

From: [Laila Alkamil](#)
To: [Marian Whitehead](#)
Cc: [Simon Cocker](#)
Subject: Re: FW: BUN60425181 - Ararimu Road Managed fill -Updated Landscape Mitigation Plan
Date: Thursday, 22 May 2025 2:41:40 pm
Attachments: [image001.png](#)

Hi Marian,

Please see our response in **red** below.

Kind regards

Laila

Laila Alkamil | Senior Planner, *MNZPI*
Williamson Water and Land Advisory

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On Thu, 22 May 2025 at 13:53, Marian Whitehead
<Marian.Whitehead@aucklandcouncil.govt.nz> wrote:

Hi Laila

Our Landscape architect has now reviewed the updated Landscape mitigation plan & Simon cockers Memorandum.

For clarity, could you please respond to her queries below:

A couple of clarifications just to ensure I am understanding everything as proposed – I don't think this requires a meeting, hopefully the applicant is able to just respond to the points / provide plans as required.

- All wetland and stream planting within both the sites are to be protected via covenant. Or will some of the planting on the neighbours site not be covenanted? If not, can it be considered as mitigation from an ecological point of view if it could be removed in the future? **All wetland and stream planting is proposed to be covenanted, including on the leased section of the site. Only planting within Transpower's easement area is not able to be covenanted.**

- The planting next to the power lines (either side of the access road to the power pylon) will not be protected. As noted in our RFI response, Transpower does not agree to a covenant within their easement area.

- Can they identify on a plan which areas are to be covenant vs which areas of planting aren't? We could produce a plan if required, however the only area not proposed to be covenanted is within Transpower's easement area.

- The areas of planting that are to be undertaken after works should also be identified on a plan with proposed planting types – such as the sediment pond areas? No planting is proposed after completion of works. In relation to SRPs, these will be removed once earthworks are complete; this are close to the wetland buffer, but are located in what is currently pasture.

- The planting adjacent to the powerlines is to be manuka and karamu, while planted at a small grades 50cell / seedling, these species grow to 4-8m high and 6m high respectively. Therefore, while they are no longer directly below the powerlines, is the mature height of the plants acceptable from Transpower perspective (noting a maximum 2.5m height in their commentary). This is requested, as the planting is providing both visual mitigation through screening the fill works, as well as replacing lost landscape values. However, if it has to be of a lower height, it will not provide the same visual screening and will require ongoing maintenance to be kept to that height. Planting adjacent to the transmission lines are subject to the requirements of the NZECP, which are included as proposed conditions of consent. The proposed conditions of consent (which Transpower has reviewed and approved of), requires that planting within 12 m of the transmission lines do not exceed 2 m in height and any vegetation outside of the 12 m corridor, must be setback to ensure the trees cannot fall within 4 m of the trasmission lines. All proposed planting adjacent to the transmission lines will be maintained by the consent holder to adhere to those heights and clearances. The Applicant's landscape archiect confirms that this requirement has been taken into account when preparing the landscape visual assessment. It is also advised by the Applicant's landscape archiect that this area of planting is on a ridge and its purpose is to reinforce existing landscape patterns, rather than provide specific visual screening.

- The landscape response notes that if Transpower need to remove the planting, that it will be replanted after the works requiring the removal. How will this be enforced/ensured, will the planting need to be at a larger grade (currently 50cell / sapling are proposed)? Consent conditions require the replanting of the area, in the fairly unlikely event that Transpower is required to remove it. Replantings will be 50c cell/ saplings as proposed, noting the difficulty in sourcing

larger grade species.

Also:

Please confirm that you are proposing five-year maintenance and management of the riparian /wetland areas. This would be anticipated, ongoing weed/pest management may also be required (ecologist likely have a view on this). **Confirming a 5 year maintenance and management of the riparian / wetland areas is proposed.**

I note the landscape response refers to a 15year duration, while the AEE notes 16year duration – I assume the 16years within the AEE is correct. **A 16 year consent duration is proposed; apologies for any confusion.**

Kind regards

Marian Whitehead | Senior Planner
Auckland Council | Planning and Resource Consents Department

Mob: 021 523 715

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Visit our website: www.aucklandcouncil.govt.nz

From: Laila Alkamil <laila.alkamil@wwla.kiwi>

Sent: Friday, 16 May 2025 10:33 am

To: Marian Whitehead <Marian.Whitehead@aucklandcouncil.govt.nz>

Cc: Simon Cocker <simon@scla.nz>

Subject: Re: FW: BUN60425181 - Ararimu Road Managed fill - Council comments on s92 response provided 15-4-25

Hi Marian,

As discussed, please see the memo from our landscape architect attached addressing the three outstanding points raised in your email dated 14 May 2025. I trust these memo will close these matters out.

