operate, maintain and renew all infrastructure required to support the development over its full lifecycle.	Limits the ability to assess whether infrastructure can be sustainably provided and maintained over time.	Uncertainty as to whether essential infrastructure will remain available, functional and adequately funded throughout the life of the development, potentially affecting the ability of future residents to access reliable services.

Infrastructure dependencies and sequencing	Insufficient clarity regarding the timing, funding status and delivery responsibility for wider transport and infrastructure dependencies relied upon by the development.	Limits assessment of whether development can occur in a coordinated manner and whether infrastructure will be available when required.	Risk that development occurs ahead of infrastructure capacity, resulting in reduced levels of service, poorer resident outcomes and an urban environment that does not function as intended.
Long-term ownership and governance arrangements	Limited information on ownership, governance and accountability arrangements for infrastructure intended to remain in private ownership.	Reduces confidence that infrastructure will be appropriately managed over the long term.	Uncertainty regarding whether infrastructure will continue to be effectively governed, maintained and renewed throughout its lifecycle, particularly as ownership and governance arrangements evolve over time.
Private water and wastewater servicing model	Insufficient information regarding the proposed ownership, governance, operational and financial arrangements for private water and wastewater services.	Limits assessment of whether the servicing model is appropriate and sustainable for a development of this scale.	Uncertainty regarding the long-term ability of the proposed servicing model to deliver safe, reliable and resilient water and wastewater services for present and future residents.
Legislative and regulatory framework for private water and wastewater	Limited assessment of whether existing legislative and regulatory settings provide adequate oversight, governance, customer protection, service continuity and long-term stewardship arrangements.	Limits understanding of how risks associated with the proposed servicing model will be managed over time.	Uncertainty regarding whether adequate oversight and intervention mechanisms exist to ensure essential services continue to operate effectively throughout the life of the development.

Service continuity, failure management and intervention pathways	Insufficient information regarding how operational, governance or financial failures would be managed and who would be responsible for intervention and remediation.	Limits the ability to assess resilience of the proposed servicing model and consequences of failure scenarios.	Risk that water or wastewater services could deteriorate or fail without a clear or practical pathway to restore service levels, potentially resulting in adverse public health, environmental and community outcomes.
Long-term maintenance, renewal and asset replacement funding	Insufficient information regarding funding mechanisms for ongoing maintenance, renewals and eventual replacement of infrastructure assets.	Limits understanding of the long-term sustainability of the infrastructure model.	Uncertainty regarding whether infrastructure will be appropriately maintained and renewed over time, creating a risk of declining service performance, asset failure and reduced resilience.
Residual public sector and community exposure	Limited assessment of the extent to which future risks, liabilities or obligations may ultimately fall to residents, property owners, infrastructure providers, Auckland Council, Watercare, Auckland Transport or future ratepayers.	Limits the ability to understand the full consequences and risk allocation associated with the proposal.	Uncertainty regarding who bears responsibility if the servicing model becomes unsustainable or fails to perform as intended, and whether sufficient mechanisms exist to protect essential services and community outcomes over the long term
Adequacy of the legislative and regulatory framework for long-term oversight and remediation	The application does not demonstrate that the current legislative and regulatory framework provides sufficient oversight, monitoring, enforcement and intervention mechanisms for privately operated water and wastewater infrastructure serving a community of this scale.	Limits confidence that identified risks can be appropriately managed through conditions or ongoing oversight arrangements.	Risk that governance, operational, financial or service failures arise without a clear, effective or timely pathway for intervention and remediation, potentially affecting continuity of essential services and resulting in adverse public health, environmental and community outcomes.

Reliance on future public infrastructure, services and investment	Limited information regarding the extent to which the development relies on future transport infrastructure, public transport services, parks, community facilities, utility infrastructure or other public investment and services that are not currently committed.	Limits the ability to assess whether the proposal can provide a well-functioning urban environment independently of future public investment decisions.	Risk that anticipated infrastructure, services or facilities do not eventuate, resulting in reduced levels of service, poorer resident outcomes and a development that does not function as intended over the long term.

8.0 Recommendation

1. Further information should be provided regarding infrastructure funding, financing, delivery, ownership and long-term operational responsibilities.
2. The applicant should demonstrate that infrastructure can be delivered and sustained in a manner that supports a well-functioning urban environment for future residents.
3. Further assessment should be undertaken of the proposed private water and wastewater servicing model, including governance arrangements, customer protections, service continuity, long-term stewardship and the adequacy of the legislative and regulatory framework.
4. The applicant should demonstrate that effective mechanisms exist to identify, manage and resolve service, governance, operational or financial failures should they occur.
5. The proposal should demonstrate that it will not create inappropriate financial exposure, unfunded obligations or pressure to accelerate infrastructure investment by Auckland Council, Auckland Transport or Watercare.
6. The Applicant should identify all assumptions regarding future public infrastructure, public services, public funding and public investment that underpin the proposal and demonstrate that the development can continue to function appropriately if those assumptions do not eventuate.

9.0 Proposed Conditions

1. **Infrastructure Funding and Delivery:**
   Require the Applicant to demonstrate, prior to each stage of development, that infrastructure necessary to service that stage, including cumulative infrastructure demands arising from previous stages of development, is funded, available and capable of supporting the proposed level of development.

2. **Infrastructure Dependencies and Staging:**
   Require development to be staged so that occupation and development are aligned with the delivery and availability of supporting transport, water, wastewater, stormwater and other necessary infrastructure.
3. **Reliance on Future Public Infrastructure and Services**
   Require the Applicant to identify all assumptions regarding future public infrastructure, public transport services, parks, community facilities, utility infrastructure, public funding, public ownership, network integration or public sector intervention that underpin the proposed development. Where development outcomes rely on such assumptions, the Applicant should demonstrate that appropriate levels of service and functionality can still be achieved if those assumptions are delayed, reprioritised or do not eventuate.
4. **Private Water and Wastewater Servicing:**
   Require the Applicant to demonstrate that proposed private water and wastewater infrastructure has appropriate ownership, governance, operational, maintenance, renewal and funding arrangements in place for the life of the development.
5. **Service Continuity and Failure Management:**
   Require documented arrangements identifying how service interruptions, infrastructure failures, governance failures, financial distress or operator failures will be managed, including responsibilities for corrective actions and continuity of essential services.
6. **Long-Term Stewardship and Asset Management:**
   Require demonstration that privately owned infrastructure assets will be appropriately maintained, renewed and replaced over time, and that adequate governance and funding mechanisms exist to support these activities throughout the life of the assets.
7. **Ownership and Responsibility:**
   Require clear identification of ownership, operational, governance and funding responsibilities for all major infrastructure assets, including any assets intended to remain in private ownership.
8. **Resident Disclosure:**
   Require future residents and property owners to be informed of any privately owned or operated infrastructure, including ownership arrangements, service obligations, charging mechanisms and any ongoing responsibilities attached to those services.
9. **Review of Servicing Arrangements:**
   Require review of servicing arrangements where there are material changes to infrastructure ownership, governance, operation, funding arrangements or servicing assumptions.
10. **Monitoring, Oversight and Remediation Framework:**
    Require the Applicant to demonstrate that effective mechanisms exist to monitor, oversee and, where necessary, remedy issues associated with privately owned water and wastewater infrastructure. This should include clear identification of:

    a. monitoring and reporting requirements;
    b. organisations responsible for oversight;
    c. statutory powers available to those organisations;
    d. mechanisms available to address non-compliance, governance failure, operational failure or financial distress;

e. responsibility for funding corrective actions; and

f. practical pathways for remediation should material service issues arise.

The arrangements should demonstrate not only that issues can be identified through monitoring and reporting, but that there are effective mechanisms, powers and responsibilities in place to address those issues should they occur.

Note

Conditions may assist in managing some infrastructure risks. However, conditions alone may not adequately address risks associated with the long-term governance, financial sustainability, service continuity and stewardship of privately owned essential infrastructure. Particular consideration should be given to whether effective oversight, intervention and remediation mechanisms exist within the current legislative and regulatory framework, and whether residual risks may remain with future residents, property owners, public health and environmental outcomes, infrastructure providers, Auckland Council or future ratepayers. These matters should be adequately understood and assessed as part of the Panel's consideration of the proposal.

10.0 Supporting Documents

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure T:

Air Quality

Marie Meredith

07 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962 (DIS60467969)

2.0 Technical Specialist Memo – Air Quality

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Marie Meredith
Qualifications & Relevant Experience:	I hold the qualifications of Bachelor of Environmental Science, Master of Science in Environmental Science, and have ten years' experience working in environmental science including four and a half in air quality and contaminated land. I am a full member of the Australasian Land and Groundwater Association. I have prepared technical assessments for resource consent applications, notices of requirement for designation and fast-track applications.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	7 October 2026

3.0 Executive Summary / Principal Issues

This memo reviews air discharge matters associated with the proposed wastewater treatment plant (WWTP) and concludes that discharges to air are able to be sufficiently managed provided the protocols of an approved AQMP; and draft and recommended conditions are adhered to.

The following sections summarise the wastewater treatment strategy, primary odour-generating sources; and proposed mitigation and management measures. Conclusions and recommendations in relation to Chapter E14 Air Quality of the Auckland Unitary Plan (AUP) are provided, including a recommendation for an additional condition of consent requiring odour surveys.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- *Beachlands South – Fast-track Approval Substantive Application, Assessment of Environmental Effects and Statutory Analysis* (AEE), by UNIO, 26-Jun-2026.
- *110 Jack Lachland Drive & 620, 712, 758 and 770 Whitford-Maraetai Road, Beachlands – Technical assessment of discharges to air from proposed wastewater treatment plant* (Air Quality Assessment – AQA) by Air Matters Ltd, 17-Jul-2026.
- *Beachlands South Fast Track – Wastewater Concept Design and Assessment* (WW assessment) by GWE, Jun-2026 v2.
- *Draft Proposed Conditions – Beachlands South Fast Track Application*, 26-Jun-2026.
- *Beachlands South – Rules Assessment,* UNIO, 26-Jun-2026.
- *Beachlands South – s67 Request for further information*, Air Matters Ltd, 10-Sept-2026.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

There are no additional reasons for consent for air quality not included in the AEE.

6.0 Specialist Assessment

The AEE and AQA identify that the proposed treatment of municipal wastewater is a **Discretionary Activity** in all air quality areas under **Rule E14.4.1(A163),** and that the use of emergency generators for the purpose of generating electricity during mains power unavailability is a **Permitted Activity** under **Rule E14.4.1(A48)**.

The applicant assesses the environmental effects of the proposal in Section 8 of the AEE and Section 7 of the AQA. The assessment identifies odour emissions, particularly during abnormal or unplanned operating conditions, as the primary air quality effect associated with the proposed WWTP activity.

Wastewater assessment

Although primarily a wastewater assessment, the report provides relevant information on potential odour emissions from the proposed WWTP.

The wastewater servicing strategy incorporates a centralised WWTP using Combined Works (CW) technology, which consolidates wastewater treatment within a fully enclosed structure. Potential odour emissions may arise from raw wastewater handling, inlet screening, grit removal, sludge stabilisation, sludge storage, and sludge dewatering activities. Conventional high-odour processes such as open aeration ponds, oxidation ponds and sludge drying beds are not proposed. Treatment occurs within enclosed reactors and treatment buildings. The assessment concludes that odour is not anticipated under normal operating conditions.

The WWTP is proposed to serve the Beachlands South development including approximately 2,000 residential dwellings, two schools, commercial and employment-generating land-uses, hotel and community facilities. The plant will be developed in two stages. Stage 1 will be with a single CW treatment train/module, and a capacity of 450 m^3 per day average dry weather flow (ADWF) to service approximately 400 – 500 dwellings, schools and commercial development. Stage 2 will be an expansion to ultimate treatment capacity of approximately 1,368 – 1,383 m^3 per day ADWF through installation of additional treatment modules, and long-term marine outfall discharge.

