

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Orawaahi – A Complete Community
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details		
Please ensure that you have authority to comment on the application on behalf of those named on this form.		
Organisation name (if relevant)	Auckland Council	
*First name	Adonica	
*Last name	Giborees	
Postal address	Private Bag 92300, Victoria Street West, Auckland 1142	
*Contact phone number	s 9(2)(a)	Alternative -
*Email	s 9(2)(a)	

2. Please provide your comments on this application
<p>Thank you for the opportunity to provide comments on the referral application for Orawaahi – A Complete Community. This response has been compiled following a comprehensive internal review by technical experts across Auckland Council and its Council-Controlled Organisations (CCOs), including Healthy Waters & Flood Resilience, Auckland Transport and Watercare Services Limited. Copies of all technical input obtained are appended to this report as follows:</p> <ul style="list-style-type: none"> • Attachment 1 – Franklin Local Board comment • Attachment 2 – Water Allocation/aquifer memo • Attachment 3 – Archaeology memo • Attachment 4 – Auckland Transport memo • Attachment 5 – Regulatory Development Engineering memo • Attachment 6 – Streams, Earthworks and NES:FW memo • Attachment 7 – Ecology memo • Attachment 8 – Economics memo

- Attachment 9 – Growth & Strategy policy memo
- Attachment 10 – Healthy Waters & Flood Resilience memo
- Attachment 11 – Landscape memo
- Attachment 12 – Parks and Community Facilities memo
- Attachment 13 – Soil Science memo
- Attachment 14 – Regulatory Stormwater memo
- Attachment 15 – Regulatory Traffic Engineering memo
- Attachment 16 – Urban design memo
- Attachment 17 – Watercare Services Limited memo

The following assessment evaluates the proposal's suitability for referral against the criteria set out in the Fast-track Approvals Act 2024 (FTAA), focusing on strategic alignment and the long-term viability of the region's infrastructure network.

Section 17(3)

1. Auckland Council confirms it is not aware of any competing applications currently lodged that would be prejudiced by a substantive application for this project.
2. We are not aware of any existing resource consents issued where the specific "priority of processing" or "affected party" provisions of sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) would apply in this context.

Section 22

Does the project have significant regional or national benefits?

- Auckland Council considers that the regional benefits asserted within the referral material are significantly overstated and have not been demonstrated through a robust net-benefit methodology.
- The applicant's economic assessment relies heavily on Economic Impact Analysis (EIA) and job multipliers. This approach assumes that the labour and capital required for the project are currently idle. In a high-employment environment like Auckland, these resources would likely be diverted from other growth areas where infrastructure is already being delivered. Consequently, the purported benefits largely represent a transfer of existing economic activity rather than the creation of new regional value.
- No formal cost benefit analysis (CBA) has been provided. CBA is the standard NZ Treasury tool for determining if a project's benefits truly outweigh its social, environmental, and infrastructure costs. Without it, the applicant fails to demonstrate a net positive outcome for the region. The assessment fails to quantify the economic cost of the permanent loss of

highly productive land or the increased long-term maintenance burden of servicing an isolated coastal extension.

- Overall, it is considered that the referral material does not demonstrate that the proposal is of regional significance or benefit. For clarity, it is not considered that there will be a national benefit from this proposal.

Would referring the project facilitate its delivery in a more timely and cost-effective way?

- It is accepted that the referral of this project would likely achieve these outcomes.

Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?

- Council has no comment in this regard.

Has the project been identified as a priority in any government or sector plan or strategy?

- This project has not been identified by Auckland Council, CCOs, or any relevant plans and strategies as being a priority.

Will the project deliver new or support existing regionally/nationally significant infrastructure?

- No regionally or nationally significant infrastructure is proposed.

Will the project increase housing supply or contribute to a well-functioning urban environment?

- The project would likely increase housing supply by around 1000 units. The Council has doubts about the efficacy of the project and its ability to provide a well-functioning urban environment. This is discussed in our assessment below.

Will the project deliver significant economic benefits?

- As discussed above, the referral lacks sufficient evidence of significant economic benefit and relies on potentially flawed economic analysis to support its economic claims.

Will the project support primary industries (e.g., aquaculture)?

- No primary industries are proposed as part of this application, and nor does it appear that any activities are proposed that will support such industries.

Will the project support development of natural resources (e.g., minerals, petroleum)?

- No development of natural resources is proposed.

Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?

- No. The proposal does not support climate change mitigation specifically. The site's remote rural location and the limitations in public transport connectivity mean that the development will likely result in a high level of private vehicle dependency. This will likely

lead to increased vehicle kilometres travelled and may undermine strategic efforts to reduce transport-related greenhouse gas emissions.

Will the project support climate change adaptation or recovery from natural hazard events?

- The proposal is not related to recovery from natural hazards.
- The proposal identifies that future development will be located outside of mapped coastal erosion and inundation areas to minimise immediate and future risks posed by climate change. However, it has not yet comprehensively demonstrated how the project will support long-term climate change adaptation or recovery from natural hazards.

Will the project address significant environmental issues?

- The proposal does not address existing significant environmental issues, as outlined in this memo.

Is the project consistent with local or regional planning documents (e.g., spatial strategies)?

Auckland Unitary Plan (Operative in Part) ('AUP')

- The proposal is inconsistent with the zoning and strategic intent of the AUP. The site is zoned 'Rural - Mixed Rural' and 'Rural - Rural Coastal'. These zones are specifically intended to support primary production and protect coastal character. An urban-scale development of approximately 1,000 units is diametrically opposed to the low-intensity, non-urban character expected in the zone.
- The site lies entirely outside the Rural Urban Boundary ('RUB'). Under the AUP regional policy statements, urban growth is directed to occur within the RUB to ensure it is orderly and integrated.
- Without a concurrent rezoning to urban status, the project would also likely create a fundamental mismatch between the urban activity and the underlying rural regulatory framework. This undermines the integrity of the AUP and creates significant consenting challenges for managing future land-use changes on the site.
- Auckland Council has recently notified Plan Change 120 (November 2025) which introduces updated provisions for the management of risks from natural hazards. At this referral stage, it is considered too early to determine consistency with the proposed objectives and policies of PC120. While the applicant's high-level assessment indicates an intention to avoid known floodplains, a substantive and comprehensive natural hazard risk assessment (including landslide susceptibility) will be required to confirm that the project does not increase risks to life, property, or infrastructure in the wider area.

National Policy Statement for Highly Productive Land ('NPS-HPL')

- Auckland Council considers that the proposal is contrary to the NPS-HPL (as amended Dec 2025). The NPS-HPL maintains strict 'avoid' directives for urban development on LUC Class 1 and 2 land. While recent amendments introduced a pathway for urban development on LUC Class 3 land, this project is situated entirely on LUC Class 2 land, meaning it remains subject to the strictest avoidance criteria.

- The applicant's strategy to 'minimise' soil loss by stripping and re-using topsoil off-site or in community gardens is technically inaccurate, and would not be effective at mitigating the impact of the proposal. In particular, the excavation and transport of soil destroys the unique physical and chemical characteristics of the LUC 2 resource, meaning the proposal effectively results in the total and cumulative loss of the highly productive land it seeks to develop.

Auckland Council Future Development Strategy ('FDS') 2023-2053

- The project is out of sequence and represents a critical strategic misalignment with the Council's long-term planning framework. The FDS does not identify this area for urban development now or in the future. The strategy anticipates only moderate growth for the Clarks Beach area (approx. 300 residents over 30 years).
- Both Watercare and Auckland Transport have confirmed that this area is unanticipated in their funding and asset management plans. Providing public services in this location would undermine the infrastructure capacity for already planned and funded growth in areas such as in the other parts of Clarks Beach (in the future), as well as at Kingseat and Glenbrook (i.e. that land zoned Future Urban under the AUP).
- The project could displace or delay planned investment in live-zoned areas. It creates an economic liability by forcing the Council and CCOs to spread limited regional resources across unplanned rural extensions rather than consolidating them in a way that aligns with the FDS and its integrated approach.

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

- While the proposal could add to housing supply, it fails to meet the broader strategic requirements of the NPS-UD. Under Policy 1, urban environments must have good accessibility to jobs and services. This proposal creates an isolated settlement that lacks necessary social infrastructure (e.g., primary schooling), which will likely result in high car dependency and increased trip generation. While the applicant notes access to school bus routes, Auckland Transport highlights that existing public transport options are highly constrained. The No. 379 bus service provides a connection only to Papakura, and technical feedback indicates significant reliability issues during peak traffic.
- Enabling an out-of-sequence development undermines the objective of achieving quality compact growth. By directing growth away from planned areas, the project would likely reduce the overall effectiveness of the region's response to the NPS-UD.

Are there any other relevant matters to consider?

- Auckland Council has serious doubts that a sustainable water supply is feasible for the site. The applicant holds an existing groundwater take consent for 50,000m³/year, which it proposes to pipe to the site as alternative to public supply from Watercare. This existing water take represents less than 20% of the projected ~280,000m³/year demand for the completed development. Based on Council water allocation records and consents, the underlying Waiau Pa Waitemata aquifer has minimal remaining unallocated capacity (~15,000m³/year), making further significant abstraction unfeasible without creating adverse environmental effects. Watercare opposes the proposal and has indicated that it

will not service the development, which raises fundamental questions about water supply from any source.

