



Planning Report for Referral under the Fast-Track Approvals Act 2024

Horseshoe Bush Road, Dairy Flat,
FastTrack Project Dairy Flat, Auckland

Issued June 2026

TUAKIRI
PROPERTY

 **Campbell Brown**
Planning & Resource Management Specialists

Introduction

This report provides the additional information required under the Fast-track Approvals Act 2024 (**'FTAA'**) for the Horseshoe Bush Road Fast-Track Project (**'the Project'** or **'the Proposal'**) referral application by Tuakiri Property Limited (**'Tuakiri'**). The Project involves the subdivision and development of a large-scale greenfield site across approximately 77.9 ha, located between Horseshoe Bush Road and Kahikatea Flat Road in Dairy Flat, Auckland (**'Site'**).

The Project is a regionally significant, place-led and master planned development proposal that is strategically located in proximity to Dairy Flat Road.

The Project represents a coordinated response to some of the most significant long-term challenges currently facing the Auckland region, including:

- Severe housing affordability pressures;
- Worker accommodation shortages;
- Constrained urban land supply;
- Infrastructure limitations;
- Transport congestion;

The Project has been designed to support long-term regional resilience, economic productivity, housing supply, infrastructure investment, environmental restoration. The applicant is committed to ongoing engagement with Mana Whenua.

The Project incorporates a coordinated and cohesive development, integrating:

- Residential neighbourhoods;
- Worker and family housing;
- Employment and commercial support;
- A commercial/community node;
- Active transport and public access;
- Ecological restoration and environmental enhancement.

The Project is intended to assist in reducing development pressure on Auckland while strengthening the wider regional economy and supporting long-term regional growth.

If this matter is referred to progress through the FTAA, the following should form the referral description for the Project:

Tuakiri Property Limited proposes a master-planned, place-led residential development within Dairy Flat, Auckland. The project will be delivered in 8 stages but a single substantive application will be lodged for the necessary approvals for all stages. The Project will include:

- a) 1,000 – 1,100 residential lots/dwellings across a spectrum of densities and typologies*
- b) Provision of a neighbourhood centre, including retail, commercial, and community activities, and comprising an approximate Gross Floor Area of 1,200m²;*
- c) Provision of all necessary infrastructure and transport elements to support the establishment of the development, including transport facilities, intersection upgrades and roading, walking and cycling networks, telecommunications, electricity, gas, water supply, stormwater, and wastewater infrastructure (including any treatment or storage facilities, drainage, pipes, pump stations, outfalls and discharges); and*
- d) A substantial green open space network (approximately 18.5 hectares), including ecological features (native restoration, revegetation, and mitigation planting), stormwater management and public open spaces across the development.*

The Project will require the following approvals:

- a) Resource consents under the Resource Management Act 1991
- b) Approval under the Wildlife Act 1953.
- c) An Archaeological Authority to Destroy or Modify under the Heritage New Zealand Pouhere Taonga Act 2014 as a precautionary measure.

Tuakiri is applying to use the fast-track approvals process for a development project by lodging a referral application with the Environmental Protection Authority ('EPA') under s13(1) of the FTAA. This report is for a referral application lodged in the form and manner that can be approved by the EPA and, together with the supporting appendices, include all the relevant information specified in s13(4).

Table of Contents

1. Executive Summary.....	7
2. Description of the Environment	11
2.1. Site Location and Zoning (section 13(4)(d) of the FTAA).....	11
3. Proposal (section 13(4)(a) of the FTAA).....	16
3.1. Overview.....	16
3.2. Detailed Proposal	17
3.2.1. Site Layout.....	17
3.3. Servicing and Infrastructure	18
3.4. Roading and Transport	19
3.5. Ecology.....	20
3.6. Historic Heritage	20
3.7. Earthworks.....	20
3.8. Title Interests	21
4. Construction Period (section 13(4)(e) and (f) of the FTAA).....	22
5. Ineligible Activities (section 13(4)(c) of the FTAA).....	23
6. Alternative Project (section 13(4)(g) of the FTAA)	24
7. Section 22 of the Fast-Track Approvals Act (section 13(4)(b) of the FTAA)	24
7.1. Assessment Framework.....	24
7.1.1. Significant Regional Benefits (section 22(1)(a) of the FTAA)	24
7.1.2. Fast-Track Facilitation (section 22(1)(b)(i) of the FTAA)	25
7.1.3. Efficient Operation of Fast Track Process (section 22(1)(b)(ii) of the FTAA)	26
7.1.4. Conclusion on section 22 criteria	27
8. Reasons for Consent	27
8.1. Resource Management Act 1991 (RMA)	27
8.1.1. Auckland Unitary Plan (Operative in Part)	28
8.2. National Environmental Standards for Freshwater 2020 ('NES-F').....	33
8.3. National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health ('NES:CS')	34
8.4. Wildlife Act 1953	34
8.5. Heritage New Zealand Pouhere Taonga Act 2014.....	34

9. Assessment of Environmental Effects (section 13(4)(h) of the FTAA)	35
9.1. Economic Benefits	35
9.2. Cultural Effects	36
9.3. Landscape Effects and Visual Amenity	36
9.4. Management of Natural Hazards	40
9.5. Servicing	42
9.6. Earthworks and Construction Management	45
9.7. Heritage Effects	45
9.8. Ecological Effects	46
9.9. Traffic Effects	47
9.10. Reverse Sensitivity Effects	48
9.11. Climate Effects and Sustainability	48
9.12. Effects Conclusion	48
10. Persons Affected (section 13(4)(j), (k) and (ka) of the FTAA)	49
11. Treaty Settlements (section 13(4)(l), (n), (o) of the FTAA)	49
12. Statutory Documents	50
12.1. National and Regional Policy Statements	50
12.1.1. National Policy Statement on Urban Development 2020 (NPS-UD)	50
12.1.2. National Policy Statement on Indigenous Biodiversity (NPS-IB)	53
12.1.3. National Policy Statement on Highly Productive Land (NPS-HPL)	55
12.1.4. National Policy Statement for Electricity Networks 2008 (NPS-ET)	56
12.1.5. National Policy Statement for Freshwater Management 2020 (NPS-FM)	56
12.1.6. National Policy Statement for Natural Hazards ('NPS-NH')	57
12.1.7. New Zealand Coastal Policy Statement	58
12.1.8. National Environmental Standards for Air Quality 2004	59
12.1.9. National Environmental Standards for Freshwater 2020	59
12.1.10. National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES:CS)	59
12.2. Auckland Regional Policy Statement	60
The Urban Growth and Form objectives and policies of the Regional Policy Statement (RPS) set out the policy framework for managing Auckland's growth. The RPS seeks to achieve a quality compact urban form by:	60
13. Conclusion	62

Appendices

Appendix A.	Masterplan Document - Isthmus
Appendix B.	Project Map
Appendix C.	Economic Assessment – Property Economics
Appendix D.	Landscape Assessment - Isthmus
Appendix E.	Infrastructure and Stormwater Assessment – Maven
Appendix F.	Drinking Water Assessment - GWE
Appendix G.	Wastewater Assessment - GWE
Appendix H.	Geotechnical Assessment - KGA Geotechnical
Appendix I.	Preliminary Traffic Assessment – Traffic Planning Consultants
Appendix J.	Ecological Assessment - Viridis
Appendix K.	Records of Title and Interests
Appendix L.	Notification and Consultation Record (section 13(4)(j), (k), (ka) of the FTAA)
Appendix M.	Staging Plan – Isthmus

1. Executive Summary

Tuakiri seeks to progress a referral application under the FTAA for the Project, a residential development located within the Dairy Flat area in Auckland.

Regional Significance

This regionally significant, place-led, master-planned mixed-use development is strategically positioned near the significant emerging employment node of Silverdale West.

The Project aligns with this through provision of 1,000-1,100 lots/houses to the Auckland region with diversification in density; significant economic benefits including a total direct capital expenditure of \$963.2m for the duration of the construction period, a total net present value of \$726.4m to GDP, and the provision of job creation equal to 1,855 FTE job years the development period.

Strategic Position

The Project has been designed not as a conventional subdivision or isolated land development exercise, but as a coordinated development, providing for regional growth intended to support long-term regional resilience, economic productivity, housing supply, private infrastructure investment, and environmental restoration.

Housing and Employment Integration

As an integrated project, the Project delivers 1,000 to 1,100 residential allotments across a broad range of housing typologies including:

- Standalone housing, including provision for worker accommodation;
- Medium-density family housing;
- Low-density residential neighbourhoods;

Cultural Integration

The Project acknowledges the cultural importance of the wider landscape to mana whenua and recognises the on-going role of mana whenua as kaitiaki of the whenua and awa.

Infrastructure and Future Growth Alignment

The Project incorporates integrated private infrastructure systems, designed to Auckland Council, Watercare and Auckland Transport ('AT') standards, including:

- Water supply;
- Wastewater treatment;

- Stormwater management;
- Transport and movement networks; and
- Active transport infrastructure.

The Project seeks to reduce pressure on constrained public infrastructure systems while enabling coordinated long-term growth. The proposed private infrastructure systems are designed to Auckland Council, Watercare and AT standards, and these could potentially connect to the public network in the future where there is capacity.

The Project also aligns with the wider future regional growth and infrastructure planning through:

- Strategic transport corridor integration;
- Active transport and public access connections;
- Alignment with existing and future employment nodes;

This integrated infrastructure framework supports a resilient and future-oriented project.

Landscape-Led Settlement Model

The Project has been developed through a landscape-led design philosophy to respond directly to the characteristics of the Dairy Flat landscape.

This Project provides a coordinated and interrelated response to housing, employment support, and infrastructure needs, connected through shared infrastructure, movement networks, economic relationships, and community functions.

Consultation

On 22 April 2026, Tuakiri gave notice of the Project to Auckland Council, mana whenua, the Department of Conservation, Heritage New Zealand Pouhere Taonga, and Transpower, in accordance with section 11(1)(b) of the FTAA. The responses from the notified parties are recorded in the Notification and Consultation Record in **Appendix L**. Tuakiri will continue consulting with these authorities and parties after the referral application is lodged and throughout the FTAA processes.

There are no applicant groups with applications for customary marine title under the Marina and Coastal Area (Takutai Moana) Act 2011 that is relevant to the Project. The Project is not located in an area within or adjacent to ngā rohe moana o ngā hapū o Ngāti Porou, nor would the Project directly affect ngā rohe moana o ngā hapū o Ngāti Porou.

Why Fast-track Approval is Required

The Project aligns with the purpose and intent of the FTAA. The Project will deliver significant regional benefits including:

- Residential neighbourhoods and communities, contributing 1,000 – 1,100 residential lots and dwellings across a range of densities and housing typologies.
- A minimum of 10% of the proposed dwellings will be provided as ‘more affordable’ homes, these being dwellings at price points 10% less than the average market rate for the same typology;
- A neighbourhood hub;
- Community spaces involving buildings, play and gathering opportunities;
- A substantial open space network of approximately 18.6 ha is proposed across the development, providing for significant ecological benefit opportunities through native restoration, revegetation, and mitigation planting.

The Project involves provision of infrastructure and transport elements to support the establishment of the development.

Consents Required

The Project requires approvals under the Resource Management Act 1991 and under the Auckland Unitary Plan for subdivision and development in the Mixed Rural zone, including stream works, stormwater and wastewater discharge, diversion and take of groundwater, earthworks and utilities and energy activities.

Note that the water take from the aquifer for water supply is being applied for separately. However, the substantive application will deal with the water network, water treatment plant and associated equipment as utility activities.

This referral application and accompanying report have been prepared in accordance with sections 13 and 22 and Schedule 5 of the FTAA. The application outlines the nature of the Project, assesses its alignment with the purpose of the FTAA, and presents a high-level effects assessment across all key environmental domains.

Conclusion

The Project represents a coordinated and integrated response to multiple interrelated regional issues rather than a fragmented or isolated development outcome.

Importantly, the Project responds to existing growth pressures and housing demand within the region by providing a coordinated and comprehensive development outcome across multiple interconnected sites, consistent with the broader economic and social objectives of the FTAA.

2. Description of the Environment

2.1. Site Location and Zoning (section 13(4)(d) of the FTAA)

The Site is located within Dairy Flat, and comprises multiple adjoining lots situated between Horseshoe Bush Road and Kahikatea Flat Road.

The Site is shown in Figure 1 below in red outline and is shown in more detail in the Masterplan document, at **Appendix A**. An enlarged Project map is included as **Appendix B**.



Figure 1 – Project Areas

The Site and zone information is identified in Table 1 below.