The wastewater strategy incorporates several controls to minimise odour emissions:

- Fully enclosed CW treatment process, fine-bubble aeration to maintain aerobic conditions, extended sludge age and endogenous respiration to reduce sludge production and odour potential;
- 24-hour emergency storage at pump stations, 100,000 L emergency/balancing storage tank, SCADA monitoring, alarms and telemetry, backup generator to maintain critical treatment and ventilation systems during power outages;
- Routine operation and maintenance by specialist operators;
- Air extraction and odour treatment systems to be incorporated during detailed design; and
- Monitoring, adaptive management and contingency procedures for process upset conditions.

Even though the wastewater design concept is yet to be finalised, the report concludes that subject to implementation of the above measures, adverse effects associated with air emissions are expected to be no more than minor.

The Air Quality Assessment

The AQA identifies odour as the primary air contaminant associated with the proposed WWTP. Odour generation may occur when wastewater becomes septic or anaerobic, producing compounds such as hydrogen sulphide. Dust associated with WWTP construction is acknowledged but assessed separately under the wider project earthworks assessment. The AQA focuses on operational odour effects, noting negligible emissions of PM_{10}, SO_2, VOCs, CO and NOx apart from minor emissions from emergency generators.

Key odour-generating sources identified are:

- Inlet screening, grit removal, biological treatment zones, biofilter treatment areas, sludge stabilisation processes, sludge storage and transfer, screenings handling and disposal and emergency storage during upset conditions.

The AQA is based on the same WWTP design capacity as the wastewater (WW) assessment:

- Stage 1: 450 m^3 per day treatment module.
- Stage 2: expansion to approximately 1,383 m^3 per day.
- Servicing approximately 2,000 dwellings, plus schools, hotel and community facilities.

It is noted that mitigation and management controls are yet to be finalised and will be finalised based on the final WW design. Mitigation and management controls are to include:

- Enclosed treatment design – all major wastewater treatment processes are enclosed with CW structures; no open aeration ponds or sludge drying beds are proposed.
- Ventilation and Odour Capture – extraction of air from enclosed odour-generating areas, treatment of extracted air prior to discharge, potential treatment technologies include ozone treatment, activated carbon filtration and equivalent BPO odour-control systems.
- Process controls – maintenance of aerobic conditions, fine-bubble oxygen diffusion, continuous process monitoring, redundancy of critical equipment and robust maintenance programmes.
- Emergency Controls – 24-hour storage at pump stations, 100,000 L emergency storage tank, recommended back-up generators to maintain ventilation and treatment systems.
- Air Quality Management Plan (AQMP) – recommended AQMP to include odour monitoring, complaints management, maintenance programmes, contingency procedures, emergency response procedures, odour control equipment control parameters, and staff responsibilities.

The AQA concludes:

- The enclosed WWTP design represents the Best Practicable Option (BPO).
- Offensive or objectionable odour beyond the site boundary is not expected under normal operations, potential effects are expected to be less than minor provided the proposed mitigation measures are implemented and maintained.
- The closest future sensitive receptors may be within 85-200 m of the WWTP, making effective odour management critical.

Additional information Request

Further information provided by the applicant under section 67 included:

- Confirmation the FIDOL assessment and separation distance assessment were undertaken assuming full capacity operation at 1,283 m^3 per day (i.e. inclusive of Stage 2).
- Confirmation that backup generators are proposed specifically to maintain odour control systems.

- Additional detail regarding emergency storage provisions and confirmation that an Emergency Response Plan will be prepared.
- Proposed odour survey conditions.

Conclusion

The AEE concludes that the WWTP is not anticipated to generate significant adverse air discharge or odour effects, with appropriate mitigation and operational measures proposed to avoid impacts on the surrounding community. Air quality effects are considered acceptable. It is noted that there are no comparable plants (modular design) operating in New Zealand, thus this is a novel concept.

I generally agree with the applicant's conclusion that the proposed WWTP is unlikely to result in significant adverse air quality or odour effects. The s67 additional information confirms that the assessment has been undertaken for the ultimate design capacity of the WWTP, backup generators are proposed to maintain critical odour control systems, emergency storage capacity is incorporated to manage abnormal operating conditions, and post-commissioning odour surveys are proposed to verify performance. These measures provide additional confidence that odour effects can be effectively managed.

Notwithstanding the above, the assessment remains based on a concept-level design and does not include quantitative odour dispersion modelling or detailed odour control system design information. Accordingly, my conclusion that adverse effects are likely to be no more than minor is contingent upon implementation of the proposed odour control measures, preparation and certification of an AQMP and Emergency Response Plan, and compliance with conditions of consent requiring post-commissioning odour surveys and ongoing management of odour emissions. On balance, I consider the actual and potential air quality effects to be no more than minor.

7.0 Section 67 Information Gap

I consider the applicant’s response to the section 67 request for further information is satisfactory and there are no section 67 information gaps.

8.0 Recommendation

Overall, I consider that air discharges from the proposed wastewater treatment plant are able to be sufficiently managed if the protocols of an approved AQMP; and draft and recommended conditions are adhered to.

9.0 Proposed Conditions

I have reviewed the proposed draft conditions provided by the applicant and consider that they are similar to our standard conditions.

In section 8 of the AQA, it is recommended that "*consent conditions incorporate routine odour surveys for an initial period following commissioning to provide confirmation that the employed controls are effective. These surveys should be repeated before and after any future Stage 2 expansion and should be undertaken during periods of low winds or calm conditions, particularly during spring and summer months"*. This has not been incorporated into the applicant's draft conditions.

I consider the addition of such a condition of consent is important given that several residential dwellings are proposed to be situated within the 200 m screening distance (and the closest one is to be approximately 85 m away). In response to the request for further information, the applicant has proposed the below condition of consent relating to odour surveys:

Field Odour Surveys

a) The consent holder must engage a Suitably Qualified and Experienced Person (SQEP) to undertake a field odour survey within 6 months of the commissioning of the operation and within 6 months of the Stage 2 becoming operative. The purpose is to establish the extent of odour effects beyond the site boundary (including the potential for chronic and acute effects).
b) The odour survey must be conducted in general accordance with guidance set out in the Ministry for the Environment Good Practice Guide for Assessing and Managing Odour.
c) The SQEP must prepare a report for the consent holder detailing their findings and recommendations. The consent holder must submit the SQEP's report to the Auckland Council within 1 month of receipt and not later than three months following completion of the survey.

Advice Note: The intent of this condition is for field odour surveys to take place in adjacent properties as well as public land, where approval for access can be sought from landowners and/or occupiers.

I recommend that the conditions of consent be amended to include the applicant's proposed condition of consent above.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure U:

Terrestrial Ecology

Luke Stanley

09 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Terrestrial Ecology

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	C. Luke Stanley, Ecologist, Ecological Advice
Qualifications & Relevant Experience:	I hold the qualification(s) of: Master of Science (First Class Honours), and have two and a half years of experience in ecological assessment, with a previous five years involved in environmental and ecological monitoring. I am a full member of the Environment Institute of Australia and New Zealand. I have prepared expert evidence and technical assessments for resource consent applications, notices of requirement for designation and fast-track applications.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	09/10/2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- *Beachlands South Fast-track Approval Substantive Application - Assessment of Environmental Effects and Statutory Analysis.* Prepared for Beachlands South Limited Partnership. 26 June 2026. Prepared by Unio Environmental Limited (AEE).
- *Beachlands South Fast Track - Ecological Impact Assessment.* Prepared for Beachlands South Limited Partnership. Prepared by Viridis Limited. September 2026. {EcIA}.
- *Beachlands South Fast Track - Biodiversity Management Plan.* Prepared by Viridis Limited. 23 June 2026. [BMP]
- *Beachlands South – Rules Assessment.* Prepared by Unio Environmental Limited, dated 26 June 2026.
- *Beachlands South Fast Track - Fauna Management Plan.* Prepared by Viridis Limited. 12 August 2026. [FMP]

4.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

My assessment does not identify additional reasons for consent not included in the AEE.

5.0 Specialist Assessment

5.1. Site description, Existing Environment and Proposal Description

The site, existing environment and proposal are adequately described in the EcIA. I undertook a site visit with Auckland Council staff and applicant specialists including the applicant ecologist on 30/07/2026 to assess the terrestrial ecological effects. A follow up meetings was undertaken to address any areas of concern.

5.2. Vegetation Removal and Management

Vegetation proposed for removal includes 1.23 ha of permanent vegetation removal and 0.76 ha of temporary vegetation removal in the Ecological Protected Area Network (EPAN). The 0.76 ha will be replanted, along with an additional 2.60 ha of additional restoration planting adjoining the existing EPAN network. The proposed remediation and mitigation planting will result in an increased total area of vegetation within the EPAN network while allowing emplacement of stormwater ponds as required for the project, and is considered appropriate management.

A slip has occurred in the EPAN, and is proposed to be remediated with reinstatement planting in line with the BMP and is considered appropriate management, resulting in revegetation that area of the site.

Stream and wetland reclamation is proposed, affecting vegetation within the stream margin and wetland buffer areas. I understand this to be addressed through compensation by restoring a wetland habitat onsite and within the wider Waikōpua Creek catchment. I defer to the Freshwater Specialist, Antoinette Bootsma to assess the appropriateness of the compensation package, but provide commentary below regarding fauna management for the vegetation removal, and appropriateness of the proposed planting and management of the wetland

5.3. Fauna Management

Fauna management is discussed in the EcIA (section 7) including potential effects on birds, lizards and bats. A Fauna Management Plan (FMP) has been provided (Appendix K of the EcIA). I consider the FMP to provide standard and appropriate management of potential fauna effects resulting from vegetation removal in keeping with similar vegetation removal activities in Auckland and recommend it be followed.

5.4. Biodiversity Management

The BMP provides for biodiversity restoration, enhancement, maintenance and monitoring within the EPAN and other ecological management areas, including restoration, weed control, planting, maintenance, monitoring and adaptive management for the wetland restoration work. The BMP provides detailed methodology and I consider it to be appropriate, providing sufficient information including plant species, spacings, area, pest control, protection, monitoring and reporting requirements. I recommend it be followed.

5.5. Precinct Plan Requirements

The application considers the requirements of Precinct Plan I458 Beachlands South. The plans provided in the application did not show in sufficient detail the location of walkways and cycleways within the riparian margin. These may not have been planned in detail yet. I458.6.5 requires a minimum 10m width of planting either side of streams, and that walkways and cycleways must not be located within the riparian planting. I recommend that proposed conditions (condition 78) permitting vegetation removal within the EPAN be amended to exclude any planted vegetation within 10m of a stream

I support the application overall, with a minor recommendation for correction to one condition.

6.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps.

7.0 Recommendation

My assessment of terrestrial ecological matters concludes that the permanent vegetation removal of 1.23 ha and temporary loss 0.76 ha within the EPAN is adequately addressed through remediation and mitigation of the 0.76 ha and an additional 2.6 ha of adjacent planting. Fauna management for vegetation removal in this and other sensitive areas is appropriately covered under the FMP. The BMP sets out the proposed planting species, planting densities, planting zones, site preparation requirements, weed and pest management measures, protection and a five-year monitoring programme for the EPAN, riparian margins wetlands.

Based on the information available, I support the application.

8.0 Proposed Conditions

Table 1 below contains the Ecology Condition 78 proposed by the applicant that I consider should be amended. I have indicated proposed changes and have followed the numbering of Draft Conditions as presented in *Beachlands South Fast Track Application - Draft Resource Consent Conditions,* dated 26 June, 2026.

