

SECTION 42A REPORT

Rebuttal Evidence

Enabling Housing Supply

Report prepared by: Karin Lepoutre

Date: 14 November 2023



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Appendix A – PDP Amendment Text

- Natural hazards and climate change chapter
- Medium density residential zone chapter

1 Introduction and Purpose

1. This report has been prepared by Karin Lepoutre. I am the author of the original s42A report for Horotiu Farms Limited (HFL) and ancillary Variation 3 matters dated 15 September 2023. My qualifications and experience, Code of Conduct acknowledgements and conflicts of interests are outlined in Section 1 of that report.
2. The purpose of this rebuttal report is to address the evidence filed by submitters, where that evidence raises points that were not considered in the s42A report and/or where those points have led to amended recommendations.
3. Where I do not respond to evidence it means that there is nothing further to state in addition to the statements made in the s42A report.
4. Where amendments to plan text are recommended, the relevant text is presented after the recommendations with new text in blue underline and shaded, and deleted text in ~~blue strike through and shaded~~. The shaded text differentiates the recommendations from the amendments made at the substantive hearing. All recommended amendments are brought together in Appendix A. The recommended amendments are limited to the Medium density residential zone chapter and the Natural hazards and climate change chapter.

2 Evidence Received

5. Table 1 below shows the evidence statements that were filed by submitters.

Table 1: Evidence Received

Submitter	Submission No.	Evidence
Horotiu Farms Limited	49	Aaron Collier (Planning)
Horotiu Farms Limited	48	Justin Adamson (Civil Engineering)
Horotiu Farms Limited	49	Richard Coventry (Corporate)
Kāinga Ora	35	Michael Campbell (Planning)
KiwiRail	54	Pam Butler (Planning)
Korris Limited	201	Tim Lester (Planning)

6. The evidence is addressed by topic in the following sections of this report:
 - i. **Section 3** - Horotiu West Land
 - ii. **Section 4** – Reverse Sensitivity
 - iii. **Section 5** – Ancillary Variation 3 Matters

3 Horotiu West Land

7. Section 3 of the s42A report dated 15 September 2023 addresses the rezoning of the Horotiu West land from GRZ to MRZ2. This section of the report addresses the relevant evidence received in relation to the Horotiu West land.
8. Mr Aaron Collier prepared planning evidence on behalf of Horotiu Farms Limited (HFL). Mr Collier:
 - i. Agrees with the s42A recommendation that the MRZ should be applied to the Horotiu West Land on the basis that the land is within an urban environment and is a relevant residential zone¹.
 - ii. Agrees with the s42A recommendation that a 26.5m setback from the margin of the Waikato River and 20m from the margin of any wetland should apply².
 - iii. Agrees with the s42A recommendation that a qualifying matter under section 6(h) of the RMA should apply to high risk flooding hazards³.
 - iv. Is of the view that the Natural hazard and climate change provisions, including rules relating to earthworks, subdivision and residential development within floodplains, ponding areas and high risk areas, are difficult to interpret and are not reflective of greenfield development.⁴
 - v. States that the Variation does not define High risk flood areas and states that the High Risk flood areas can be remedied through filling⁵.
 - vi. Does not support the non-complying activity status for subdivision, earthworks and development within the High risk flood areas on the Horotiu West Land⁶.
 - vii. Is of the view that a new rule should be included that assigns a restricted discretionary activity status for development within the High Risk areas that apply to the Horotiu West land⁷.
9. The method for managing flood risks through the proposed flood density QM and higher risk areas were addressed at the substantive Variation 3 hearing held between 26 July and 2 August 2023 and in the following sections of the associated s42A reports:
 - i. Section 7 of the s42A rebuttal statement dated 19 July 2023
 - ii. Section 12 of the s42A closing statement dated 5 September 2023
10. While I was not directly responsible for the development of the proposed method for managing flood risks and the associated QM provisions, I am familiar with the recommended approach outlined in the above s42A statements. Specifically, as applied to the Horotiu West Land:

¹ Sections 4 and 5 of Aaron Collier's evidence statement dated 7 November 2023

² Section 6.2 of Aaron Collier's evidence statement dated 7 November 2023

³ Section 6.2 of Aaron Collier's evidence statement dated 7 November 2023

⁴ Section 6.3 of Aaron Collier's evidence statement dated 7 November 2023

⁵ Sections 6.3-6.4 of Aaron Collier's evidence statement dated 7 November 2023

⁶ Section 6.6 of Aaron Collier's evidence statement dated 7 November 2023

⁷ Section 6.7 of Aaron Collier's evidence statement dated 7 November 2023

- i. Additional High risk flood areas are shown on the Variation 3 Final Flood Maps dated November 2023, prepared by Te Miro Water. These High risk flood areas are in addition to the existing High risk flood areas included within the PDP. The location of the flood hazards identified within the Horotiu West Land are shown in Figure 1 below. The Figure shows that there are smaller isolated High risk flood areas located within the HFL land and larger High risk flood hazard within the Korris land.

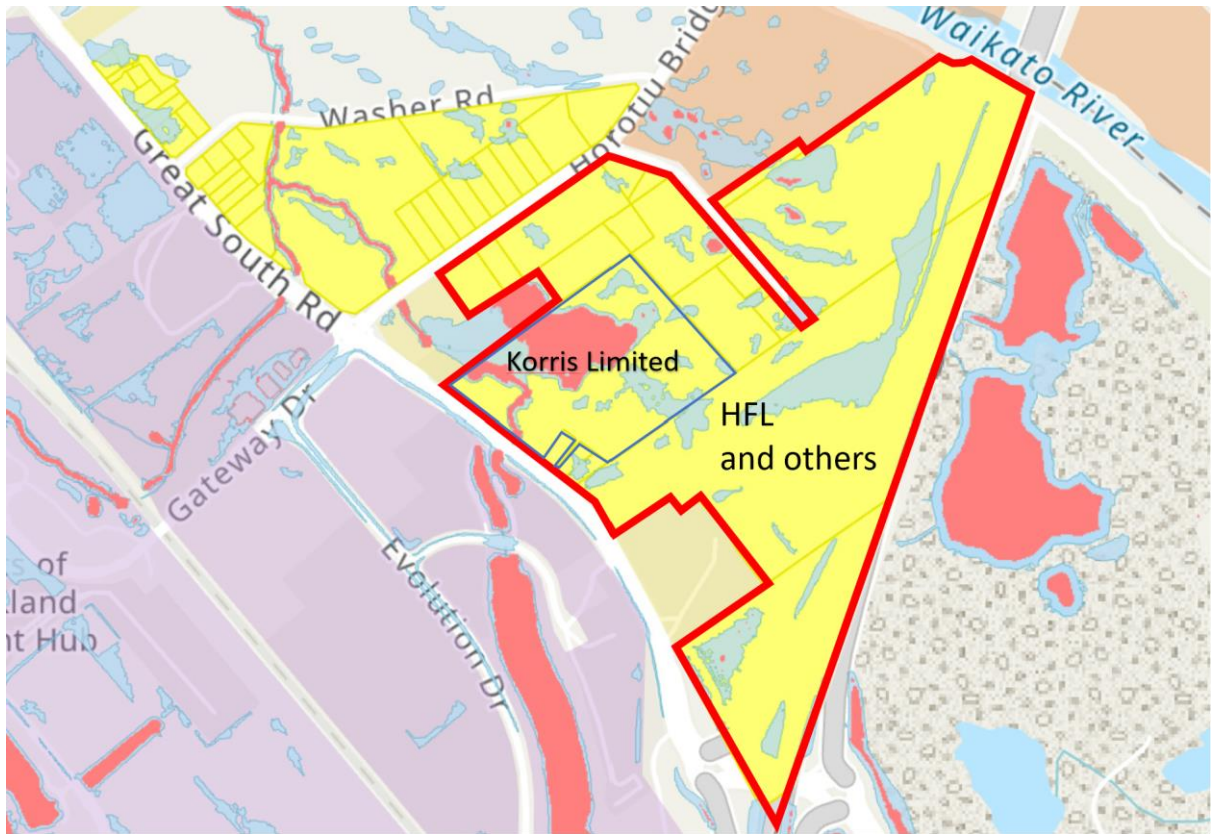


Figure 1: High Risk Flood Areas (dark pink) within the Context of Horotiu West

- ii. Residential development on the Horotiu West Land could require the following resource consents under the existing Natural Hazards Chapter of the PDP:

For High risk flood areas⁸

- NH-R19 - **Discretionary** resource consent for subdivision that creates one or more additional vacant lots where the additional lots are located entirely outside the High risk flood area or where a complying building platform can be located entirely outside the High Risk Flood Area. This is an existing provision in the PDP that is not proposed to be amended by Variation 3. It is likely that resource consent under this rule would

⁸ It is noted that there is an existing PDP Flood plain management area and High risk flood area on the northern-most part of the site, adjacent to the river.

already be required for the development of Horotiu West given that there is an existing High risk flood area already identified on the planning maps. Subdivision that does not comply with NH-R19 requires a **non-complying** resource consent (NH-R21).⁹

- NH-R20 – **Non-complying** resource consent for the construction of a new building within a high risk flood area. This is an existing provision in the PDP that is not proposed to be amended by Variation 3.

For Flood plain management areas

- NH-R1 – Construction of a new building is **permitted** if a suitably qualified engineer can demonstrate that the minimum floor level is at least 0.5m above the 1% AEP flood level. This is an existing provision in the PDP that is not proposed to be amended by Variation 3.
 - NH-R8 – Earthworks to create a building platform for residential purposes within flood plain management areas is **permitted** if filling height is only to provide for minimum floor levels that are at least 0.5m above the 1% AEP flood level. This is an existing provision in the PDP that is not proposed to be amended by Variation 3.
 - NH-R10 – **Discretionary** activity for subdivision to create on or more additional vacant lots within the flood plan management area. This is an existing provision in the PDP that is not proposed to be amended by Variation 3.
- iii. The following additional Natural Hazard provisions that have subsequently been recommended through the Variation 3 process are likely to apply to a residential development on the Horotiu West land:
- NH-R26A – which provides for one residential unit within a site as a permitted activity within the High risk flood area, provided it meets specified minimum floor levels and the required river/wetland setbacks. Non-compliance with this rule would require a non-complying resource consent.
 - NH-R26B – which provides for one residential unit within a site as a permitted activity within the Flood density QM but outside the High risk flood area, provided it meets specified minimum floor levels and the required river/wetland setbacks. Non-compliance with this rule would require a restricted discretionary resource consent.

⁹ A concurrent land use and subdivision consent is proposed to be provided for as a Controlled activity within the MRZ under SUB-R152.

- NH-R26D – **Restricted discretionary** for subdivision that creates one or more vacant lot within the Flood Density QM area.
 - NH-R26E – **Restricted discretionary** for earthworks for two or more residential units
11. Despite discussions with Mr Collier, I am unclear which specific PDP provisions are problematic for HFL. However, based on the above analysis, I expect that the concern relates to the application of NH-R19 and NH-R20. Specifically, with the inclusion of the Te Miro Flood Maps the overall activity status for a medium-density residential development on the Horotiu West land would change from Discretionary to Non-Complying.
 12. Based on discussions with Mr Boldero, and as stated in his rebuttal evidence¹⁰, I understand that there can be instances where mapped High risk flood areas (especially isolated High risk areas) can be modified through filling or other engineered solution to a degree where they would no longer be defined as High risk flood areas¹¹. If the identified High risk flood areas on the HFL land (or any other land) were removed through filling or engineering, actual flood risks would be remedied but this would not be reflected in the flood maps. Any subsequent (or concurrent) resource consent application for subdivision and/or land use on the HFL land would still be subject to the provisions of the High risk flood area as shown on the flood maps and would require a non-complying resource consent.
 13. In my view, a non-complying activity status is unnecessarily onerous for medium-density residential development on residential land which has mitigated (or removed) any high risk flood risks. I therefore recommend that an alternative resource consenting pathway is included for land which has mapped High risk flood areas but where it can be demonstrated that the high risk areas have been removed/are not present.
 14. Specifically, I recommend that the following exception be included to NH-R19, NH-R20 and NH-R21.
 15. This rule does not apply where a detailed hydraulic analysis undertaken by a suitable qualified person, and approved by Council, determines that the site is not within the definition of a High Risk Flood Area.