- Auckland Transport identifies the proposal as creating an isolated settlement that places unbudgeted pressure on the constrained Linwood Road/Hingaia Road corridor. This corridor already suffers from severe capacity constraints and has no currently funded planned upgrades, meaning the project will likely degrade levels of service for the existing community. It is agreed that upgrades will be required at several intersections.
- In terms of stormwater, the site is outside the Regionwide Network Discharge Consent (RWNDCC), though it is acknowledged that effects can likely be managed via best-practice engineering.
- The potential for significantly adverse urban design and landscape/character effects is low given the modified nature of the local environment, albeit misalignment with the AUP, FDS and NPS-UD as outlined above. Healthy Waters & Flood Resilience (HWFR) has advised that the vesting of stormwater assets is not accepted as a given for this development. Consequently, the applicant is encouraged to design all future infrastructure to Council standards to facilitate potential future acceptance. Furthermore, HWFR generally does not support the vesting of stream corridors or natural wetlands where the primary stormwater function can be adequately secured through private ownership and protective mechanisms, avoiding unnecessary long-term maintenance burdens for the Council.
- The project area contains two unscheduled pre-1900 archaeological sites (a coastal midden and a pit/terrace complex) which are likely to be destroyed by earthworks. Management via a Historic Heritage Management Plan (HHMP) and a formal archaeological authority from Heritage New Zealand Pouhere Taonga will be required.
- In terms of freshwater and terrestrial ecological values, there are no immediate concerns, though further watercourse classification verification and detailed riparian margin mapping will be required as part of a substantive application, should the project be referred successfully.
- Given the scale of earthworks, an Adaptive Management Plan (AMP) would be expected to support any substantive application. Detailed staging plans, evidence of chemical treatment for sediment retention devices, and clearly defined wetland setbacks are required to protect the sensitive receiving environment from sedimentation and runoff during the construction phase.
- The indicative provision of reserves generally aligns with regional strategies, though information gaps remain regarding the specific location and intended ownership of open spaces. Support for a substantive application in this regard would likely be contingent on relocating the proposed central-eastern neighbourhood park to a more centrally accessible position and removing incompatible activities from any reserves to be vested.
- Auckland Council acknowledges the feedback provided by the Franklin Local Board, which representing the local community interest, does not support this application. The community values the rural aspect of the area and opposes its conversion into an urban zone that lacks adequate transport links. The Board emphasizes that this land is currently being successfully cropped and provides more value to the regional economy as productive

land than as an isolated residential pocket. The Board is concerned the development will remove existing roading capacity without any mitigation plan, creating safety risks at the McKenzie/Waiiau Pa intersection.

Conclusion

Auckland Council considers that the proposal is fundamentally inconsistent with the AUP, the FDS, and the NPS-HPL. The project represents a significant strategic misalignment that risks undermining the RUB and burdening the region with unbudgeted infrastructure costs. It is also considered that regional benefits asserted within the referral material appear to be overstated and not demonstrated. Overall, Auckland Council considers that the proposal does not meet the threshold of "regional or national significance" as intended by the Fast-track Approvals Act 2024.



Adonica Giborees

Principal Project Lead
Division of Planning and Resource Consents
Auckland Council

29 January 2026

Local Board Feedback Template – Fast-track Approvals Act 2024

Project Name:

Orawaahi, Ref: FTAA-2508-1135 (Council reference: PRR00043620)

Location:

Clarks Beach Road – Lot 3 DP 337204 and 156 Clarks Beach Road – Lot 1 DP 337204.

Date:

14 January 2026

Prepared by:

Andrew Kay - Pukekohe Subdivision Fast Track Applications Lead, in consultation with Pukekohe Subdivision members Alan Cole, Merritt Watson and Lesieli Oliver.

1. Context – About Fast-track Applications

The Fast-track Approvals Act 2024 (FTAA) provides a streamlined consenting process for projects deemed to have significant regional or national benefit. Decisions are made by an appointed **Expert Panel**, with no public notification and limited avenues for appeal.

It is important to note:

- The Local Board does **not have a formal decision-making role**, but can provide **local insights** on community impacts, transport, open space, mana whenua engagement, and infrastructure alignment.
- There is **no requirement for applicants to respond to Local Board feedback**, but it can be considered by the Expert Panel.

2. Local Board Feedback

The Franklin Local Board **does not** support this application, as there are no proposed improvements to the roading network, just assessments.

The area is located on highly productive land and designated LUC 1& 2, so should **not** be turned into houses under the NPSHL. Currently being cropped by a grower.

Concern over the transport impact

The applicant states this development would strip out existing capacity and beyond. There is no plan for increasing capacity and it ruins the rural aspect of the area.

The intersection of McKenzie/ Waiiau Pa/ Clarks Beach Roads would need to be turned into a full size roundabout if a certain number of houses are built at Clarks Beach which is already projected at 5500- 6500 people with the current Future Urban zoned land.

With 6500 at Kingseat, 1500 at Karaka four-laning would need to be extended out as far as the Karaka Hall at some point, once a number of houses are built.

Plan change 120 has enough capacity for Auckland future growth and is based around public transport hubs, which this not. The public transport will be poor because of the distance to the nearest Hubs, including by water.

The area is zoned rural, and the plan change does not change that – we have a strong feeling that the community would not appreciate this rural area (which they have chosen specifically as their place to reside because it is rural) being converted into urban zone with poor transport links .

The proposed bus network already has issues getting to Papakura on time in the peak morning traffic. This is real world example here.

The ferry service -the Wharf Society – no longer exists. Auckland Transport has no plans to support it.

Concerns over the watercare management of the infrastructure

We do not support the use of private water systems as this leads to undesirable outcomes and unintended consequences.

3. Conclusion

The Franklin Local Board does not support this application.

4. Contact for Further Information

Name: Andrew Kay
Role: Pukekohe Subdivision Lead for Fast Track Applications
Email: s 9(2)(a)

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Orawaahi – A Complete Community
Address	(a) Clarks Beach Road - Lot 3 DP 337204 (no address allocated) (b) 156 Clarks Beach Road - Lot 1 DP 337204.
FT application number	FTAA-2511-1135

Respondent Information

Name	Marija Jukic
Role	Team Leader – Coastal and Water Allocation
Agency / Department	Specialist Input / Resource Consents
Date	20 January 2025

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

<p>Insufficient information was provided regarding water supply, and therefore support of the proposal cannot be provided at this stage.</p> <p>I have reviewed the Referral Application for the proposed Orawaahi development with respect to water supply for the development.</p> <ol style="list-style-type: none"> 1. The Clarks Beach Road fast-track approval application is to develop a residential community, Orawaahi, in Clarks Beach, which comprises approximately 1,000 dwellings (781 new residential lots and 222 retirement villas), a neighbourhood centre, and an approximately 5 ha area for light industry/service type activities. 2. The <i>Earthworks and Infrastructure Report</i> prepared by Civilplan Consultants, dated 29 October 2025 (EIR) details the calculated water demand for the development using the
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parameters listed in the Auckland Council Code of Practice for Water, as follows: an average water demand of 764m³/day; a peak day demand of 1,528m³/day and peak hour demand of 71l/hour (see table below).

	Average Daily Demand
Neighbourhood Centre	62.8m ³ /day
Light Industrial	112.6m ³ /day
Retirement Village	73.3m ³ /day
Residential Dwellings	515.5m ³ /day
Total	764m ³ /day

3. This equates to an average demand of 280,000m³/year.
4. The EIR states that calculated water demand can be significantly reduced with the addition of water saving efficiency measures (i.e. low flow fixtures), roof water re-use for non-potable uses and any greywater reuse for non-potable uses.
5. The EIR identifies two methods to meet the calculated water demand:
 - **Option 1:** Private Bore/Treatment supplemented by on-lot tanks
 - **Option 2:** Connection to the Watercare Services Limited (WSL) networks

They also note that a hybrid solution comprising components on each option may also be feasible.

6. Option 1:

Under Option 1, the applicant proposes to use a combination of methods to source water, including the abstraction of 50,000m³/year of groundwater from a production bore located at McKenzie Road, Waiau Pa (Lot 11 DP 485009) screened in the Franklin Glenbrook Kaawa aquifer, under an existing water take consent WAT60315288 to supply water for the retirement village/neighbourhood centre; rain tanks for the light industrial area and rain tanks; and the use of grey water for the residential dwellings.

7. Option 2:

Under Option 2, the Project would be connected to the adjacent public network. However, consultation with WSL's Strategy and Consented team has not identified this option as being currently possible.

8. Although not mentioned in the EIR as a possible water supply, I note that there is currently only approximately 15,00m³/year of water available remaining in the underlying Waiau Pa Waitemata aquifer.

9. The abstraction of groundwater under water consent WAT60315288 to supply water for the retirement village/neighbourhood centre would require the lodgement of a section 127 consent application to change the purpose of the water take.

10. Conclusion

- On the basis of the information provided by the applicant, I am not satisfied that the applicant has adequately demonstrated that there will be a guaranteed supply of water of a sufficient quantity to meet the calculated demands of the proposed development, particularly in relation to the residential dwellings, which require the largest portion of water for the development (515.5m³/day and 188,157m³/year).
- The applicant proposes to utilise rainwater tanks, recycle greywater for toilet and laundry, and apply water-saving measures, to meet the entirety of the water demand for the dwellings. Whilst I fully support the adoption of these measures, I consider that insufficient detail has been provided, particularly in relation to the water-saving measures, and likely volumes of greywater reuse, to confirm this approach is feasible to fully meet the water demands. In addition, no discussion has been provided on mitigation measures during drought years or the potential long-term risks associated with climate change on water supply.
- Given that a reliable water supply is crucial for any development, particularly for a residential community, it is for this reason that I cannot support this proposal at this time.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Prepared by:



Marija Jukic

Date: 20 January 2026

Team Leader – Coastal and Water Allocation

Planning & Resource Consents

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Orawaahi Clarks Beach Road
Address	156 Clarks Beach Road
FT application number	FTAA-2511-1135

Respondent Information

Name	Joe Mills
Role	Specialist Historic Heritage
Agency / Department	Planning and Resource Consents
Date	08/01/2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

This feedback is limited solely to archaeological matters and does not include an assessment of matters relevant to built heritage or Māori heritage.

The application area contains two unscheduled pre-1900 archaeological sites. One site is a relatively small midden site largely contained within the coastal escarpment, the other site is a pit/terrace site comprising at least 12 pits with associated terraces over a relatively large area. Neither site is scheduled in Schedule 14.1 Historic Heritage in the Auckland Unitary Plan.

Both sites will be impacted by the proposed application, likely being wholly destroyed by proposed earthworks. As unscheduled pre-1900 archaeological sites, management of impacts on these sites is best provided for under the Heritage New Zealand Pouhere Taonga Act.

The applicant's archaeologist has recommended the development of a Historic Heritage Management Plan to manage impacts on these sites during construction, and that an archaeological authority from Heritage New Zealand will be sought. These are suitable recommendations for effective management of impacts on these sites.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Prepared by:

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal line extending to the right.