Condition	Proposed Conditions	Comment or suggestion
78	**Vegetation alteration or removal within the Ecological Protected Area Network (excluding high value terrestrial and wetland vegetation) to form pedestrian and cycle paths shall be permitted. Except within 10m of any stream.**	I recommend the inclusion of proposed wording so that it is in keeping with Precinct Plan rule I458.6.5(2) and (3) below: (2) The riparian yard setback required in Standard I458.6.5(1) above must be planted either side to a minimum width of 10m. This riparian planting must be native species and protected and maintained in perpetuity by an appropriate legal mechanism or vested in Council. (3) Walkways and cycleways must not be located within the riparian planting area required in standard I458.6.5(1) above.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure V:

Arboriculture

Regine Hoi Gok Leung

16 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Arboriculture

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Regine Hoi Gok Leung (Senior Arborist – Earth, Streams and Trees Team)
Qualifications & Relevant Experience:	My name is Regine Hoi Gok Leung, and I am the Senior Specialist Arborist in the Earth, Streams and Trees Team of Specialist Unit at Auckland Council. I hold the qualification of Bachelor of Science in Biology (1998) & Master of Philosophy in Geography (2001). I am also the Certified Arborist (since 2009) of International Society of Arboriculture (ISA) and hold the Tree Risk Assessment Qualification (TRAQ) of ISA (2022 – 2027), and over 26 years of experience in arboricultural assessment, tree risk assessment and consenting. I am a full member of New Zealand Arboricultural Association and International Society of Arboriculture. I have prepared expert evidence and technical assessments for resource consent applications, plan changes & notices of requirement for designation, fast track applications and have appeared as an expert witness before consent authorities and the Environment Court for hearing and mediation on multiple occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:	
Date:	1 October 2026

3.0 Executive Summary / Principal Issues

The natural terrestrial habitats including riparian margin of streams and wetlands, 20m MHWS, 20m of Cliff, SEA Overlay and associated vegetation/trees within the site have been identified as Ecological Protected Area Network (EPAN) which is about 33.51 ha with low to medium ecological value. To facilitate the proposed development, a range of activities with the potential impacts on protected trees are proposed including vegetation/tree removal, bulk earthworks, stream diversions and reclamations, wetland reclamation, construction of stormwater management devices, installation of transport and utility infrastructure, establishment of water supply and wastewater infrastructure, and associated changes to landform, hydrology and freshwater habitats.

The proposal will result in approximately 1.89 ha of vegetation removal within the EPAN areas (approx. 2.5% of the total EPAN extent), including indigenous trees within riparian margins of streams and wetlands, coastal cliff, 20m MHWS and SEA overlay (overall 181m^2) and 1.87ha of exotic-dominated scrub and managed rank exotic grassland, and removal of existing street trees on the road berm of existing roads within the project site (details not available in the application documents). This comprises approximately 1.13 ha of permanent vegetation removal within EPAN and 0.76 ha of temporary disturbance, which trigger consent under E15.4.1 (A18), (A19), (A20), (A21), (A22), E15.4.2 (A43) and E17.4.1 (A10). To address the effects of vegetation removal within the EPAN and street trees removal, the proposal (detailed in the Biodiveristy Management Plan - BMP) incorporates approximately 2.60 ha of additional restoration planting (indigenous trees and riparian plants) adjoining the existing EPAN network. Together with reinstatement of approximately 0.76 ha of temporary removal within EPAN, these measures including extensive landscape planting on the open space and road berm of new roads substantially exceed approximately 1.13 ha of permanent EPAN vegetation loss. Consequently, the proposal will result in a net increase of approximately 1.47 ha of land subject to ecological restoration, long-term management and legal protection.

Overall, I can support the proposed tree works with additional arboricultural conditions on top of the recommended conditions from the applicant.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Assessment of Environmental Effects and Statutory Analysis by Unio Environmental dated 26 June 2026.
- Ecological Impact Assessment Report by Viridis dated 23 June 2026 Final 1.
- Biodiversity Management Plan by Viridis dated 23 June 2026 Final 1.
- Utilities Plans by Harrison Grierson dated April 2026.
- Earthworks Plans by Harrison Grierson dated April 2026.
- Draft Proposed Conditions of Consent by Unio Environmental dated 26 June 2026.
- S92 responses from the applicant in Sept 2026 including update on reasons of consent.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

N/A

6.0 Specialist Assessment

Arboriculture

Impacts on existing street trees located on road berm

6.1 It is noted that reasons stated in original AEE Report under E17 of AUP has been revised in Sept 2026 from E17.4.1 (A10), (A8) and (A6) for street tree removals, works within root zone and canopy pruning to E17.4.1 (A10) only and all the identified street trees on the road berm of existing streets within the project site are proposed for removal. It is noted that there is no arboricultural report and detail assessment by qualified arborist to identify the associated tree impacts on existing street trees within the project site according to assessment criteria under E17 of AUP. There is no arboricultural information related to street trees that can be summarized from the Ecological Assessment by Viridis. Replanting proposals on the road berm of existing streets/roads are not detailed to demonstrate that the associated impacts on existing street trees from the proposed development can be adequately mitigated. Nevertheless, I consider the majority of existing street trees are unlikely in mature status with significant landscape and amenity value nor contribute significantly to the local community with the reason of the current site context. I can support removal of existing street trees with mitigation replanting of new trees according to the replanting and greening strategies on the road berm along the public streets to be formed, which will be pragmatic for implementation. The streetscape will be sustained with replacement planting of new street trees.

Impacts on protected trees within Ecological Protected Area Network (EPAN) - riparian margin of streams and wetlands, 20m MHWS, 20m of Cliff & SEA Overlay

6.2 According to Ecological Assessment Report by Viridis, vegetation found within the site includes exotic grassland, small areas of native planting, and isolated amenity species within Formosa Golf

Resort. Pohutukawa treeland and SEA overlay are also noted along the eastern coast within 20m MHWS and cliff. Kanuka scrubland and exotic dominated scrubland are found on the riparian margin of the streams within the site, and the protected trees are dominated by Kanuka, Mahoe, Cabbage, Karamu, Mapou, Tree Fern and exotic amenity canopy tree species including mature radiata pines and Eucalyptus spp. Ecological values associated with these areas are constrained by their pest plant dominance, fragmented distribution, limited indigenous species composition, and association with historically disturbed land. The natural terrestrial habitats within the site have been identified as Ecological Protected Area Network (EPAN) which is about 33.51 ha on site incorporates a mosaic of exotic and indigenous vegetation, revegetation planting, wetlands, riparian habitats and modified vegetation communities (such as golf course and surrounding landscaped area). Overall, EPAN is currently considered to provide low to moderate terrestrial ecological value within the context of the wider modified landscape.

6.3 A narrow strip of coastal cliff vegetation and several smaller areas of coastal wetland vegetation have been identified as SEA_T_4556 under the AUP. Approximately 159 m² of SEA_T_4556 extends into the Site boundary across four small areas within the south-western portion of the Site. Two additional terrestrial SEAs are located at 620 Whitford-Maraetai Road. SEA_T_1140 (11.1 ha) and SEA_T_1141 (4.6 ha) comprise indigenous gully vegetation associated with the wider Beachlands South Precinct area. Both SEAs were identified primarily based on vegetation diversity values. Just a note that the project area was expanded to include two adjoining land parcels (758 and 770 Whitford-Maraetai Road). These areas were not subject to ecological field verification as part of the investigations undertaken for this assessment, but only as desktop review.

6.4 To facilitate the development, a range of activities with the potential to affect protected trees are proposed including vegetation/tree removal, bulk earthworks, stream diversions and reclamations, wetland reclamation, construction of stormwater management devices, installation of transport and utility infrastructure, establishment of water supply and wastewater infrastructure, and associated changes to land cover, hydrology and freshwater habitats.

6.5 The proposal will result in approximately 1.89 ha of vegetation removal within the EPAN areas (approx. 2.5% of the total EPAN extent), including indigenous trees within riparian margins of streams and wetlands, coastal cliff, 20m MHWS, and SEA overlay (overall 181m^2) and 1.87ha of exotic-dominated scrub and managed and rank exotic grassland. This comprises approximately 1.13 ha of permanent vegetation removal within EPAN and 0.76 ha of temporary disturbance, which trigger consent under E15.4.1 (A18), (A19), (A20), (A21), (A22) and E15.4.2 (A43).

6.6 Proposed encroachment into EPAN areas is primarily associated with construction of stormwater management pond, bulk earthworks and associated development activities. While these works will result in the removal of some EPAN vegetation/trees, the proposal also incorporates reinstatement planting within temporarily disturbed areas and expansion of ecological restoration areas adjoining the existing EPAN network. Additional restoration planting adjoining the EPAN, together with long-term enhancement and management of the wider EPAN network, is proposed to maintain the overall ecological function and restoration objectives of the EPAN framework.

6.7 To address the effects of vegetation removal within the EPAN, the proposal (detailed in the Biodiveristy Management Plan - BMP) incorporates approximately 2.60 ha of additional restoration planting (indigenous trees and riparian plants) adjoining the existing EPAN network. Together with reinstatement of approximately 0.76 ha of temporary removal within EPAN, these measures substantially exceed approximately 1.13 ha of permanent EPAN vegetation loss. Consequently, the proposal will result in a net increase of approximately 1.47 ha of land subject to ecological restoration, long-term management and legal protection. The additional planting areas have been located adjacent to the existing EPAN to strengthen ecological connectivity across the Site and establish vegetated buffers that reduce edge effects and enhance the resilience of retained ecological habitats and the loss of protected trees within these habitats. Approximately 0.81 ha of riparian restoration planting is proposed outside the EPAN at the southern corner of the site. Collectively, areas subject to restoration and enhancement will be legally protected and managed in perpetuity through covenant mechanisms and implementation of the BMP.

6.8 In addition to the EPAN enhancement programme, the proposal incorporates extensive indigenous planting throughout the wider development area, including streetscape planting, neighbourhood parks, stormwater parks and other public open spaces. The Open Space Strategy also provides for retention of a modified nine-hole golf course and a network of parks and green spaces integrated with ecological restoration areas. Collectively, these measures will increase indigenous vegetation cover, improve landscape connectivity and contribute to ecological resilience across the wider Site.

6.9 In view of the majority of the EPAN have been avoided from the proposed development with only 2.5% of the EPAN to be developed to accommodate the infrastructure, it is considered the associated impacts on protected trees within EPAN are acceptable, taking into account of the majority of the protected trees being impacted are pioneer tree species within Kanuka dominated scrubland and isolated exotic amenity trees within golf course which are not substantial tree specimens. With restoration replanting within EPAN and riparian margins, and these replanted areas under legal protection of perpetuity through covenant mechanisms and implementation of the BMP, the overall amenity, ecosystem services and functions within the site will be enhanced and sustained over time. Overall, I can support the proposed tree works of the application with conditions which to be detailed in Section 9.

7 Section 67 Information Gap

At the time of writing this Memo I have identified the following information gap:

7.1. It is noted that reasons under E17 of AUP including E17.4.1 (A10) for street tree removals has been proposed in the AEE Report. However, there is no arboricultural report and detail assessment by qualified arborist to identify the associated tree impacts on existing street trees within the project site. There is no arboricultural information related to street trees that can be summarised from the Ecological Assessment by Viridis to facilitate our assessment. Replanting proposal on

the road berm of existing streets/roads are also not detail enough to demonstrate that the associated impacts on existing street trees from the proposed development can be adequately mitigated.

7.2. The missing information is considered in low to medium risk which should be supplemented to support the application.