Site Address	24 Horseshoe Bush Road, Dairy Flat
	42 Horseshoe Bush Road, Dairy Flat
	46 Horseshoe Bush Road, Dairy Flat
	48 Horseshoe Bush Road, Dairy Flat
	Lot 3 DP 130668, Horseshoe Bush Road, Dairy Flat
	Lot 1 DP 130668, Horseshoe Bush Road, Dairy Flat
	100 Horseshoe Bush Road, Dairy Flat
	82 Horseshoe Bush Road, Dairy Flat
	61 Kahikatea Flat Road, Dairy Flat
Legal Description(s)	77 Kahikatea Flat Road, Dairy Flat
	Lot 1 DP 62568

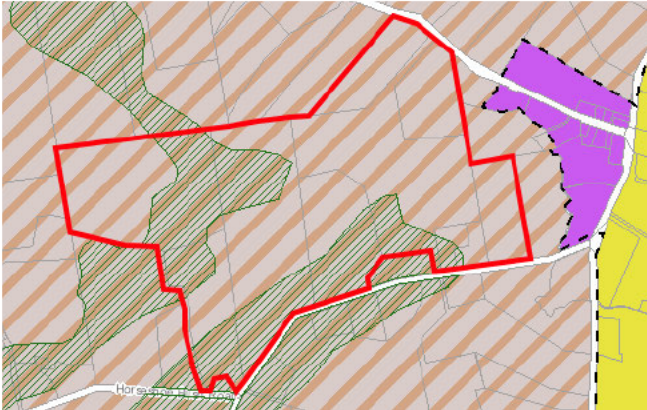
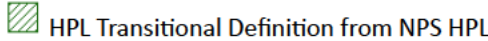
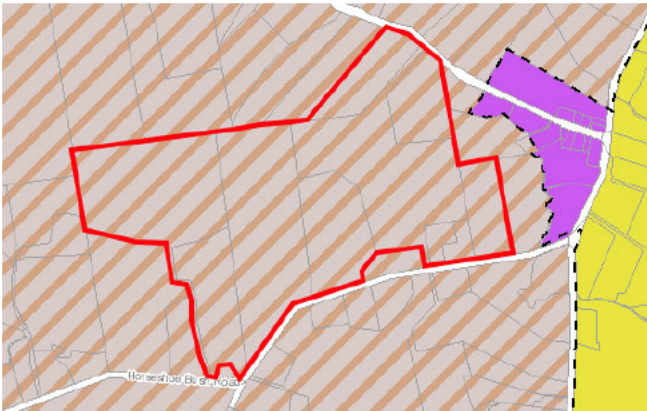
Highly Productive Land	Lot 3 DP 466485 Lot 2 DP 466485 Lot 1 DP 466485 Lot 3 DP 130668 Lot 1 DP 130668 Lot 2 DP 105762 Lot 2 DP 136612 Lot 1 DP 354161 Lot 7 DP 65688
	Yes – LUC 3 (Partially)
	
	
	Rural - Mixed Rural Zone
Zone	
Overlays	Infrastructure: Airport Approach Surface Overlay - North Shore Airport
Controls	Controls: Macroinvertebrate Community Index - Native Controls: Macroinvertebrate Community Index - Rural
PDP Appeals	None

Table 1: The project area land and zone information

The Site is located on the western side of Dairy Flat Highway and comprises a collection of contiguous titles as noted in Table 1. The Masterplan (Refer **Appendix A**) notes that:

“The 77.9ha landholding comprises multiple titles and occupies a ‘pinch point’ between Kahikatea Flat Road to the north and Horseshoe Bush Road to the south. The site sits close

to where these roads intersect with Dairy Flat Road, adjacent to an area of Light Industrial zoned properties. This reinforces the site's location and the opportunity for its strategic role within the evolving Dairy Flat context, and its proximity to the identified Future Urban growth areas.

The existing landscape is defined by rolling pastoral topography interwoven with an intricate stream network. This network has formed a distinct east– west basin through the centre of the site, with land rising toward the northern and southern edges along Kahikatea Flat Road and Horseshoe Bush Road. A series of wetlands and areas of established native and exotic vegetation sit within this central system, creating a strong natural armature that informs the structure of the masterplan.”

As noted above, the Site is zoned as Rural - Mixed Rural Zone (**'MRZ'**). The immediately surrounding land is also zoned MRZ and mostly used for lifestyle and/or agricultural activities.

Approximately 150 metres to the east of the Site is an area of land (circa 11.8 hectares) that is zoned Business - Light Industry Zone (**'LIZ'**). The LIZ features mainly yard-based industrial activities, although there is also a service station, superette and bakery.

Further east on the opposite side of Dairy Flat Highway is land zoned as Future Urban Zone (**'FUZ'**).

To the south-east of the Site, AW Holdings 2021 Limited holds resource consents to construct and operate Stage 1 of the Auckland Surf Park Community Project, a surf park at 1350 Dairy Flat Highway, Silverdale (**'Surf Park development'**). Stage 1 comprises operational buildings, 40 visitor accommodation units, a 20-unit wellness retreat, a restaurant, data centre and a 7-hectare solar farm to provide power to the Surf Park development.

The Auckland Surf Park Community Stage 2 project was referred under the FTAA for resource consents to expand the Surf Park development, including to provide for a hyperscale artificial intelligence data centre campus, an integrated residential development comprising approximately 400 residential units (detached dwellings, apartments and live/work units), visitor accommodation, a village centre, a work-live precinct, industrial precinct, extensive riparian planting and landscaping, subdivision and ancillary activities. The proposal also involves variations to Stage 1 of the Surf Park development.

The Redvale Landfill & Energy Park is located to the southwest of the Site, and the existing Dairy Flat School is further south of the Site.

To the north of the Site, Plan Change 103 (PC103) has recently rezoned approximately 107ha of land at Silverdale West from FUZ to LIZ. The PC103 site is located south of the Silverdale

motorway interchange between State Highway 1 to the east and Dairy Flat Highway to the west and extends to the south to approximately halfway to Wilks Road.

A wider context plan is provided in Figure 2 illustrating the proximity of the Site to employment precincts, centres and amenities.



Figure 2 – Site Context Plan

As noted by Traffic Planning Consultants in the Preliminary Traffic Assessment, NZ Transport Agency Waka Kotahi ('NZTA') and Auckland Transport ('AT') are proposing several upgrades to the transport environment in the north Auckland region to facilitate the expansion of Dairy Flat and the surrounding areas, including the Pine Valley area, as part of the North Supporting Growth programme. Figure 3 illustrates the location of these upgrade projects in relation to the Site. The specific upgrade projects close to the Site include:

- Upgrade to Dairy Flat Highway between Silverdale and Dairy Flat (Notice of Requirement 8 – NoR 8);
- Upgrade to Dairy Flat Highway between Dairy Flat and Albany (Notice of Requirement 9 – NoR 9); and

- New connection between Dairy Flat Highway and Wilks Road (Notice of Requirement 11 – NoR).

More details about these upgrade projects are included in the Preliminary Traffic Assessment (Appendix I).

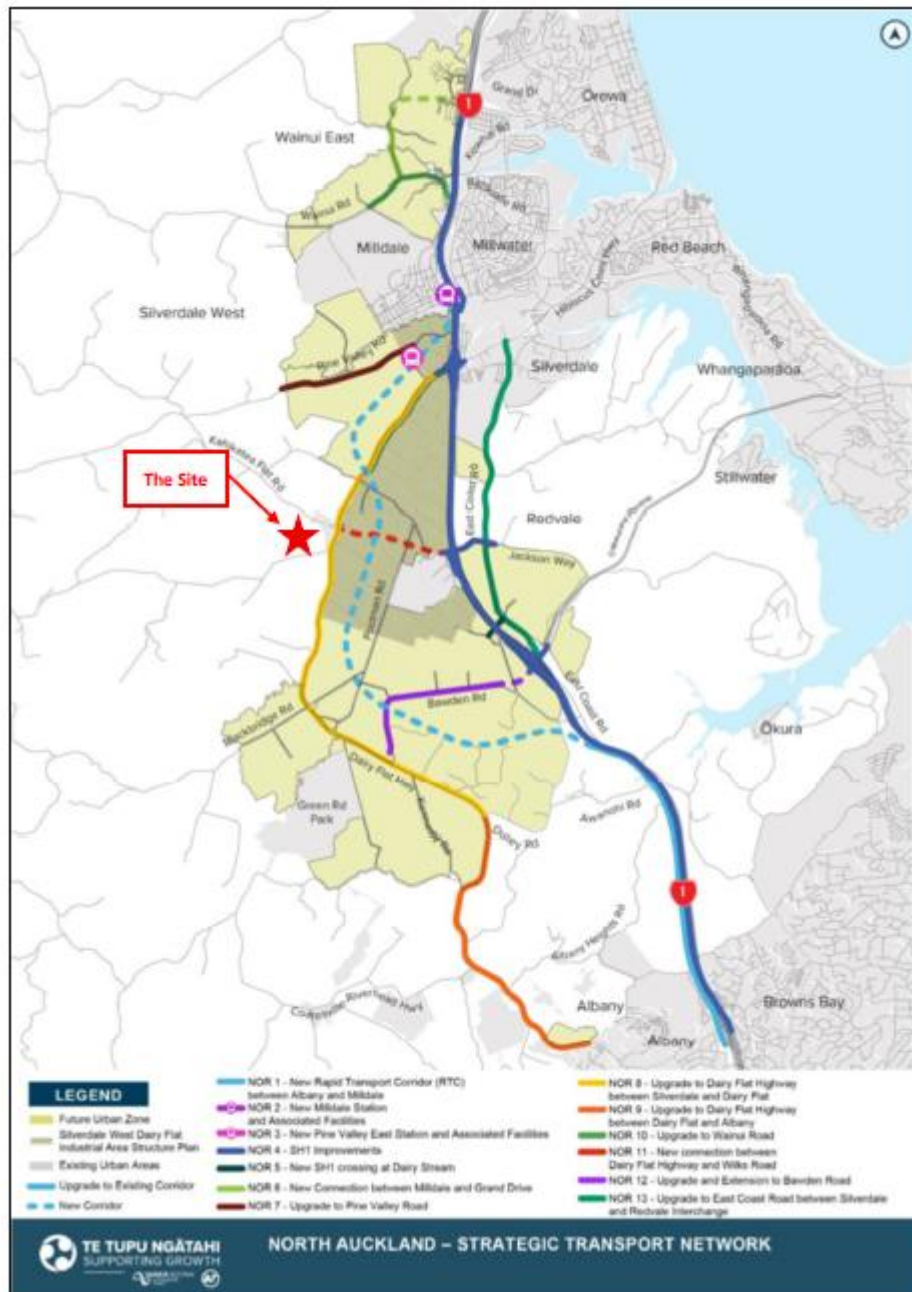


Figure 3 – Transport Network (site identified by a red star)

3. Proposal (section 13(4)(a) of the FTAA)

3.1. Overview

The provision of housing in the Auckland Region remains a significant issue, with ongoing pressure arising from persistent shortages in supply, limited housing diversity, worker accommodation, constraints on availability and infrastructure, and concerns as to affordability and quality.

The Project will deliver a comprehensively designed residential development, unlocking land to enable the construction of a residential community, supported by an open space network, and located in an area that is undergoing significant change with access to significant employment opportunities.

The Project will provide significant regional benefits to the local community, wider Silverdale and Dairy Flat community, and greater Auckland region, such as:

- Provision for a diversity and supply of housing, including enabling worker accommodation, family housing and intergenerational living;
- Provision of housing that is 'more affordable', these being dwellings at price points 10% less than the average market rate for the same typology;
- Regional resilience;
- Public access;
- Cycle network integration;
- Biodiversity restoration;
- Public open space; and
- Climate resilience.

The Economic Assessment undertaken by Property Economics (refer **Appendix C**) highlights the significant economic benefits that the Project will deliver to the Auckland region. The proposed development is expected to directly generate:

- \$897.4 million total direct capital expenditure over the development period (excluding land)
- \$663.6 million total Net Present Value at 2% over a 10-year development period;

- An estimated 781 jobs during the peak construction year;
- A total estimated number of 4,465 full time equivalent ('FTE') jobs over the development timeframe;
- Improved housing choice and affordability outcomes through provision of 1,000 – 1,100 residential lots/dwellings of varying densities; and
- Wider flow-on benefits for local businesses, services and community amenity.