Joe Mills

Specialist Historic Heritage – Cultural
Heritage Implementation Team

Planning and Resource Consents

Date: 8 January 2026

Referral Application Feedback Form from Auckland Transport

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Orawaahi – A Complete Community
Address	Clarks Beach Road (various)
FT application number	FTAA-2511-113

Respondent Information

Name	Hedré Dednam
Role	Team Leader - Development Planning South
Agency / Department	Auckland Transport (AT)
Date	

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

Overall Summary of Auckland Transport (AT) Position

1. The project comprises an extension of the existing and zoned extent of Clarks Beach. There is development potential in existing urban zones and an area of Future Urban Zone. The proposed development, whilst an extension to this existing and proposed urban area, is located primarily in rural zoned land not currently envisaged in the Auckland Future Development Strategy 2023 (FDS) as urban. Accordingly, any additional transport effects on the wider transport network are of particular interest, particularly in relation to the Linwood Road/Hingaia Road corridor which has existing capacity constraints that do not include any funded projects or designations to address. There is development potential at Kingseat Village that will also put further pressure on this corridor that should be taken into account in any assessment.
2. AT acknowledges that Clarks Beach is not fully reliant on the Linwood Road/Hingaia Road corridor for transport connections with alternative road access to proposed train stations at Paerata, Ngakoroa and Drury (noting there are no currently planned bus services to

link Clarks Beach to these stations). However, AT will require a full assessment of effects on the Linwood Road/Hingaia Road corridor as part of any substantive application should the matter be referred for fast-track for AT to confirm an overall position on this proposal.

3. The #379 bus route and new rail stations provide options for access to employment land and education, but both options have constraints.
4. Whilst the application outlines a number of positive economic effects, it has not considered any adverse effects and costs in relation to the wider transport network.
5. The detailed layout of the development, road network and intersections will be important considerations at the substantive application phase should this application be referred for fast-track.

General Information for a substantive application

6. AT envisages that the following information would be required in an Integrated Transport Assessment to support any substantive application:
 - Traffic modelling and data to support trip generation assumptions and assess the impacts on the local and wider network. This also includes trip movements to and from the neighbourhood centre.
 - An assessment of effects of the development on the local and wider transport network, and any mitigation measures to address the effect of additional vehicle trip generation on the wider network. Particularly to address capacity issues and trip generation along Hingaia-Linwood Road (notably during peak hours).
 - Further details on potential uptake of non-private vehicle modes.
 - Vehicle access restrictions along Clarks Beach Road and active mode facilities.
 - Cross-sections of proposed roads or road function tables, and details on the proposed active transport facilities.
 - Development thresholds that trigger requirement for transport infrastructure provision/ upgrades (intersections, shared paths, other mitigation measures).
 - Traffic calming measures to achieve a vehicle speed of 30km/h within the development.
7. Several specific recommendations on matters to be addressed from specialist transport engineering advice are provided at the conclusion of these comments which we recommend are addressed in a substantive application should the matter be referred for fast-track.

Transport Mitigations - General

8. In addition to confirming there are no overriding constraints to the development (such as capacity of the Linwood Road/Hingaia Road corridor), a number of more localised transport mitigations will need to be considered.

9. The Applicant's Transport Memo confirms that a shared path to Waiau Pa would be appropriate. Should the matter be referred for fast-track, the requirements will be further assessed.
10. An upgrade to the Clarks Beach Road/Waiiau Pa Road/McKenzie Road intersection to accommodate development would be required. The form and design of the upgrades will be determined following additional traffic surveys and modelling.
11. More detailed specialist transport engineering advice is provided at the conclusion of these comments which we recommend are addressed in a substantive application should the matter be referred for fast-track.

Road Safety

12. There is no assessment regarding road safety as part of the transport memo.
13. AT would support use of roundabouts at intersections where the development meets Clarks Beach Road.
14. AT recommends a Safe System Audit be carried out in the design stages.
15. Detailed design would need to ensure safe pedestrian/cycle crossing points are provided for residents wanting to walk/cycle from the development to Clarks Beach.
16. Clarks Beach Road/Wharf Road intersection currently has a sharp bend with priority on the curve, which is a typical layout that may attract issues when traffic volumes increase including boat trailers. AT requests further consideration of this in any substantive application.

Proposed Road Closure

17. As outlined in previous pre-application feedback, AT is supportive of the proposal road stopping process for the unformed road running along the coastal edge of the site.

Public Transport

18. It is not clear from the indicative development plans whether any of the internal roads will be suitable for buses, especially school buses.
19. As part of concept design should the application be referred for fast-track, AT would encourage the design of the road layout to enable future public transport connections to the east and west should that land be subject to future fast-track or urban plan change proposals.

20. The official name of the branch line that goes to the Glenbrook Steel Mill is the “Mission Bush Branch line”, not the “Glenbrook Railway”. This is a freight only line owned by KiwiRail. AT does not have any plans to use the line for passenger services.
21. The official name of the branch line from Glenbrook Station Road to Waiuku is the “Waiuku Branch line”. This is owned by the Glenbrook Vintage Railway, a private trust. AT does not have any plans to use the line for passenger services.
22. Transport Assessment – Page 5. It should be noted that:
- With the new #379 bus there will only be a public transport connection to Papakura.
 - There will be park and ride facilities at Drury, Ngakoroa, and Paerata.
 - At this stage, no work has been undertaken to see if higher productivity lanes (T2 or T3) on Hingaia Road are warranted.
23. Transport Assessment – Page 17. It is noted that there are some people in the community who support a ferry link to Onehunga from Clarks Beach as a privately funded operation. There are no plans to provide public funding for infrastructure or services. It should be noted that a ferry would only provide a connection to “Onehunga Wharf”, not “Onehunga” where there are buses and trains. However, it is acknowledged that the Applicant is not relying on this ferry service to mitigate effects.
24. Overall, this proposal creates a larger isolated settlement which will have a limited public transport bus service to connect into the wider Auckland region via the Papakura train station.

Road Network Stormwater

25. For any substantive application, the Applicant should refer to the latest AT design guidelines (e.g. AT’s Bioretention Design Guide Version 2) for any solutions intended to treat road runoffs.
26. Assessments of the impacts of development on downstream flood hazard within the road reserve will be required for any substantive application. The requirements for flood hazard within the road reserve are set out within Table 2 and 3 of the Road Drainage chapter of AT’s Transport Design Manual (TDM). This assessment should include a range of storm events and storm durations and should consider the frequency of flooding as well as the duration of flooding. Where the limits are already exceeded in the existing scenario, opportunities to reduce the existing flood hazard to the public should be considered.
27. Assuming overland flow paths within the development are to be conveyed via the public road reserve, careful consideration of how they are managed will be required at the consenting stage to ensure that they can be safely managed in accordance with Table 3 of the Road Drainage chapter of the TDM and section 4.3.5.6 of the Auckland Council Stormwater Code of Practice Version 4 once detailed design is underway. Failing to consider this early on could lead to the need to redesign earthworks, road networks and

lots at Engineering Approval stage as Auckland Transport will not support piping of overland flow paths due to the lower resilience and risk of blockages.

Matters to Consider within site and local network for a substantive application (specialist transport engineering advice)

28. The Transport Assessment Report (TAR) prepared by Flow proposes a new three-arm roundabout at the entry to Clarks Beach and an additional arm on the proposed roundabout at the Clarks Beach Road/Wharf Road/Kaitiaki Drive. Specialist transport engineering advice is that constructing a new roundabout on Clarks Beach Road at either end of the new neighbourhood centre will help moderate the operating speeds of vehicles as they pass the centre. The new three arm roundabout at the eastern end is an appropriate entry treatment to help slow traffic on Clarks Beach Road as it leaves the rural area and enters the Clarks Beach settlement.
29. When AT met with the Applicant in August 2025, they indicated that they would upgrade the frontage of their site onto Clarks Beach Road between a point east of the eastern roundabout, starting around the existing speed limit reduction to 50 km/h, to the west edge of the retirement village site. This is considered appropriate and important for both pedestrian safety and amenity and for signaling to drivers that they have entered an urban area and need to reduce speed. This is not shown on the concept drawings for the site provided in December 2025. Confirmation is sought from the Applicant that they still intend to do this.
30. Adding a fifth arm to the Clarks Beach Road/Wharf Road/Kaitiaki Drive roundabout could potentially result in some safety and/or operational issues. However, this is subject to the design of the intersection. Having more than four arms on a roundabout often necessitates a larger intersection. Given the population of Clarks beach, capacity type effects are not anticipated. A detailed design for the intersection should be provided with any substantive application.
31. Pedestrian facilities to allow safe crossing of Clarks Beach Road near the roundabouts at each end will be critical to allow pedestrians to walk between the neighbourhood centre and the existing residential areas in Clarks Beach to the north.
32. While Clarks Beach Road is not an arterial road, direct vehicle access onto it from the neighbourhood centre should be minimised or avoided. Access to the area should be from the local roads at either end where practical and a service lane providing access for rubbish collection and deliveries separate from the customer parking areas should be considered along the south edge of the neighbourhood centre adjacent to the light industrial zone. It is recommended that the Applicant investigate ways to separate vehicle access to the new neighbourhood centre for customers from the access used for heavy vehicles servicing these sites, so that trucks making deliveries to the supermarket or other businesses do not mix with pedestrians walking to and from vehicles in the customer parking areas.
33. During a meeting with the Applicant in August 2025 AT noted that Park Boulevard Road was intended to have high quality active modes facilities, and this is annotated on the

concept plan. However, the plan does not have any details of the proposed active mode facilities. Vehicle crossings across these facilities should be avoided. The lot layout shown in the concept plan shows lots with frontage onto the Park Boulevard Road, which do not have any alternative vehicle access. It is recommended that alternative lot layouts or potentially rear jointly owned service lands are investigated for these lots to provide alternative vehicle access which is not directly off the Park Boulevard Road.