In terms of the culvert query, can you please advise if there's any further clarity regarding what is being requested?

Kind regards

Laila

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Williamson Water and Land Advisory

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On Wed, 14 May 2025 at 12:55, Laila Alkamil <laila.alkamil@wwla.kiwi> wrote:

Thanks Marian - if we could have the meeting this week, that would be much appreciated.

And yes - confirming you have the latest landscape plans.

Kind regards

Laila

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Williamson Water and Land Advisory

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On Wed, 14 May 2025 at 12:50, Marian Whitehead
<Marian.Whitehead@aucklandcouncil.govt.nz> wrote:

Hi Laila

I'll send the updates through to our Landscape Specialist and then arrange a meeting time. Could you please confirm we are looking at the latest plans as per my email below.

Thanks

Marian Whitehead | Senior Planner
Auckland Council | Planning and Resource Consents Department

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From: Laila Alkamil <laila.alkamil@wwla.kiwi>

Sent: Wednesday, 14 May 2025 12:31 pm

To: Marian Whitehead <Marian.Whitehead@aucklandcouncil.govt.nz>

Cc: Simon Cocker <simon@scla.nz>

Subject: Re: FW: BUN60425181 - Ararimu Road Managed fill - Council comments on s92 response provided 15-4-25

Hi Marian,

I just tried calling you.

Could we please arrange a call with the landscape architect to go through these plans? There appears to be some confusion as to what areas of planting have been removed and assessed in the Landscape Assessment already.

Kind regards

Laila

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On Wed, 14 May 2025 at 10:41, Marian Whitehead
<Marian.Whitehead@aucklandcouncil.govt.nz> wrote:

Thanks Laila for the confirmation.

I was looking at the landscape assessment Updated 27 September 2024 – Rev B ,
provided to us on 18-10-24. Is that the latest assessment?

Then the updated mitigation planting plan is that dated 03-04-25 which we received
on 14-4-25.

Kind regards

Marian Whitehead | Senior Planner
Auckland Council | Planning and Resource Consents Department

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From: Laila Alkamil <laila.alkamil@wwla.kiwi>

Sent: Wednesday, 14 May 2025 9:44 am

To: Marian Whitehead <Marian.Whitehead@aucklandcouncil.govt.nz>

Cc: Simon Cocker <simon@scla.nz>

Subject: Re: FW: BUN60425181 - Ararimu Road Managed fill - Council comments on s92
response provided 15-4-25

Hi Marian,

The comments provided are from the landscape architect, Simon Cocker.

Just to be clear, what version of the landscape assessment are you referring to?

Kind regards

Laila

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Williamson Water and Land Advisory

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On Wed, 14 May 2025 at 09:06, Marian Whitehead
<Marian.Whitehead@aucklandcouncil.govt.nz> wrote:

Hi Laila

Thank you for your response.

Are the comments regarding the landscape assessment from Simon Cocker, being the person who undertook the original assessment and mitigation planting plan?

The comments do not cover :

- the reduction in the length and width of the planting along the north- eastern boundary
- the accessway by the Transpower lines not being planted.
- the extent to which the ongoing maintenance of the planting following the completion of the fill works is considered important for ongoing mitigation.

It would be helpful to receive Simon Cocker's comments on all of the changes in

the Landscape mitigation plan.

When those comments are received I can pass them to our Landscape Specialist for review, and if necessary set up a meeting following that.

Kind regards

Marian Whitehead | Senior Planner
Auckland Council | Planning and Resource Consents Department

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From: Laila Alkamil <laila.alkamil@wwla.kiwi>

Sent: Tuesday, 13 May 2025 2:12 pm

To: Marian Whitehead <Marian.Whitehead@aucklandcouncil.govt.nz>

Subject: Re: FW: BUN60425181 - Ararimu Road Managed fill - Council comments on s92 response provided 15-4-25

Hi Marian,

Please see my comments in red below.