The existing PDP definition of High Risk Flood Area is:

16. *areas within the floodplain where the depth of flood water in a 1% AEP flood event exceeds 1 metre and the speed of flood water exceeds 2 metres per second, or the flood depth multiplied by the flood speed exceeds one.*
17. With the inclusion of the above exception, any applicants (including HFL) who have removed High risk flood areas through land modifications, would instead be subject to the Flood plain management provisions in the PDP, not the High risk flood area provisions. In turn, based on the HFL scenario, the activity status for the subdivision and development of the site under the Natural

¹⁰ Andrew Bolero, Statement of Evidence (Stormwater), 14 November 2023

¹¹ Filling of a High Risk Flood area would require a restricted discretionary consent under EW-R13

hazard chapter of the PDP would be **Discretionary**¹². This is the same activity status that currently applies to the development of the HFL land under the existing Natural hazard provisions (in the absence of the Te Miro mapping).

18. I sought feedback from Mr Collier regarding the above approach (i.e. the exemption to the High risk flood rules) via email on 10 November 2023. I subsequently discussed the approach with Mr Collier on 13 November 2023. I understand that his preference remains for residential development of the HFL land to be a restricted discretionary activity under the PDP, on the basis that flood risks can be mitigated. Despite this, Mr Collier accepted that a Discretionary resource consent would be required due to (at a minimum) the existing High risk flood area and the existing PDP provisions applying to the HFL land.
19. I note that Mr Tim Lester prepared planning evidence on behalf of Korris Limited and does not raise concerns about existing or proposed provisions.

4 Reverse Sensitivity

4.1 Overview

20. Section 4 of the s42A report dated 15 September 2023 addressed the KiwiRail and Waka Kotahi submission points relating to building setbacks and reverse sensitivity. This section of the report addresses the evidence received relating to specific amendments to the PDP provisions for reverse sensitivity.
21. Ms Pam Butler prepared two planning evidence statements on behalf of KiwiRail. The first statement was dated 4 June 2023, prior to IHP's direction to defer the submission points relating to noise, vibration and setback controls¹³. The second statement, dated 20 October 2023, relies, in part, on the first evidence statement.
22. Ms Butler supports amendments to the following provisions:
 - i. MRZ-S15 – Building setback – sensitive land uses¹⁴
 - ii. MRZ-P11 – Reverse sensitivity¹⁵
 - iii. MRZ2-O6 - Reverse sensitivity¹⁶
 - iv. MRZ2-P6 - Qualifying matters¹⁷
23. Mr Cambell prepared planning evidence on behalf of Kāinga Ora and supports amendments to the following provisions:

¹² It is noted that there will be additional resource consent requirements, including a Discretionary resource consent for subdivision of any land containing an Outstanding Natural Landscape under NFL-R3.

¹³ IHP Direction dated 12 June 2023

¹⁴ Section 4.13-4.14 and Appendix A and B of Pam Butler's evidence statement dated 20 October 2023

¹⁵ Section 5.1 of Pam Butler's evidence statement dated 20 October 2023

¹⁶ Section 5.1-5.5 of Pam Butler's evidence statement dated 4 June 2023

¹⁷ Section 5.6-5.10 of Pam Butler's evidence statement dated 4 June 2023

- i. MRZ-S15 – Building setback – sensitive land uses¹⁸
- ii. MRZ2-O6 - Reverse sensitivity¹⁹