34. The internal layout of the site indicates a number of cross-roads intersections. These should be designed as roundabouts, especially at the intersections of the key local roads.
35. There are some internal intersections where the roads intersect at angles which are not right angles. Where practical, roads should intersect at between 80 to 100 degrees. Where this is not practical the use of roundabouts should be investigated. Angles lower than this result in poor viewing angles for drivers, increased space requirements for vehicle tracking, and increased crossing distances for pedestrians.
36. The land to the west of the site is not urban or future urban zoned, but a plan change or fast track application could result in it being developed as urban. A small reserve located at the south end of the retirement village between the road and the western boundary should be provided. If the land to the west is urbanised an active modes link could be provided via this reserve.
37. The internal road network should be designed to ensure that vehicle operating speeds are at or around 30 km/h (regardless of whether a formal 30 km/h speed limit is set for the development). Traffic calming will be needed to achieve this.
38. The TAR (page 11) explains that the neighbourhood centre will comprise a small supermarket, supporting retail, a community hub with medical services, a childcare centre, and similar local amenities. For the light industry zone small workshops and other small businesses are proposed. The trip generation estimate in the TAR assumes that the neighbourhood centre and light industry will have no net trip generation outside of Clarks Beach because any trips they generate from outside the settlement will be offset by providing local employment and shopping opportunities (meaning that local residents do not need to leave Clarks Beach for work or shopping as frequently).
39. There is a risk that these areas could develop differently than assumed in the TAR. Neighbourhood centre zoning allows residential use and if it were to be developed like this then dwellings inside the neighbourhood centre zone could generate trips on the wider network and that the dwellings outside the zone would also generate more trips as there would be less opportunity for local employment and shopping.
40. The same could happen with the light industrial area. Small workshops and businesses focused on servicing customers in the nearby settlement can be expected to generate far less trips on the wider network than a single (or small number of) larger businesses servicing a much wider area. Accordingly, the Applicant should assess this in terms of AT's ITA guidelines, if the application is referred.

41. Provision for bus stops near the neighbourhood centre should be included in the engineering drawings provided with any substantive consent application.

Matters to consider with wider transport network for a substantive application (specialist transport engineering advice)

42. The *Kingseat Wider Area Review Transport Assessment Report* prepared by Flow and dated January 2024 identified significant capacity constraints on the Linwood Road/Hingaia Road corridor stating that *“Demands for private car travel on the Linwood Road/Hingaia Road corridor are predicted to exceed capacity in the future, as will demand for travel through Papakura interchange.”*

43. According to Section 6.2.4 of the TAR the proposal would generate an additional 265 trips per hour travelling north/east along this corridor away from Clarks Beach in the AM peak hour period.

44. Same section of the TAR then notes that *“by the time the development is constructed and occupied, the rail station at Paerata or Drury will be completed and operational, the development offers employment, goods and services which will reduce the need to travel outside of Clarks Beach, and further developments in working patterns will assist in providing people options as to whether travel is needed on a day to day basis.”*

45. It is not clear if the 265 trips per hour figure accounts for the new railway stations, employment opportunities, and developments in working patterns. It is anticipated that some private vehicle trips in the AM peak hour originating inside the site will go via the Linwood Road/Hingaia Road corridor and the proposal will have some effect on its capacity. Any substantive application should include an estimate of the number of trips allowing for these things, and an assessment of how the trips will affect the Linwood Road/Hingaia Road corridor. The nearest station (Paerata) is approximately 22km driving distance from the site, and this will affect how many people are prepared to travel to the station before switching to public transport. Specialist transport engineering received is that it is considered that only a minority of travelers leaving Clarks Beach in the AM peak hour will use public transport as part of their journey.

46. More assessment of the effects on this corridor, including updated SATURN modelling, should be provided with any substantive application. This assessment should include specific assessment in regard to the Blackbridge Rd/Linwood Rd roundabout and the Oakland Road/Hingaia Road signalised intersection.

47. Sections 5 and 7.2 of the TAR discuss the Clarks Beach/Waiiau Pā/McKenzie Road intersection, noting that the 2016 predicted queues forming on McKenzie Rd when assessing the extent of the structure plan with 1,500 dwellings. The TAR recommends further investigation at substantive application stage. Specialist advice is that it is considered likely that this intersection will require an upgrade to mitigate the effects of increased traffic generated by the development (potentially in the form of a roundabout) and this assessment should be included in any substantive application.

48. Section 4.1 of the TAR discusses a planned shared path connecting Clarks Beach and Waiau Pa via Clarks Beach Road being promoted by the Franklin Local Board. This will provide an active modes connection to Waiau Pa School and will benefit both school children and recreational users. Page 7 of the TAR gives an estimate of 550 primary and intermediate school aged children living in Clarks Beach (including existing, the Future Urban Zone land and the proposed fast track development). While the distance between Waiau Pa and Clarks Beach is too far to walk riding to school is viable with an appropriate facility and this path would help mitigate the trip generation effects of the development in the critical AM peak hour. The provision of this path either by the Local Board or the Applicant should be set as a condition of consent for the proposal.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Orawaahi – A Complete Community
Address	(a) Clarks Beach Road - Lot 3 DP 337204 (no address allocated) (b) 156 Clarks Beach Road - Lot 1 DP 337204.
FT application number	PRR00043620

Respondent Information

Name	Kent Liu
Role	Principal Engineer
Agency / Department	Regulatory Engineering, Planning and Resource Consents Department
Date	28/01/2025

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

<p>Infrastructure and Servicing:</p> <p>The site is not currently serviced by public stormwater, wastewater, or water supply reticulations. Development Engineering relies heavily on the confirmation and technical input of the respective asset owners when assessing servicing feasibility.</p> <p>Wastewater and Water Supply:</p> <p>Watercare has advised that the proposal cannot be serviced by public wastewater or water supply networks without compromising the capacity required to service existing zoned land and future urban (FUZ) growth areas. On this basis, public servicing cannot be relied upon at this stage for either wastewater or water supply.</p>

Stormwater:

Healthy Waters & Flood Resilience (HWFR) has indicated that, for a development of this scale, vesting of some components of the proposed stormwater network is likely to be the most appropriate outcome. HWFR recommends preparation of a Stormwater Management Plan in accordance with Schedule 4 of the Regionwide Network Discharge Consent (RWND) to support any private stormwater diversion and discharge application. If vesting is pursued later, early alignment with Council standards will enable smoother assessment and consideration of such assets.

Overall:

At this stage it remains unclear whether public stormwater, wastewater, and water supply reticulations can be made available to service the development. A substantive level of additional detail will be required at the substantive application stage (should the referral be accepted) to enable a full engineering assessment and determination on servicing feasibility.

OLFP and Flooding – earthworks, accessway and proposed activities (including Plan Change 120 matters)

The applicant's stormwater and flooding assessment acknowledges that the site is subject to several flood-related hazards, including mapped floodplains, overland flow paths, and areas of low-lying ponding.

The proposed flood management approach includes:

- Locating building platforms outside the 1% AEP floodplain.
- Designing earthworks to maintain or improve conveyance and avoid increasing flood levels upstream or downstream.
- Ensuring existing wetlands are not water-shortened.
- Realigning overland flow paths within public roads and drainage reserves to provide safe conveyance.

These measures are noted; however, significantly more detail will be required at the substantive application stage—particularly modelling, detailed earthworks design, and confirmation of OLFP functionality—before Development Engineering can reach conclusions on the adequacy of the proposed flood management response.

District Earthworks and Geotechnical Matters:

The applicant proposes extensive bulk earthworks across the 75 ha site to create building platforms, roads, and stormwater devices, with cut/fill volumes to be balanced where practicable. The preliminary geotechnical assessment indicates the site is generally suitable for development; however, the current information remains high-level. A full geotechnical review will be required at the substantive application stage, including (but not limited to):

- Detailed soil type classification across the development area.
- Confirmation of groundwater levels and seasonal variability.
- Any required remedial or ground stabilisation works.

- Assessment of land suitability for the construction of public and private infrastructure (roads, drainage, utilities).

This information is necessary to confirm earthworks feasibility, infrastructure stability, and long-term performance of the development.

Conclusion:

From a Development Engineering perspective, we are neutral on the referral of this application. Substantial additional and more detailed information will be required with the substantive application if the application is accepted for referral to enable a full engineering assessment of the application and conclusions to be reached.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Prepared by:

Signed

Name: Kent Liu

Date: 28 January 2026

Title: Principal Engineer

Planning & Resource Consents

Referral Application Feedback Form

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Project Information

Project Name	Orawaahi – A Complete Community
Address	Clarks Beach Road - Lot 3 DP 337204 (no address allocated). 156 Clarks Beach Road - Lot 1 DP 337204.
FT application number	FTAA-2511-1135

Respondent Information

Name	Shanelle Beer Robinson
Role	Senior Specialist – Earthworks & Streamworks
Agency / Department	Specialist Unit, Resource Consents
Date	08/01/2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

Streamworks (Chapter E3 of the AUPOP) and Natural Inland Wetland (NES-F) Comments

The ecological report prepared by ecoLogical Solutions dated 11 November 2025 provides a high-level summary of the project description, location and ecological values. The report states that there are “*numerous, small potential wetlands within gully systems*”. I support the proposal insofar as it states that wetland reclamation will be avoided and that no loss of wetlands is anticipated.