Why is this Information Essential?

7.3. The ecological report by Viridis did not provide any information about tree impacts on existing street trees that trigger consent under E17.4.1 (A10). This is identified as information gap that we cannot understand the associated tree impacts on existing street trees from the proposed development. This information gap is also essential for the applicant to obtain the Tree Owner Approval from Community Facilities for any impacts on protected street trees located on road berm.

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
Detail assessment for impacts on street trees according to assessment criteria under E17 of AUP.	Detail assessment by qualified arborist on the impacts of existing street trees within the site and mitigation measures and replanting proposal to mitigate the loss of street trees according to assessment criteria under E17 of AUP.	Cannot accurately assess the associated impacts on existing street trees.	Potential loss of amenity value on the existing streetscape from the proposed development.

8 Recommendation

Arboriculture

Overall, I can support the proposed tree works of the application with additional conditions which are to be detailed in Section 9. In view of the majority of EPAN have been avoided from the proposed development with only 2.5% of the EPAN to be developed to accommodate the infrastructure, it is considered the associated impacts on protected trees within EPAN are acceptable, taking in account of the majority of the protected trees being impacted are pioneer tree species within Kanuka dominated scrubland and isolated exotic amenity trees within golf course which are not substantial tree specimens. With restoration replanting within EPAN and riparian margins, and these replanted areas under legal protection of perpetuity through covenant mechanisms and implementation of the BMP, there will be a net gain in the overall EPAN areas within the site and the overall amenity, ecosystem services and functions within the site will be enhanced and sustained over time.

9 Proposed Conditions

On top of the proposed conditions by the applicant, here I recommend additional arboricultural condition for desirable arboricultural outcomes.

Condition [8] (t) Construction Tree Management Plan – CTreeMP, which is a management plan prepared by Project arborist being engaged by the consent holder to identify and protect the retained trees located in the vicinity to the works areas at different stages of the development, with detailed tree protection measures to be proposed and implemented, follow up with regular monitoring during construction period. It is recommended that the CTreeMP to be certified by Council prior to the commencement of tree works on site.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure W:

Freshwater Ecology

Antoinette Bootsma

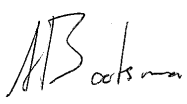
07 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Freshwater Ecology

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Antoinette Bootsma (Senior Freshwater Specialist, Earth, Streams & Trees Team, Auckland Council)
Qualifications & Relevant Experience:	I hold the qualification of: Master of Science in Environmental Science and have 19 years of experience in freshwater ecological assessments. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications and have appeared as an expert witness before consent authorities and the Environment Court.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	07/10/2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- *Beachlands South Fast-track Approval Substantive Application - Assessment of Environmental Effects and Statutory Analysis.* Prepared for Beachlands South Limited Partnership. 26 June 2026. Prepared by Unio Environmental Limited (AEE).
- *Beachlands South Fast Track - Ecological Impact Assessment.* Prepared for Beachlands South Limited Partnership. Prepared by Viridis Limited. September 2026. (EcIA).
- *Beachlands South Fast Track - Biodiversity Management Plan.* Prepared by Viridis Limited. 23 June 2026.
- *Beachlands South – Rules Assessment.* Prepared by Unio Environmental Limited, dated 26 June 2026.

4.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

My assessment does not identify additional reasons for consent not included in the AEE

5.0 Specialist Assessment

6.1. Effects on stream extent and value

The proposed development will result in the reclamation and permanent loss of 646 m of intermittent stream length (330.3 m² of streambed area).

Through the section 67 process, the applicant's ecologist confirmed that the installation of four new culverts associated with a new accessway in the southeastern part of the site at 712 Whitford-Maraetai Road will not reduce stream extent or adversely affect stream values through impeded fish passage.

Culverts 1 and 2, shown on Drawing A2515591.00-4260-B, include riprap extending beyond the 5 m length permitted under the relevant Permitted Activity Standard. However, these culverts are located at the transition between ephemeral and intermittent flow. As a conservative measure, the culverted sections of intermittent stream were treated as stream reclamation in this assessment and were included in the Biodiversity Compensation Model (BCM) calculations.

In addition, Culverts 1, 3, and 4 exceed a grade of 10%, which is steeper than that recommended for fish passage. However, I agree with the ecologist's assessment that the ephemeral nature of the upstream habitat limits its value as fish habitat and that the culverts will not form a barrier to fish migration. I also

note that the applicant has proposed conditions requiring plans detailing all instream structures relevant to fish passage to be certified by Council prior to the commencement of works.

Further clarification provided through the section 67 process confirmed that no stormwater infrastructure will be located within intermittent streams. I note that the applicant has proposed a condition requiring all stormwater infrastructure located within 5 m of a stream to be designed in consultation with a suitably qualified and experienced ecologist (SQEP) and submitted to Council for certification prior to construction.

Proposed conditions relating to temporary stream diversions, erosion controls, and sediment management are addressed through the requirement for an Erosion and Sediment Control Plan to be certified by Council. I defer to Council's earthworks specialist regarding these matters.

In relation to offsetting or compensating for the permanent loss of stream extent and value resulting from the development, the ecological assessment identifies limited opportunities to create new stream habitat on site and provides justification for aquatic compensation in accordance with Appendix 7 of the NPS-FM, including the principle of "trading up". I consider the enhancement of 2.943 ha of wetland habitat within the site and the wider Waikōpua Creek catchment to be a positive ecological outcome that adequately compensates for the loss of stream habitat.

6.2. Effects on wetland extent and value

The proposed development will result in the reclamation and permanent loss of 2,907 m² of wetland habitat, including direct reclamation and a conservatively assessed hydrological loss resulting from catchment modification. As compensation for this loss, 2.943 ha (29,430 m²) of wetland habitat within the site and the wider Waikōpua Creek catchment will be enhanced, based on calculations set out in the Biodiversity Compensation Model (BCM) assessment. This enhancement area includes compensation for the loss of both stream extent and ecological values, as well as wetland habitat.

Based on my review, I confirm that the potential value of the affected wetlands was considered in the BCM calculations. I largely agree that the aquatic compensation principles set out in Appendix 7 of the NPS-FM have been demonstrated to have been met.

6.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps remaining.

7.0 Recommendation

My assessment of freshwater ecological matters concludes that the permanent loss of 646 m of intermittent stream (330.3 m² of streambed area) and 2,907 m² of natural inland wetland has been adequately addressed through the proposed aquatic compensation measures.

The aquatic compensation includes enhancement of retained riparian corridors within the site and the EPAN area, as well as restoration of 2.943 ha of coastal fringe wetland at the ecotone between tidal flats, saltmarsh, wetland, stream, and terrestrial vegetation along the southern extent of the site. This area is contiguous with the EPAN and is located adjacent to saltmarsh, tidal flats, and coastal habitats that support threatened and at-risk indigenous fauna.

The Biodiversity Management Plan sets out the proposed planting species, planting densities, planting zones, site preparation requirements, weed and pest management measures, and a five-year monitoring programme.

Based on the information available, I support the application.

8.0 Proposed Conditions

Table 1 below contains the stream and wetland works related conditions proposed by the applicant that I consider should be amended. I have indicated proposed changes and have followed the numbering of Draft Conditions as presented in *Beachlands South Fast Track Application - Draft Resource Consent Conditions,* dated 26 June, 2026.

Table 1 – Applicants Proposed Consent Conditions.

Condition	Proposed Conditions	Comment or suggestion
137	**Native Fish Management Plan (NFMP)** The Consent Holder must prepare and submit a NFMP to the Council at least 15 Working Days prior to the planned commencement of stream works on the site, for certification in accordance with Conditions [XX to XX]. The objective of the NFMP is to avoid, remedy or mitigate the potential adverse effects of the Project on native fish. The NFMP must be prepared by a SQEP and must include:	I recommend the following amendment: The Consent Holder must prepare and submit a NFMP to the Council at least 15 Working Days prior to the planned commencement of stream <u>or wetland</u> works on the site, for certification in accordance with Conditions [XX to XX]. The objective of the NFMP is to avoid, remedy or mitigate the potential adverse effects of the Project on native fish. The NFMP must be prepared by a SQEP and must include: a) The outcomes of consultation with

	a) The outcomes of consultation with Ngāi Tai ki Tāmaki. b) Methodologies to capture fish within any impacted stream habitat or justification there is no habitat for native fish present at the time of construction. c) Fishing effort anticipated. d) Details of the relocation site. e) Storage and transport measures including the best practice for prevention of predation and death during capture. f) Euthanasia methods for diseased or pest species (if relevant); and *g)* An assessment on the habitat availability of the relocation site to support fish at the time of streamworks.	Ngāi Tai ki Tāmaki. b) Methodologies to capture fish within any impacted stream<u>, wetland, or pond</u> ~~habitat~~ or justification there is no habitat for native fish present at the time of construction. c) Fishing effort anticipated. d) Details of the relocation site. e) Storage and transport measures including the best practice for prevention of predation and death during capture. f) Euthanasia methods for diseased or pest species (if relevant); ~~and~~ g) An assessment on the habitat availability of the relocation site to support fish at the time of streamworks<u>, and</u> h) <u>An accidental discovery protocol for aquatic fauna which require specialised handling and relocation effort that is not otherwise covered in the standard methodologies (i.e. regionally threatened species as per the Conservation Status of Freshwater Fishes in Tamaki Makaurau / Auckland). This includes a protocol to implement the following actions:</u> i) <u>Immediately cease reclamation (including dewatering) upon accidental discovery of any unexpected aquatic fauna and notify the Council.</u> ii) <u>Ensure aquatic fauna are left in a</u>

		suitable environment where they will be unharmed while the NFCRP is updated. iii) Update the NFCRP to address handling and relocation of the unexpected aquatic fauna to be submitted to Council for re-certification. i) Only re-commence the capture and relocation upon re-certification of the NFCRP

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure X:

Archaeology / Historic Heritage

Mica Plowman

14 August 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Archaeology/Historic Heritage

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Mica Plowman - Principal Heritage Advisor
Qualifications & Relevant Experience:	I hold the qualification(s) of: Bachelor of Arts (BA) and Master of Arts (MA) in Anthropology (archaeology) and have 30 years of experience in historic heritage and archaeological resource management under the RMA (Part 2, Section 6 e and f matters) and the HNZPT Act (2014). I am a full member of the New Zealand Archaeological Association. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications, and have appeared as an expert witness before consent authorities and the Environment Court on multiple occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	14/8/2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

Beachlands South. Fast-track Approval Substantive Application. Assessment of Environmental Effects and Statutory Analysis. Prepared for Beachlands South Limited Partnership by UNIO Environmental, 26 June 2026.

Appendices and Attachments

- Attachment B Planning Assessment
- Attachment C Proposed Draft Consent Conditions

Archaeological Assessment

- Attachment 17 Archaeological Assessment
- Attachment 17A Archaeological Vegetation Management Plan and Planting Plan
- Attachment 17B Archaeological Bundle – including Archaeological Management Plan

- Attachment 20 Cultural Values Assessment

4.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

The proposed works, as described in the FTAA application and supporting documents, do not affect scheduled archaeological sites in Schedule 14.1 (Schedule of Historic Heritage) in the Auckland Unitary Plan operative in part (June 2026) [AUP OIP]. No consents are required under Chapter D17 Historic Heritage [AUP OIP]. There are no additional reasons for consent.

5.0 Specialist Assessment

There are twenty-eight archaeological sites located within 250m of the development project area relating to prehistoric Māori settlement. These sites are comprised primarily of typical undefended habitation features including storage pits/ terraces and midden deposits but include one defended pa site. These sites are described in detail in the applicant's archaeological assessment. Only the recorded archaeological sites identified as being located within the application area are discussed in this memo.

