

Auckland Council
Victoria Street West
Private Bag 92300
Auckland, 1142

12 March 2026

Attention: Michelle Creamer

Tēnā koe Michelle,

NZ Transport Agency Waka Kotahi Notice of Requirement SH16 The Strand – Revised Notice of Requirement and response to s92 RMA Request for Further Information

Thank you for your letter dated 27 November 2025 requesting further information in respect to the Notice of Requirement (NOR) for State Highway 16 (SH16) The Strand, pursuant to s92 of the Resource Management Act 1991 (RMA). This letter and the attached documents set out our response to those queries and other clarifications sought during subsequent engagement:

- Attachment A – Notice of Requirement Form 18 (revised March 2026)
- Attachment B – Flood Hazard Report
- Attachment C – GIS maps
- Attachment D – Tabulated s92 response
- Attachment E – The Strand road overbridge details (over KiwiRail Designation 6302)

1 Revised Notice of Requirement (March 2026)

NZTA has prepared a new NOR (Attachment A) to replace the NOR lodged with Council in October 2025. The earlier NOR should now be disregarded. The attached NOR dated 12 March 2026 should be included in the notification package and assessed for Council's recommendation under section 171 RMA.

The proposed conditions in the NOR are proportionate to the scale of potential adverse effects which may occur from activities authorised by the designation, consistent with the direction set out in the National Policy Statement for Infrastructure 2025 to enable infrastructure while managing adverse effects. Where appropriate, the proposed conditions and advice notes in the March 2026 NOR take account of matters raised by Council in the s92 request and through subsequent engagement.

Potential effects from future work within the designation can be appropriately managed through the proposed conditions and, where relevant, Outline Plan process set out in s176A of the RMA, which requires, amongst other things, that an Outline Plan must show 'any other matters to avoid, remedy or mitigate any adverse effects on the environment'.

2 Further assessment reports

Council's s92 letter requests several additional specialist reports, including a Construction Noise and Vibration Management Plan (CNVMP) or Vibration Management Guide, Archaeological Assessment of Effects, and Built Heritage Assessment.

Future works within the transport corridor will be undertaken in accordance with the purpose and conditions of the designation, and if needed, an Outline Plan submitted in accordance with section 176A of the RMA. As there are no planned works to assess or manage at this time, it is not appropriate or practicable to prepare further technical assessments for future unknown work. Section 176A3(f) of the RMA requires that matters to address actual and potential effects are included in the Outline Plan of work (if needed), which, coupled with the proposed conditions, is the appropriate mechanism through which works-specific effects assessment and management within the designation can be addressed.

3 Natural hazards and Plan Change 120

Auckland Council notified Plan Change 120 (Housing Intensification and Resilience) (PC120) on 3 November 2025. While the intensification matters have limited application to the city centre, the proposed natural hazard rules of PC120 have immediate legal effect under Schedule 1 of the RMA¹. An assessment of the NOR in relation to the natural hazard provisions of the AUP:OP and PC120 is provided below.

The Flood Hazard Assessment Report (Attachment B) includes an assessment against the new requirements for hazard risk assessments under PC120, specifically Policies E36.3(3), E36.3(4A) and E36.3(4B) of PC120, which specify requirements for such risk assessments.

3.1 Natural Hazard Area overlays

The proposed designation area is within the Very High to Low Flood Hazard Areas under PC120, as shown in Figure 1.