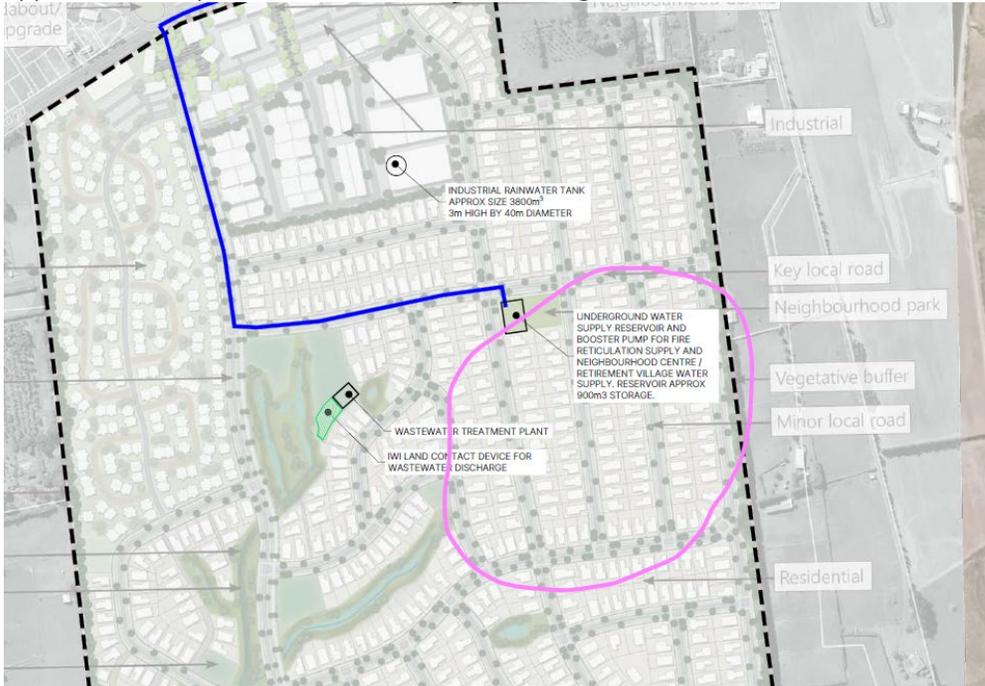
It is considered appropriate that any freshwater environments located within mapped overland flow paths and/or floodplain areas are verified onsite for the presence of natural inland wetlands, RMA wetlands or streams. CivilPlan Drawing Number SK12-1 shows

housing and roading development along the eastern extent of the site where Auckland Council's Geomaps has mapped this area as a permanent stream and major overland flowpaths (likely intermittent streams). This area would need to be investigated further and functional need demonstrated for reclamation.

Area of concern circled in pink below with Geomaps watercourse mapping:



Approximate respective area on CivilPlan Drawing:



1940's historic aerial:

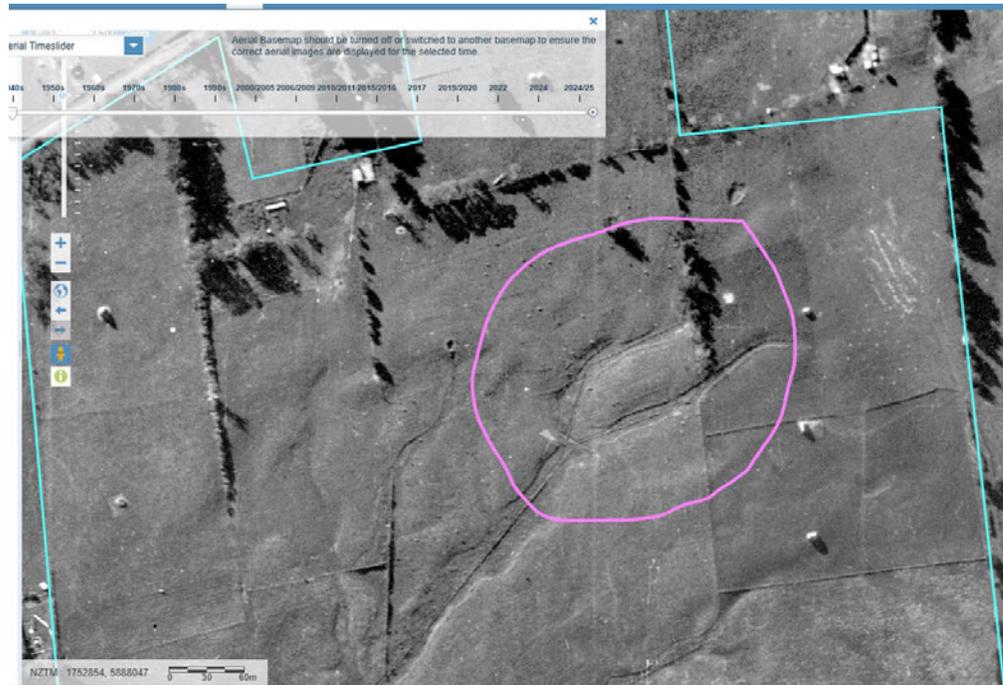


Figure 4 provides a map of watercourses and wetlands within the project area. However, no evidence is provided regarding how watercourses and wetlands were classified. This information, including supporting data sheets, should be provided as part of any updated ecological reporting.

Ecological values are stated to be low to moderate for watercourses and wetlands based on SEV scores. The SEV spreadsheet should be provided to support this assessment.

Any reclamation of artificial ponds (farm ponds) across the site must be assessed against Chapter E3, rule E3.4.1(A49) as a non-complying activity. The overall level of effect must be determined and native fish capture and relocation measures proposed.

The applicant should consider all culverts onsite, measured in metres, and provide clear mapping of existing and proposed culverts as part of the proposal. Should all culverts onsite exceed 30 metres in length, the progressive encasement rule would apply under Chapter E3 and standards in E3.6.1.14(1)(c). Appropriate mitigation for loss of stream bed and habitat should be considered. I support the proposal of removing/remediating existing culverts that do not currently provide for fish passage due to perched barriers. Consideration for bridges or u-culverts for road crossings.

All new culverts will require detailed design in accordance with NES-F Regulation 70(2) for fish passage. This must include both a written assessment against the relevant standards and supporting design drawings. Given the site's location and direct connection to the CMA, fish passage, including potential spawning and migration, may be an important consideration.

Detailed design drawings for any new culverts should also include erosion and scour protection measures, including rip rap design at inlets and outlets. Any rip rap exceeding five metres in length will require consent under Chapter E3 due to non-compliance with standard E3.6.1.14(1)(b). Design details should demonstrate how fish passage will be maintained, ensuring that water flows over, rather than through, the rip rap.

Any in-stream works should be clearly identified on plans and supported by a streamworks methodology. This should include, but not be limited to, the anticipated timing and duration of works, dam and divert methodology or formal diversions, native fish capture and relocation, monitoring and maintenance, wet weather contingencies, and remediation of the works area following completion.

Any stormwater infrastructure, including outlets proposed to discharge to streams or wetlands, must be supported by appropriate assessments against E3.4.1(A39), the NES-F discharge rules and applicable earthworks setback standards. Design details, including outlet angles, rip rap length and rip rap locations, should be provided.

Regional Earthworks (Chapter E11 of the AUPOP) and NESF Comments:

The earthworks and infrastructure report prepared by CivilPlan Consultants, dated 29 October 2025, provides a high-level summary of the project description and general information relating to erosion and sediment control and methodology. However, the report does not include earthworks quantities, including areas and volumes, cut and fill balances, or defined earthworks catchments. Given the size of the site, it is anticipated that earthworks would be undertaken in stages, and an appropriate earthworks staging plan should be provided.

Earthworks plans should illustrate the following:

- Earthworks staging and defined catchment areas
- Watercourses and appropriate setbacks between earthworks and freshwater environments
- Cut and fill areas
- Erosion and sediment control measures, including the location of devices, detailed design information for any sediment retention ponds or decanting earth bunds, standard GD05 design details, the location of stabilised entranceways, and clean and dirty water diversions. Super silt fencing should only be considered as a last line of defence and where works are occurring near waterways
- Progressive stabilisation of the site and individual earthworks catchments
- Chemical treatment proposed for any sediment retention pond or decanting earth bund
- The maximum area of exposed earthworks at any given time.

Given the overall earthworks area (>5ha) and the proximity of the site to the immediate receiving environment, including the coastal marine area and the marine Significant Ecological Area SEA-M2-31, it is considered appropriate that an Adaptive Management Plan be prepared to support the earthworks proposal.

Clear setbacks from any natural inland wetlands should be shown on all plans and earthworks drawings to ensure that no accidental encroachment or unintended reclamation occurs during construction. This could be achieved through the installation of wetland fencing or physical demarcation at an appropriate setback distance prior to works commencing. An assessment against Regulation 54B or Regulation 45 for urban development should be provided for any earthworks proposed within 10 m, where required.

Prepared by:

Signed:



Name: Shanelle Beer Robinson

Date: 8 January 2026

Title: Senior Specialist, Earthworks and
Streamworks (Specialist Unit)

Planning & Resource Consents

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Orawaahi – A Complete Community
Address	Clarks Beach Road - Lot 3 DP 337204 (no address allocated) 156 Clarks Beach Road - Lot 1 DP 337204.
FT application number	FTAA-2511-1135

Respondent Information

Name	Jason Smith
Role	Terrestrial Ecology Reviewer
Agency / Department	Consultant to Ecological Advice
Date	16/01/26

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

The purpose of this review is to inform Auckland Council's position on if *Orawaahi – A Complete Community* project should be referred to the streamlined fast-track pathway.

The scope of this review is to provide high-level feedback on the Ecological Assessment in regard to terrestrial ecology matters, as considered under Chapter E15 of the Auckland Unitary Plan. To inform this assessment, I have reviewed:

- Attachment 1 *Orawaahi A complete Community*, report by Knight Investments LTD.
- Attachment 2 *Orawaahi A complete Community*, report by Knight Investments LTD.
- Attachment 6 *Project Site Maps*.
- Attachment 9 *Planning Memorandum*.
- Attachment 18 *Ecological Assessment*.

In relation to terrestrial ecology matters, the Ecological Assessment provides a high-level summary of the site's ecological values. The habitat, and species likely to utilise this habitat are adequately described for the purposes of this review. A greater level of detail regarding the level investigation will need to be undertaken with the substantive application. Watercourse classifications and delineations will be required with the substantive application. Further supporting evidence would be required in regard to the watercourse classifications and delineations will be required with the substantive application. The upstream extent of watercourses A and B in particular, as the aerial imagery available via GeoMaps and the lack of an intermittent extent being mapped infer a greater length of stream than what is currently shown in the Ecological Assessment (although the comment on the field drains is also noted).

For proposed activities, once the watercourse extents are confirmed the applicant is advised to map the riparian margins and buffers. This is noted as it is currently unclear if consent would also be required under E15.4.1 (A18). E15.4.1 A20 – A22 could also applying, depending on the extent of the vegetation alteration works in the coastal area.

Aside from the point noted above regarding activities within 10 m and 20 m of the watercourses, and based on the applicant's description of the proposal, the potential effects can be understood at a high-level. A point of clarification will be required in the substantive application as to the extent of any works within the 10m / 20 m and if there is any effects management proposed for any intrusion.

All management plans should be provided with the substantive application.