There are eleven recorded sites (R11/343, R11/344, R11/345, R11/1438, R11/1439, R11/1440, R11/1617, R11/1618, R11/1621, R11/1622, and R11/1623) that are either located within, or extend into, areas of proposed ground disturbance associated with bulk earthworks or the Ecological Protection Area Network (EPAN) works.

One additional recorded site, R11/1445, lies within an area subject to an earthworks consent covering part of the Development Site and is covered by HNZPT Archaeological Authority 2026/140. The authority was obtained under section 44(a) of the HNZPTA for an activity that may modify or destroy one or more archaeological sites within the land identified in the application as Stage 1.

Of the eleven recorded sites within the Beachlands South development footprint, the extent of earthworks intersects the previously recorded extents of seven archaeological sites (R11/343, R11/1439, R11/1617, R11/1618, R11/1621, R11/1623 and R11/1440). The recorded site extents are based on previous investigations and/or recorded locations and do not necessarily represent the full extent of archaeological deposits.

The location and archaeological extent of these recorded sites in relation to the development area is provided in attachment 1.

Importantly, no intact archaeological deposits were identified within the proposed earthworks footprint for these sites during the field survey undertaken for this application. Consequently, although the proposed works overlap recorded site extents, there is currently no evidence that intact archaeological deposits will be affected within the earthworks footprint. However, the potential exists that archaeological deposits or features survive within these areas and could be modified or removed during earthworks.

There also remains the potential for previously unrecorded archaeological material to be encountered during earthworks in areas that have not been subject to detailed archaeological investigation. Such material is most likely to include midden, oven stones, and associated occupation debris.

Clough and Associates summarise the archaeological value of the recorded sites within the project area and the wider area as follows:

"Overall, the sites are assessed as having limited to moderate archaeological value at a site-specific level, with variation across the group. While a number of sites have been modified or not reidentified, others retain intact subsurface deposits with moderate information potential. When considered collectively as a landscape, the archaeological values are assessed as moderate to high, reflecting both the presence of surviving deposits and the degree of historic modification across the broader area."

Clough and Associates conclude that the potential effect on recorded archaeological sites is limited in the absence of confirmed archaeological deposits within the earthworks footprint and the localised areas where potential effects might occur. They also comment that while the recorded sites are evidence of Māori settlement activity within the wider Beachlands area, the proposed works are not expected to result in a substantial loss of archaeological information.

To mitigate the risk of discovery of unrecorded subsurface archaeological sites within the project area, any archaeological features encountered will be managed in accordance with the requirements of the archaeological authority sought under section 44(a) (i) of the FTAA.

The applicant concludes that the potential adverse effects on archaeological values are avoided as far as practicable and will be minimised through the implementation of the Archaeological Management Plan, the Archaeological Vegetation Management Plan and the archaeological monitoring and recording proposed as conditions of the authority sought.

I agree with and support the Clough and Associates assessment of the potential risk to previously unidentified archaeological/historic heritage features within the project area. I also agree that it is appropriate to secure an Authority under section 43 of the FTAA.

6.0 Section 67 Information Gap

I have identified that there are no outstanding issues or information gaps.

7.0 Recommendation

I have assessed the effects of the proposed Beachlands South application on historic heritage resource, the magnitude of these effects, and whether adverse effects are avoided, minimised or mitigated.

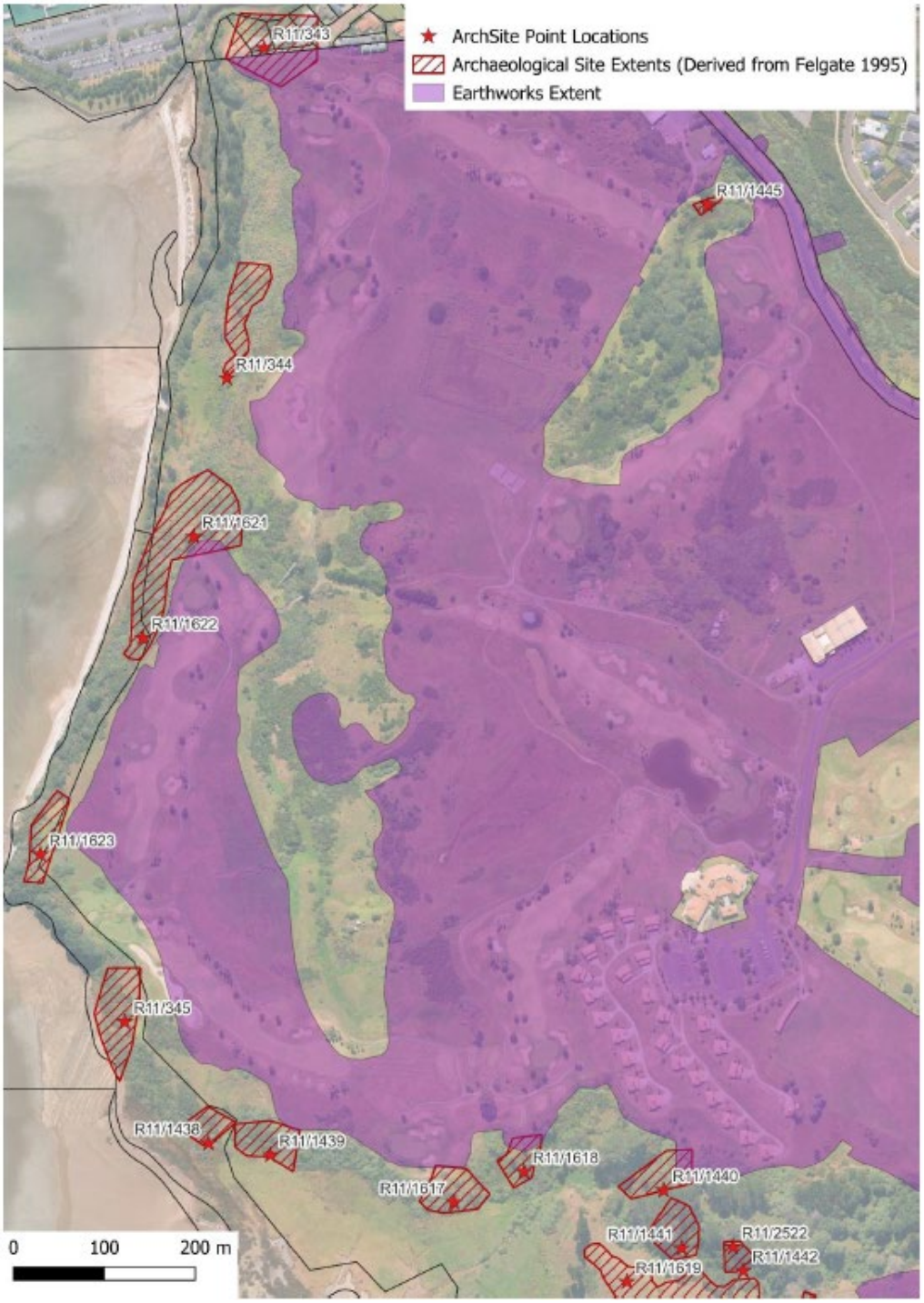
There is no National Policy Statement on Historic Heritage to assess this application against.

In reviewing the application documentation, the conditions outlined in Attachment C (M) Conditions of HNZPT Act Authorization (conditions 1-14) in conjunction with the Archaeological Management Plan (Attachment 17b) and the Vegetation Management Plan (Attachment 17a) are sufficient to mitigate the potential risk of archaeological discovery and give effect to s6 (f) of the RMA.

8.0 Proposed Conditions

No amendments or additions to the proposed conditions are necessary.

9.0 Supporting Documents



Plan showing earthworks extent (purple shading) in relation to the recorded archaeological sites. Source Clough and Associates 2026 (attachment 17, pg. 77).

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure Y:

Noise and Vibration

Duffy Visser

05 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Noise and Vibration Assessment

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Duffy Visser Specialist: Contamination, Air & Noise. Specialist Input, Planning & Resource Consents
Qualifications & Relevant Experience:	I hold the qualification of: Diploma in Public Health and have 5 years of experience in contaminated soil assessment. I have prepared expert evidence and technical assessments for resource consent applications, notices of requirement for designation and fast-track applications and have appeared as an expert witness before consent authorities on multiple occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	5 October 2026

3.0 Executive Summary / Principal Issues

I have assessed the application in terms construction noise and vibration as well as operational noise with reference to Chapter E25 of the Auckland Unitary Plan (AUP).

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

Assessment of Environmental Effects and Statutory Analysis, prepared by Unio Environmental, dated 26 June 2026. (AEE)

- Proposed conditions, prepared by Unio Environmental, dated 26 June 2026. (PC)
- Beach lands South -Rules Assessment, prepared by Unio Environmental, dated 26 June 2026. (RA)
- Assessment of Noise and Vibration Effects, prepared by Hegley Acoustic (HAC), dated 1 September 2026. (acoustic report)

5.0 Specialist Assessment

The site is comprised of 110 Jack Lachlan Drive and 620, 712, 758 and 770 Whitford-Maraetai Road, Beachlands.

Proposal

The applicant proposes to develop residential dwellings, a hotel and conference venue, community and commercial activities, protected ecological restoration areas, walking and cycling networks, and community facilities, and enable the potential development of two schools. The Project requires earthworks and all associated infrastructure, including transport facilities, intersection upgrades and roading, telecommunications, power, and water supply and stormwater, and wastewater infrastructure, which includes an outfall some 2km off the Project's coast.

CONSTRUCTION NOISE AND VIBRATION

Compliance criteria

Noise

The noise from the activities must not exceed the levels permitted by Rule E25.6.27 of the Auckland Unitary Plan (AUP) provides the construction noise limits for the Project.

The overall works are anticipated to take more than 20 weeks and is therefore considered long-term duration. High noise and vibration generating activities must be restricted to the hours of 7:30am to 6:00pm Mondays to Saturdays.

In accordance with the Auckland Unitary Plan requirements for the subject site zoning, the noise limits are Monday – Saturday 7:30am to 6:00pm Leq 70 dBA and Lmax 85 dBA.

Vibration

Vibrations emanating from construction activities must be considered against two criteria: Effects on Buildings and Structures, and Effects on Humans.

Effects on humans (for occupied buildings)

The AUP requires a lower limit during daytime works for occupied structures of 2mm/s. Works generating vibration for three days or less between the hours of 7am to 6pm may exceed the limits of 2mm/s, but must not exceed a limit of 5mm/s, providing that all occupied buildings within 50m of the extent of the works generating vibration are advised in writing no less than three days prior to the vibration-generating works commencing; and the written advice must include details of the location of the works, the duration of the works, a phone number for complaints and the name of the site manager.

Effects on building structures and unoccupied buildings: The following limits are as per DIN 4150-3:1999 as referenced in 25.6.30.(1).(a) of the AUP, based on the residential structures: 5mm/s @ 1-10 Hz, 5mm/s-15mm/s @ 10-50Hz, 15mm/s-20mm/s @ 50-100Hz, 20mm/s @ more than 100Hz

Potential noise and vibration

Noise

HAC used Predictor noise modelling software to predict/calculate the potential noise from proposed construction activities.

Provided the mitigation measures and in the CNVMP are adhered to, the predicted noise levels can be maintained as low as practicably possible. Notwithstanding that, due to proximity and elevation of the adjacent neighbours, noise levels are expected to exceed the compliance limits at some receivers during the highest noise generating activities in proximity.