24. The sections below respond to the evidence provided in relation to the above provisions.

4.2 MRZ-S15 – Building setback – sensitive land uses

- 25. Both Mr Campbell’s and Ms Butler’s evidence confirms that KiwiRail, Council, Waka Kotahi, and Kāinga Ora have agreed noise and vibration provisions through the PDP appeals process to minimise the potential for both reverse sensitivity effects and risks to public health and safety²⁰. The agreed 2.5m setback from the designated boundary of the railway corridor in the MRZ that formed part of this agreement was included as an amendment to MRZ2-S15 in the s42A²¹.
- 26. MRZ2-S15 sets out the minimum building setbacks for a sensitive land use from numerous nuisance generating activities (including railways, wastewater oxidation ponds, wastewater treatment facilities and the Alstra Poultry farm in Ngaaruawaahia). Both Ms Butler and Mr Campbell are of the view that the rail corridor setbacks should be provided for as a separate standard, rather than contained within existing MRZ2-S15. Both Ms Butler and Mr Campbell include the same proposed wording for the new standard and Ms Butler includes a s32AA analysis in Appendix B of her evidence statement.
- 27. Ms Butler states that providing for a separate standard, would be consistent with other zones in the PDP and would better reflect the purpose of the setback which relates to all buildings and structures, not just sensitive land uses. Similarly, Mr Campbell is of the view that the recommended amendment would provide an efficient and effective rule framework and reduce conflated effects assessments through unrelated matters of discretion.
- 28. Given that the agreed position between KiwiRail, Council, Waka Kotahi, and Kāinga Ora relates to the setbacks of any new building or alteration, I agree with Ms Butler’s and Mr Campbell’s recommendation that a separate standard should be included in the PDP for the setbacks from rail corridors. In my view, a separate standard will be more efficient and clearer than retrofitting the existing standard for sensitive land use setbacks (MRZ2-S15). For that reason, I recommend that MRZ2-S15 be amended as follows:

MRZ2-S15 Building setback – sensitive land use	
<p>(1) Activity status: PER</p> <p>Where:</p> <p>(a) Any new building or alteration to an existing building for a sensitive land use shall be set back a minimum of:</p> <p>(i) 5m from the designated boundary of the railway corridor;</p>	<p>(2) Activity status where compliance not achieved: RDIS</p> <p>Council’s discretion is restricted to the following matters:</p> <p>(a) Road network safety and efficiency;</p> <p>(b) On-site amenity values;</p>

¹⁸ Section 3 of Michael Campbell’s evidence statement dated 20 October 2023

¹⁹ Section 4 of Michael Campbell’s evidence statement dated 20 October 2023

²⁰ Section 5.1 of Pam Butler’s evidence statement dated 20 October 2023

²¹ Refer to paragraphs 59 and 62 of the 15 September 2023 s42A report.

<ul style="list-style-type: none"> (ii) 15m from the boundary of a national route or regional arterial; (iii) 25m from the designated boundary of the Waikato Expressway; (iv) 300m from the edge of oxidation ponds that are part of a municipal wastewater treatment facility on another site; (v) 30m from a municipal wastewater treatment facility where the treatment process is fully enclosed; and (vi) 300m from the boundary of the Alstra Poultry intensive farming activities located on River Road and Great South Road, Ngaaruawaahia. 	<ul style="list-style-type: none"> (c) Odour, dust and noise levels received at the notional boundary of the building; (d) Mitigation measures; and (e) Potential for reverse sensitivity effects.
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29. I note that Ms Butler supported the removal of the matter of discretion (a), however, given that the setback to regional arterial boundaries remains in (ii), I am of the view that a matter of discretion relating to road operations should be retained.

30. I further recommend the following new standard is included:

<p>MRZ2-S17 <u>Building and structure setback – rail corridor</u></p>	
<p>(1) Activity status: PER Where:</p> <ul style="list-style-type: none"> (a) <u>Any new building or structure, or alteration to an existing building or structure, shall be setback a minim of 2.5m from the designated boundary of the railway corridor.</u> (b) <u>Standard MRZ2-S17(1)(a) does not apply to fences or structures less than 2m in height, poles or aerials.</u> (c) <u>Standard MRZ2-S17(1)(a) does not apply to retaining walls, which must be setback a minimum of 1.5m from the destined boundary of the railway corridor.</u> 	<p>(2) Activity status where compliance not achieved: RDIS Council’s discretion is restricted to the following matters:</p> <ul style="list-style-type: none"> (a) <u>The location, size and design of the building as it relates to the ability to safely use, access and maintain buildings without requiring access on, above or over the rail corridor.</u> <p><u>Notification: Any restricted discretion activity under MRZ2-S17 shall not be notified or limited notified unless KiwiRail is determined to be an affected person in accordance with section 98B of the Resource Management Act 1991 or Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991.</u></p>

4.3 Objectives and Policies relating to Reverse Sensitivity and Qualifying Matters

MRZ2-O6 and MRZ2-PI I relate to reverse sensitivity. The s42A Closing Statement version of these provisions are as follows:²²

MRZ2-O6 Reverse sensitivity.

