12 May 2025
Job No: 1015172.1701

Watercare Services Limited
Private Bag 92521
Victoria Street West
Auckland 1142

Attention: Xenia Meier

Dear Xenia

s92 Further Information Request - Response Document
May Road Stream Enhancement (BUN60444050)

This letter provides a response to the information requested in Auckland Council's Request for Further Information pursuant to s92 of the Resource Management Act 1991 (RMA) dated 15 March 2025. The questions are listed below with responses provided in blue text.

Engineering

1. With respect to earthworks, the submitted assessment of environmental effects states that approximately 500 m^3 of excavations are proposed. However, it is noted from the submitted cross sections that filling is also proposed. Accordingly, please provide an earthworks plan that clearly shows the full extent of the earthworks proposed, including details of the excavation depths and fill heights and overall area and volume.

   The earthworks are for the purposes of channel clearance and re-profiling of the stream. Section 3.2 of the AEE states that approximately 500 m^3 of material is required to be moved as a result of cutting, rock breaking, filling and trimming the stream profile. The cross sections provided with the application (contained at Appendix A of the Assessment of Environmental Effects (AEE) show the existing and proposed ground levels associated with the stream channel clearance and enhancement. No filling is proposed as such; rather reference to filling relates to moving existing material and re-profiling (slightly higher in places and slightly lower in other places) as shown in the cross sections.

   The proposed earthworks are well within the permitted limits for the Business – Light Industrial Zone (see Table 4.2 of the AEE), albeit have been included as a reason for consent based on their location within the riparian yard. Please note the site is already being used as a main construction area for the Central Interceptor and the imagery used for the civil drawings is not a current representation of the site. See Figure below for the extent of the CI works. The earthworks proposed as part of this application is limited to the Marion Ave watercourse and Northern Stream and their associated banks.

Tonkin & Taylor Ltd | 1 Fanshawe St, Auckland Central, Auckland 1010, New Zealand
PO Box 5271, Victoria Street West, Auckland 1142 P +64-9-355 6000 F +64-9-307 0265 E akl@tonkintaylor.co.nz

2. The submitted cross sections of the stream channelling do not appear to show all of the proposed finished ground levels. Please update the cross sections to include all finished ground level profiles as they relate to the proposed earthworks.

   As set out above, the remainder of the site beyond the stream reprofiling has been modified – see Figure above. The finished ground levels provided in the cross sections show the change in stream profile subject to this application which will then be tied into the existing ground profile as a result of the consented/designated CI works (outside the scope of this application).

3. Please confirm whether compliance will be achieved with respect to the relevant flooding related matters in Chapter E12 of the Auckland Unitary Plan (Operative in Part), and particularly Standard E12.6.2.(11). Please note that any earth filling proposed within the flood plain / overland flow path may create flood dispersion or an increase in flood volume with respect to surrounding properties. If so, this will need to be identified and addressed to ensure that existing adverse flooding effects are not increased / exacerbated.

   The project is a stream enhancement project which seeks to reprofile an existing watercourse. This will result in minor modifications to the stream channel and adjacent banks. As such, while there are localised earthworks that include recontouring/re-profiling, there is no actual filling proposed (please refer response to question 1).

   Jacobs has undertaken post-development flood modelling to ensure that the proposed ecological enhancement project does not increase flood impacts to the surrounding area. This Hydraulic Memo was provided at Appendix D of the AEE. Based on that assessment, peak water levels show a decrease with the addition of the stream enhancements for the 10-year and 100-year annual recurrence interval (ARI) and climate change (ARI + CC) scenarios as well as for some locations for the 2-year scenario. The modelling also shows a decrease in peak flow and volume through the existing 1800 dia culvert in the north-eastern corner.

Healthy Waters

Please find attached response to further queries from Heathy Waters in the document at Appendix A.

We trust this satisfactorily addresses your queries. Please let us know if you have any further comments.