Based on the material I have reviewed, I am neutral on this application being submitted under the Fast Track process. The reasons given for the project being considered of regional or national significance do not relate to terrestrial ecology and so I do not comment on this matter. Several points for inclusion in the substantive application have been noted above; however, from a terrestrial ecological perspective, I am not aware of that would affect project delivery, and do not identify any 'red flags'.

From a terrestrial ecology perspective, the application is not inconsistent with the Auckland Unitary Plan or any other statutory document relevant to the scope of this assessment. Whilst the potential for adverse ecological effects related to terrestrial ecology is recognised by the applicant, based on the applicants description of the potential effects, the applicant has also put forth standard measures that would appropriately manage the effects that have been identified to date.

Prepared by:



Jason Smith

Consultant Ecologist to EcoAdvice

Planning & Resource Consents

Date: 16 January 2026

Review of Orawaahi Clarks Beach Fast Track Economic Benefits Assessment

Tim Denne

DRAFT 21st January 2026

1 Introduction

This note provides a quick review of the economic benefits assessment by Property Economics (PE) for the Orawaahi Clarks Beach project that has been proposed for approval under the Fast Track Approvals Act 2024 (FTAA).¹

The economic analysis report describes the project, noting the variety of housing, facilities and amenities it would provide. It suggests that the project will provide low-cost housing, including that specifically targeted at the elderly, police, firefighters, nurses and teachers, and that it will result in reduced prices because of the nature of the accommodation and the addition to total housing supply that the project represents.

The economic analysis uses the applicant's data on expected construction and development costs and on commercial spend. Multipliers are then used to estimate total direct, indirect and induced economic activity associated with a generic housing development project, such that the same results would be produced from analysis of any project with the same balance of costs and expenditure, regardless of the location in Auckland or the affordability of the housing. Based on this quantitative analysis and the accompanying qualitative description of other impacts, PE concludes that the project would provide significant economic benefits.

2 Review

The problem with the approach to analysis is two-fold.

1. GDP contribution is not a measure of net economic benefit
2. There is no estimate of the difference in benefit relative to what would happen without the project – the counterfactual

I discuss the second issue first because it is relevant both to the analysis of GDP impacts and to other analytical approaches.

2.1 Opportunity Costs

The multipliers are developed using recent statistics as ratios of average levels of economic activity and employment across the wider economy, associated with construction and

¹ Property Economics (2025) Orawaahi Clarks Beach Fast Track Economic Benefits Assessment. Report for Knight Investment Ltd. October 2025.

development costs and commercial spend. A new housing development will require resources that include building materials and workers, who will spend their wages on a range of goods and services. The GDP effects counted by PE include the payments to workers and the profits of the companies that are involved directly or indirectly, including that induced by the workers spend. StatsNZ input-output tables of economic activity are used to calculate the multipliers used.

The multipliers are developed from statistics of the economy in a recent snapshot or equilibrium position. To count the full amounts estimated using these multipliers as the impacts of the project assumes that, without the new development project, the labour and other resources involved would all be idle – the land would not be used, the capital would have no other possible investment option, the companies supplying inputs would have spare capacity, as would the companies selling goods and services to the workers; and the workers employed directly and indirectly would currently have no jobs. None of these assumptions are likely to apply. In practice, resources are not idle, and meeting the requirements of a new project will involve shifting capital and labour from what it would be doing otherwise so that the impacts of the new project are offset by reduced activity and employment elsewhere.

The reduced activity elsewhere is the opportunity cost of the new development, and it is ignored in the analysis by PE. The difference in GDP and in employment levels between a world in which this specific project goes ahead and one in which it does not is the marginal impact of the project. It will be very much smaller than is calculated by PE as the project's supposed impact.

2.2 The Analytical Approach

2.2.1 The Analytical Task

Above I have noted the failure to analyse the marginal effects of the project. In this section I discuss the approach to analysis itself. The FTAA sets out the requirements for economic analysis. This includes:

- the criteria for assessing an application. These are that the project would have “**significant regional or national benefits**” (22(1)(a));
- the things the Minister may consider in assessing this, including *inter alia*, whether the project will deliver **significant economic benefits** (22(2)(iv)); and
- the reasons for declining approvals, which include adverse impacts (85(3)(a) **that are sufficiently significant** to be out of proportion to the project's regional or national benefits (85(3)(b)).

These matters are not clearly defined in the legislation and there are different views on what constitutes a benefit or how to measure it. PE assumes that national or regional benefit can be defined as an increase in GDP, either nationally or locally, as analysed using an economic impact analysis (EIA). This is not a universally held view by any means. The contrasting view is that an economic benefit is best defined as an improvement in the wellbeing of people, i.e. that in

aggregate, people's lives are improved. Measuring changes in wellbeing is the focus of an alternative economic analysis technique: cost benefit analysis (CBA).

2.2.2 EIA vs CBA

The NZ Treasury asserts that “EIA differs from CBA in that it measures ... the activity generated, rather than the net benefit created”² and that “EIA can provide useful contextual information for decision-makers, but it is not suitable as a tool for measuring the balance of costs and benefits of a decision to society.”³ I would suggest that such a balance or net amount (benefits minus costs) is exactly what the requirement is for the analysis under the FTAA.

CBA assesses whether society is better off once the full opportunity costs of the resources required are counted. Rather than assuming that a project is automatically beneficial because it requires labour and expenditure, it recognises that projects can crowd out other economic activity or lead to inefficient allocation of resources. CBA calculates the total economic value of a project which includes:

- The producer surplus (PS), equivalent to economic profits of companies. This is the difference between the revenues, e.g. from house sales, and the full opportunity costs of development. This may be different from accounting measures of profit as: (1) it needs to include all costs, including otherwise unpriced impacts on the environment, and (2) because opportunity costs may differ from costs using market prices.⁴

In addition, because opportunity costs include the opportunity costs of capital, the PS will be a measure of profit levels above a “normal” profit level. A normal profit is the profit level expected from a similar kind of development and is part of the estimated cost of capital invested in the project.

- The consumer surplus (CS), measured as the difference between what consumers pay for something (the new housing in this instance, including the low price options) and their willingness to pay (WTP), taking account of income, travel costs etc. It is relevant to the analysis here because we are expecting people to purchase the new housing in preference to their existing housing, or alternatives. They will obtain some CS provided the price paid is less than their maximum WTP and provides an improvement over what a potential purchaser could obtain elsewhere. The CS might also include the benefits for potential house purchasers resulting from any fall in property prices from the

² The Treasury (2015), p54

³ *ibid*

⁴ For example, in this calculation, wages and salaries are treated as an opportunity cost. Payment of a wage is effectively a transfer payment; it is a cost to the employer and a benefit to the employee. However, what is lost to society when new employment arises is the benefit of what the worker would have produced otherwise. If there is significant unemployment, this might be very little and the opportunity cost of labour will be less than the market price, but if there is relatively low unemployment, we can assume that the person is displaced from some other activity and that the wage rate represents the cost to society of the productive activity that is lost. Some labour may be unemployed currently, but the current national unemployment rate of 5.3% (<https://www.stats.govt.nz/information-releases/labour-market-statistics-september-2025-quarter/>) is within the 95% confidence intervals of the estimated natural rate of unemployment (4.0 to 5.5%), from people moving location, voluntarily leaving jobs, company closures, new additions to the workforce (e.g. school leavers) waiting for work etc. See: Jacob P and Wong M (2018) *Estimating the NAIRU and the Natural Rate of Unemployment for New Zealand*. Reserve Bank of New Zealand Analytical Note Series ISSN 2230-5505.

increased supply.

Also included in CS are any benefits to the wider community, which might include the net value of increased opportunities (or reduced travel costs) for commercial or recreational activity.

CBA usually exclude multiplier effects because it is assumed that other industries, e.g. building materials suppliers, are operating efficiently without idle resources, so that supplying the new developer results in additional costs and that the goods are supplied competitively at a price equal to this additional cost. Thus, NZ Treasury suggests “*Unless there is significant unemployment of people with the requisite skills, it is therefore likely that multiplier effects do not exist.*”⁵

A CBA would produce very different results from those provided by PE. They would be expected to be significantly lower. However, the results of a CBA represent a true measure of value rather than simply a record of the fact that the project requires money to be spent and workers to be employed, regardless of whether this is the best use of these resources. In the approach employed by PE, more expenditure or more labour is always better – there is no attempt to measure optimal resource use for the greatest benefit of the region or the country.

2.2.3 Significance

PR describes the project as having significant economic impacts, but this is not using any criteria to define significance. Previously I have suggested possible criteria might include the following.⁶

1. It is of a **large absolute size**, ie the measured (net) benefits exceed some threshold, in net present value (NPV).⁷ Such a threshold might be different for individual regions versus a project of national significance.
2. It makes use of **significantly underutilised resources** including spare infrastructure or network capacity, so that relative costs might be lower than usual for a large development.
3. It produces **large spillover effects** in other markets, eg agglomeration economies, knowledge transfer and innovation, or increased labour mobility, so that the benefits extend well beyond the immediate project.
4. It has **transformational effects** in the wider economy, eg inducing other investment, enabling new industries, or transforming urban environments, so that the wider benefits may be even more significant in the longer run.

Usefully the analysis would assess the development against these or similar criteria.

⁵ p19 in NZ Treasury (2015) *Guide to Social Cost Benefit Analysis*.

⁶ Denne T (2025) Delmore Fast Track Approvals Act Application – Review of Economic Analyses. Resource Economics. www.fasttrack.govt.nz/_data/assets/pdf_file/0004/10111/TD-Delmore-Economics-Review-130825.pdf

⁷ NPV is the main output of a CBA

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	
Address	156 and 162 Clarks Beach Road, Clarks Beach
FT application number	PRR00043620

Respondent Information

Name	Eva Zombori
Role	Senior Advisor
Agency / Department	Policy
Date	20.01.2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

Proposal

1. The Clarks Beach Road fast-track approval application is to develop a comprehensively planned residential community, Orawaahi, in Clarks Beach, including approximately 1,000 dwellings (781 new residential lots and 222 retirement villas), a neighbourhood centre, an approximately 5 ha area for light industry/service type activities, supporting infrastructure, and associated works.
2. The land is currently zoned Rural Coastal and Mixed Rural in the Auckland Unitary Plan 2016 (Operative in Part) and it is not identified as an area for development in the Future Development Strategy (FDS) nor in its sub-part, the Southern Rural Strategy (SRS).
3. Our comments consider the strategic planning implications of this fast-track application.