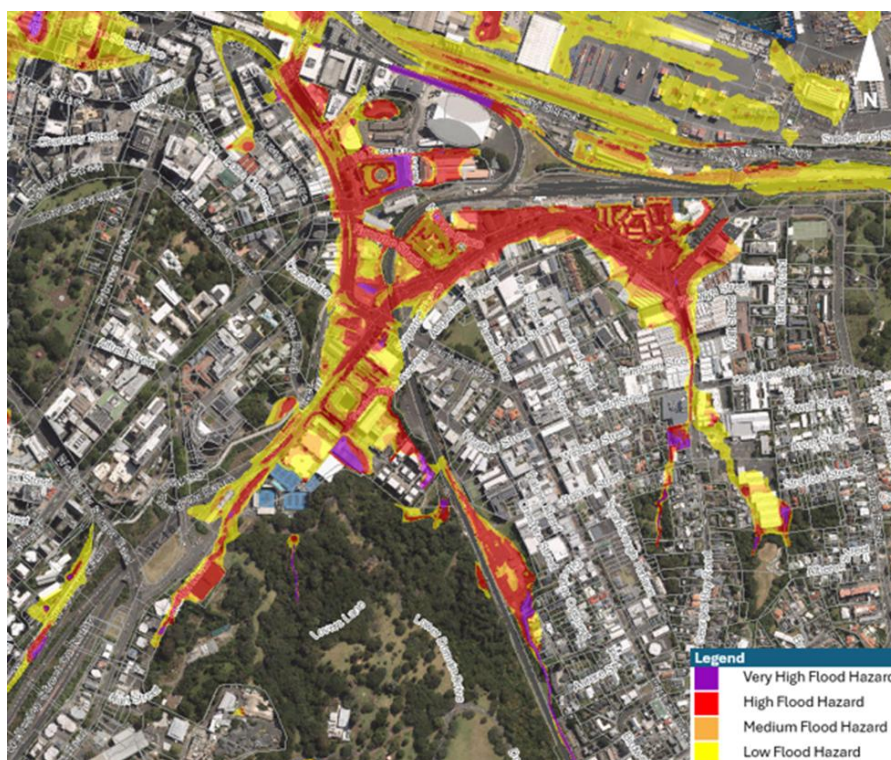


Figure 1: PC120 Flood Hazard Areas (Source: PC120 maps)

¹ Central government announced updates to PC120 in February 2026, including a reduction in the required minimum housing capacity from 2 million to 1.6 million homes. At this stage, there is no indication that any revisions to PC120 will alter the proposed natural hazard rules that currently have immediate legal effect, nor has the status of these rules been changed by the announcement.

The proposed designation area is also subject to coastal inundation hazard overlays under the AUP:OP, as shown in Figure 2, and PC120, as shown in Figure 3.



Figure 2: AUP:OP coastal inundation hazard extents (Source: AUP:OP maps)



Figure 3: Extent of PC120 coastal inundation hazard area (Source: PC120 maps)

Under the AUP:OP, the proposed designation area is subject to Very Low to High Shallow Landslide Susceptibility and is also within 150m of Very High susceptibility areas, as shown in Figure 4 below. Under PC120, this overlay is indicative of land instability hazards.



Figure 4: AUP:OP Shallow Landslide Susceptibility (Source: AUP:OP maps)

3.2 Regional Policy Statement

PC120 includes a number of amendments to the objectives and policies of the AUP:OP, including within the Regional Policy Statement, where section B10.2 – Natural hazards and climate change specifically acknowledges natural hazard risks and the functional and operational needs of infrastructure activities to occur in areas subject to natural hazards. The relevant objectives and policy are assessed in Table 1.

Table 1: Relevant Regional Policy Statement objectives and policies

Provision	Description	Assessment
Objective B10.2.1(2A)	Natural hazard risks to people, property, infrastructure and the environment resulting from existing use and development are reduced.	Under Plan Change 120, the proposed designation area is subject to the 1% AEP floodplain, overland flow paths, coastal inundation and landslide susceptibility. There is no practicable option for relocation of this transport corridor (which exists and therefore has a functional and operational need to be in this location).
Policy B10.2.2(21B)	Enable the construction, operation, maintenance and upgrading of infrastructure, in areas subject to natural hazards where the infrastructure is functionally or operationally required to locate in hazard areas, or it is not reasonably practicable that it be located elsewhere.	The risk from natural hazards is existing, and the proposed designation will not change the use of the corridor. Future works undertaken within the designation are not anticipated to accelerate or exacerbate existing hazard risks. If relevant, any potential risk associated with future work in identified natural hazard areas would be considered at the design stage.

3.3 E36 objectives and policies

Chapter E36 of PC120 includes objectives and policies specifically relevant to infrastructure and natural hazards, which are assessed in Table 2 below.