The following noise level exceedances are expected at the assessment location of 1m from the facades facing the subject:

Noise Levels from the Construction of the Roundabout

During excavation

Noise levels are predicted to extend into the 71 – 75dBA Leq range at 49, 51 53,55, 57 and 59 Jack Lachlan Drive

Given the linear nature of road construction, it is impracticable to determine a specific duration. Through discussions with the contractor, it is estimated that the exceedances could occur for several days, several times during the estimated five months of construction on Jack Lachlan Drive.

Minor Upgrades to Jack Lachlan Drive

During excavation

Noise levels are predicted to extend into the 71 – 75dBA Leq range at 61, 83, 85 & 87 Jack Lauchlan Drive, 1 & 2 Karo Road, 31 - 36 Doidge Street, 1 Mahutonga Avenue, 31, 33, 36, 38, 40 & 42 Kaiawa Street, 1, 2, 3, 4, 6 & 8 Kibblewhite Avenue and 15, 17, 19 & 26 Lydiard Place for 2 to 3 days.

During compaction

Noise levels are predicted to extend into the 80 – 90 dBA Leq range at 61, 83, 85 & 87 Jack Lauchlan Drive, 1 & 2 Karo Road, 31 - 36 Doidge Street, 1 Mahutonga Avenue, 31, 33, 36, 38, 40 & 42 Kaiawa Street, 1, 2, 3, 4, 6 & 8 Kibblewhite Avenue and 15, 17, 19 & 26 Lydiard Place. For up to 2 to 3 days.

Construction Noise Levels from Northern Bulk Earthworks

While using the motor scraper

Noise levels are predicted to extend into the 71-75 dBA Leq range at 18,19, 24 &27 Tui Brae.

During excavation
Noise levels are predicted to extend into the 76-80 dBA Leq range at 18,19, 24 &27 Tui Brae.

The earthworks in this area would take approximately two weeks to complete and that the exceedances would be limited to a relatively small portion of this time.

Vibration
HAC predicted /calculated that it will be practicable to complete the project in full compliance with the vibration limits of the AUP.

There is the potential for the amenity criterion of the AUP to be exceeded to the neighbors closest to the earthworks for short periods. It is proposed to manage these effects through consultation via a Construction Noise and Vibration Management Plan (CNVMP).

Consents required

In terms of construction noise and vibration:

As the Permitted Activity Standards stipulated under the AUP OP for construction noise - E25.6.27 cannot be met due to the proximity and elevation of the adjacent receivers with line of sight into the works, and no practicable options to shield them, consent is required for a **Restricted Discretionary Activity** pursuant to E25.4.1(A2).

With the proposed mitigation measures in place, noise and vibration levels can be maintained at reasonable levels commensurate with the type of works and proximity of the adjacent neighbors and therefore are considered acceptable.

OPERATIONAL NOISE

The Project contains a suite of zones that provide for a range of residential, business and open space uses as well as schools and Future Urban zoning. The Project is surrounded by sites in the Residential – Single House zone. The Rural – Countryside Living zone, or the Open Space- Informal Recreation zone.

For each zone, the noise provisions contained in Chapter E25 of the AUP provide suitable controls, and it is proposed that they be adopted in full.

Noise from the wastewater treatment plant

HAC predicted that noise from the WWTP will not exceed the permitted noise levels as:

The preliminary design of the WWTP consists of a mechanical inlet screen and UV disinfection equipment, both of which produce relatively low levels of noise, and two circulation pumps, each of which are understood to produce a level of 85dB at 5m. This equipment will be located within a purpose-built enclosure, the construction of which could be specified during detailed design to provide the attenuation needed for compliance with the limits of the AUP.

Assessment

I agree with the acoustic report that: while some adverse effects are predicted from the construction of the Project, those effects are typical of most large construction activities and that it will be practical to manage those effects using current best practices.

I consider that with the proposed mitigation measures including a CNVMP, is the best practicable option to ensure that the noise and vibration levels will not be unreasonable.

6.0 Recommendation

I recommend that the application be approved.

Comments on proposed noise and vibration conditions

Condition 31 is lengthy and can be replaced by the following:

Prior to the commencement of works, the consent holder must submit a Construction Noise and Vibration Management Plan (CNVMP) for certification. The objective of the CNVMP is to set out the Best Practicable Option for the management of noise and vibration effects. The CNVMP must be prepared with reference to Annex E, New Zealand Standard NZS6803:1999 Acoustics – Construction noise and Appendix B in DIN 4150-3:1999 Structural Vibration – Part 3

Effects of vibration on structures and include but not necessarily be limited to the following:

a) details of the community consultation to be undertaken to advise the owners and occupiers

- *a brief description of the works, timing and duration;*
- *the times and days when the highest noise and vibration is likely to be generated;*
- *mitigation measures to be implemented;*
- *noise and vibration monitoring;*
- *a contact name and number of the project manager who can be contacted if any issues arise; and*
- *how noise and vibration complaints will be managed and responded to*

b) a description of the works and their duration, plant and equipment to be used, the methodology to be undertaken and the predicted noise and vibration levels; and

c) identification of the best practicable options that will be undertaken to mitigate and minimise noise and vibration including use of boundary or localized noise barriers.

The CNVMP must be prepared by a suitably qualified person and submitted to the Council for certification a minimum of ten (15) working days prior to commencement of the works. Any subsequent amendment of the certified CNVMP which comprises material changes to proposed construction methodology must also be prepared by a suitably qualified person.

Amendments must be tracked and the revised CNVMP submitted to the Council for certification.

Condition 71 – I recommend it be replaced by the AUP rule in C72:

Noise arising from construction work activities on the Site, except for noise generated by works within the road and provided for in the CNVMP required by Condition 31, and noise levels allowed for in condition XXXX, must not exceed the noise limits specified in Tables E25.6.27.1 and E25.6.27.2 of the AUP(OP) decreased by 5 dB when measured 1m from the most exposed façade of any building that is occupied during the works. Noise from construction work activity must be measured and assessed in accordance with the requirements of New Zealand Standard NZS 6803:1999 Acoustics – Construction Noise.

Condition XXXX

During the northern bulk earthworks, for works not occurring on the road, the activities must be managed to ensure that the following noise limits are not exceeded:

- During the use of the motor scraper, up to 75dBLAeq at 18,19, 24 &27 Tui Brae.
- During excavation up to 80 dBLAeq at 18,19, 24 &27 Tui Brae.

Intermittently for a portion of two weeks.

Condition 75 – The acoustic report is based on the times that the higher noise limits apply. I suggest changing this condition to:

High noise and vibration generating activities must be limited to the hours of Monday –Saturday 7:30am to 6:00pm.

Conditions 75 and 76 can be part of the CNVMP and may not need to be set as consent conditions.

7.0 Proposed Conditions

C1. Prior to the commencement of works, the consent holder must submit a Construction Noise and Vibration Management Plan (CNVMP) for certification. The objective of the CNVMP is to set out the Best Practicable Option for the management of noise and vibration effects. The CNVMP must be prepared with reference to Annex E, New Zealand Standard NZS6803:1999 Acoustics – Construction noise and Appendix B in DIN 4150-3:1999 Structural Vibration – Part 3

Effects of vibration on structures and include but not necessarily be limited to the following:

a) details of the community consultation to be undertaken to advise the owners and occupiers
- a brief description of the works, timing and duration;
- the times and days when the highest noise and vibration is likely to be generated;
- mitigation measures to be implemented;
- noise and vibration monitoring;
- a contact name and number of the project manager who can be contacted if any issues arise; and
- how noise and vibration complaints will be managed and responded to

b) a description of the works and their duration, plant and equipment to be used, the methodology to be undertaken and the predicted noise and vibration levels; and

c) identification of the best practicable options that will be undertaken to mitigate and minimise noise and vibration including use of boundary or localized noise barriers.

The CNVMP must be prepared by a suitably qualified person and submitted to the Council for certification a minimum of ten (15) working days prior to commencement of the works. Any subsequent amendment of the certified CNVMP which comprises material changes to proposed construction methodology must also be prepared by a suitably qualified person.

Amendments must be tracked and the revised CNVMP submitted to the Council for certification.

C2. The construction works must be carried out in accordance with the certified CNVMP referred to in C1 and a copy of the certified CNVMP must be made available to authorised Council staff during monitoring inspections.

C3. During the northern bulk earthworks, for works not occurring on the road, the activities must be managed to ensure that the following noise limits are not exceeded:
- During the use of the motor scraper, up to 75dBLAeq at 18,19, 24 &27 Tui Brae.
- During excavation up to 80 dBLAeq at 18,19, 24 &27 Tui Brae.

Intermittently for a portion of two weeks.

C4. Noise arising from construction work activities on the Site, except as otherwise provided for in the CNVMP required by Condition 1, must not exceed the noise limits specified in Tables E25.6.27.1 and E25.6.27.2 of the AUP(OP) decreased by 5 dB when measured 1m from the most exposed façade of any building that is occupied during the works. Noise from construction work activity must be measured and assessed in accordance with the requirements of New Zealand Standard NZS 6803:1999 Acoustics – Construction Noise.

C5. High noise and vibration generating activities must be limited to the hours of Monday –Saturday 7:30am to 6:00pm.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure Z:

Economics

Shane Martin

09 October 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Economics

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Shane Martin – Consulting Economist
Qualifications & Relevant Experience:	I hold the qualification(s) of: PhD in Economics, MA in Economics, and BA in Economics and Mathematics, and have 19 years of experience as a professional Economist. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, and fast-track applications, and have appeared as an expert witness before consent authorities and the Environment Court on multiple occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	9 October 2026

3.0 Executive Summary / Principal Issues

The evidence reviewed consisted of a document, "Beachlands South Project Fast Track Application Economic Impact Assessment" prepared by Property Economics for Beachlands South LP and dated June 2026. The primary authors of the report were Phil Osborne and Tim Heath.

In general, this report is an easy-to-follow economic impact assessment (EIA) which have been accepted as adequate evidence under Section 32(2) of the Resource Management Act 1991 (RMA). It is clear, however, that the Fast-track Approvals Act 2024 (FTAA) requires more than this to determine whether a proposed project is likely to be beneficial. In my professional judgment, this means that the evidence presented – while seemingly well done – is inadequate under the FTAA.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- "Beachlands South Project Fast Track Application Economic Impact Assessment" prepared by Property Economics for Beachlands South LP and dated June 2026.
- Personal email from Tim Heath (cc Vijay Lala, Nick Roberts, Phil Osborne) with a breakdown of GDP (direct versus indirect and induced) to clarify Table 1 of the report.

5.0 Specialist Assessment

In my professional judgment, the EIA prepared for the Beachland Couth Project Fast Track Application is a perfectly good EIA. The EIA shows that the project is expected to produce an impact of $1.93 billion over 15 years (with $644 million being a direct, more defensible, measure of impact) and employ the equivalent of approximately 7,900 full-time equivalent (FTE) years. These are impacts but not necessarily benefits.

In addition to these impacts, the EIA identifies, but does not quantify, some benefits that may be realised. These are:

- Increased housing supply
- Increased choice of housing location
- Potential lower housing prices
- Supports competitive land markets
- Improved access to existing and planned infrastructure
- Improved employment travel efficiency
- Potential impetus for greater local and regional growth

While some of these may or may not happen, they are all reasonable conjectures about the types of benefits that could be realised.

However, that does not mean that the EIA has satisfied the criteria outlined by the FTAA.

For example (underlined emphasis is mine),

Section 3 indicates that the "purpose of this Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits".

Section 22(2)(a)(iv), under the criteria for assessing referral application indicates that the Minister may consider whether the project will deliver "significant economic benefits".

Similarly, Section 22(6)(a) states that the "Minister may compare the activity involved in the project… taking into account the economic benefits and strategic importance of the proposed project".

Finally, Section 43(1)(b)(i) states that "a substantive application must… explain how the project to which the application relates is consistent with the purpose of this Act".