~~Avoid or m~~Minimise the potential for reverse sensitivity by managing the location and design of sensitive activities through:

- (a) The use of building setbacks and building heights; and
- (b) The design of subdivisions and development.

MRZ2-PI I Reverse Sensitivity.

- (1) Maintain appropriate setback distances between new sensitive land uses and existing lawfully established activities that may result in reverse sensitivity effects.
- (2) Manage potential reverse sensitivity effects by restricting building heights within the Area I height restriction area in the Havelock Precinct.

31. Ms Butler and Mr Campbell (for KiwiRail and Kāinga Ora respectively) both provided planning evidence in support of amendments to the above provisions. Their evidence is addressed in the sections below.

KiwiRail - Ms Pam Butler

- 32. Ms Butler is of the view that amendments should be made to MRZ2-O6 and MRZ2-PI I to better reflect railway operations and setbacks²³. Through discussions with the appeals team, I understand that the reason for the required setback to the railway corridor is to address public health and safety and the safe operation of the railway rather than reverse sensitivity. For that reason, I recommend that a new objective and policy are included to address the railway corridor operation and setback.
- 33. Including a separate objective and policy within the MRZ2 aligns with the approach recommended above to separate building setback standards for sensitive land uses (MRZ2-S15) from the setback requirements to railway corridors. In my view, this provides for a more effective and clearer outcome than the recommended amendments supported by Ms Butler in her statement of evidence.

²² S42A Closing Statement Recommendation version – **Green text** = notified version, **red text** = s42A recommendation, **purple text** = s42A Closing Statement recommendation.

²³ Section 5.1 of Pam Butler’s evidence statement dated 20 October 2023 and sections 5.1-5.5 of Pam Butler’s evidence statement dated 4 June 2023

34. The recommended wording for the new objective and policy is as follows:

Objective – Railway Corridors

Protect the safe and efficient operation of the railway corridor and minimise risks to public health and safety.

Policy – Railway Corridors

Maintain appropriate setback distances to the railway corridor to provide for its safe and efficient operation and to minimise any risks to public health and safety.

35. I acknowledge that the district-wide Infrastructure Chapter of the PDP already contains objectives and policies relating to the safe and efficient operation of infrastructure including railways. However, given that MRZ2 will contain specific railway corridor setback standards, I am of the view that it is necessary and appropriate to include a railway corridor objective and policy within the MRZ2. This will contribute to a clear cascade between the objective, policy and standard.
36. On 14 November 2023, Ms Butler confirmed via email that the above wording was acceptable to KiwiRail and recommended the following alternative amendment to MRZ-P11 (amendment shown in red underline), rather than the amendment supported in the evidence statement:

MRZ2-P11 Reverse Sensitivity.

- (1) Maintain appropriate setback distances between new sensitive land uses and existing lawfully established activities that may result in reverse sensitivity effects.
- (2) Use of design controls for sensitive activities to minimise reverse sensitivity effects on existing lawfully established activities.
- (3) Manage potential reverse sensitivity effects by restricting building heights within the Area 1 height restriction area in the Havelock Precinct.

37. I support the alternative amendment to MRZ2-P11 outlined above. The amendment reflects that a range of measures will be used to address reverse sensitivity, including the use of design controls.
38. Butler also provided evidence in support of the following amendment to MRZ2-P6 requested by KiwiRail²⁴:

MRZ2-P6 – *Qualifying Matters*

Restrict ~~residential~~ development to an appropriate level to provide for and protect any relevant qualifying matters.

²⁴ Section 5.6-5.10 of Pam Butler’s evidence statement dated 4 June 2023

39. Ms Butler is of the view that the amendment would provide a wider variety of tools to enable the protection of rail as a qualifying matter. I note that there are numerous rules and standards within the MRZ2 that restrict development (buildings) to protect qualifying matters including wetlands, the Waikato and Waipa rivers, the National Grid Yard and the railway corridor. Those rules and standards are not limited to residential development and therefore I agree that MRZ2-P6 should be amended accordingly. In my view the amendment would be consistent with the requirement of Policy 3 of the NPS-UD which is not limited to residential development and instead relates to building heights and density of urban form generally.
40. With the inclusion of the amendments recommended in the section above (and shown in Appendix A), all KiwiRail submission points have now been resolved. This was confirmed by Pam Bulter via email on 14 November 2023.