Thanks

Laila

Laila Alkamil | Senior Planner, *MNZPI*
Williamson Water and Land Advisory

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On Tue, 13 May 2025 at 14:01, Marian Whitehead
<Marian.Whitehead@aucklandcouncil.govt.nz> wrote:

Hi Laila

In regard to your email I note the following:

Mitigation Planting

The request for an explanation and comment from Simon Cocker regarding the effectiveness of the amended mitigation planting and ensuring long term maintenance was from me, based on previous discussions with our Specialists. This is requested because there has been a reduction in planting from that originally proposed and we seek confirmation that this will achieve the same level of landscape and visual mitigation that was originally proposed. This includes how its effectiveness will be retained when there is a reduction in the planting area, the accessway by the Transpower lines will not be planted when the fill is complete, and there appears to be no ability to ensure the long term retention and maintenance for much of the planting.

I'm not sure that a meeting is needed regarding this unless it is unclear what is being requested.

The previous iteration of the landscape and ecological mitigation proposal was contained in the SCLA assessment (Rev B), dated 23 October 2024. The primary divergences between this previous iteration and the current iteration of the plan are as follows:

A minor refinement to the western edge of the landscape mitigation planting where it adjoins the car park / storage area and SRP. This will not result in any change in the mitigation offered by the proposed planting.

A reduction in the width of the finger of planting on the northern boundary of Stage 1. This area of planting has been reduced in width but still encompasses the watercourse and includes wetland and wetland buffer planting. The area not to be planted lies between the gradually rising land between the watercourse and the foot of the proposed Stage 1 fill area. The boundary with the neighbouring property is defined by tall pine trees, and these, as well as the proposed mitigation planting (which varies between 10 - 30m in width) will buffer views from this adjoining property. The reduction in the width of this planted area will not diminish the mitigation offered when compared to the planting as proposed under the previous iteration. The ecologist is better qualified to comment on the

ecological contribution of the planting, but in my opinion, the planting of the wetland and its riparian margins will still provide the landscape benefits previously described.

The long term maintenance and health of the planted areas will be secured by a requirement in the conditions of consent to manage and maintain the landscape mitigation and ecological (wetland and wetland buffer planting) in accordance with a management plan prepared as a condition of consent. This will be secured for the duration of the consent. Where planted areas are not covenanted, the requirement to manage and maintain these areas will still be enforced. If planting is removed by Transpower (noting however, that the proposed planting has been specified to ensure that it will not conflict with the operational needs of the powerlines), then a clause in the management plan will require replanting of the area of planting removed.

If this is not considered acceptable, a meeting with the council's landscape architect would be helpful to avoid further delays.

Ecology

Antoinette Bootsma has advised that she is available to discuss the progressive encasement matter. I suggest that could be a conversation between Antoinette and RMA Ecology. I'm not sure that a wider meeting is needed at this stage.

Antoinette can be contacted on the following:

antoinette.bootsma@aucklandcouncil.govt.nz Phone: 0273320868

Noted - thank you. RMA Ecology will get in touch with Antoinette to discuss.

I'm happy to discuss this further if needed.

Kind regards

Marian Whitehead | Senior Planner
Auckland Council | Planning and Resource Consents Department

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From: Laila Alkamil <laila.alkamil@wwla.kiwi>
Sent: Tuesday, 13 May 2025 10:26 am
To: Marian Whitehead <Marian.Whitehead@aucklandcouncil.govt.nz>
Cc: Emily Roper <emily.roper@rmaecology.co.nz>; Simon Cocker <simon@scla.nz>
Subject: Re: FW: BUN60425181 - Ararimu Road Managed fill - Council comments on s92 response provided 15-4-25

Hi Marian,

Thanks for your email.

Could we please arrange a call with the council's ecologist and landscape architect? It would be good to discuss the progressive encasement question as well as the proposed planting and edge effects raised.

Kind regards

Laila

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On Fri, 9 May 2025 at 11:29, Marian Whitehead
<Marian.Whitehead@aucklandcouncil.govt.nz> wrote:

Hi Laila,

We have received your further information response dated 15 April 2025 and related attachments and these have been reviewed by the relevant Council

Specialists.

Our responses are included below the relevant requests in the email below in blue font.