Legislative background

4. The Future Development Strategy (FDS) and its sub-part, the Southern Rural Strategy (SRS), are both relevant considerations in fast-track application decision-making under clause 17 of Schedule 5 to the FTAA. This 'imports' the decision-making provisions of the Resource Management Act 1991 (RMA), including section 104 of the RMA. Both the FDS and the SRS were prepared using the special consultative procedure in section 83 of the Local Government Act. The FDS is an important growth document required by the National Policy Statement on Urban Development (NPS-UD), and it is, therefore, a relevant planning document for the Panel to have regard to under section 104(1)(c) of the RMA.
5. Section 85(4) of the FTAA states that a panel may not decline approval solely because it is inconsistent or contrary to provisions in an Act or other document. This does not prohibit consideration of relevant planning documents. Along with other matters, such as actual adverse effects, inconsistency with planning documents may contribute to a decision to decline.

Strategic alignment

6. The Application site is rural land. The FDS anticipates minimal growth in rural areas to retain the rural environment and rural productivity. This strategic direction is further reinforced by the Southern Rural Strategy, that identifies Clarks Beach as a rural village with moderate growth of up to 300 residents in the next 30 years. Furthermore, development of a large extent of rural land is not consistent with the strategic direction set out in the FDS and the SRS. See Principle 1(a)[1] and section 4.1.1 of the FDS and Direction 1(a) and (d) of the SRS.
7. The FDS and the SRS do not anticipate this area being developed as urban land now or in the future. Development of this land now also has implications on the rezoning of the nearby Clarks Beach future urban area that is anticipated in 2030+.
8. The application is not aligned with planned growth within the Clarks Beach area, Clarks Beach has very limited services and no social infrastructure, and residents largely rely on nearby larger rural towns and settlements to access these facilities. The addition of approximately 1,000 dwellings would necessitate the provision of social infrastructure, which is not included in the application.
9. The application does not provide a strategic planning assessment against the FDS and the SRS in relation to the subject site.

Residential capacity and well-functioning urban environment

10. At the regional level, Tāmaki Makaurau has broadly enough plan-enabled capacity to accommodate future residential growth, and the FDS and SRS do not anticipate an increase in housing capacity in this area.
11. The application does not consider the significant greenfield residential capacity available in the wider catchment, including at Clarks Beach. It also does not consider future development across the broader catchment (Kingseat and Glenbrook Beach).
12. In failing to include these areas, the application has not considered the effects which impact on the efficiency of enabling growth in different locations across the wider catchment and across the wider region (FDS principle 5, and SRS Direction 1(a) and (d)).
13. No detail has been provided as to how the application is proposed to contribute to a well-functioning urban environment on a regional and local scale, particularly as it is not planned in the FDS and the SRS.
14. The application does not provide a robust explanation of how the new centre would impact on other, existing and planned centres in the wider area.

Infrastructure

15. The proposal does not consider social infrastructure matters locally, and the applicant relies on infrastructure provided in nearby settlements that can mostly be accessed by car. This will mean significant additional vehicle traffic to existing narrow secondary rural roads. This is inconsistent with FDS principle 1, well-functioning urban environment requirements, and Infrastructure Direction 3(d) of the SRS.
16. The site falls outside of Healthy Waters Regional Network Discharge Consent for stormwater.
17. The application site is subject to landowner agreement with Watercare and right of entry to secure a wastewater pipeline transmission route through the site as part of the wider South-West Wastewater Servicing strategy. While the site is currently not serviced, this agreement may include Watercare working together with the applicant to find solutions for the provision of water and wastewater services for the proposed development.
18. Detailed information about the possibilities for provision and timing of water and wastewater infrastructure requirements for the development should be discussed by other council and CCO specialists.
19. The proposed development would come at the expense of the delivery of other developments and is not possible without displacing planned investment and infrastructure provision in existing live zoned areas and sequenced future urban areas (FDS principle 5).

20. These deficiencies in the application raise questions about the efficiency of the required infrastructure investments (FDS principle 3) and the cost implications on a local and regional scale to the council, AT, and Watercare for enabling and supporting strategic infrastructure at this location.

Summary

21. Our view is that the proposal is not aligned to the FDS and the SRS, both in terms of the proposed location and the FDS and SRS principles for growth and changes.

22. Enabling the development would have wide-ranging local and subregional implications in terms of increased number of residents in an unanticipated location within a rural area.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Prepared by:

Signed

Eva Zombori

Senior Advisor

Growth & Spatial Strategy

Date: 20 January 2026

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Orawaahi
Address	<ul style="list-style-type: none"> • Clarks Beach Road – Lot 3 DP 337204 (no address allocated) • 156 Clarks Beach Road – Lot 1 DP 337204
FT application number	FTAA-2511-1135

Respondent Information

Name	Hillary Johnston
Role	Consultant Stormwater Specialist
Agency / Department	Healthy Waters & Flood Resilience
Date	20.01.2025

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

Healthy Waters & Flood Resilience (HWFR) has reviewed the Referral Application for the proposed Orawaahi development. The Application outlines a large-scale master planned development in existing rural zoned areas.

Zoning and Application Context

The site is within the Rural – Rural Coastal Zone and the Rural – Mixed Rural Zone.

HWFR holds a Regionwide Network Discharge consent (RWNDC) which authorises the diversion into and discharge from public stormwater networks within the Auckland Region. The RWNDC is only applicable to existing urban zoned land or land rezoned urban through a Plan Change process. As the current underlying zoning of the development site is rural and it is not proposed to go through a Plan Change to

rezone the underlying land, the development cannot be authorised by the RWNDC. As such it would be anticipated that a private diversion and discharge consent will be required to authorise the stormwater discharges from the development.

Ownership of Network and Devices

There is currently no Council-planned stormwater network or infrastructure provision for this location.

Irrespective of the consenting status of the diversion and discharge component of the Application, for a development of this scale it is likely that the most appropriate outcome will be for parts of the proposed stormwater network to be vested as public infrastructure, specifically any large-scale communal devices and their associated networks that service multiple residential, neighbourhood centre, or light industry lots and where public roads are proposed and have been accepted by Auckland Transport.

The Applicant's Engineer has acknowledged this potential within the Stormwater Assessment Report and has noted that the concept stormwater management design has considered relevant engineering standards. Further information should be provided at the Substantive Application stage on any communal stormwater management that may have the potential to be vested to HWFR in future as public assets.

HWFR suggests the development of a Stormwater Management Plan prepared in accordance with the requirements of Schedule 4 of the RWNDC to support the private diversion and discharge consent. If vesting of stormwater infrastructure is pursued at a later stage, this would allow smoother assessment and consideration as public assets.

Although indicative scheme plans have not been provided at this stage of development, it should be noted that HWFR typically does not support the vesting of stream corridors or natural wetlands where the stormwater function does not require public ownership and can be adequately secured through private ownership with protective mechanisms. This is to avoid vesting of land that would result in an ongoing financial maintenance burden to Council without generating public land and infrastructure benefit. As part of the Substantive Application the extent and location of any land proposed for vesting should be accompanied by evidence that the land delivers essential stormwater function as well as wider public benefit.

Stormwater Management

The Stormwater Assessment outlines that communal roadside raingardens are proposed to provide water quality treatment and hydrology mitigation. If at any

stage these assets are put forward for vesting as public infrastructure, it should be noted that HWFR generally prefers communal centralised solutions such as constructed wetlands, rather than dispersed smaller devices such as raingardens as they are more efficient to maintain and are often easier to access for operation and maintenance purposes than roadside devices.

Consent Conditions

Consent conditions have not yet been provided. If stormwater management assets are intended to be vested at future stages of development, the conditions of consent should be drafted in a way that would enable the adoption of any private diversion and discharge consent by HWFR at some point in the future. HWFR would seek input into such conditions and welcomes ongoing discussion with the Applicant's Agents in this respect.

In addition, there are several engineering design elements outlined within the referral application documents that would warrant discussions with HWFR. HWFR would encourage further discussion, especially in respect of potential public stormwater assets, prior to the further development of the substantive design, and prior to the lodgement of the Substantive Application.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

At this stage, Healthy Waters & Flood Resilience is not opposed to the proposal proceeding to referral. The site does not present significant flood risk constraints, and the stormwater management approach outlined indicates that effects can likely be appropriately managed in accordance with best practice.

In considering the Section 22 referral criteria, it is acknowledged that the proposed development has the potential to contribute positively to housing supply and the delivery of a well-functioning urban environment.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Prepared by:



Hillary Johnston

Consultant Specialist – Growth and Development

Healthy Waters & Flood Resilience

Date: 20 January 2026

Landscape Architecture Specialist Advice for:

Adonica Giborees | Principal Project Lead
Premium Resource Consents
Auckland Council



20th January 2026

Re: **Orawaahi 156 Clarks Beach Road Fast-Track Referral** Initial Review

1.0 Introduction

As requested, I have reviewed the Orawaahi Clarks Beach Fast-Track Referral Application and visited the site surrounds. This initial assessment focuses on three matters:

- Will the project give rise to significant environmental (in this case, landscape and rural amenity) issues?
- Is the project consistent with the local and regional planning instruments of the AUP?
- Are there any other relevant matters to consider?

These matters are addressed in turn in the following sections of this report.

2.0 Landscape & Amenity Effects

The subject site is located on the south-western side of the Clarks Beach Road ridge, facing away from the Manukau Harbour and existing coastal settlement at Clarks Beach towards the Taihiki River inlet, which it directly abuts. The western end of the site lies opposite a recent extension to the existing beach settlement, which falls towards the Manukau Harbour from Mutetai Road northwards. This occupies roughly half the AUP's Clarks Beach Precinct (map excerpt below), which anticipates further development both east of the current 'village' and towards Beach Road in the foreseeable future.



Contrasting with this area of residential development, the greater bulk of the property comprises open ‘farmland’ at present, mainly market gardening blocks that fall towards the inlet and are subdivided by a mixture of shelterbelts and hedgerows. Some amenity planting encloses dwellings and farm sheds next to Clarks Beach Road, while a ‘checkerboard’ of smaller, lifestyle blocks and paddocks flanks the western end of the site, near Boyd Road. A mixture of market gardening and dwellings occupies the land at the opposite, western end of the property, while a small enclave of residential properties lies across Clarks Beach Road from it – to the north.