Kāinga Ora - Mr Michael Campbell

41. Mr Campbell addresses the amendment to MRZ2-O6 relating to building heights²⁵ that was recommended in the s42A closing statement (shown in purple above). The amendment was addressed in paragraph 10 of the s42A closing statement dated 5 September 2023 and was made to recognise that building heights are used as a method for managing potential reverse sensitivity within the Havelock Precinct (Area 1).
42. Mr Campbell is of a view that there is a potential risk that building heights may be applied broadly to manage potential reverse sensitivity effects within the MRZ2 as a result of the wording of MRZ2-O6. Mr Campbell therefore recommends an amendment to MRZ2-O6 to more clearly identify where building heights are used to address potential reverse sensitivity effects. In Mr Campbell's view, the amendment would provide for an effective and efficient rule framework and ensure that there is no conflation of effects assessment and a clear policy cascade²⁶. I agree with Mr Campbell that the objective could be misconstrued and support the following recommended amendment:

MRZ2-O6 - Reverse sensitivity.

~~Avoid or~~ Minimise the potential for reverse sensitivity by managing the location and design of sensitive activities through:

1. The use of building setbacks and building heights; and
2. The design of subdivisions and development; and
3. The use of building height restrictions in Havelock Precinct (Area 1)

²⁵ Section 4.7 of Michael Campbell's evidence statement dated 20 October 2023

²⁶ Section 4 of Michael Campbell's evidence statement dated 20 October 2023

5 Ancillary Variation 3 Matters

43. Sections 5 and 6 of the s42A report dated 15 September 2023 outlined ancillary Variation 3 matters. This section of the report provides an update on those matters including:
- i. Havelock Precinct (and the Havelock Village Holdings appeal to the PDP)
 - ii. Relevant PDP zoning appeals
 - iii. Harrisville rezoning request
 - iv. Flood maps

5.1 Havelock Precinct

44. HVL have indicated that draft consent orders for the Havelock Precinct are currently being drafted and intend to file these with the Environment Court along with a request for an urgent consent order prior to the hearing scheduled for 5 December 2023. A further update relating to any implications for Variation 3 may be provided verbally at the hearing.

5.2 Relevant PDP Zoning Appeals

45. As was stated in Section 5.3 of the s42A report dated 15 September, there are two appeals to the PDP from Variation 3 submitters which seek rezoning to the General residential zone (GRZ) in Tuakau. The GRZ in Tuakau is a relevant residential zone.
46. The submissions are from Greig Developments (submitter #20)²⁷ and GDP Developments (submitter #100)²⁸. If the appeals are resolved prior to closing the Variation 3 hearing, there may be an opportunity for the Panel to subsequently rezone the sites to MRZ as part of the Variation 3 process.
47. My understanding of the status of each appeal is as follows:
- i. In relation to the Aarts appeal (GDP Developments), general agreement has been reached. Council's appeals planner has indicated that consent documents are likely to be lodged with the Environment Court by the end of November 2023.
 - ii. In relation to the Greig Holdings appeal (Greig Developments), Council is in the process of reviewing additional information that was provided by the appellant to support the rezoning request. It is unlikely that consent documents will be lodged prior closing the Variation 3 hearing.
48. Additional updates relating to the above appeals the Harrisville rezoning may be provided verbally on the day of the hearing.

²⁷ Greig Holdings Ltd's appeal in relation to 11A and 15 Johnson Street in Tuakau (ENV-2022-AKL-000070)

²⁸ G. Aarts and Y. Aarts appeal in relation to 111 Harrisville Road in Tuakau (ENV-2022-AKL-000041)

5.3 Flood Maps

49. As was stated in Section 6 of the s42A report dated 15 September 2023, additional flood modelling to address the matters raised by the Panel regarding sensitivity testing and quality assurance is currently being undertaken. The Horotiu flood model was completed and the maps circulated to all Variation 3 submitters on 3 November 2023. The final flood maps for the remaining four towns is expected to be completed by 24 November 2023.