The key elements of the Project are outlined within the Masterplan Document prepared by Isthmus (refer **Appendix A**), and reports accompanying the application. The Project includes the following key components:

- a) A master-planned development;
- b) A mix of residential densities;
- c) Community and service elements including a village centre;
- d) Supporting infrastructure and land use components;
- e) A substantial open space network of approximately 18.5 ha across the development;
- f) Provision of infrastructure and transport elements to support the establishment of the development, including on-site wastewater treatment and disposal and water collection via an aquifer.

The Project acknowledges the cultural importance of the wider landscape to mana whenua, with Tuakiri committed to aligning the Project with mana whenua values through ongoing engagement and collaboration with interested mana whenua.

The relevant mana whenua were notified about the Project on 22 April 2026, and while no responses have been received from mana whenua to date, there will be scope or opportunity to provide for kaitiaki input, which will be explored through further engagement with mana whenua through the referral and substantive application process.

3.2. Detailed Proposal

3.2.1. Site Layout

The Project represents a masterplanned residential village intended to balance regional growth, housing supply and good urban development outcomes with green open space and natural landscape values that align with the wider environmental context.

No processes are proposed under the Public Works Act 1981 in relation to the Project (section 13(4)(m) of the FTAA).

3.3. Servicing and Infrastructure

The Project has been developed with a provision for the following private infrastructure to reduce pressure on constrained public infrastructure systems, while enabling coordinated long-term growth:

- Water supply;
- Wastewater treatment;
- Stormwater management; and
- Power and Telecommunication.

Servicing for the proposed development areas is outlined in the Infrastructure Report prepared by Maven (refer **Appendix E**). This is particularly relevant with respect to the private treatment and disposal of wastewater, the provision for water supply and management of stormwater.

There are no existing public water, wastewater, or stormwater services currently available to any of the sites, as such the Project is to be serviced through private or site-specific infrastructure solutions. A summary of the proposed servicing strategy for the development is outlined below:

Water

For water supply, the proposal seeks to take water from a privately owned and operated bore-fed system. Sufficient water supply will be provided for each lot in the development, including for firefighting purposes, while adverse effects will be adequately mitigated.

Ownership and management arrangements will be confirmed at the substantive application stage. Further technical details on the water supply option are provided in the drinking water servicing report prepared by GWE (refer **Appendix F**), which accompanies this application.

Wastewater

All wastewater generated by the proposed development will be collected via a privately owned and managed on-site reticulation system and conveyed to a centralised on-site wastewater treatment plant. This reticulated network is expected to comprise a low-pressure

sewer ('LPS') system as the preferred solution, although conventional gravity or hybrid arrangements may be adopted where appropriate.

Further technical details on the wastewater option are provided in the wastewater servicing report prepared by GWE (refer **Appendix G**), which accompanies this application.

Stormwater

The stormwater strategy for the Project seeks to manage both the quantity and quality effects of stormwater, respond to existing flood hazards and natural drainage patterns, and protect downstream receiving environments. This will be delivered through a reticulated system. A project-specific private diversion and discharge consent will be sought because stormwater discharges cannot be authorised under the regional Network Discharge Consent.

Power and telecommunications

Public power and telecommunications are available in Dairy Flat to service the proposed development. Network upgrades will be required to meet the increased demand.

3.4. Roothing and Transport

The Project aligns with wider future regional growth and infrastructure planning principles through:

- Strategic transport corridor integration; and
- Active transport and public access connections.

The Preliminary Transport Assessment prepared by Traffic Planning Consultants (TPC) identifies the access and roading arrangements for the proposed development areas (refer **Appendix I**). The traffic associated with the Project can be accommodated within the nearby road network with upgrades to existing infrastructure as follows:

- active mode connections throughout the Site and to Dairy Flat Highway.
- enabling public transport to connect with and through the Site.
- signalisation of the Dairy Flat Highway intersections with Horseshoe Bush Road and Kahikatea Flat Road.

TPC are of the view that the Project will integrate well with future nearby employment areas and the planned future upgrades to Dairy Flat Highway and public transport network.

3.5. Ecology

The proposed development is located across a series of sites that are generally characterised by modified rural land cover, including exotic pasture, exotic scrub, shelterbelts and constructed water features. The preliminary Ecological Assessment prepared by Viridis (**Appendix J**) identifies generally low existing botanical and freshwater ecological values across the Site.

The Project incorporates:

- Extensive restoration planting;
- Riparian enhancement;
- Ecological corridors;
- Wetland and gully protection;
- Indigenous habitat enhancement;
- Weed and pest management; and
- Native revegetation.

The Project has been developed to avoid natural waterways and wetlands as far as practicable, with many freshwater features and more sensitive habitat areas intended to be retained within open space or green space areas. The wetland that is protected by the consent notice is completely avoided. The Project also includes substantial revegetation and ecological restoration planting, particularly around the streams and wetlands and other open space areas, as part of the wider landscape and environmental framework.

3.6. Historic Heritage

There are no archaeological sites identified on the Site, however it does fall within a settlement acknowledgement area. As a precautionary measure, an Archaeological Authority to Modify or Destroy will be sought under the Heritage New Zealand Pouhere Taonga Act 2014.

3.7. Earthworks

Staged bulk earthworks will be required to achieve the master planning layout including for road construction, infrastructure and to achieve suitable building platforms. The earthworks will seek to achieve a cut to fill balance, and the design of the works will integrate with the site levels with the adjacent infrastructure and roads. Detailed erosion and sediment control plans for the works will be provided at the substantive application stage.

3.8. Title Interests

As set out in Table 1 above, the Site comprises ten properties. Copies of those properties' Records of Title and Interests are included at **Appendix K**. A range of consent notices and easements are registered on the properties' titles within the Site. However, many will be designed around or have no implications for the proposed development. The wetland that is protected by the consent notice 9519890.3 is avoided.

Tuakiri has entered into conditional sale and purchase agreements with the landowner(s) of the respective properties:

- **24 Horseshoe Bush Road, Dairy Flat** – 6 months from the unconditional date;
- **42 Horseshoe Bush Road, Dairy Flat** – 6 months from the unconditional date;
- **46 Horseshoe Bush Road, Dairy Flat** – 6 months from the unconditional date;
- **48 Horseshoe Bush Road, Dairy Flat** – 6 months from the unconditional date;
- **Lot 3 DP 130668, Horseshoe Bush Road, Dairy Flat** – 6 years from the unconditional date;
- **Lot 1 DP 130668, Horseshoe Bush Road, Dairy Flat** – 5 years from the unconditional date;
- **100 Horseshoe Bush Road, Dairy Flat** – 4 years from the unconditional date;
- **82 Horseshoe Bush Road, Dairy Flat** – 3 years from the unconditional date;
- **61 Kahikatea Flat Road, Dairy Flat** – 6 months from the unconditional date;
- **77 Kahikatea Flat Road, Dairy Flat** – 6 months from the unconditional date.

(section 13(4)(s) of the FTAA).

4. Construction Period (section 13(4)(e) and (f) of the FTAA)

Please refer to **Appendix M** for a copy of the Staging Plan. The Project will be staged over a 10-year period, generally as follows:

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Stage 1										
Stage 2										
Stage 3										
Stage 4										
Stage 5										
Stage 6										
Stage 7										
Stage 8										

Isthmus also note that:

“The staging strategy has been developed to balance, infrastructure delivery, amenity provision, land ownership, and the creation of a strong community environment from the outset.

Development is proposed to commence at the northwest end of the site, enabling primary infrastructure and the transport spine and key space amenities be established early to support the first residents and create a clear structure for future growth

Stage 2 builds on this foundation through the introduction of the commercial offering an expanding neighbourhood amenities. Stage 3 then completes the spine road connection from Kaheka Flat Road to Horseshoe Bush Road, improving overall accessibility network resilience across the site.

Subsequent stages continue progressively up the catchment, allowing earthworks infrastructure, space and housing delivery to be coordinated in a logical and efficient manner. The staging approach also supports a steady delivery of homes with each stage anticipated to provide 100 to 150 dwellings on average.

Planting an ecological restoration will be integrated throughout the staging process with stream corridors space areas in the landscape buffers established daily to support amenity environmental performance enabled character from the outside of the development, the approach allows vegetation to mature alongside each stage, reinforcing the blue-green framework and contributing to a stronger sense of place overtime.”

If the substantive approval for the Project is granted by the end of Q1 of 2027, Tuakiri anticipates that it will be in a position to commence the earthworks and servicing elements of the Project enabled through the approval in Q3 of 2027.

5. Ineligible Activities (section 13(4)(c) of the FTAA)

The Project does not contain any ineligible activities set out in Section 5 of the FTAA, as the Project does not involve:

- Any activity on identified Māori land;
- Any activity that would occur in a customary marine title area;
- Any activity that would occur in a protected customary rights area;
- Any activity that would occur on Māori customary land, or land set apart as a Māori reservation;
- Any aquaculture activity;
- Any activity that would require an access arrangement under the Crown Minerals Act 1991;
- Any activity that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA;
- Any activity that would occur on any land listed in Schedule 4;
- Any activity that would occur on a national reserve, or a reserve that is vested in someone other than the Crown or local authority, or that is managed by someone other than the Department of Conservation;
- A prohibited activity under the EEZ Act, or an activity described in, and prohibited by section 15B or section 15C of the RMA;
- A decommissioning-related activity in the EEZ Act; or

- An activity undertaken for the purpose of an offshore renewable energy project.

6. Alternative Project (section 13(4)(g) of the FTAA)

The Project is not an alternative project.

7. Section 22 of the Fast-Track Approvals Act (section 13(4)(b) of the FTAA)

7.1. Assessment Framework

7.1.1. Significant Regional Benefits (section 22(1)(a) of the FTAA)

Section 22(1)(a) of the FTAA requires consideration of whether the project is an infrastructure or development project that would have significant regional or national benefits.

The proposal is plainly a 'development project' for the purposes of the FTAA. The Project is capable of delivering significant regional benefits, particularly for the Silverdale and Dairy Flat area and the wider Auckland region, as demonstrated in the technical assessments accompanying the referral application.

A key regional issue to which the Project responds is the well-documented shortage of housing in Auckland.

As set out in the economic assessment (refer **Appendix C**), the Project would deliver significant regional economic, social and environmental benefits to the Auckland region. In particular, the Project would:

- Enable 1,000 – 1,100 residential units, representing a material increase in housing supply in the context of an area that is experiencing significant employment growth of circa 350 hectares, which includes the consented Stage 1 Surf Park development;
- Build on the employment growth being created by the nearby Surf Park development;
- Create long-term infrastructure certainty through efficiently and environmentally orientated infrastructure; and
- Align with the Government and Auckland Council growth and productivity objectives.

The Economic Assessment concludes that the Proposal would provide substantial flow-on benefits for regional growth, local employment, amenity, and community wellbeing, and supports the project from an economic perspective in the context of the FTAA.

Tuakiri is committed to ongoing engagement with mana whenua and will seek to provide for cultural opportunities through design, partnership and supporting iwi aspirations for the area.

Taken together, the material accompanying the referral application demonstrates that the proposal would deliver significant regional benefits for Auckland. Those benefits are not confined to the project areas themselves but extend to the wider Auckland region through increased housing capacity, improved affordability outcomes, substantial economic and employment gains, support for regional productivity, and significant ecological restoration and enhancement.

On that basis, the Proposal meets the threshold of a development project that would have significant regional benefits for the purposes of the Fast-track Approvals Act 2024.

7.1.2. Fast-Track Facilitation (section 22(1)(b)(i) of the FTAA)

Section 22(1)(b)(i) of the FTAA requires consideration of whether referring the project will facilitate the project by enabling it to be processed in a more timely and cost-effective way than under the normal process.

Referral of the Project to the Fast-track process would materially facilitate its delivery by enabling the necessary approvals to be considered through a single, integrated statutory pathway, rather than through the standard planning processes that would be lengthy and uncertain.

Given the complexity of the planning framework applying to the Site, including the rural zoning of the land and the scale of activities proposed, the Project would otherwise need to proceed by way of a private plan change, followed by multiple non-complying resource consent applications. This would be likely to involve public notification and lengthy hearing processes, with results that could potentially be appealed to the Environment Court. It is estimated that a plan change process, together with the subsequent resource consent processes required to implement the development, could take in the order of five years to resolve.

By contrast, the FTAA provides a more efficient and cost-effective mechanism for considering the Project as a whole. The fast-track process is capable of consolidating the approvals required for a project of this nature and scale, thereby avoiding the duplication, delay, and uncertainty associated with sequential plan change and consent processes. This is particularly important for a master-planned development comprising housing, infrastructure, open space, ecological restoration, and supporting commercial and community activities, where an integrated assessment is preferable to fragmented decision-making across multiple separate applications.