Legal Instruments

1. The instruments provided still do not contain the full consent notice or the full Transpower easement.

To clarify, the full consent notice is not provided however it is accepted that only part of the consent notice is contained in the document available through the LINZ website. It is accepted that the Transpower easement refers to a generic document.

Noise Assessment

1. Not Resolved - As advise by email on 18 February, in your response to the item (Item 2 in your letter dated 17 February 2025) regarding noise you have referred to the Acoustic Memo provided on 18 October 2024. That Memo identifies the truck numbers on the busiest day and those on a typical day. The busiest day has almost twice as many truck movements per day and per hour as the typical day. The Predicted noise rating levels in Table 1 have utilized the typical truck numbers. The additional information requested was to also provide the predicted noise levels for the maximum truck movements / busiest day truck numbers. This has not been provided.

The predicted noise levels requested have been provided, and an explanation regarding the adjustments has also been provided.

Earthworks

1. Re the updated *Civix 34000 series ESCP Drawings, Revisions E & D*, there is generally not much change from previous versions, plans show 2 permanent SRPs servicing 6 earthworks stages.
2. The updated *Civix 250217 - 1618 Ararimu Road - Earthworks Report, 3 Earthworks*, provides a generic approach to the construction of controls, however given the long steep flowpaths which will result, there needs to be a detailed earthworks methodology that explains how/when the various Stages will be managed.

3. The updated Civix 250217 - 1618 Ararimu Road - Earthworks Report, 3 Earthworks, needs to explain how the previous Stages will be fully stabilised and the clean water diverted away from the SRP. Given each Stage shares the same SRP, the methodology must recognise that even when instantly stabilised with seed and mulch, sediment controls are required until the stabilisation is robust enough to withstand erosion.
4. Also, the 6 Stages show open areas from ~1 to 3-4ha, with no detail re winter restrictions.
5. There is no reference in the earthworks methodology to the draft Adaptive Management Plan (AMP), which is also generic and lacking detail.

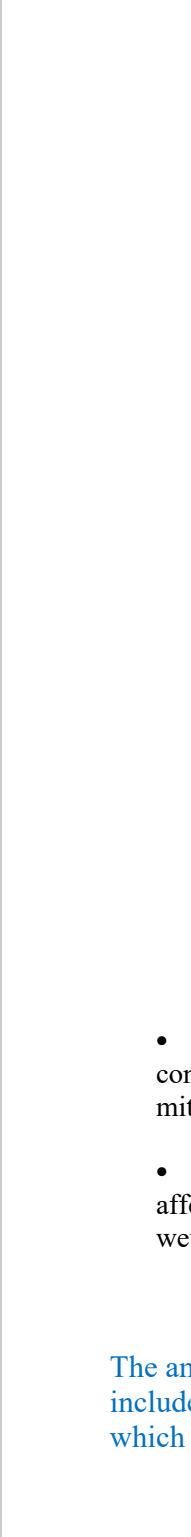
Regarding the request for an AMP, the guidance refers to small to medium sites as those up to '5ha in total area'. The proposal is for a total fill area of 10ha. In addition, it has not been explained exactly how it is intended to use the same two SRPs for all the various stages, and that approach can be problematic given the long lineal distance from the top to bottom of the sites, and transitioning from one stage to another with sufficient robust stabilisation on the completed stage. The earthworks effects for this proposal are therefore not understood with sufficient certainty.

6. Council's earthworks specialist has noted that he is unable to support this application in its current form.
7. In addition, the updated 34000 ESCP Drawings show the truck access to the eastern fill areas to be around the top of the fill area for all of the stages. There is no reason given for this and it is noted that this will have potential visual and landscape effects that have not been considered or assessed. It is also shown to outside the 'cutfill assessment areas'.

Discussion regarding earthworks matters is ongoing between Council's Specialist, Steve Bryant, and the applicant and Civix engineers.

Freshwater Ecology

1. The Ecological Mitigation and Offset Management Plan dated October



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2. No information has been provided regarding progressive encasement. This matter remains **unresolved**

You have provided comments regarding progressive encasement and this has been further reviewed by Council's Freshwater Specialists who consider that this matter is not adequately addressed.

As the two culverts are on the same site the 8m additional loss of stream bed from encasement exceeding the permitted culvert length of 30m should be accounted for in any offsetting. In the context of the stream loss already occurring on the site, cumulative effects are relevant, and opportunities exist for the additional loss of 8m of stream to be offset/ compensated.

