

Fast-track Approvals Act 2024 – Delmore Substantive Application Technical Addendum

FTAA-2502-1015 / BUN60444768

1.0 Technical Specialist -Rosie Stoney and Claire Gray – Strategic Planning

From: Rosie Stoney and Claire Gray

Date: 18/07/2025

2.0 Executive Summary / Principal Issues

The issues identified in the Strategic and Planning Matters for Auckland Council memo issued 25/06 have been considered in the updated application documents, however they remain unresolved. Bringing the timing of the proposed development forward has wide ranging local and subregional implications, particularly in terms of planned infrastructure investment and delivery.

3.0 Specialist Assessment – Previous Memo / Comments Overview

Summary of 25/06 Issues identified

The council's Future Development Strategy 2023-2053 (**FDS**) is a relevant consideration under clause 17 of Schedule 5 to the FTAA. The proposed Delmore development is inconsistent with the anticipated FDS timing for urbanisation of 2050 onwards. Bringing development forward in this area comes at the expense of the delivery of other developments, particularly those in live zoned areas. It is not possible to service this area without displacing planned investment and infrastructure service provision in existing live zoned areas and sequenced areas.

- The council, in its FDS, anticipates urbanisation of this area in the future. However, the council does not anticipate development of the Upper Orewa future urban area until 2050 and beyond.
- The FDS identifies the infrastructure prerequisites needed to enable development in the Upper Orewa future urban area:
 - Wainui Road upgrade (NoR 10)
 - Milldale and Grand Drive connection (NoR 6)
 - North Shore Rapid Transit (extension to Milldale) (NoR 2)
 - Army Bay Wastewater Treatment Plant Upgrade.

4.0 Specialist Assessment – Material Reviewed

Review of 07/07 Updates

The following additional information has been reviewed:

- Updated Delmore AEE dated 7 July 2025
- Upper Orewa Concept Structure Plan, July 2025
- Commute Memo - Specialist comments response – 88,130,133 Upper Orewa Road And 53a, 53b, 55 Russell Road, Orewa, 12 June 2025
- Urban Economics memo - Response to Auckland Council Review of Proposed Delmore Residential Development, 30 May 2025
- B&A Urban & Environmental memo - Delmore – Water and Wastewater capacity, 2 July 2025

The issues identified in the Strategic and Planning Matters for Auckland Council memo issued 25/06 have been considered in these documents, however they remain unresolved.

5.0 Specialist Assessment – Addendum – Outstanding Issues / Information Gaps

At the time of writing this Memo, and having reviewed the 7 July updates from the Applicant, we have identified the following key outstanding issues:

- The proposed timing of development is out of sequence with the Future Development Strategy and therefore not aligned with planned provision of bulk infrastructure to support the application
- Bulk infrastructure required to support development of the site is not funded and is not planned to be funded until 2050+
- Bringing forward the timing of the proposed development will come at the expense of other developments in existing live zoned and sequenced areas.

The application has not adequately addressed the infrastructure prerequisites required to serve urban development within this area, only considering infrastructure needed to support the site directly. In particular:

- The proposed partial delivery of NoR 6 is not considered a regionally significant benefit as it would only serve the development site. Auckland Transport's comments explain the adverse transport impacts which arise from only partial provision of this road and the proposed standard of other planned roads.
- As noted in Watercare's comments, Watercare's bulk infrastructure delivery is planned, funded and delivered in line with the FDS. Allowing development ahead of the planned sequencing in 2050+ will exacerbate capacity issues and are likely to result in environmental impacts.

We do not agree with several comments within the application's assessment of how the project is consistent with the FDS (AEE, pages 109-112):

Principle 1: Reduce Greenhouse gas emissions

- We do not agree that the proposed project will contribute to reduced greenhouse gas emissions.
- As noted in Auckland Transport's comments the standard of planned roads (not including NoR 6) will not support public transport nor will it sufficiently support active modes. This, in addition to bringing the development forward ahead of the planned North Shore Rapid Transit extension to Milldale (NoR 2) will likely encourage the use of private vehicles as there will be no services to nearby schools, local centres and employment zones.
- Without appropriate levels of provision, there are cumulative effects on the transport network. Collectively these effects contribute to carbon emissions, poor safety outcomes, congestion and poor land use outcomes.

Principle 3: Make efficient and equitable infrastructure investments

- We believe the proposed development being enabled ahead of the planned sequencing (2050+) would require planned infrastructure investment to be redirected away from other identified future growth locations, which would be inefficient and inequitable.
- The partial funding of NoR 6 will not provide the full connection, leading to additional costs to the council. Watercare notes that there is no capacity within their bulk infrastructure to serve the proposed development until 2050.
- In the Water and Wastewater capacity memo, only granted resource consents for greenfield development areas are included in the assessment of demand. This ignores the potential for demand from the existing urban area of Orewa, other greenfield resource consents for live zoned land, and from sequenced future urban growth.
- Out of sequence development in future urban areas puts pressure on the council group's ability to provide funding and financing to service development. Limited financial resources mean the council must decide how best to invest to maintain infrastructure services while increasing the resilience of current and future communities. In planning assets to vest back to council in advance of their planned sequencing (2050+), costs for expanding existing networks, and ongoing maintenance and service provision costs are not taken into account.

Principle 5: Enable sufficient capacity for growth in the right place at the right time

- We do not agree with the application's assessment of this principle.
- As noted above, enabling development in this area in advance of the required bulk infrastructure will lead to poor outcomes.
- If the council spreads funding too widely and only invests in reactive planning, then it risks not making a measurable difference for communities.

6.0 Proposed Conditions

There are significant costs involved in ensuring sufficient bulk infrastructure is available to support development onsite and no public funding is available. Until infrastructure capacity and delivery issues are resolved, the only suitable conditions would be staging development in time with the planned delivery of bulk infrastructure.

As set out in the council's Strategic and Planning memo dated 25 June 2025, the following conditions are considered necessary:

“If the Application is granted, conditions should be imposed requiring certainty of infrastructure financing and funding before the Development proceeds. These conditions should ensure that the Development demonstrates how infrastructure will be paid for and confirms that required infrastructure provision will not displace planned investment in other areas of Auckland. Consideration could be given to conditions or covenants such as requiring private funding and private operational responsibility for infrastructure, and / or deferring development stages until infrastructure is funded and delivered. Agreements such as ‘Infrastructure Agreements’ may increase funding & financing certainty as well as timing certainty for infrastructure to be delivered.”

In addition, we recommend that the bulk infrastructure triggers should be noted in the consent conditions.

7.0 Recommendation

Key Headings

The application, based on the information available, is not supported.

Enabling development ahead of the planned delivery of bulk infrastructure comes at the expense of the delivery of other developments, particularly those in live zoned areas and has adverse effects including safety, congestion and poor land use outcomes. Based on the current proposals, it is not possible to adequately service this area without displacing planned investment and infrastructure service provision in existing live zoned areas and sequenced areas.