Table 2: Relevant E36 Natural hazards and flooding objectives and policies

Provision	Description	Assessment
Objective E36.2(4) [PC120]	Where infrastructure has a functional or operational need to locate in a natural hazard area, avoid the creation or exacerbation of risks from natural hazards to people, property, and the environment or, if avoidance is not able to be achieved, the residual effects are otherwise mitigated to the extent practicable.	Under Plan Change 120, the proposed designation area is subject to the 1% AEP floodplain, overland flow paths, coastal inundation and landslide susceptibility. There is no practicable option for relocation of this transport corridor (as it is already formed and operating). The risk from natural hazards is existing, and the proposed designation will not change the use of the corridor. Future works undertaken within the designation are not anticipated to accelerate or exacerbate existing hazard risks. If relevant, any potential risk associated with future work in identified natural hazard areas would be considered at the design stage.
Policy E36.3(1A) [PC120]	Identify risk from natural hazards associated with subdivision, use and development by differentiating risk into the following three classifications: (a) significant (b) potentially tolerable (c) acceptable	
Policy E36.3(35) [PC120]	Enable for the construction, operation, maintenance, and upgrading and construction of infrastructure, in areas subject to natural hazards where: (a) infrastructure is functionally or operationally required to locate in hazard areas or it is not reasonably practicable that it be located elsewhere; (b) [Deleted] (c) risks to people, property and the environment are mitigated to the extent practicable.	
Policy E36.3(36) [PC120]	When considering the location and design of infrastructure in areas subject to natural hazards consider the potential to reduce natural hazard risks to Māori Land, Treaty Settlement land, marae, urupā, mana whenua cultural heritage and values.	

3.4 Flood hazard

The Flood Hazard Risk Report (Attachment B) has been prepared with reference to AUP:OP E36.9 2 (a) – (l) (as applicable), and predominantly considers existing site conditions, with some commentary regarding potential future works which may occur in the designation.

The Report assesses most hazard considerations as low risk, except for frequency, duration and scale, which are assessed as medium risk based on existing conditions.

The proposed designation includes one full parcel, and one part-parcel of land zoned City Centre Zone, both of which are currently 100 percent impervious. These two parcels are shown in Figure 5 below. The proposed designation of the northern parcel includes a narrow strip adjacent to the SH16 The Strand road reserve, whilst the southern parcel is a triangular island site bordered by SH16 The Strand, Shipwright Lane, and the rail embankment.

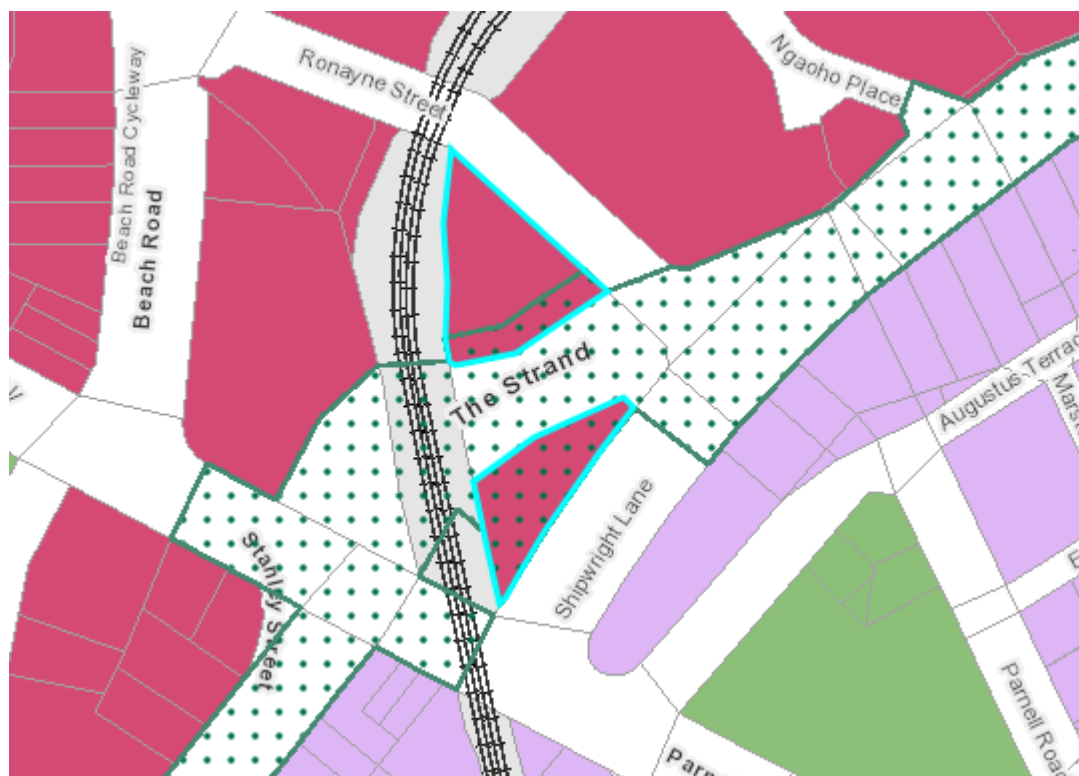


Figure 5: Parcels zoned Business - City Centre within the proposed designation footprint