Given that the Act is repeatedly clear that it is concerned with benefits rather than impacts, I judge an EIA to be inadequate to answer the question of how much benefit the project can be anticipated to deliver. Neither GDP impacts nor jobs are adequate to assess benefits for several reasons. The largest among these is that an EIA (either explicitly or implicitly) assumes that all this activity is *additional* activity to the economy. That is, if this project was not built, none of this activity would take place elsewhere. Given that the applicant is in the business of creating residential development, it is unlikely that their development pipeline would lie fallow in the absence of this project. By that rationale, the EIA numbers overstate the impact of the development, but it is unclear how much this is the case.

Even under the RMA where EIAs have been considered to be adequate, it is clear that this is not necessarily the intention. Guidance[1] created by the Ministry for the Environment, now part of the Ministry for Cities, Environment, Regions and Transport (MCERT) on the impacts of the Resource Management Amendment Act 2013 indicates that the requirements encourage "quantification of costs and benefits, emphasise the need to assess economic costs and benefits, and generally require a more robust, more clearly articulated analysis…". Further, the guidance has the following key message: "All costs and benefits of a proposal should be identified and assessed so decision-makers have a sound understanding of the impact a proposal will have on the community, the economy, and the environment." EIAs fall short on these criteria.

Further, I find the following guidance to be especially important:

> *"While higher levels of economic output and employment are generally considered beneficial for the community, an increase in GDP or employment cannot be automatically considered a benefit. This is because economic activity includes both benefits and costs – additional activity incurs additional resource inputs, employment includes the time and energy input of the person employed. The shares of economic activity and employment that can be considered a benefit are difficult to measure, and generally double-count costs or benefits that have already been considered and would in any case vary from situation to situation.*

[1] https://environment.govt.nz/assets/Publications/Files/guide-to-section-32-of-resource-manangemnt-amendment-act-1991.pdf

Therefore, economic growth and employment measured as gross indicators – commonly GDP and persons employed – need to be treated very carefully alongside other indicators of costs and benefits…"

All of this is to say that merely stating that a project will involve a lot of spending on construction and have a large number of workers is not enough to show that it is beneficial. If this were the case, all large projects would be considered beneficial. A more nuanced take on benefits is required – not only to satisfy the requirements of the FTAA but to properly assess benefits within an economic framework.

6.0 Section 67 Information Gap

At the time of writing this Memo I have identified the following information gaps:

- The reported benefits of this project are entirely based on the scale of the development proposed
    - The argument made is essentially that construction activity creates jobs and spending which is good for the economy
    - Most of the economic reports submitted under the FTAA, which are similar to those submitted under standard RMA processes, take the view that economic activity/effects/impacts are economic benefits
        - ***Economic impacts are not equivalent to economic benefits***
        - While the FTAA does not require a full benefit-cost analysis, it specifically uses the words "economic benefits" which is different than the RMA which uses the words "economic… effects". An increase in GDP or employment from construction (economic activity) is an economic effect (or impact) but not necessarily an "economic benefit". If we assume that the legislation uses specific words with intention, then measuring economic activity, effects, or impacts, as under the RMA, is not sufficient under the FTAA.
    - This report is an Economic Impact Assessment (EIA) which quantifies economic impacts and activity but does not measure economic benefit except as a matter of more economic activity more economic benefit.

Why is this Information Essential?

Without a measure of economic benefits (rather than impacts), it will be difficult for the panel to judge whether the project has economic benefits.

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
Measure of economic benefits	Economic impacts are not equivalent to economic benefits	The panel will be unable to assess if the project is beneficial as economic benefits have not been enumerated or identified.	Economic benefits will be either improperly considered (e.g., impacts being conflated with benefits) or not considered at all

7.0 Recommendation

Based on the above assessment of the EIA provided and the clear intentions of the FTAA in terms of what is required, I cannot recommend that this application be approved. It is entirely possible that the project could be beneficial, but the analysis has not shown this. The panel has not been given adequate information to determine if the proposal is likely to have overall benefits.

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure AA:

Environmental Monitoring

Christian Greff Turza

06 August 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Environmental Monitoring

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Christian Greff Turza – Senior Environmental Monitoring Officer
Qualifications & Relevant Experience:	I hold the qualification of Bachelor of Science in Environment and Renewable Energies and have five years' experience assessing environmental effects, compliance, and regulatory requirements. I have prepared technical assessments for fast-track applications on multiple occasions.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	
Date:	06/08/2026

3.0 Executive Summary / Principal Issues

N/A

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Beachlands South - Fast-track Approval Substantive Application - Assessment of Environmental Effects and Statutory Analysis.
- Beachlands South - Fast-track Approval Substantive Application – Draft proposed conditions.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

N/A

6.0 Specialist Assessment

N/A

7.0 Section 67 Information Gap

N/A

8.0 Recommendation

N/A

9.0 Proposed Conditions

- Condition 13: It is recommended that a pre-start meeting be held prior to the commencement of any earthworks and construction works for each main stage of the project.
- Condition 75: It is recommended that a timetable for earthworks and construction activities be included.

- Condition 125: It is recommended that the condition refers to 'prior to the commencement of any earthworks instead of 'prior to the commencement of disturbance'.

10.0	Supporting Documents
N/A	

Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure BB:

Harbourmaster

Jason Son, Maritime Officer

11 August 2026

Harbourmaster memo for resource consent

To: Adonica Giborees

From: Auckland Harbourmasters Office

Date: 11 August 2026

Subject: **BUN60467962 (EPA: FTAA-2606-1256): Beachlands South FAST TRACK**

Date referral received by the Harbourmasters Office: 06/08/2026

The Harbourmaster's Office acknowledges receipt of the above resource consent referral for review from a navigation safety perspective.

Based on the information provided, the Harbourmaster's Office does not identify any significant navigation safety matters at the moment.

Comments on navigation safety matters were addressed at previous consultation with the council team (refer to Attach-22-12.-Harbourmaster-consultation-18.06.26)

Key points from the Harbourmaster's Office are:

- Navigation safety while installation of pipelines
- Diffuser protection & navigation safety (to be confirmed by the applicant consulting with the Harbourmaster's Office)

If the proposal is amended, or if further information becomes available that may affect navigation safety, the application should be referred to the Harbourmaster's Office for further review.

Note, this response is provided as technical advice on navigation safety only. It is not an approval, endorsement, certification, or decision on the resource consent application.

Regards,

Prepared by Jason Son, Maritime Officer

Reviewed by Christiaan Moss, Deputy Harbourmaster

BEACHLANDS SOUTH

FAST TRACK HARBOUR MASTER CONSULTATION

Meeting Date: 18th June 2026

Meeting Time: 11:30 to 12:00

Attendance:

In person			
Graeme Harvey	RPG		
Vijay Lala	UNIO	Khai Azizi	RPG
Online			
Adonica Giborees	AC	Christiaan Moss	AT
Brooke Dales	AC	Jason Son	AT
Apologies			

Executive Summary

The meeting reviewed the technical, navigational, regulatory, and consultation matters associated with the proposed Beachlands South wastewater outfall. The project team outlined the proposed under-seabed installation method, diffuser options, construction methodology, and programme for document sharing and stakeholder review. Key discussion points included the need to confirm the status of disused cables, assess navigation and vessel safety implications, determine appropriate infrastructure protection measures, and confirm resource consent and occupation consent requirements. The team agreed that ongoing engagement with Council, navigation/safety stakeholders, and technical experts will be required immediately following application lodgement to resolve issues and minimise outstanding consent conditions.

Key Decisions

1. The outfall pipeline is to be progressed on the basis of an under-seabed installation, with the only protruding element expected to be the diffuser structure.
2. The final diffuser configuration, including whether a multiport diffuser or single outlet is adopted, will be confirmed during detailed design.
3. The project team will consider both coffer dam and marine welding installation options prior to construction.
4. Both exclusive and non-exclusive occupation consent requirements will be included in the application scope, subject to confirmation through Council engagement.
5. The project team will share project documents with relevant stakeholders following application launch and will continue direct engagement to resolve technical and regulatory matters.

Meeting Discussion

1. Wastewater Outfall Project Overview and Technical Approach

Vijay Lala, Graeme Harvey, and Khai Azizi discussed the technical details of the Beachlands South wastewater outfall project, including the proposed method of installing a treated wastewater pipe under the seabed, diffuser options, and construction methods, with input from marine and planning consultants.

BEACHLANDS SOUTH

RUSSELL PROPERTY GROUP
PROPERTY REDEFINED

FAST TRACK HARBOUR MASTER CONSULTATION

1.1. Project Scope and Objectives

Vijay Lala outlined the Beachlands South project, which includes approximately 2,000 dwellings, 50,000 square metres of commercial activity, and associated infrastructure such as roads, ecological areas, schools, and open spaces. The focus of the meeting was on the wastewater outfall component, specifically the installation of a treated wastewater pipe under the seabed.

1.2. Outfall Pipe Design and Installation

The team described the plan to thrust or bore a treated wastewater pipe for about two kilometres under the seabed, with the pipe emerging in the harbour. Two construction options were discussed: using a coffer dam to install the diffuser and then removing it or performing marine welding underwater to install the diffuser directly.

1.3. Diffuser System Options

Graeme and Khai explained that the outfall could use either a multiport diffuser system or a single outlet, with the final configuration to be determined during detailed design. The diffuser will be located four to six metres below the water surface, based on marine survey data.

1.4. Technical Clarifications and Visuals

Khai clarified that the pipeline would be embedded under the seabed and not laid on the sea floor, and shared visual plans to illustrate the layout and depth. The team confirmed that the only part of the structure expected to protrude above the seabed is the diffuser.

2. Navigation, Safety, and Infrastructure Protection Considerations

Jason raised questions about navigation, vessel safety, and protection of the outfall infrastructure. Recommendations included checking for disused cables, consulting relevant authorities, and considering mitigation measures to prevent damage to the pipeline and diffuser.

2.1 Navigation and Vessel Safety

The team discussed the potential implications of the outfall structure on navigation and vessel traffic, drawing comparisons to similar projects such as the Army Bay discharge pipe. Input was sought on the mitigation measures required to manage vessel safety during and after construction.

2.2 Disused Cables and Infrastructure Checks

Jason advised the project team to check for disused cables in the area using the LINZ website and to contact relevant organisations such as Spark and Vector to confirm the status of any cables. Charted data identifies a disused cable but does not confirm its current status.

2.3 Protection Measures for Pipeline

The team discussed potential protection measures for the pipeline and diffuser, including installing a pole or marker at the end of the pipeline, similar to previous projects, to reduce the risk of accidental damage from vessels or anchors.

2.4 Charted Data and Depth Considerations

The importance of maintaining accurate charted data was noted, particularly given tidal variations and the need to ensure the pipeline remains at the correct depth to avoid navigation hazards.

FAST TRACK HARBOUR MASTER CONSULTATION

3 Resource Consent, Regulatory, and Consultation Processes

discussed resource consent requirements, the need for both exclusive and non-exclusive occupation consents, and the importance of ongoing engagement with Council and other stakeholders during the application and construction process.

3.1 Resource Consent Requirements

The team identified the need to obtain resource consent for boring in the area and discussed challenges in accessing Council GIS data. It was agreed that the Council resource consent team would be contacted to confirm requirements and ensure compliance.

3.2 Exclusive and Non-Exclusive Occupation Consents

Christiaan raised whether an exclusive occupation consent would be needed for the construction area and whether a non-exclusive occupation consent would be required for the pipeline under the seabed. Brooke confirmed that both may be required, and the team agreed to include these matters in the application.