Yours sincerely,

Mikayla Woods
Senior Planner

Karen Baverstock
Project Director

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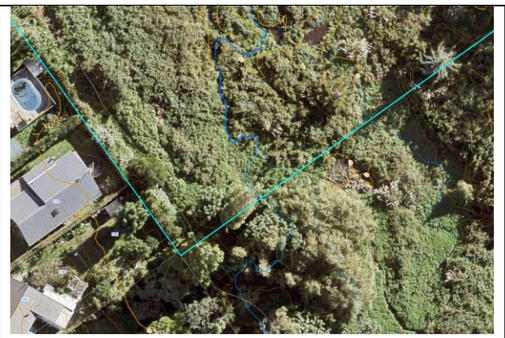
Appendix A HWD s92 Requests

S92 Requests – HWD

HWD Comment – 13.03.2025 (**Revision A**)		Response – 12 May 2025	**HWD Comment** – xx.xx.xxxx (**Revision A**)	Response – xx.xx.xxxx	**HWD Comment** – xx.xx.xxxx	Status
HWD G&D						
1.	**Relevant scenarios for comparison** My understanding is that the site has been established for the CI works based on an existing consent. My understanding is that the works in the Goodman Site have now all been completed. For the purposes of assessing the impacts on the downstream environment of the proposed stream works, would not the baseline model be Model 2, and this to be compared against a post development model, Model 3? In comparing these two models it appears that the peak water levels and peak flows increase in some locations in the post development scenario. Can you please assess the effects of this?	Watercare considers it is appropriate to use Model 1A as the baseline model as this is 54 Roma Road's true pre-development model (i.e. when CI works on the site were started) and as per condition 6.3 of Watercare's CI stormwater consent. The Model 3 post development scenario provides for both the Goodman site works that have been completed as well as the ecological enhancement works 'post development scenario'. Comparing this to Model 1A provides the most accurate pre- and post-development change in flows/flood hazards. As such, Watercare considers the assessment of flood hazard effects provided with the consent application is appropriate. This current consent application is required as the CI consent does not provide for a component of the works i.e. instream works at this location. However ecological enhancement works are anticipated under the CI consent and should not be considered in isolation from the CI works on the site for the purpose of assessing flood hazards, as all works are being undertaken by Watercare. In addition, the Goodman works have occurred on a separate site and have not affected the northern watercourse.				Open
2.	**Climate change effects** Please update the models to account for effects of 3.8°c climate change.	The Hydraulic Memo considered 2.1 degrees for climate change as the baseline model was prepared using this (in accordance with the Auckland Council Stormwater Flood Modelling Specifications (November 2011). The Goodman's model also used this climate change allowance. Therefore, for consistency the post development models have used the same allowance. The requirement to allow for 3.8 degrees climate change came into force March 2024 after the baseline was set (i.e. after CI consent was granted). Taking this into account, along with the purpose and nature of the ecological enhancement and associated effects, Watercare does not consider it necessary to update this to provide for 3.8 degrees climate change.				Open
3.	**Connectivity upstream** The proposed stream channel appears to include a sort of stop bank between the stream and the rest of the site area (including proposed stormwater pond). The tie in with upstream is unclear as it appears that this is designed based on there being a channelised stream in the upstream site that will directly connect to this proposed stream. AC GeoMaps shows an overland flowpath which does not align with the proposed stream. Can you please confirm connectivity with the upstream site?	As confirmed by Watercare on site on 14 April 2025, Watercare already has consent for the existing stormwater pond. The purpose of the stream bank reprofiling is for ecological enhancement purposes. As discussed at Section 2.1 of the AEE, the land parcel immediately to the south (upstream) at 105 May Road is currently leased to Watercare for construction of the shaft site and is subject to separate authorisations (BUN60405379) to recontour the site to maximise the extent of developable area while maintaining flood storage. This includes realigning an overland flow path/watercourse within that site that discharges to the Oakley Creek Tributary at the eastern boundary of 105 May Road and 105A-109A May Road as shown in purple in the figure below. This provides separation of overland flows and flood storage within each of the respective sites. The site is being used as a main construction area for the Central Interceptor and as such, Geomaps and aerial imagery does not show the existing arrangement i.e. the aerial image is outdated and the overland flow path referred to in this query no longer exists post-development to undertake CI works (refer aerial image further below and in AEE).				Open

		 				
4.	**Proposed stormwater pond** Can you please confirm proposed connectivity of the pond with the proposed stream works?	The stormwater pond is already existing as part of the CI works as shown in the figure below. There is a bund between the existing stormwater pond and the Marion Ave watercourse subject to this application. No changes are proposed to the pond such that it will change what has previously been modelled and consented / the ecological enhancements are not to the pond but rather to the stream.				Open

	It is stated that WSL, "wish to undertake ecological enhancements within the May Road Pond". Can you please confirm if this will include any earthworks or have any effects on the pond volume or shape such that it will change what has previously been modelled?					
HWD Catchment Planner Comments						
5.	TBC – note that further comments are to come from the HWD catchment planner.					