Given the configuration of these parcels, the existing impervious surfaces, and extent of the proposed designation, it is not anticipated that future works which may occur in the designation will accelerate or exacerbate flood hazard effects in these locations. If future works have a potential to impact the alignment or capacity of overland flow paths and potentially affect flood hazard outcomes, those will be addressed, where relevant, through the design and Outline Plan process (if one is needed) as per section 176A of the RMA and in accordance with proposed designation condition 1(d) (refer to Attachment A).

3.5 Coastal inundation

An assessment of coastal inundation hazard has been undertaken in accordance with the hazard risk assessment in AUP:OP E36.9 (refer to Attachment B). This assessment predominantly considers existing conditions, with some commentary regarding potential future works which may occur in the designation.

The coastal inundation hazard is permanent due to the low-lying nature of the site. The coastal inundation risk is currently managed by the existing stormwater infrastructure. The assessment concludes that the existing transport corridor and future activities authorised by the designation will not accelerate or exacerbate coastal inundation hazard risks, and residual risk will remain the same.

3.6 Landslide

It is noted that that Shallow Landslide Susceptibility has been mapped at a 1:8,000 scale. The overlay of this site identifies landslide risk associated with cliffs which are in general proximity to the SH16 The Strand corridor but are not within the corridor itself. The majority of the proposed designation is located on flat reclaimed land at sea level. Thus, the risk of landslide hazards from the existing transport corridor are very limited under existing conditions. The only location where landslide hazard risk is currently elevated is land near the rail cutting at Gladstone Road. If relevant, any potential risk associated with future work in this area would be considered at the design stage.

3.7 Relevant natural hazards rules

Rules E36.4.1(A53), E36.4.1(A104) and E36.4.1C(131) of the AUP:OP enable construction, operation, maintenance and renewal of road network activities within the legal road width subject to flood, coastal inundation, and landslide susceptibility hazards as permitted activities.

PC120 rules E36.4.1A(A103) to (A105) and E36.4.1C(A130) to (A132) enable the following activities within flood and coastal hazard areas and landslide susceptibility areas as permitted activities:

- operation, maintenance, renewal, repair and minor infrastructure upgrading;
- construction, operation, maintenance, renewal and repair of road network activities within the legal road or road formation; and
- infrastructure within roads.

Future works undertaken by NZTA within the designation will be similar to the permitted activities listed above.

4 New national direction

Two new national policy statements have recently come into effect. The National Policy Statement for Infrastructure (NPS-I) and the National Policy Statement for Natural Hazards (NPS-NH) both came into force on 15 January 2026.

4.1 NPS – Infrastructure

The NPS-I came into force in January 2026. It applies very broadly to "all infrastructure activities and infrastructure supporting activities".²

- *The NPS-I applies the RMA definition of the term "infrastructure",³ which includes (relevant to this Project): "structures for transport on land by cycleways, rail, roads, walkways, or any other means".⁴*
- *"infrastructure activities" is defined in the NPS-I as "the construction, operation, maintenance, upgrade and removal of infrastructure and all ancillary infrastructure activities, unless otherwise specified, and include all physical components and assets associated with the infrastructure activity".*
- *"ancillary infrastructure activities" is in turn defined as "an activity that supports and is subsidiary to an infrastructure activity, including but not limited to:*
 - *vegetation clearance and tree trimming;*
 - *earthworks and land disturbance;*
 - *construction, maintenance, repair and upgrading of access tracks, bridges and culverts; and*
 - *power supply and telecommunications."*
- *"infrastructure supporting activities" is defined to mean "activities that are not ancillary infrastructure activities but that are needed to directly support infrastructure activities, and may include quarrying activities."*

The NPS-I therefore applies directly to all works undertaken by NZTA within the SH16 The Strand corridor: the state highway, shared use path, and associated physical structures and assets are the primary infrastructure, other components that support the operation of the state highway are either ancillary infrastructure activities or infrastructure supporting activities.