Therefore, please provide an updated offset/compensation assessment that addresses the additional loss of 8m of stream bed.

(Council's Freshwater Specialist Antoinette Bootsma is available to discuss this matter with RMA Ecology if that would be helpful).

3. Values for wetland potential value are addressed. This matter is **resolved**

Terrestrial Ecology

4. Maintaining the accessway through the proposed mitigation planting in the western area creates edge effects and reduces the actual width of the planting to 5m for some of it and will compromise the long term sustainability and benefit expected to be provided by mitigation planting. This is therefore not considered to provide the level of mitigation required.

The edge effects resulting from the accessway through this planting have been acknowledged and increased pest control is proposed, however it is unclear how this will be enforced in the long term given that a covenant has not been accepted by Transpower. The width of the mitigation planting on both sides of the accessway in the western area is also reduced from that originally shown, which further decreases the establishment and long term viability of the planting and the mitigation it was intended to provide. I note also, that Figure 2c still shows that "*Access alignment within planted area to be planted on completion of fill works*".

See also my comments regarding Landscape Mitigation Planting in 6 below.

5. Transpower confirmation regarding a covenant over the mitigation planting is also still required. (It is understood that you have contacted Transpower in this regard), to ensure that any planting within the Transpower easement will be maintained in perpetuity.

You have provided correspondence from Transpower advises that they are not willing to have a covenant for the mitigation planting within the Transpower easement. See my comments regarding Landscape Mitigation Planting in 6 below.

6. Written approval from the landowner regarding a covenant for the eastern planting area has not been provided.

The written approval provided from the adjoining landowner does not mention whether the landowner is willing to have a covenant for the riparian planting and/ or landscape mitigation planting registered on the title of that property.

It is also noted that the extent of the landscape mitigation planting on that adjoining property has been reduced.

Landscape Mitigation Planting

Items 4 – 6 and the updated landscape mitigation planting plans advise that the location, extent and width of proposed landscape and visual mitigation planting has changed. In addition, covenants will not be provided to provide long-term protection and pest and weed management for those areas and the access will not be planted on completion of the fill works. No explanation as to effectiveness of the amended planting for landscape and visual mitigation including its ecological contribution has been provided.

Please provide an explanation and comment from the Landscape Specialist (Simon Cocker) regarding the effectiveness of the amended mitigation planting now being proposed and also the inability to ensure long term maintenance and health of the planted areas. (This aligns with the outstanding matters in Items 51 and 55 of the s92 response Table).

7. It is noted that you have proposed that the fencing plan be provided as a condition.

8. Please advise if it is accepted that a Lizard Management Plan would be provided as a condition.

The applicant has not accepted a Lizard Management Plan as a condition and the absence of a Lizard Management Plan will need to be assessed accordingly.

9. The width of the buffers have been included in a table in the letter but widths are not shown on the plans.

Buffer widths are now shown on the Ecological Mitigation Offsetting Plan.

Updated AEE

The updated AEE does not appear to have covered a number of the changes to the proposal that have occurred since the application was first lodged:

- The pine plantation is still included through the document although the trees are now felled. E.g. pp. 4, 10, 18 and others.
- P. 12. Section s.2.9 refers to Appendix D for the PSI which is in Appendix E.
- It would be helpful to include a list of updated drawings, reports, information etc. to be referenced in the Appendices.
- P.17 Trip generation does not appear to be the latest truck volumes etc. that has been provided.

The Trip generation stated does not include the busiest days of 87 trucks arriving and then departing the site, with up to 9 trucks (18 movements per hour) at peak over a 10 hour day. The TIA states 55-87 trucks per day. This should be clarified in the AEE. (It appears that the truck numbers stated in the AEE of 6 trucks each hour is averaging over a 15 hour day for the purposes of the noise assessment.)

- P.41 Notification Assessment – does not include that notification is now requested by the applicant.
- Hours of operation should be included in the AEE so that the information is clear.

It is also suggested that Sections 8 & 9 of the AEE be updated. –

consultation & conclusion.

I am available to discuss any of the comments and matters raised.

Kind regards

Marian Whitehead | Senior Planner
Auckland Council | Planning and Resource Consents Department

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