Referral under the FTAA would therefore facilitate the Project by materially reducing approval timeframes, streamlining processing costs, and improving certainty for all parties. That in turn would enable the earlier delivery of the Project's identified regional benefits.

As set out in the supporting economic report, the Proposal would provide a substantial increase in housing supply through the delivery of approximately 1,000 – 1,100 residential lots, increasing residential capacity within the Silverdale and Dairy Flat area and the wider Auckland market. Earlier delivery of that supply is likely to assist in addressing pressing housing need and affordability pressures in the region.

The Project would also enable supporting infrastructure, generate significant employment and economic activity, and facilitate ecological restoration and enhancement measures that are proposed as part of the overall development.

7.1.3. Efficient Operation of Fast Track Process (section 22(1)(b)(ii) of the FTAA)

Section 22(1)(b)(ii) of the FTAA requires consideration of whether the referral of a project would materially affect the efficient operation of the fast-track approvals process.

Referring the Project to the Fast-track process is unlikely to materially affect the efficient operation of that process. Although the Proposal is substantial in scale, the issues it raises are not novel in either planning or technical terms. The Project involves a master-planned urban development comprising residential, community node, infrastructure, and open space elements on identified landholdings, supported by a conventional suite of technical assessments. The principal matters for assessment, including land use, subdivision, infrastructure servicing, transport, ecology, landscape, urban design, economic effects, are well understood within the resource management framework and are capable of being assessed through established methodologies. There are no known heritage sites on the site and any potential heritage effects will be managed through a precautionary approach. The applicant is committed to ongoing cultural engagement with mana whenua.

The application will be supported by detailed expert input across the relevant disciplines, enabling the substantive issues and effects of the Proposal to be clearly identified and evaluated. In that respect, the Proposal does not raise unusual legal or factual complexity that would be likely to place disproportionate demands on the fast-track system or require exceptional process adaptations.

Further, the anticipated effects of the Proposal are generally identifiable and capable of being appropriately managed through standard conditions, management plans, design controls, and other established mitigation measures. The Project is therefore well suited to an

integrated fast-track assessment, rather than requiring an unduly complex consenting process.

Accordingly, referral of the Project is not expected to impose any material inefficiency on the operation of the fast-track approvals regime. Rather, it is the type of large-scale development project for which the regime is intended for and can be assessed efficiently within that framework.

7.1.4. Conclusion on section 22 criteria

The Project is considered a 'development project', which would deliver significant regional benefits outlined in this report, aligning with section 22(1)(a) of the FTAA.

If referred, the Project would be enabled through the Fast-track process, to proceed in a timely manner compared to the alternative normal process, and it is unlikely to materially affect the efficient operation of the fast-track approvals process, aligning with sections 22(1)(b)(i) and 22(1)(b)(ii) of the FTAA.

8. Reasons for Consent

8.1. Resource Management Act 1991 (RMA)

Resource consents that would otherwise be applied for under section 104 of the RMA are likely to be required to enable the proposed development. Resource consents under the Auckland Unitary Plan are also required for this proposed development.

A list of possible reasons for consent is outlined below, and it is noted that these will be finalised through the FTAA substantive application process once the Project is referred.

In respect of s13(4)(i) of the FTAA, prohibited activities are likely to be involved in the Project by virtue of the National Environmental Standards for Freshwater 2020 ('NES-F'), given the potential need for removal of some discrete low ecological areas potentially meeting the definition of "inland wetland" as part of the development. As noted on page 4 of the Ecological Assessment (**Appendix J**):

One raupō wetland approximately 0.5 ha in size was observed on the Site, at 48 Horseshoe Bush Road. Based on historical aerial imagery, this wetland appears to have been constructed, potentially for an environmental benefit subdivision. Other areas of wetland habitat are also likely to be present, primarily associated with stream margins and floodplain environments. These will be confirmed through detailed field investigation.

If the detailed field investigation undertaken for the substantive application confirms the presence of these additional areas of wetland habitat, and those require removal, the Site

would be unable to meet the requirements of regulation 45C(7) of the NES-F (section 13(4)(i) of the FTAA).

8.1.1. Auckland Unitary Plan (Operative in Part)

s11 Land use Consents

H19 Mixed Rural Zone

- Under Table H19.8.2 (A78), the construction of approximately 1,020 dwellings not otherwise provided for in the mixed rural zone is a **non-complying activity**.
- Under Table H19.8.2 (A78), the construction of any dwelling that does not comply with Standard H19.10.10¹ is a **non-complying activity**.
- Under Table H19.8.1 (A36), a café not otherwise provided for is a **discretionary activity**.
- Under Rule C1.7(1), the proposal to establish retail and commercial activities is a **discretionary activity**.

E11 Earthworks - Regional

- Under Activity Table E11.4.1(A5), earthworks greater than 50,000m² where land has a slope of less than 10 degrees outside a Sediment Control Protection Area are a **restricted discretionary activity**.
- Under Activity Table E11.4.1(A8), earthworks greater than 2,500m² where land has a slope of equal to or greater than 10 degrees are a **restricted discretionary activity**.
- Under Activity Table E11.4.1(A9), earthworks greater than 2,500m² within the Sediment Control Protection area are a **restricted discretionary activity**.

E12 Earthworks – District

- Under Activity Table E12.4.1(A6), earthworks greater than 2,500m² is a **restricted discretionary activity**.

¹ H19.10.2 (Building Height) and H19.10.3 (Minimum Yards).

- Under Activity Table E12.4.1(A10), earthworks greater than 2,500m³ is a **restricted discretionary activity**.

E15 Vegetation Management and Biodiversity

- Under Activity Table E15.4.1 (16), the alteration or removal of any vegetation within 20m of a rural streams is a **restricted discretionary activity**.
- Under Activity Table E15.4.1 (18), the alteration or removal of any vegetation within 20m of a natural wetland is a **restricted discretionary activity**.

E25 Noise and Vibration

- The proposed construction works are anticipated to exceed the applicable maximum 75dB LAeq long-term construction noise limits under Standard E25.6.27. Under Table E25.4.1(A2), this is a **restricted discretionary activity**.

E26 Infrastructure

- Under Activity Table E26.2.3.1 (A50), any above ground pipes and ancillary structures for the conveyance of wastewater is a **restricted discretionary activity**.
- The development will be serviced by a private wastewater treatment plant. Under Activity Table E26.2.3.1 (A54), the construction of a wastewater treatment plant is a **restricted discretionary activity**.
- The development will construct a number of stormwater ponds for managing stormwater onsite. Under Activity Table E26.2.3.1(A55), the construction of stormwater detention/retention ponds/wetlands is a **controlled activity**.

The development will be serviced by a private water treatment plant and tank(s) not meeting Standard E26.2.5.2 'Activities within zones in Table E26.2.3.1' is a **restricted discretionary activity** under C1.9.(2).

E27 Transport

- Under Activity E27.4.1 (A3), any activity or subdivision which exceeds the trip generation standards under E27.6.1 is a **restricted discretionary activity**.
- The Proposal seeks a new intersection off Kahikatea Flat Road, which is identified as an arterial road. Under Activity E27.4.1 (A5), the construction or use of a vehicle crossing where a Vehicle Access Restriction applies is a **restricted discretionary activity**.

E36 Flooding and Natural Hazards

- The Proposal involves the construction of stormwater management devices and flood mitigation works in the 1 per cent AEP floodplain. Under Table E36.4.1 (A33), this is a **restricted discretionary activity**.
- The Proposal includes the construction of infrastructure on land subject to overland flow paths and the 1% AEP floodplain. Under Table E36.4.1(A56), the construction of all other infrastructure in these areas not otherwise provided for is a **restricted discretionary activity**.

E40 Temporary Activities

- Under Table E40.4.1(A24), the proposed construction activity associated with the development will exceed 24 months. This is a **restricted discretionary activity**.

Stream Consents

E3 Lakes, Rivers, Streams and Wetlands

- Any new structures and associated diversion of water not complying with the general permitted activity standard E3.6.1.14 is a **discretionary activity** under Table E3.4.1(A44).
- The Proposal would require the reclamation of streams. Under Table E3.4.1(A49), the reclamation of streams is a **non-complying activity**.

Discharge Consent - Wastewater

E6 Wastewater Network Management

- The proposed development seeks an onsite private treatment plant. Under Rule E6.4.1(A6), the discharge of wastewater on-site on land or to the stream is a **discretionary activity**.

Discharge Consent - Stormwater (Private)

E8 Stormwater Discharge

- Under Activity Table E8.4.1(A10), all other diversion and discharge of stormwater runoff from impervious areas not otherwise provided for is a **discretionary activity**.

Contaminated Discharges

E30 Contaminated Land

- The potential discharge of contaminants onto the land not meeting Standard E30.6.2.1², is a **discretionary activity**.

Water Take - Groundwater Diversion

E7 Taking, Using and Diversion of Water and Drilling

- Temporary diversion of surface water for urban development during earthworks not otherwise listed is a **discretionary activity** under E7.4.1(A13).
- The diversion of groundwater caused by excavation during earthworks that does not meet the permitted activity standards is a **restricted discretionary activity** under E7.4.1(A28).

Subdivision Consents

E39 Subdivision (Rural)

- Under E39.4.1(A8), the subdivision of land within the 1% AEP floodplain is a **restricted discretionary activity**.
- Under E39.4.1(A9), the proposed subdivision of land which does not meet the standards in E39.6.1 is a **discretionary activity**.
- Under Table E39.4.2(A11), subdivision for open spaces in the Mixed Rural zone is a **discretionary activity**.
- Subdivision which does not meet the standards in E39.6.5.1 requires consent under E39.4.2(A13) as a **non-complying activity**.

² The PSI and need for a DSI is not yet known. For the avoidance of doubt, a reason for consent is identified at this stage.

Proposed Plan Change 120 (PPC120)

The following matters for consent are identified under PPC120:

E36 Natural Hazards and Flooding

Flood Hazard

The Maven Infrastructure Report (**Appendix E**) identifies³ that the Site is subject to flood hazards ranging from low to high as identified by PPC120. These hazards follow the existing watercourses on the Site. Earthworks will be undertaken to manage any flooding within the roads and open space extents on site. On this basis the following are the applicable reasons for consent:

- The development of roads and accessways located within flood hazard areas under Table E36.4.1A (A88) is a **restricted discretionary activity**.
- The Proposal involves the construction of stormwater management devices or flood mitigation works in the 1 per cent AEP floodplain and flood prone areas is classified as a **restricted discretionary activity**.
- The proposal involves the development of new structures including retaining walls. Under Table E36.4.1A(A98), all other structures and buildings (including retaining walls) in the 1 per cent AEP floodplain and flood prone areas are classified as a **discretionary activity**.

Landslide hazard

In respect of landslide susceptibility, the KGA Geotechnical Assessment determines that the Site has a 'medium' risk classification⁴. This corresponds to a 'tolerable' or medium risk classification under Table E36.4.1B.

- The development of the commercial node would trigger consent under Table E36.4.1B (A122) new structures and buildings with a gross floor area more than 20m² associated with activities potentially sensitive to natural hazards in medium (tolerable) and high (significant) landslide hazard risk areas that comply with Standard E36.6.A1 (A123) are a **controlled activity**.
- The development of new dwellings on the site would trigger consent under Table E36.4.1B (A124) new structures and buildings with a gross floor area more than 20m²

³ Figure 5, Infrastructure Report, prepared by Maven refer **Appendix E**.

⁴ Section 4.4.3, Geotechnical Engineering Appraisal, prepared by KGA refer **Appendix H**.

associated with activities sensitive to natural hazards in landslide hazard risk areas that comply with Standard E36.6.A1 are a **restricted discretionary activity**.

- Under Table E36.4.1C (A133) all other infrastructure in landslide susceptibility assessment areas not otherwise provided for within the medium landscape susceptibility areas are a **restricted activity**.

Key AUP Compliances

- The new buildings would all fall under the airport approach surface overlay 89.70-109.70 datum with the levels of building heights situated approximately 15m below. Under Activity Table D23.4.1 (A2) buildings that do not exceed the airfield height limits restriction in Standard D23.6.1 Height is a **permitted activity**.
- Buildings and structures and onsite wastewater treatment systems located on land which may be subject to land instability are permitted if Standards E36.6.1.11 and E36.6.1.12 is met. These are met as a geotechnical completion report conditions and any other recommendation for the Geotech engineer would be offered up with any substantive application.

Overall, the Proposal would be a **non-complying activity** under the Auckland Unitary Plan.

The final approvals will be specifically identified in the substantive application.