The NPS-I is intended to be enabling for infrastructure. As set out in its explanatory note, the NPS-I recognises infrastructure as a matter of national significance under the RMA, and provides national

² Other than renewable electricity generation assets and activities.

³ Clause 1.4 NPS-I.

⁴ s2 RMA.

direction to support the development, maintenance and upgrade of infrastructure across New Zealand. Table 3 provides an assessment of the proposed designation against the relevant provisions of the NPS-I.

Table 3: Relevant NPS-I objectives and policies

Provision	Description	Assessment
Objective	<p>The objective of this National Policy Statement is to:</p> <p>(a) ensure the national, regional and local benefits of infrastructure are provided for;</p> <p>(b) enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;</p> <p>(c) enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;</p> <p>(d) ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and</p> <p>(e) ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.</p>	<p>The proposed designation aligns with all elements of this objective.</p> <p>The purpose of the proposed designation is to construct, operate, maintain, and improve a state highway, cycleway and / or shared path, and associated infrastructure. The existing corridor forms part of SH16 and the nationally significant state highway network, and already delivers benefits at local, regional, and national levels.</p> <p>Designation of this section of SH16 will support the social and economic wellbeing of the community and protect and maintain its lifeline functions supporting the movement of people and goods across the wider state highway network.</p> <p>The proposed designation will support timely and efficient maintenance and upgrading of this section of SH16, consistent with the rest of the state highway network within the Auckland region.</p>
Policy 1	<p>(2) Decision-makers must recognise that the benefits of infrastructure include:</p> <p>(a) providing for the social, cultural and economic wellbeing of present and future generations;</p> <p>(b) creating, supporting and enhancing well-functioning urban and rural environments;</p> <p>(c) supporting sufficient development capacity to meet demand for housing and business land;</p> <p>(d) providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy;</p> <p>(e) helping to protect and restore the natural environment;</p>	<p>SH16 provides a lifeline function as the primary state highway connection to the Ports of Auckland, and connects the Auckland CBD to the wider community via the motorway and state highway network, including via a shared use path that provides safe pedestrian and cycle movement into the city. This transport infrastructure is critical to Auckland's current and future functioning and development. Designating the corridor will protect and support these functions.</p>

Provision	Description	Assessment
	<p>(f) supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and</p> <p>(g) reducing the risks from, and improving resilience to, natural hazards and climate change.</p>	
Policy 2	<p>(1) Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments.</p> <p>(2) Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to:</p> <p>(a) provide services to people and communities in a timely, effective and efficient manner;</p> <p>(b) operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries;</p> <p>(c) access or connect to particular natural or physical resources, including other infrastructure;</p> <p>(d) be accessible so infrastructure activities can be undertaken effectively and efficiently;</p> <p>(e) locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure has been spatially identified in advance; and</p> <p>(f) manage risks from natural hazards</p>	<p>The area proposed to be designated is an existing state highway corridor located within the 1% AEP floodplain and coastal inundation hazard areas. It is an existing linear infrastructure corridor with connections to other state highways, the Ports of Auckland, and the Auckland CBD, and is constrained by surrounding development, other infrastructure and heritage features.</p> <p>The road cannot be feasibly relocated from its current location within the natural hazard areas to another location outside of any natural hazard area. Potential future works in the proposed designation are not anticipated to exacerbate any natural hazard risks. Where relevant, the management of potential hazard risks would be considered in detailed design and through an Outline Plan, if needed.</p>
Policy 4	<p>(1) Decision-makers must:</p> <p>(a) enable the efficient and timely delivery of infrastructure activities;</p> <p>(b) enable cross-boundary infrastructure networks;</p> <p>(c) provide flexibility for infrastructure providers to use new or innovative technologies and methods to improve the delivery of infrastructure services and/or improve environmental outcomes;</p> <p>(d) enable opportunities to make more effective use of existing infrastructure;</p>	<p>The proposed designation supports the efficient and timely operation, maintenance, and upgrading of an existing nationally significant state highway corridor by providing an appropriate planning framework for future works consistent with Policy 4 of the NPS-I.</p>