4 Next Steps and Ongoing Collaboration

agreed on the importance of continued communication, sharing detailed designs, and collaborative problem-solving as the project progresses.

4.1 Design Finalisation and Feedback

The team agreed to share final or shortlisted designs, particularly regarding the height and robustness of the diffuser structure, with navigation and safety authorities for feedback before construction begins.

4.2 Pre-Construction Coordination

Further discussions will take place before construction commences, particularly regarding the choice between coffer dam and marine welding methods, to ensure all mitigation and safety measures are in place.

4.3 Ongoing Document Exchange

The project team committed to providing relevant plans, reports, and conditions to stakeholders for review and to maintaining open communication to address emerging issues.

Follow-up actions:

1	Conduct an investigation to confirm the status and ownership of the disused cable line near the pipeline end area, including contacting relevant organisations such as Spark and Vector.	Khai Azizi
2	Follow up with the Council resource consent team to verify any existing resource consents or moorings in the project area, including checking with the coastal team for records and compliance.	Adonica Giborees
3	Consider and evaluate potential protection measures for the pipeline, including a pole, sign, or marker at the end of the pipeline, based on previous project examples and detailed design information.	Jason Son / Graeme Harvey

Beachlands South Fast-track

Annexure CC:

Franklin Local Board

Amanda Hopkins

07 October 2026

Substantive Fast-Track Application Feedback Form – Local Board, Ward Councillors, Houkura & Committee Chairs

This form is to be used to provide feedback on Substantive Fast-track applications under the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below.

Project Information

Project Name	Beachlands South
Address	110 Jack Lachlan Drive, Beachlands 620, 712, 758 and 770 Whitford-Maraetai Road, Beachlands Adjacent Coastal Marine Area, Beachlands
FT application number	FTAA-2606-1256

Respondent Information

Name	Amanda Hopkins
Role	Franklin Local Board Wairoa Subdivision Resource Consents Lead
Agency / Department	Franklin Local Board
Date	07/10/26

Do you support the proposal?

☐ Support

☒ Oppose Unless the conditions below are met.

☐ Neutral

Response:

The Franklin Local Board has significant concerns about aspects of the development, The Board cannot support the application unless these concerns are appropriately addressed. The Board is generally supportive of the design and style of the development.

1. **Water**

    a. Wastewater – the Board does <u>not</u> support a separate privately owned wastewater treatment plant when an existing Watercare facility is nearby. Development within the Beachlands/Maraetai community is currently constrained by the existing Watercare plant at capacity. Watercare is in the process of expanding the plant to incorporate future development and it makes sense that the new community of Beachlands South connects to a public wastewater treatment plant.

b. Flood-risk - The Board is concerned about the downstream flooding risks to the existing properties along Jack Lachlan Drive and the infrastructure in this area.

c. Water supply – the Board is concerned that there is insufficient information about the existing aquifers and the effects of the additional take on this water source, other existing bore users and potential saline intrusion. Existing communities in Beachlands relying on the privately owned water suppliers complain on a regular basis about the water quality.

2. Transport

a. Any consent conditions must align with the triggers agreed in the appeal process and settlement agreement for Plan Change 88 and that all infrastructure agreed through that process is in place at the appropriate stages of development.

b. Trip generation analysis must be tested and agreed by Auckland Council (Auckland Transport), to ensure transport upgrades occur before further development is allowed.

c. The proposed road network within the development must explicitly consider buses and emergency vehicles and align with at least minimum standards as set by Auckland Council (Auckland Transport).

3. Open space and provision for sports fields

a. There is a lack of clear sports fields provision, noting the significant increase in population and existing capacity deficits in the area. Provision for primary and secondary schools does not provide a solution for this.

b. The parks proposed by the developer do not provide the optimal solution for the new community.

c. The application does not reference the Pōhutukawa Coast Trails Plan which was adopted by the Franklin Local Board in 2017. Specific reference to how this proposal will contribute to the aspirations within this plan is critical both in terms of public amenity, active transport outcomes and community return.

d. The Coastal Walkway should be connected to the existing coastal walkway at 600 Whitford-Maraetai Road and completed in the first stages of the development.

4. Building Heights

The Board does not support apartment blocks exceeding the building height standards by a significant margin and is concerned about the visual impacts and

adverse effects on the landscape and natural character of the wider Whitford area. This has not been tested with the community, and the effects will be significant.

5. Infrastructure and Funding

The Board is concerned about how the infrastructure will be funded and managed over the longer term, including water provision and particularly the wastewater treatment infrastructure if the development proceeds with a private wastewater treatment rather than connecting to the public facility nearby. Lack of information on ownership models, management and future arrangements is a concern.

The applicant has not consulted with the local board on this application other than via a meeting with Wairoa Board members Amanda Hopkins and Alix Bonnington, at the members request.

Beachlands South Fast-track

Annexure DD:

Houkura

01 October 2026

From:	Caleb Hamilton
To:	Adonica Giborees
Subject:	RE: FAST-TRACK: Substantive application - Beachlands South, Ref: FTAA-2606-1256 (Council reference: BUN60467962)
Date:	Thursday, 1 October 2026 8:53:43 pm

Kia ora Adonica,

Thank you for sending this information through below. Going through the documents, it is clear that the Applicant has contacted all mana whenua listed for this site, and there is consistent engagement with Ngāi Tai ki Tāmaki as a partner for the Project, but also as an entity with statutory acknowledgement for the area. Ngāi Tai ki Tāmaki have provided a letter of support for the Project and a CVA with recommendations that has been incorporated into the overall Project.

Based on the information provided, Houkura is supportive that this proceeds to the next stage of the FTAA process.

Ngā mihi,
Caleb

Caleb Hamilton
Pouārahi | Principal Advisor
Ngāti Raukawa ki te Tonga, Kai Tahu
M +64 27 263 7051 E caleb.hamilton@houkura.nz W www.houkura.nz
Houkura
Independent Māori Statutory Board

From: Adonica Giborees <adonica.giborees@aucklandcouncil.govt.nz>
Sent: Tuesday, 29 September 2026 1:29 pm
To: Caleb Hamilton <caleb.hamilton@houkura.nz>
Subject: RE: FAST-TRACK: Substantive application - Beachlands South, Ref: FTAA-2606-1256 (Council reference: BUN60467962)

Kia ora Caleb,

Thank you for your e-mail.

There are quite a few documents, however may I direct you to the Fast Track website which includes these and are listed quite clearly, I have provide a direct link here and below:
Substantive application

Appendix 22

Attach-22-13.-Letter-to-Relevant-MACAA-Parties-and-Iwi-Authorities.pdf
Attach-22-15.-NTKT-Support-Letter.pdf

Appendix 20 (relates to Iwi & MACA Consultation):

Attach-20-Cultural-Values-Assessment_Redacted.pdf
Attach-20A-BSLP-IWI-and-MACA-Consultation-Ltr-18-05-26.pdf
Attach-20B-NTKT-Ltr-re-BS-WWTP.pdf

The attached Planning Assessment also provides commentary around Mana whenua values at Section 16.8.

I hope this is useful, but please let me know if there is anything else I can do to assist.

Kind Regards,

Adonica Giborees | Principal Project Lead
Premium Resource Consents
Auckland Council
Mob +64 27 203 2562
Auckland Council, Auckland House, Level 6, 135 Albert Street
Visit our website: www.aucklandcouncil.govt.nz

Please note I take every second Friday as a scheduled day off. I work from the Albert Street office Monday and Thursday, and from home Tuesday, Wednesday and Friday. I am contactable by phone, email or MS Teams. Thanks!

From: Caleb Hamilton <caleb.hamilton@houkura.nz>
Sent: Tuesday, 29 September 2026 9:36 am
To: Adonica Giborees <adonica.giborees@aucklandcouncil.govt.nz>
Subject: RE: FAST-TRACK: Substantive application - Beachlands South, Ref: FTAA-2606-1256 (Council reference: BUN60467962)

Kia ora Adonica,

Thanks for sending this through. Can you please provide me with copies of the engagement with mana whenua to date for this project, so Houkura can provide comment?

Ngā mihi,
Caleb



From: Adonica Giborees <adonica.giborees@aucklandcouncil.govt.nz>
Sent: Monday, 28 September 2026 2:21 pm
To: Councillor Richard Hills <Richard.Hills@aucklandcouncil.govt.nz>; Councillor Josephine Bartley <Josephine.Bartley@aucklandcouncil.govt.nz>; Councillor Andrew Baker <Andrew.Baker@aucklandcouncil.govt.nz>; RES Local Board Franklin <FranklinLocalBoard@aucklandcouncil.govt.nz>; Taff Wikaira <taff.wikaira@houkura.nz>; Caleb Hamilton <caleb.hamilton@houkura.nz>; Ngarimu Blair <ngarimu.blair@houkura.nz>; Karen Wilson <Karen.Wilson@houkura.nz>
Cc: Brooke Dales <brooke@dcs.gen.nz>
Subject: FAST-TRACK: Substantive application - Beachlands South, Ref: FTAA-2606-1256 (Council reference: BUN60467962)

Kia ora,

This email is to provide visibility on Beachlands South project, which is currently under consideration under the Fast-track Approvals Act 2024 as a substantive application. This communication forms part of an updated internal process to ensure key elected members are informed of any significant issues arising through the fast-track pathway.

The application documents can be accessed here: FTAA-2606-1256 - Beachlands South Fast Track project (BUN60467962)

The link to the project on the EPA website is also provided: Beachlands South

Application Summary

In summary, the Project will provide for:

- Residential activities comprising approximately up to 2,000 dwellings in a variety of housing types, densities and vacant sites for future residential development;
- Establishment of a commercial local centre supported by employment opportunities within and around the periphery of the local centre and on the Whitford-Maraetai Road frontage comprising approximately 27,000m^2 of commercial GFA and 30,000m^2 of light industrial GFA;
- Provision for future primary and secondary educational facilities.
- Establishment of an Ecological Protected Area Network (EPAN) comprising approximately 75 hectares of land being protected, replanted, restored, maintained and enhanced including preservation of streams and their margins;
- A series of open spaces including a suburban park, neighbourhood parks, the Fairway Reserve, golf course, esplanade reserve and riparian margins;
- Provision of public access to and along the coastal marine area and the creation of a quality coastal pathway;
- Public transport enhancements and integrations including expanded ferry passenger capacity;
- Staged road upgrades including the provision of pedestrian and cycling facilities along Jack Lachlan Drive, the upgrade of Whitford roundabout, a series of intersection upgrades; and
- Establishment of infrastructure to service the project including wastewater, water supply, stormwater, telecommunications and power.

The Local Board is invited to provide comment – Please provide comment by **5pm Monday 5th October 2026,** please see response template attached.

For the Councillors and Houkura, please note that the purpose of this update is to provide visibility only and no formal feedback is sought, although comments are welcome should you wish to share them.

Please reach out if you have any questions.

Kind Regards,

Adonica Giborees | Principal Project Lead
Premium Resource Consents
Auckland Council

Mob +64 27 203 2562
Auckland Council, Auckland House, Level 6, 135 Albert Street
Visit our website: www.aucklandcouncil.govt.nz

I work from the Albert Street office Monday and Thursday, and from home Tuesday, Wednesday and Friday. I am contactable by phone, email or MS Teams. Thanks!



CAUTION: This email message and any attachments contain information that may be confidential and may be LEGALLY PRIVILEGED. If you are not the intended recipient, any use, disclosure or copying of this message or attachments is strictly prohibited. If you have received this email message in error please notify us immediately and erase all copies of the message and attachments. We do not accept responsibility for any viruses or similar carried with our email, or any effects our email may have on the recipient computer system or network. Any views expressed in this email may be those of the individual sender and may not necessarily reflect the views of Council.