8.2. National Environmental Standards for Freshwater 2020 ('NES-F')

As noted above, there are a number of streams and potential wetlands within the Site. The largest and the only definitively identified wetland is the central raupō wetland (located on 48 Horseshoe Bush Road), with a number of potential discrete ones generally located adjacent to watercourses. Alongside this, there are multiple constructed ponds that are not defined as wetlands. The Proposal seeks to limit earthwork and water diversion around the central raupō wetland and streams, but it is likely a number of the smaller inland wetlands and discrete intermittent stream portions will need to be removed. The extent will not be known until the detailed design is progressed at the substantive stage and a detailed field investigation is undertaken to identify any additional areas of wetland habitat.

It is therefore highlighted that prohibited status under regulation 53 of the NES-F may be triggered, in addition to consents under regulations 57 and 71 for stream reclamations and culverting.

Under section 21(7) of the FTAA, the Minister can accept and refer a referral application for an activity that is prohibited under the RMA. The potential effects of these activities will be assessed as part of any substantive application.

8.3. National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health ('NES:CS')

Given the historical rural uses of the Site, it is likely that provisions of the NES:CS will apply to future residential development at the locations where HAIL activities are likely to have occurred, although it is noted there are no known HAIL sites within the Site to date. A preliminary site investigation (PSI) and a detailed site investigation (DSI) involving a targeted soil sampling will be undertaken for the Site in support of the substantive application. This will ascertain whether NES:CS land resource consents are required to be sought in support of the proposed development. Conservatively, a reason for consent under Chapter 30 of the AUP has been identified above, although it may fall away following completion of the PSI and DIS above.

8.4. Wildlife Act 1953

The Proposal is likely to require approval under section 53 of the Wildlife Act 1953 for the relocation of indigenous lizards that may be present within the Site. The Ecological Assessment identifies that lizard habitat is present in some discrete parts of the Site.

Areas of lizard habitat have largely been avoided by the layout of the Site and will mostly be retained in open space. Some habitat areas may fall within future lots. Notwithstanding that, any potential disturbance, relocation, or rescue of these indigenous species during earthworks and development must be appropriately authorised.

Section 53 approval is therefore likely to be required to authorise any activities that involve capturing, handling, or relocating protected wildlife. A fauna management plan will be prepared to guide these actions, including appropriate mitigation measures such as pre-clearance surveys, translocation protocols, and habitat enhancement. These measures are designed to ensure compliance with the Wildlife Act 1953 and minimise adverse effects on indigenous fauna.

Tuakiri has undertaken pre-lodgement consultation with the Department of Conservation (DoC) being the relevant administering agency for approvals under the Wildlife Act 1953. Further details of that consultation are contained in **Appendix L**.

8.5. Heritage New Zealand Pouhere Taonga Act 2014

There are no archaeological sites identified on the Site.

The Site does fall within an area of settlement acknowledgement area. As a precautionary measure, an Archaeological Authority of Modify will be sought under the Heritage New Zealand Pouhere Taonga Act 2014.

Tuakiri has undertaken pre-lodgement consultation with Heritage NZ (**HNZ**) being the relevant administering agency for approvals under the Heritage New Zealand Pouhere Taonga Act 2014. Further details of that consultation are contained in **Appendix L**.

9. Assessment of Environmental Effects (section 13(4)(h) of the FTAA)

The key potential adverse effects are addressed in general below and should be reviewed in conjunction with the supporting technical expert memoranda accompanying this application.

9.1. Economic Benefits

The Horseshoe Bush Road Fast-Track Project will deliver significant economic benefits at a regional level, aligning with the purpose of the FTAA, as confirmed in the Economic Assessment prepared by Property Economic (Refer **Appendix C**).

The key economic benefits that are outlined in the report include:

- Delivery of a substantial economic stimulus to the Auckland regional economy with Total direct expenditure over a 10-year development period¹ (excluding land) of \$897.4m. A Total Net Present Value of \$663.6m at 2% over a 10-year development period.
- Increased housing supply and capacity in the Dairy Flat and Silverdale area.
- Increased and diversified choice of housing location.
- Potential for lower housing prices through increased competition, increased supply and improved affordability in the region.
- Delivering more affordable housing capacity with greater certainty.
- Enhanced access to existing and planned infrastructure networks.
- Increased economic activity through increased construction and contributions to local employment, both during the development period and ongoing.
- Improved employment travel efficiency through recently zoned employment options nearby.
- Potential impetus for greater levels of local and regional growth.

Property Economics have concluded that the fast-track process will ensure these identified benefits are realised sooner than traditional development pathways would otherwise normally allow. In their expert view, the Proposal meets the criteria under sections 22(2)(a)(iii) and 22(2)(a)(iv) of the FTAA and is supportable on economic grounds.

In terms of wider economic effects, while Dairy Flat is not currently planned for growth at this scale, Property Economics note that the supply in housing from this proposed development satisfies the definition of “significant” in Policy 8 of the NPS-UD, which requires authorities to be responsive to significant unplanned or out-of-sequence proposals that would contribute meaningfully to a well-functioning urban environment. Property Economics has also considered whether the Proposal might impose unwarranted costs on the wider community via the infrastructure required to service it. Property Economics have concluded that this is minimal, given Tuakiri will fund the infrastructure to service the development.

Having regard to the economic assessment as a whole, the Proposal is appropriately characterised as one that would deliver significant economic benefits for the Auckland Region.

9.2. Cultural Effects

The cultural value of the area is an important consideration in this Project, where mana whenua relationships to land and water are acknowledged and respected. Tuakiri is committed to ongoing engagement and co-design with between Tuakiri and mana whenua, recognising mana whenua’s role as kaitiaki, holders of mātauraka and tikaka specific to this landscape and the surrounding region.

Overall, the role of mana whenua is recognised, acknowledged, and the applicant will continue to collaborate with mana whenua to ensure cultural effects are appropriately considered, managed and enhanced where possible.

9.3. Landscape Effects and Visual Amenity

The Project has been developed through a landscape-led design philosophy responding directly to the characteristics of the Dairy Flat landscape context.

Within the wider Dairy Flat setting, these contextual values are shaped by its transitional role on Auckland’s metropolitan edge. The landscape functions as a buffer between rural urban boundary and urban centres such as Albany and Silverdale, with Dairy Flat Highway and State Highway 1 forming strong transport connections. The pattern of open pasture, scattered rural dwellings, and farming activity contributes to the identity of Dairy Flat as a coherent though modified rural landscape that is undergoing gradual change.

It is noted that the FUZ is generally located on the western side of Dairy Flat Road, albeit that there are areas located on the western side of Dairy Flat Road that are also zoned as FUZ, indicating that the road is not necessarily a hard line as an urban boundary.



Figure 4 – Zoning Context

The Landscape Assessment Refer to **Appendix D**, notes that the land to the east of the Dairy Flat settlement, immediately beyond Dairy Flat Highway and within the RUB, is land zoned Future Urban (FUZ), which anticipates urban use and intensification in the land extending across to State Highway 1.

The wider area, known as the Silverdale West Dairy Flat Industrial Area Structure Plan, is a comprehensive blueprint that has been developed by Auckland Council to transform approximately 1,400 hectares of greenfield rural land from FUZ into a major hub for light and heavy industry. Strategically located south of the Silverdale motorway interchange, the structure plan area spans between State Highway 1 to the east and Dairy Flat Highway to the west. The site is located opposite the Gateway Entrance Point to the Silverdale West Dairy Flat Industrial Area (Refer Figure 5 Below).

The northern area of the Silverdale West Structure Plan located close to the Silverdale motorway interchange, has recently gone through a Private Plan Change process (PC103). PC103 provides for the rezoning of some 107Ha of FUZ land to LIZ.

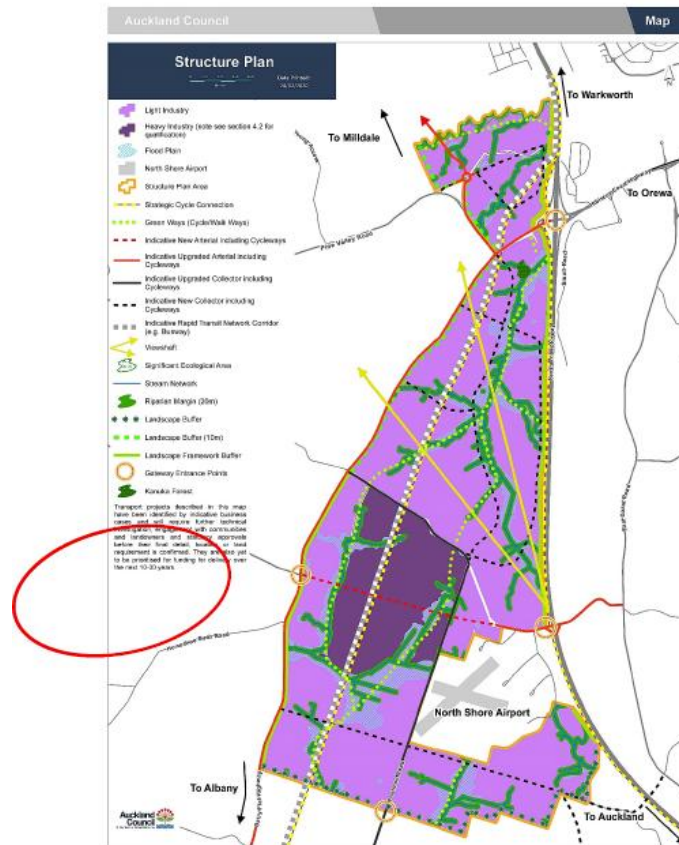


Figure 5 – Silverdale West Dairy Flat Industrial Area Structure Plan

The Landscape report notes that:

“4.1 Having undertaken an evaluation of the proposed masterplan from a landscape perspective, the site is appropriate, has the capacity to absorb urban development and can be supported for the following reasons:

- *The site is located proximate to the settlement of Dairy Flat, situated at the ‘pinch point’ between Kahikatea Flat Road (north) and Horseshoe Bush Road (south), near where these roads intersect with Dairy Flat Highway (east);*
- *Its location in the context of the FUZ land to the east of Dairy Flat Highway and the emerging development (e.g. the Significant Light Industrial zone spatial extent and Auckland Surf Park) and anticipated development within that area;*
- *Its connection and proximity to Dairy Flat Highway (the main north-south arterial), which has been designated for upgrade to a rural arterial connection through this area – based on anticipated urban intensification;*

- *The site's immediate context and the surrounding area is peri-urban, with both urban and rural features and land uses;*
- *The design identifies and protects existing landscape features across the site (e.g. streams and wetlands, and areas of vegetation) and these provide key structuring elements in the masterplan's design;*
- *It retains, protects and enhances the existing stream catchments / drainage patterns across the site through the provision of extensive planting along their margins;*
- *The site has rolling topography and is set within a natural basin shaped by the central stream network. The layout responds to the underlying topography and its associated slope and aspect;*
- *The masterplan has been designed based upon this central landscape framework which identifies a series of separate yet integrated development character areas, responding to the identification of sensitive landscape areas;*
- *The landscape framework will provide a natural buffer between these development areas, enabling physical and visual separation and breaking up the overall extent of development;*
- *The central landscape framework will be enhanced through landscape treatment and regenerative planting. This will provide long term benefits, enhancement of natural characteristics of the streams, and an increase the ecological and environmental qualities of the site within a central, contiguous landscape corridor. It also provides the structure for walking and cycling connectivity through open space and recreation areas. The landscape framework will also be complemented by a comprehensive street tree strategy;*
- *The design has provided a carefully considered response to the existing topography and potential landform modification required;*
- *The design provides for varied lot sizes, arrangements, and yield across the site, within the respective character development areas. This includes 'more intensive' development anticipated within the central and eastern parts of the site, proximate to Dairy Flat;*
- *A sensitive transition is provided to the site's surrounding rural context. This is achieved through a combination of a transition to larger lot sizes and increased areas of vegetation and buffers proposed along the site's northern, western*

and southern frontages. This will assist with the transition and integration of the development into the broader rural landscape;

- The site is devoid of any landscape related overlays or significant features per the AUP:OP; and*

4.2 The design provides a logical and legible street network circulation and hierarchy which connects into the wider network and adjacent amenities. In relation to visual amenity, a high proportion of the site is located within a basin of rolling topography. The basin setting and anticipated buffer planting and larger lot sizes around the site's periphery will minimise and soften any views into the site. The central landscape framework is extensive and will form a physical and visually contiguous pattern which will also assist with visually breaking up concentrations of future houses and provide a vegetated backdrop and foreground, depending on the location of the viewer. The planting proposed around the sensitive boundary edges and frontages will also provide a buffer and visual softening, including to those properties in closer proximity. It will also provide a visual backdrop against which future development is seen in longer views.