Provision	Description	Assessment
	<p>(e) consider opportunities for continuous improvement in service delivery and environmental outcomes when renewing or replacing resource consents; and</p> <p>(f) enable the upgrading of infrastructure where this will:</p> <ul style="list-style-type: none"> (i) improve the resilience of infrastructure to the risks from natural hazards and effects of climate change; (ii) maintain or improve its level of infrastructure service, including to meet increasing demand; or (iii) improve environmental outcomes. 	
Policy 6	<p>(1) Decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities, including by:</p> <p>(a) taking into account the outcome of any engagement with tangata whenua on any relevant resource consent, notice of requirement, or request for a private plan change;</p>	<p>As detailed in Section 5 of the Assessment of Effects on the Environment (lodged with Auckland Council in October 2025), engagement has been undertaken with mana whenua. No specific responses regarding the designation of the SH16 The Strand corridor have been received from these groups to date.</p>
Policy 7	<p>(1) When assessing and managing the effects of infrastructure activities, decision-makers must:</p> <p>(a) have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work;</p> <p>(b) consider the technical and operational requirements and constraints of infrastructure activities;</p> <p>(c) take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure;</p> <p>(d) take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and</p> <p>(e) ensure that the mitigation measures and consent conditions are proportionate</p>	<p>The approach taken to effects assessment and management, including reliance on the Outline Plan process (if needed) for works specific detail, is consistent with Policies 7 and 9 of the NPSI, which require adverse effects of infrastructure activities to be appropriately assessed and managed in a proportionate manner.</p> <p>No material changes are proposed as a result of this designation that will change the scale, intensity, duration or frequency of effects from the existing infrastructure (as per Policy 7(c)).</p>

Provision	Description	Assessment
	to the scale of adverse effects generated by the activity.	
Policy 8	(1) Decision-makers must enable the efficient operation and maintenance and minor upgrade of existing infrastructure, provided that, where practicable, adverse effects are avoided, remedied or mitigated.	The proposed designation will support efficient operation, maintenance and upgrading of this stretch of SH16. Potential adverse effects of any future works will be managed, where relevant, via the design and Outline Plan (if needed), and in accordance with the proposed designation conditions.
Policy 9	(1) Decision-makers must enable new infrastructure or major upgrades of existing infrastructure activities in all environments. (2) Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans. (3) Where (2) does not apply, the adverse effects of new infrastructure and major upgrades must be, where practicable, avoided, remedied or mitigated.	Refer to the assessment of Policy 7, above.

4.2 NPS – Natural Hazards

The NPS-NH provides national direction on management of natural hazard risk to people and property associated with subdivision, use and development using a risk-based proportionate approach.

Section 1.3.2 confirms that infrastructure (as defined in the RMA)⁵ is excluded from the application of the NPS-NH. As the purpose of the proposed designation is to construct, operate, maintain, and improve a state highway, cycleway and / or shared path, and associated infrastructure, the NPS-NH is not applicable and is not assessed further.

5 Matters of clarification

NZTA's response to matters discussed with Council officers on 5 February 2026, where those are not already reflected in the March 2026 NOR and the response above, is set out below.

- a) Clarification of proposed designation boundaries/extent in comparison to the Gazetted extent of the state highway, and any differences between the two.

The Gazette notices declaring various parts of SH16 as state highway are noted below. The records do not contain spatial data, maps, or plans of the extents.

- [Gazette No.64, 26-Jun-1997 p1513 \(notice 1997-au4208\)](#)

⁵ The definition of infrastructure in s2 of the RMA includes “structures for transport on land by cycleways, rail, roads, walkways, or any other means”

No. 16 State Highway to include that section of Parnell Rise from its intersection with Stanley Street and The Strand (at RP 01/0.0), and then along full length of The Strand to its intersection with Quay Street (at new RP 0/0.0)--a distance of approximately 1.00 kilometres.

- [Gazette No.120, 27-Sep-2012 p3428 \(notice 2012-go6121\)](#)

Following the proposed alignment of State Highway 16 commencing at the intersection of The Strand and Shipwright Lane (Route Position 0/0.81) and extending in a generally south-westerly direction to the intersection of Stanley Street and Parnell Rise (Route Position 0/0.97); a distance of approximately 0.16 kilometres.

- [Gazette No.39, 4-Apr-2013 p1194 \(notice 2013-In1949\)](#)

Land Declared Road-State Highway 16, Grafton Road to Stanley Street, Auckland (various legal descriptions - please refer to linked record).

The proposed designation boundaries incorporate the extent of the road corridor and land within Crown ownership, as well as partial parcels of Council owned land where the state highway interfaces with the local road network. The proposed designation aligns with the current ownership, administration, and use of the state highway corridor, and includes areas where interfaces with surrounding land (and road network) are critical to the safe and efficient operation of the state highway, shared use path, and associated infrastructure.

As per the land requirement schedule in the March 2026 NOR, all parcels within the proposed designation boundaries are owned by the Crown (administered by either NZTA or KiwiRail) or Council. The proposed designation does not include any private land.

- b) Clarification of ownership of land within the designation, and ownership of the street trees along the state highway corridor.

Refer to the March 2026 NOR Form 18 Attachment B – Schedule of Directly Affected Property, for details of land parcels within the proposed designation. Street trees within Crown land parcels administered by NZTA are owned by the Crown. NZTA generally has management and operational control of those trees as part of its role as the state highway authority, subject to any statutory provisions, delegations, or agreements with local authorities or other agencies, such as ASM or Auckland Council.

The proposed designation necessarily overlaps with local roads to provide for integration works (e.g. should intersection improvements be needed). Where the land within the overlap is not administered by NZTA, i.e. land administered by KiwiRail or owned by Council, any works within an existing KiwiRail or AT designation will require approval of the relevant Requiring Authority. In addition, landowner approval will be required for any works undertaken by NZTA on KiwiRail or Council-owned land (including any tree works).

- c) Alternative methods for undertaking the activity, s168(3B)(c).

This matter is addressed on pages 2 and 3 of the March 2026 NOR.

- d) Healthy Waters request for clarification on definition of “no increased flood risk to buildings and neighbouring properties”, and application of the proposed designation condition 1d) to “construction activities” only.

The latest floodplain modelling provided by Council⁶ was considered in the update to Flood Assessment Memo dated 27 January 2026 included as Attachment B to this s92 response.

⁶ <https://www.aucklandcouncil.govt.nz/content/dam/ac/docs/plans/unitary/pc-120/39-pc120-info-sheet-23-flood-hazard-info-in-geomaps.pdf>

Applying a 'zero change' equivalence to flood risk is not practicable, as any minor change in road geometry can result in very small changes in flood depth (e.g. 1 mm) at a specific location. Such changes are unlikely to result in a material increase to flood risk or flood-related effects. The assessment in the Flood Assessment Memo is appropriate for the current context and the nature of the work covered by the NOR and reflects the need for flood risk to be assessed in relation to specific works proposed in the future, as set out in NZTA P46G:2025 Stormwater Management requirements. The assessment also reflects that flood risk applies to all parcels outside the designation, as flooding can affect people, property, infrastructure, and the environment.

Regarding the application of proposed condition 1, s176A of the RMA already requires that any necessary Outline Plan show permanent features of proposed works within the designation, e.g. height, shape, bulk, location, contours etc. In addition, proposed condition 1(d) requires that any Outline Plan (if one is needed) includes matters to address adverse effects in relation to flood hazards.

- e) Clarification on how potential contamination effects from state highway activities are regulated and addressed, including via stormwater and/or accidents/spills that occur on the road.

Potential contamination effects from state highway activities would be considered through regional consenting processes where a regional consent is needed e.g. for discharges associated with increased impervious surface areas or work in contaminated soils, including compliance with the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, where applicable.

Established procedures for the management of contamination from spills or accidents that occur on the state highway are set out in a suite of internal and external documents, with the procedures to be implemented depending on the scale of the incident. The most relevant of these are The NZTA State Highway Controls Manual and the Coordinated Incident Management System (CIMS) 3rd edition 2019, and specifically for spills, NZTA P41 Specification for environmental incident notification, investigation and reporting.

The March 2026 NOR, and the information included in this letter, address all matters raised to date by Council. NZTA requests that Council now proceeds with notification of the NOR as soon as possible.

Ngā mihi nui, nā



Stephanie Kane
Principal Planner, Poutiaki Taiao / Environmental Planning
Transport Service