4.3 The design illustrates a spatial form and arrangement which responds to the key landscape features of the site, identified through the opportunities and constraints analysis, and the site is well located in relation to its specific, localised and wider landscape and emerging urban land use context."

Overall, the Proposal will result in moderate landscape character effects, and the proposed open space corridors, riparian setbacks, landscape buffers and restoration planting will assist in maintaining landscape coherence and integrating the development into the wider Dairy Flat landscape over time.

9.4. Management of Natural Hazards

KGA Geotechnical has prepared a preliminary geotechnical hazards assessment (refer **Appendix H**) to support the fast-track referral application. The assessment is based on a desktop review, field walkover and mapping, review of GIS historic information, Auckland Council natural hazard mapping, GNS geological mapping, and interpretation of topographic

information. Further geotechnical assessment will be required at the substantive application stage once the project is referred.

KGA Geotechnical have advised that:

“Based on the appraisal completed to date, the proposed subdivision is considered feasible from a geotechnical perspective, provided the geotechnical constraints identified in this report are appropriately addressed during future stages of investigation, design, and construction.

The main constraints requiring further assessment include slope instability, variable alluvial ground conditions, shallow groundwater/seepage, potential acid sulphate soils, uncontrolled or disturbed fill, expansive soils, and potential liquefaction-related effects.

Appropriate mitigation measures are expected to be available for these constraints and may include targeted earthworks treatment, removal or replacement of unsuitable soils, engineered fill construction, groundwater and surface water drainage control, acid sulphate soil management, slope stabilisation, retaining, erosion protection, specific foundation design, setbacks, and localised layout refinement where required.

In our professional opinion, and based on our experience with large-scale land development projects involving similar geotechnical constraints, appropriate mitigation measures should be able to be implemented to provide safe and stable building platforms within the currently proposed development layout, subject to confirmation by future site-specific geotechnical investigation and detailed design.”

Maven have also undertaken an assessment of the flood hazard areas on the Site that are primarily associated with the stream network (Refer **Appendix E**). Maven are of the view that natural hazards can be appropriately addressed as part of the detailed design to ensure the safety of building occupants, egress to and from the Site and in terms of both the upstream and downstream stormwater catchment.

Overall, whilst the preliminary geotechnical and flooding assessments have identified a number of natural hazards that affect the Site and proposed development, each of the hazard risks are able to be avoided or adequately mitigated. The development areas have been designed and located having regard to the geotechnical assessment. In particular, the layout has sought to respond to the Site’s landforms, waterways, drainage paths, slope conditions and potential flooding, slope instability.

Further refinement of building platform locations, setbacks, earthworks, stormwater design and any necessary engineering mitigation will occur through the substantive application and

detailed design process to ensure that natural hazard risks are appropriately avoided or mitigated.

9.5. Servicing

The Infrastructure Assessment prepared by Maven (refer **Appendix E**), concludes that the proposed sites can be serviced through private infrastructure solutions for stormwater, wastewater and water supply. All infrastructure will be designed to the Auckland Council standards, such that if the Auckland Council desires to vest the infrastructure in the future, it will be a smooth transition. However, at this stage, all infrastructure is proposed to be private. Further investigation and design of the infrastructure will be developed in the next stages of design to support the proposal and the substantive application.

Water

The Proposal seeks to take water from a privately owned and operated, bore-fed system. Sufficient water supply will be provided to each lot in the proposed development, including for firefighting purposes, while adverse effects will be adequately mitigated.

The Site is located within the Rangitōopuni–Waitemata Aquifer, which provides a viable groundwater source for the development, subject to confirmation through site-specific investigation and testing. Auckland Council has confirmed that approximately 1,403,000 m³/year of groundwater remains available for allocation within the Rangitōopuni–Waitemata Aquifer, indicating that sufficient capacity exists to support this supply option.

The water supply system would comprise of:

- One or more on-site production bores abstracting groundwater.
- A centralised water treatment system to achieve potable water quality standards prior to distribution.
- A private reticulated water network servicing individual lots.
- Raw and treated water storage infrastructure to provide operational storage and manage demand variability.

The Proposal is estimated to generate an average daily water demand of approximately 720 m³/day. Rainwater harvesting is proposed as a supplementary source for non-potable uses, including toilet flushing, irrigation, and outdoor use, thereby reducing reliance on groundwater abstraction. The remaining demand is anticipated to be met from groundwater,

subject to confirmation through further investigation and testing. This will also include provision for firefighting requirements as part of the detailed design and consenting phase.

It is expected that the system will be classified as a networked drinking water supply and will be required to comply with the Water Services Act 2021 and the Drinking Water Quality Assurance Rules administered by Taumata Arowai, which will include registration of the supply and implementation of appropriate management and monitoring frameworks.

Ownership and management arrangements will be confirmed at the substantive application stage. Further technical details on the water supply option are provided in the drinking water servicing report prepared by GWE (refer **Appendix F**), which accompanies this application.

Wastewater

The Site is not currently connected to a public wastewater network. The proposal for wastewater disposal has been designed to a higher standard than typically accepted in an urban context. All wastewater generated by the proposed development will be collected via a privately owned and managed on-site reticulation system and conveyed to a centralised on-site wastewater treatment plant. This reticulated network is expected to comprise a LPS system as the preferred solution, although conventional gravity or hybrid arrangements may be adopted where appropriate.

It is proposed that treated effluent from the on-site treatment plant would be discharged to the most appropriate receiving environment, which may include discharge to land and/or to the central stream, subject to detailed design, regulatory approvals, and discharge consent conditions.

The key elements of the wastewater system for the Site includes:

- A private wastewater reticulation network, with LPS as the preferred servicing approach, supplemented by gravity or hybrid systems where required.
- A centralised, modular wastewater treatment plant designed to achieve a high standard of treatment appropriate to the receiving environment.
- Treated effluent will be discharged to land and/or the receiving stream, as appropriate, subject to detailed design and consenting, with effects on water quality and downstream environments appropriately managed.
- Staged implementation of infrastructure to align with development delivery and demand.
- Ongoing operation, maintenance, and monitoring of the private wastewater system by a suitably qualified operator in accordance with consent conditions and regulatory

requirements. With the option to connect to the public network if a connection becomes available.

Further technical details on the wastewater supply option are provided in the wastewater report prepared by GWE (refer **Appendix G**), which accompanies this application.

Considering the high level of treatment proposed, the effects of wastewater will be adequately mitigated.

Stormwater

The stormwater strategy for the Proposal seeks to manage stormwater (both quantity and quality effects), respond to existing flood hazards and natural drainage patterns, and protect downstream receiving environments.

Early stakeholder engagement will be undertaken and the proposed stormwater design and will be refined through detailed investigations and the preparation of a Stormwater Management Plan as part of the subsequent design and consenting phases.

A project-specific private diversion and discharge consent will be sought because stormwater discharges cannot be authorised under the NDC.

Maven has summarised the proposed stormwater management strategy for the Proposal as follows:

- Stormwater runoff from the development will discharge initially to the on-site stream network, with the ultimate receiving environment being the Upper Waitematā Harbour.
- Stormwater quality treatment will be provided prior to discharge using devices designed in accordance with Auckland Council Guideline Document GD01 – Stormwater Management Devices.
- Hydrological mitigation is proposed to achieve, as a minimum, equivalence with SMAF 1 outcomes, consistent with established Auckland Council practice for greenfield development.
- Stormwater attenuation is proposed for design storm events up to and including the 100-year ARI event, including climate change allowances, such that post-development peak flows are designed to match pre-development levels.
- Stormwater management will incorporate both retention and detention measures to manage runoff volume and flow characteristics.

- Primary and secondary stormwater conveyance systems will be designed to safely manage stormwater flows up to and including the 100-year ARI event, including climate change allowances.
- Existing and proposed overland flow paths will be maintained or formalised as required to ensure safe conveyance of secondary flows through the Site and continuity of upstream and downstream flow paths.
- The development will be designed to avoid increases in flood risk within the Site and to upstream and downstream properties as a result of the proposed works.
- Habitable buildings will be located and designed to avoid identified flood hazard areas where practicable, with finished floor levels set above the relevant design flood levels, including appropriate freeboard, in accordance with Auckland Council and Building Code requirements.

Overall, all stormwater discharges will be captured and treated, to manage natural hazards, avoid scouring and erosion, align with the recommendations in the geotechnical assessment and to provide enhanced ecological outcomes for the stream and wetland network that runs through the Site.

In the next stages of design, the infrastructure engineers, geotechnical engineers and ecologists will collaborate together on the best approach to stormwater disposal, to ensure any risk of adverse effects on the Site and receiving environment are adequately avoided.

9.6. Earthworks and Construction Management

During the earthworks phase of construction, sediment and erosion control measures will be installed as required to manage any adverse environmental effects. A Land Management Plan will be developed for each stage, specifically addressing erosion and sediment control during site preparation and construction. Geotechnical recommendations will be considered when designing the required earthworks, and only earthworks required for the development and natural hazard mitigation will be considered.

Any adverse effects associated with earthworks can be adequately managed.

9.7. Heritage Effects

The Site does not feature any known Heritage sites or features on the Auckland Unitary Plan. A review of the Arch GIS website indicates that there are no known archaeological sites.



Figure 6 – ARCH GIS Overlay

An archaeological report will be obtained as part of the substantive application and any features that are identified will be considered through the next stages of design to be celebrated in their context. As such, effects on heritage features will be minimised or avoided.

9.8. Ecological Effects

The Ecological Assessment prepared by Viridis (Refer **Appendix J**) notes that the Site is currently used for pastoral agricultural purposes, with land cover dominated by grazed pasture and associated rural infrastructure. Vegetation within the Site is predominantly exotic. The Site is considered to have low suitability for birds, lizards and bats, noting that surveys of all birds, lizards and bats will be undertaken as part of the substantive application.

The report also notes that the Site features a network of headwater streams and overland flow paths, centred on the Rangitoo-puni Stream and its tributaries. Overall, ecological values within the Site are primarily associated with the Rangitoo-puni Stream, its main tributaries and the raupō wetland.

The report considers that the main ecological effects are expected to be some disturbance to existing habitat, and temporary construction-related effects on habitat. Freshwater effects are expected to be low, with the proposal designed to enhance waterways and their riparian margins and to minimise stream crossings.

The Site provides a significant opportunity for ecological enhancement, particularly through extensive riparian and wetland margin planting. This planting will:

- improve habitat quality;
- increase native vegetation diversity;

- enhance ecological connectivity; and
- strengthen buffering functions across the Site.

Viridis consider that, in the context of widespread historical biodiversity loss and fragmentation within the Auckland region, the proposed planting associated with the Proposal presents a meaningful opportunity for biodiversity gain.

Effects on indigenous fauna can be appropriately managed through the implementation of fauna management measures, to be developed as part of the substantive application.

In terms of effects on freshwater values, the Proposal also provides significant opportunities for ecological enhancement, including:

- riparian planting to improve water quality through increased filtration;
- increased shading to moderate water temperatures;
- improved bank stability; and
- enhancement of in-stream habitat and ecological connectivity.

Viridis considers that, given the current degraded condition of many stream habitats within the Site, these measures are expected to result in an overall improvement in freshwater ecological values.

Overall, the ecological assessment concludes that adverse ecological effects are expected to be minor and capable of being appropriately managed. The Proposal is also expected to deliver substantial ecological enhancement through restoration planting and habitat improvement, resulting in a significant increase in indigenous habitat and connectivity across the wider landscape. On that basis, any ecological effects can be effectively mitigated, and many positive ecological effects will result from the Proposal.

9.9. Traffic Effects

The Preliminary Transport Assessment prepared by TPC (**refer Appendix I**) identifies that the proposed development will generate additional traffic. The traffic associated with the Project can be accommodated within the nearby road network with upgrades to existing infrastructure as follows:

- active mode connections throughout the Site and to Dairy Flat Highway.
- enabling public transport to connect with and through the Site.
- signalisation of the Dairy Flat Highway intersections with Horseshoe Bush Road and Kahikatea Flat Road.

TPC are of the view that the Project will integrate well with future nearby employment areas and the planned future upgrades to Dairy Flay Highway and public transport network. The additional population would enable improvements to be made to bus frequencies and new routes to be provided. This would benefit both the new and existing residents as well as those already living along the bus routes and generated by the adjacent Surf Park development.

Overall, TPC considers that where the Proposal will generate transport effects, these can be appropriately avoided, remedied, or mitigated through access upgrades, intersection improvements, staged implementation, and detailed assessment and design at the substantive application stage. Relying on this assessment, and taking into account the proposed mitigation measures, the potential adverse effects of the Proposal on the transport network are considered to be adequately managed.

9.10. Reverse Sensitivity Effects

Considering the proximity of the Site to the rural environment and the surrounding land uses, there is the potential for some reverse sensitivity effects. As part of the substantial application, noise and odour effects will be considered, noting that the Site will be developed in stages.

9.11. Climate Effects and Sustainability

The Proposal avoids issues relating to flooding and natural hazards that could be exacerbated by climate change and seeks to incorporate active transport infrastructure, reduced commuting patterns, integrated settlement outcomes and substantial landscape restoration planting.

The Proposal has the potential to reduce transport-related greenhouse gas emissions by enabling a greater proportion of residents' employment needs to be met within the Silverdale West industrial growth area, thereby reducing reliance on longer vehicle commuter trips

Climate change effects will be adequately managed, and the Project will not result in any significant effects contributing to climate change.

Overall, it is considered that the Proposal will deliver a number of positive effects in terms of climate change resilience and sustainability.

9.12. Effects Conclusion

Whilst it is acknowledged there are some effects that arise from the Proposal, with particular reference to landscape and cultural effects, most, if not all effects can be avoided, managed or mitigated to an acceptable level.

In the context of the FTAA, any adverse effects of the Project that cannot be avoided, managed or mitigated will not be sufficiently significant to be out of proportion to the Project's social, cultural and economic benefits (including provision of a large amount of housing and housing diversity, significant direct and indirect economic capital expenditure, value contribution to the Auckland region, substantial employment creation, and support for the emerging Silverdale West employment node).

10. Persons Affected (section 13(4)(j), (k) and (ka) of the FTAA)

Appendix L provides a list of persons affected, all of which have been notified or consulted with, as explained in the Appendix. As noted, Tuakiri is committed to ongoing engagement with affected persons including the wider community.

11. Treaty Settlements (section 13(4)(l), (n), (o) of the FTAA)

Under Section 7 of the FTAA, all persons performing and exercising functions, powers, and duties under the FTAA must act in a manner that is consistent with the obligations arising under existing treaty settlements. Section 16 sets out the requirements for the Minister.

Treaty settlements with the following iwi/groups are therefore of relevance to the Project and the Site:

- Ngāti Whātua o Kaipara; and
- Te Kawerau a Maki

These organisations do not create any new co-governance or co-management processes which would affect decision-making under the RMA for this project. No areas covered by a statement of association, or any other form of cultural or commercial redress provided in the Ngāti Whātua o Kaipara or the Te Kawerau a Maki settlements would be directly affected by the Project.

The Site is located in a statutory acknowledgement area for Te Kawerau a Maki.

Tuakiri acknowledges that an absence of specific settlement redress does not indicate the absence of an iwi's cultural association with ancestral lands, sites, wāhi tapu or other taonga within an area.

All mana whenua noted on the Auckland Council register have been notified of the Proposal, in accordance with section 11(1)(b) of the FTAA. Notice was provided to the relevant iwi authorities, hapū, and Treaty settlement entities on 22 April 2026, and no feedback or response has been received to date. Tuakiri acknowledges the cultural relationship of Ngāti

Whātua o Kaipara, Te Kawerau a Maki and Manuhiri within its rohe, and is committed to ongoing engagement with all iwi on this Project.

The identification and implementation of the applicable principles will continue to be discussed with mana whenua in recognising and protecting mahinga kai and taonga.

The Proposal seeks to align with these principles through restoration planting of indigenous species to support habitat improvement, biodiversity and mahinga kai values, and the wastewater disposal method proposed to ensure wai entering back to the awa has its mana restored. Ongoing consultation with mana whenua will ensure meaningful iwi participation throughout the life of the Project.

With respect to section 13(4)(n) of the FTAA, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 is not applicable to this Project.

With respect to section 13(4)(o) of the FTAA, there is no Māori land or marae within the Site.

12. Statutory Documents

With respect to section 22(2)(a)(i) of the FTAA, the Proposal has not been identified as a priority project in a central government, local government or sector plan or strategy, or a central government infrastructure list.

This section is provided in accordance with subclause 2(1)(a)(i) – (iii) of Schedule 5 of the FTAA. This requires that applications include an assessment of the activity against the relevant provisions and requirements of the following statutory documents:

- a) Any relevant national policy statements;
- b) Any relevant national environmental standards; and
- c) If relevant, the New Zealand Coastal Policy Statement.

12.1. National and Regional Policy Statements

12.1.1. National Policy Statement on Urban Development 2020 (NPS-UD)

The National Policy Statement on Urban Development 2020 (**NPS-UD**) came into force on 20 August 2020, replacing the National Policy Statement on Urban Development Capacity 2016. It places significant emphasis on achieving well-functioning urban environments and promoting intensification in urban areas, including Auckland, as a means of increasing housing supply, supporting competitive land markets, and improving housing affordability.

In particular, the NPS-UD introduces a stronger focus on:

- *the concept of a well-functioning urban environment, including the provision of a diverse range of homes to meet the needs of different households in terms of type, price, and location (Objective 1 and Policy 1);*
- *enabling more people to live, and more businesses to locate, in areas close to centres, planned public transport, and other areas of high demand (Objective 3);*
- *improving housing affordability (Objective 2);*
- *robust strategic planning, including the integration of urban development with infrastructure (Objective 6);*
- *shifting from the requirement to provide sufficient development capacity to the requirement to provide at least sufficient development capacity (Policy 2);*
- *directing councils to provide additional development capacity, including replacing “minimum targets” with “housing bottom lines”;*
- *being more prescriptive about what it means for councils to be “responsive” to plan changes in the urban environment (Policy 8); and*
- *ensuring that New Zealand’s urban environments contribute to reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change (Objective 8 and Policy 1(e)).*

The Proposal is consistent with the NPS-UD for the following reasons:

- The proposed development would provide a significant increase in residential capacity, enabling approximately 1,000 – 1,100 lots for residential living. This would materially increase housing supply within both the local and wider regional market and assist in accommodating anticipated population growth, particularly in the short to medium term.
- The Site is strategically located in terms of access to the current and future transport network enhancements. It is also located in an area that is undergoing significant change, particularly in terms of the provision of increased employment growth within the Silverdale West industrial growth area. The provision of housing in close proximity to this new employment node will support integrated transport and land use.

- The Tuakiri is committed to ongoing engagement with iwi authorities, supporting planning outcomes that recognise and respond to mana whenua interests and values.
- The Proposal will involve a change to the amenity and character of the area, with the landscape shifting from rural to urban. However, the Landscape Assessment undertaken by Isthmus (**Appendix D**) confirms the Site's ability to absorb urban development from a landscape perspective.
- The proposed development is intended to be coordinated with the provision of private infrastructure, including roading and active transport connections, stormwater, wastewater, water supply, electricity, gas, and telecommunications, thereby supporting integrated and efficient urban development.
- The Proposal provides a high level of internal accessibility, in terms of walking and cycling. The Proposal provides a range of open spaces, all of which are within walking or cycling distance from the proposed residential dwellings.
- The Proposal will support an overall reduction in greenhouse gas emissions across the Auckland region by enabling Silverdale and Dairy Flat to grow to a sizeable community which can support expanding local employment opportunities, community facilities and other amenities locating within the vicinity of Silverdale and Dairy Flat, reducing the need for car trips out of Silverdale and Dairy Flat.
- The NPS-UD does not require all development of scale to be serviced by a rapid transit network, in particular:

*Objective 3 district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment well-served by **existing or planned public transport**; and*

*Policy 1(c) requires planning decisions to contribute to well-functioning urban environments that "have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, **including by way of public or active transport.**"*

[for emphasis]

The Proposal is consistent with this policy direction, as the existing public transport service provides future residents with accessibility to the Silverdale Town Centre and subregional employment, entertainment and service hubs. As the population of Dairy Flat grows, there is significant opportunity to improve the efficiency of these connections and the relative accessibility via public transport. Further, as noted above, Policy 1(c) requires that good accessibility be achieved "including by way or public or active transport". This is an

acknowledgment of the different modes of transport that contribute to accessibility, with both private transport and public transport options, which must be considered for achieving good accessibility under this policy.

Based on the assessment above, it is considered that the Project is consistent with the NPSUD.

The feedback provided by Auckland Council questions whether the Proposal will result in a well-functioning urban environment. The Council's comments relate to whether the Proposal can integrate with infrastructure, stormwater management and whether the Proposal will result in a commuter suburb reliant on private car trips.

The following comments are made in response to this feedback:

- As outlined within the Infrastructure and Stormwater Assessment prepared by Maven (**Appendix E**), the Proposal can be serviced by groundwater that will be treated onsite with a water treatment plant. A wastewater servicing solution is identified that is fully private that will dispose of treated waste on-site to either land or to water. As demonstrated within Maven's assessment, the proposed development is integrated with feasible infrastructure servicing.
- The proposed development areas of the Site are elevated and not subject to flooding, with the proposed development located away from the stream network. Initial engineering advice indicates that all upstream and downstream flood effects can be appropriately mitigated. Further flood modelling will be undertaken as part of the final Stormwater Management Plan (SMP) and will prioritise minimising post-development impacts on overland flow by adopting a hydraulic neutrality approach.
- The Proposal will support an emerging employment node that has been identified as part of the Silverdale West Dairy Flat Industrial Area Structure Plan. Part of this area is already under development through the approval of PC 103 (Private): Silverdale West Industrial Area. The approved plan change rezoned approximately 107ha of land at Silverdale West from FUZ to LIZ. In addition, Stage 1 of the Surf Park development is located generally opposite the Site. The Site is strategically close to this significant emerging employment node.

12.1.2. National Policy Statement on Indigenous Biodiversity (NPS-IB)

The National Policy Statement for Indigenous Biodiversity ('**NPS-IB**') ensures the protection, maintenance and restoration of New Zealand's most threatened indigenous species. An ecological assessment has been prepared by Viridis and is included at **Appendix J**. Based on

this analysis, in our opinion, the Project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- Objective 2.1: The Proposal is expected to maintain indigenous biodiversity and avoid overall loss. The ecological values of the Site have been identified and assessed, including habitats for indigenous lizards and birds, and the Proposal has been designed to avoid areas of higher ecological value as far as practicable. The Ecological Assessment (at **Appendix J**) confirms that no loss in terrestrial biodiversity is anticipated and that the Proposal will instead improve terrestrial biodiversity through planting and enhancement activities. No overall loss in indigenous terrestrial biodiversity is anticipated as a result of the urbanisation of the Site.
- Policy 3 precautionary approach: The Proposal adopts a precautionary approach by conservatively identifying and assessing ecological values, including potential habitat for At Risk and Threatened indigenous fauna. Areas of high-value lizard habitat are proposed to be avoided where practicable, and any potential effects on indigenous fauna will be managed through fauna management plans, including lizard rescue and relocation where required. There is minimal notable native vegetation on the Site.
- Policy 5 integrated management: Ecological outcomes are integrated into the overall subdivision design, including the retention and enhancement of waterways, wetlands and open-space areas. The proposed revegetation and restoration planting is focused around ecological corridors and freshwater margins, improving habitat connectivity across the wider landscape.
- Policy 8 — maintaining indigenous biodiversity outside SNAs: No Significant Natural Areas are identified within the Site, but the Proposal still recognises and provides for indigenous biodiversity values outside SNAs, including potential habitat for indigenous lizards and birds. The design avoids higher-value habitat where practicable and proposes enhancement of open-space and riparian areas.
- Policy 10 — providing for social, economic, cultural and environmental wellbeing: The Proposal provides for residential and community development while also delivering ecological restoration, increased indigenous vegetation, improved habitat, pest and weed control, and enhanced ecological connectivity.
- Policy 13 — restoration of indigenous biodiversity: The Proposal directly supports Policy 13 through extensive native revegetation and ecological restoration across the site. The Ecological Assessment (at **Appendix J**) states that this restoration will increase native vegetation, improve habitat for indigenous fauna, and provide significant local and regional biodiversity benefits.

- Policy 14 — increasing indigenous vegetation cover: The Proposal will materially increase indigenous vegetation cover across the Site through native planting, restoration of open space areas and enhancement of riparian margins.

Based on the assessment above, it is considered that the project is consistent with the NPS-IB.

12.1.3. National Policy Statement on Highly Productive Land (NPS-HPL)

The National Policy Statement for Highly Productive Land 2022 (**'NPS-HPL'**) ensures the availability of New Zealand's most favourable soils for food and fibre production, both now and for future generations. It is noted the NPS-HPL came into effect on 17 October 2022 and was amended in August 2024 and again in December 2025, with the latest changes in effect since 15 January 2026. The NPS-HPL applies to land in the General Rural or Rural Production Zone, or the equivalent zone.

The NPS-HPL was amended in late 2025 to specifically lessen some of the restrictions on development as it applied to land classified as LUC 3. This amendment applies to parts of the Site, specifically the amendment to clause 3.5(7).



Figure 7: New Zealand Land Resource Inventory Map Source: Our Environment

With respect to clause 3.5(7)(a), the Auckland region has not yet been mapped by the relevant territorial authority, the Site is zoned mixed rural at the commencement date of the NPS-HPL. The Site is identified as having LUC 3, LUC4 and LUC 6 class soils.

Clause 3.5(7)(b) sets out qualifiers that apply in some instances whereby land would not qualify as highly productive land (**HPL**), despite meeting subclause (7)(a), being:

- i. Land that is identified for future urban development at the commencement date of the NPS-HPL; or

- ii. Land that is subject to a council-initiated or adopted notified plan change to rezone the land from general rural or rural production to urban or rural lifestyle; or
- iii. Land that subject to a resource consent application for subdivision, use or development on LUC 3 land for any activity other than rural lifestyle, where that consent is lodged at or after the commencement date of the NPS-HPL.

Subclauses 3.5(7)(b)(i) or (ii) do not apply.

Sub-clause 3.5(7)(b)(iii) does apply to the Site, in that through the FTAA process (once referred), the Site will be subject to a resource consent application for subdivision, use and development on LUC 3 land for residential, community and commercial activities, which are activities other than rural lifestyle. Therefore, the LUC 3 land within the Site does not qualify as HPL.

Based on the assessment above, it is considered that the project is consistent with the NPS-HPL.

12.1.4. National Policy Statement for Electricity Networks 2008 (NPS-ET)

The National Policy Statement for Electricity Networks 2008 does not apply to this Site.

12.1.5. National Policy Statement for Freshwater Management 2020 (NPS-FM)

The National Policy Statement for Freshwater Management 2020 ('NPS-FM') seeks to manage natural and physical resources in a way that prioritises:

- (a) first, the health and well-being of water bodies and freshwater ecosystems;
- (b) second, the health and needs of people; and
- (c) third, the ability to provide for the social, economic, and cultural well-being of people and communities.

An ecological assessment has been prepared by Viridis and is included at **Appendix J**. Based on Viridis' analysis, in our opinion, the Project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- Objective 2.1 — Te Mana o te Wai / freshwater health: The Proposal is consistent with the NPS-FM objective because it prioritises the health and well-being of freshwater by identifying water bodies and freshwater ecosystems early, enhancing natural waterways and wetlands, and incorporating those features into open/green space for enhancement.

- Policy 1 — Te Mana o te Wai: The Proposal gives effect to Te Mana o te Wai by avoiding where practical reclamation of natural freshwater features and proposing riparian and wetland planting to improve freshwater ecosystem health.
- Policy 3 — integrated management: The Proposal integrates subdivision design, open space, stormwater treatment, riparian planting and ecological restoration so that land-use effects on freshwater are managed together.
- Policy 5 — maintaining and improving freshwater ecosystems: The Proposal is expected to maintain and improve freshwater values through avoidance of natural freshwater features, riparian restoration, increased shade, improved bank stability, organic matter inputs and stormwater treatment.
- Policy 6 — natural inland wetlands: Natural inland wetlands are to be avoided where practicable and incorporated into open/green space, with wetland planting and hydrological controls proposed to protect and enhance their values.
- Policy 7 — rivers: The Proposal avoids reclamation of permanent and intermittent streams as far as practicable, minimises stream crossings, and provides for any required crossings to be managed through best-practice design.
- Policy 9 — indigenous freshwater species: Although fish presence is considered unlikely, the Proposal protects and improves potential freshwater habitat through stream and wetland avoidance, riparian enhancement and water quality treatment.

Overall, the Proposal is generally consistent with the NPS-FM because it avoids loss of natural freshwater features and is expected to improve freshwater ecological values through restoration and integrated design.

Based on the assessment above, it is considered that the Project is generally consistent with the NPS-FM.

12.1.6. National Policy Statement for Natural Hazards ('NPS-NH')

The NPS-NH provides national direction for managing the risks associated with natural hazards through resource management and planning processes. It is intended to support consistent, risk-based decision-making by councils when assessing subdivision, land use, and development proposals in areas that may be affected by natural hazards.

Natural hazards may include flooding, landslides, flooding, liquefaction, and other hazard events that have the potential to affect people, property, infrastructure, and the environment. The policy statement promotes the use of the best available hazard information

to identify and assess risks, and to ensure that planning decisions are proportionate to the level of risk identified.

The Proposal gives effect to the NPS-NH by adopting a preliminary, risk-based approach to identifying and managing natural hazard risk at the referral stage. A geotechnical assessment has been prepared by KGA Geotechnical (**Refer Appendix H**), drawing on desktop information, field observations, historic geotechnical data, council hazard mapping, geological mapping and topographic interpretation. This provides an initial evidence base for understanding the natural hazard context of the Project. KGA Geotechnical have advised that the Proposal is feasible from a geotechnical perspective. This is conditional on the additional geotechnical input discussed in Section 7 being carried out and any resulting geohazard mitigation strategies being implemented, at which time the proposed development on the Site may be considered 'safe' and 'stable'.

Maven has also undertaken an assessment of the flood hazard areas on the Site that are primarily associated with the stream network (**Refer Appendix E**). Maven is of the view that natural hazards can be appropriately addressed as part of the detailed design to ensure safety to building occupants, egress to and from the Site and in terms of both the upstream and downstream stormwater catchment.

The assessments identify the principal hazards relevant to the Site, including flooding hazards, landslides and slope instability, and liquefaction. Preliminary hazard zoning has been applied, including identification of areas subject to high or very high natural hazard risk. This enables the Proposal to distinguish between land that may be suitable for development, and land that requires further assessment or mitigation.

The approach is consistent with the direction in the NPS-NH to avoid creating or increasing unacceptable natural hazard risk, while allowing lower or manageable risks to be addressed through proportionate assessment, design and mitigation. Overall, the risk to development areas will be adequately managed and mitigated such to become a low risk.

Based on the assessment above, it is considered that the Project is generally consistent with the NPS-NH.

12.1.7. New Zealand Coastal Policy Statement

The NZCPS sets out objectives and policies for managing activities within the coastal environment of New Zealand. As the proposed development is not located within or near the coastal environment, the NZCPS is not considered relevant to this Proposal.

12.1.8. National Environmental Standards for Air Quality 2004

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (**NES:AQ**) establishes national standards intended to protect ambient air quality and provide a minimum level of protection for human health. No specific resource consents are anticipated to be required under the NES:AQ for the Proposal. However, the standards have been considered in assessing potential construction and operational air quality effects.

The principal air quality issue associated with the Proposal is likely to be dust generated during construction, earthworks and site development phases. These effects are temporary and can be appropriately managed through standard construction controls commonly applied to large-scale subdivision and land development projects, with further detail, including construction management plans, to be provided at the substantive application phase.

12.1.9. National Environmental Standards for Freshwater 2020

The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (**NES-F**) sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the Proposal are the provisions which require resource consent for works in and around natural wetlands and works affecting rivers and streams. As stated above at 8.1 and 8.2, the substantive application will require consents for a variety of reasons under the NES-F and this will be assessed in detail at the substantive application stage.

12.1.10. National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (**NES:CS**)

The NES:CS sets a nationally consistent set of planning controls and soil contaminant values to control and minimise exposure to contaminants in soil. Given the historical rural uses of the Site, it is likely that provisions of the NES:CS will apply, although from a site walkover and investigation of the registers, there are no obvious signs of soil contamination. Once the PSI and DSI are undertaken prior to lodgement of the substantive application, management of any areas of potential contamination will be undertaken and designed into the Proposal. This may include remediation of the Site, with management of contaminants throughout the earthworks and construction process. There are sufficient mitigation measures to ensure the Proposal will align with the purpose of the NES, and therefore the Proposal will be consistent with the NES:CS.

12.2 Auckland Regional Policy Statement

The Urban Growth and Form objectives and policies of the Regional Policy Statement (**RPS**) set out the policy framework for managing Auckland’s growth. The RPS seeks to achieve a quality compact urban form by:

- Promoting urban growth and intensification within the urban area, towns, and rural and coastal towns and villages, and avoiding urbanisation outside these areas (B2.2.2(4));
- Promoting quality compact urban form (B2.2.2(4) – (9));
- Enabling higher residential intensification in and around centres and close to public transport (B2.2.2(5));
- Ensuring that employment, commercial and industrial opportunities meet current and future demands (B2.5.1(1)); and
- Enabling growth and development of existing or new rural and coastal towns and villages in a way that avoids scheduled resources, elite and prime soils, and significant natural hazards; and is consistent with local character, enables mana whenua wellbeing and can be serviced by infrastructure (B2.6.1).

The RPS seeks to achieve a “quality compact urban form” to urban development in Auckland, by applying a centres-based approach (B2.2.2(7)), and promoting residential intensification in and around centres, corridors and close to public transport, social facilities and employment (B2.2.2(6)). This approach is broadly consistent with the NPS-UD concept of well-functioning urban environments.

Auckland Council has provided feedback that in its view the RPS does not anticipate urbanisation of the rural environment that is not identified within the FUZ, including the Site. We disagree and in our view the Proposal will form an extension of Dairy Flat Village, and it will support an emerging employment node in a gateway location already expanding with the Surf Park development and the expanding Silverdale West industrial growth area.

The technical reporting and subsequent master planning of the Site demonstrates that the elements of B2.6.1 are given effect to including whether enabling growth of existing rural towns occurs in a way that avoids scheduled resources, elite and prime soils, and significant natural hazards; and is consistent with local character, enables mana whenua wellbeing and can be serviced by infrastructure.

Overall, we do not consider that the Proposal will be contrary to the outcomes sought by the RPS.

12.3 The Auckland Future Development Strategy 2023-2053

Auckland Council has provided feedback that the Site is not identified within the Future Development Strategy (**FDS**) for urban development in the next 30 years.

We note that the purpose and content of the FDS is set out in clause 3.13 of the NPS-UD. This states that its purpose is to promote long-term strategic planning, within which it must spatially identify broad locations in which development capacity will be provided over the long term.

The FDS does not specifically identify the Site as a growth area; nor does the Site appear to have been considered by Auckland Council in its evaluation of the spatial scenarios. This is despite the spatial extent of the RUB boundary not being consistently applied along Dairy Flat Highway, as that are some areas of FUZ, to the north that are located on the western side of Dairy Flat road, indicated that the Flat road is not a hard boundary for the RUB. As noted, above at section 9.4, the Site is able to manage its infrastructure such that it will not compromise the funding alignment objectives of the FDS.

13. Conclusion

The Project is of regional significance due to its substantial economic scale, strategic infrastructure investment, and its ability to deliver a broad range of housing, employment support, and community outcomes within one integrated development project.

The Project will generate significant economic activity through construction, long-term housing and the delivery of associated infrastructure, while contributing materially to housing supply and regional resilience within the wider Auckland area. It will support the emerging employment node that is establishing in Silverdale West and around the Auckland Surf Park Community.

Tuakiri is committed to ongoing engagement with mana whenua and recognises their ongoing role as kaitiaki of the whenua and awa.

For completeness, Tuakiri confirms there has been no compliance or enforcement actions taken against Tuakiri under a specified Act as defined under the FTAA. (section 13(4)(x) of the FTAA).

The Project is considered to be regionally significant because it will:

- Deliver substantial housing supply at regional scale;
- Support employment growth and resilience to the Silverdale and Dairy Flat areas;
- Provide significant economic investment;
- Deliver integrated infrastructure;
- Support regional employment growth in Auckland;
- Provide ecological restoration and environmental enhancement;
- Support active transport and public transport connections;
- Provide access and connectivity to the surrounding areas; and
- Contribute toward long-term regional resilience.

The Proposal represents a coordinated and integrated response to multiple interrelated regional issues rather than a fragmented or isolated development outcome.

Importantly, the Project responds to existing growth pressures and housing demand within the Auckland region by providing a coordinated and comprehensive development outcome that is consistent with the broader economic and social objectives of the FTAA.