The following photos (overleaf) help to illustrate the nature of the site and its surrounds, although it was not possible to access the margins of the Taihiki River.



Figure 1. The eastern end of the site viewed from Clarks Beach Road when approaching the coastal settlement of Clarks Beach



Figure 2. The centre of the site viewed from Clarks Beach Road, near a dwelling located at 162 Clarks Beach Road



Figure 3. The western end of the site viewed from Clarks Beach Road, almost opposite the existing coastal 'village'



Figure 4. Looking towards the site over intervening paddocks from Boyd Road to the west



Figure 5. The enclave of existing housing on the northern side of Clarks Beach Road – opposite the eastern end of the site



Figure 6. The western end of the site & the edge of the existing Clarks Beach settlement viewed down Clarks Beach Road



Figure 7. The recent extension to the Clarks Beach coastal settlement, which extends north from Mutetai Road & a band of open space that is presently retained between Mutetai Road and Clarks Beach Road



Figure 8. Part of the older settlement's Manukau Harbour beachfront

While the subject site retains a markedly rural character at present, it clearly lies close to both the existing enclave of dwellings shown above and the much larger enclave of recent development at the eastern end of the Clarks Beach settlement. Despite a band of open space remaining between Clarks Beach Road and the development around Mutetai Road (shown above), there remains a sense of proximity and connection between the expanded margins of the village and 156 Clarks Beach Road – albeit not a close one at present. This will change if the open space next to Mutetai Road and east of the current village is developed in the near future, as seems highly likely.

In terms of the area's landscape values, the Taihiki River is subject to a Marine 2 Ecological Overlay, but neither the river nor its margins are the subject of any Outstanding Natural Feature / Landscape or High / Outstanding Natural Character overlays. This is hardly surprising, as the coastal margins and hinterland of this part of the Manukau Harbour have consistently rated lowly in past assessments of both landscape and natural character values at the regional level (in 1984, 2008 and 2012).

The landscape and coastal margins of the subject site and its surrounds are highly modified and largely devoid of any natural attributes or values, apart from the waters of the adjoining inlet and its underlying landforms. Moreover, the open paddocks spread across the application site remain sufficiently elevated that even views of the Taihiki Inlet are largely screened from Clarks Beach Road, together with most of Boyd Road (which is itself more elevated in places). Consequently, much as the site undoubtedly contributes to the perception of a 'green belt' around the existing settlement, and also enhances the aesthetic appeal of views from neighbouring properties towards the Taihiki River – including those on Boyd Road – I have not identified any specific landscape, amenity or natural character values that are significant in relation to the subject site.

Additionally, at a slightly more strategic level, the rest of the Taihiki River is flanked by a highly modified sequence of farmland, paddocks and market garden / horticulture blocks, while the mouth of the Inlet is framed by the Glenbrook coastal settlement. Although much more distant, the stacks and industrial profile of the Glenbrook Steel Mill also leave an indelible imprint on the Waiuku River's coastline and landscape south of that settlement.

In summary, it is clear that development of the Orawaahi site would appreciably expand the Clarks Beach settlement, and thus further consolidate it as a development 'node'. Even so, the factors just outlined suggest that the fast-track proposal would have a quite limited impact on the southern Manukau Harbour's landscape and amenity values. Instead, the proposed development looks likely to significantly expand public exposure to the Taihiki Inlet and facilitate improved public access to it.

As a result, it is considered that the proposal would not give rise to any appreciable landscape or amenity effects.

3.0 Consistency With AUP Provisions

A range of AUP provisions are relevant to the proposal. Those that appear of most direct relevance are listed below:

Urban Growth and Form:

B2.6. Rural and coastal towns and villages

B2.6.1. Objectives

(1) *Growth and development of existing or new rural and coastal towns and villages is enabled in ways that:*

(a) *avoid natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage or special character unless growth and development protects or enhances such values;*

B2.6.2. Policies

(1) *Require the establishment of new or expansion of existing rural and coastal towns and villages to be undertaken in a manner that does all of the following:*

(f) *is compatible with natural and physical characteristics, including those of the coastal environment;*

(2) *Avoid locating new or expanding existing rural and coastal towns and villages in or adjacent to areas that contain significant natural and physical resources that have been scheduled in the Unitary Plan in*

relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage
.....

- (4) *Enable small-scale growth of and development in rural and coastal towns and villages without the need for structure planning, in a manner consistent with policies B2.6.2(1) and (2).*

Coastal Environment:

B8.2. Natural character

B8.2.1. Objectives

- (1) *Areas of the coastal environment with outstanding and high natural character are preserved and protected from inappropriate subdivision, use and development.*
- (2) *Subdivision, use and development in the coastal environment are designed, located and managed to preserve the characteristics and qualities that contribute to the natural character of the coastal environment.*

B8.3. Subdivision, use and development

B8.3.1. Objectives

- (1) *Subdivision, use and development in the coastal environment are located in appropriate places and are of an appropriate form and within appropriate limits, taking into account the range of uses and values of the coastal environment.*
- (2) *The adverse effects of subdivision, use and development on the values of the coastal environment are avoided, remedied or mitigated.*

B8.3.2. Policies

Use and development

- (2) *Avoid or mitigate sprawling or sporadic patterns of subdivision, use and development in the coastal environment by all of the following:*
- (a) *concentrating subdivision, use and development within areas already characterised by development and where natural character values are already compromised;*
- (b) *avoiding urban activities in areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal, historic heritage and special character;*
- (4) *Require subdivision, use and development in the coastal environment to avoid, remedy or mitigate the adverse effects of activities above and below the mean high water springs, including the effects on existing uses and on the coastal receiving environment.*

B8.4. Public access and open space

B8.4.1. Objectives

- (1) *Public access to and along the coastal marine area is maintained and enhanced, except where it is appropriate to restrict that access, in a manner that is sensitive to the use and values of an area.*
- (3) *The open space, recreation and amenity values of the coastal environment are maintained or enhanced, including through the provision of public facilities in appropriate locations.*

Rural Environment:

B9.2. Rural activities B9.2.1. Objectives

- (3) *Rural production and other activities that support rural communities are enabled while the character, amenity, landscape and biodiversity values of rural areas, including within the coastal environment, are maintained.*

B9.2.2. Policies

- (1) *Enable a diverse range of activities while avoiding significant adverse effects on and urbanisation of rural areas, including within the coastal environment, and avoiding, remedying, or mitigating other adverse effects on rural character, amenity, landscape and biodiversity values.*

B9.4. Rural subdivision

B9.4.1. Objectives

- (3) *Subdivision of rural land avoids, remedies or mitigates adverse effects on the character, amenity, natural character, landscape and biodiversity values of rural areas (including within the coastal environment),*

B9.4.2. Policies

- (4) *Provide for new rural lifestyle subdivision in locations and at scales and densities so as to:*
- (b) *protect areas where natural and physical resources have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal, historic heritage and special character;*
 - (f) *maintain or enhance landscape, rural and, where relevant, coastal, character and amenity values;*
.....

Most of these provisions focus on the consolidation of existing development, focusing new development on parts of the Region's coastline that are already modified, and protecting key values and locations that are identified in the AUP as having importance from a landscape, natural character or rural amenity standpoint. Based on this initial assessment, it is considered that the Orawahi project would be largely consistent with the local and regional planning instruments of the AUP that are identified above.

The proposed development area would, however, lie outside the Clarks Beach Precinct, which already caters for significant growth at Clarks Beach. However, I regard this matter as being more of a planning matter than one that pertains to the landscape, natural character and amenity values of the environment around Clarks Beach and the Taihiki River.

I have also reviewed the Clarks Beach Precinct provisions, and note that it mainly provides for different (relatively low) densities of residential development, road network, internal open spaces and a neighbourhood centre abutting Clarkes Beach Road. The proposed Orawahi development would add yet more residential development, a commercial centre and a retirement village to the Clarks Beach environs. However, at this stage, it is not possible to assess the degree to which these proposals would integrate with the adjoining Precinct and wider settlement. Tentatively, it is my view that any amenity effects derived from such 'engagement' would be limited and would not give rise to additional policy implications.

4.0 Other Matters Raised By The Application

I have not been able to identify any other landscape, natural character or amenity matters that are relevant to my evaluation of the Orawaahi proposal at this preliminary stage.

Yours sincerely,

Stephen Brown

Brown NZ Ltd

s 9(2)(a)



Parks Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Orawaahi – A Complete Community
Address	Clarks Beach Road - Lot 3 DP 337204 (no address allocated) 156 Clarks Beach Road - Lot 1 DP 337204.
FT application number	PRR00043620 / FTAA-2511-1135

Respondent Information

Name	Andreas Lilley
Role	Consultant Parks Planner
Agency / Department	Parks Planning, Parks and Community Facilities
Date	19/01/2026

Do you support the proposal proceeding through fast-track?

- Support
- Oppose
- Neutral

Agency/Department Response

Applicant: Knight Investments Limited

Proposal: The project seeks to establish:

- Residential lots to accommodate approximately 700-800 dwellings;
- A retirement village of approximately 220 units/villas;
- A neighbourhood centre (likely to include activities such as a supermarket, retail, a community hub, commercial offices, food and beverage premises, childcare and/or fitness/wellness facilities);
- A service / light industrial area (likely to include workshops, storage and warehouse facilities, associated retail and business premises);
- A multi-functional green / blue network across the site’s stream and wetland features, with enhancements of the coastal edge. This will include neighbourhood parks, recreational pedestrian/cycle connections throughout the site.

Specialist Brief Request:

The specialist brief requests Parks and Community Facilities provide high-level comments on the overall master plan, in particular open space demand and expectations; and regarding esplanade reserve matters and road design / landscaping matters.

Concept Masterplan



Figure 1: Clarks Beach Road Master Plan layout with neighbourhood park provision

Thank-you for your request for specialist input from the Parks Planning team representing the wider Parks and Community Facilities Department for this referral application under the Fast-track Approvals Act 2024 (FTAA).

The following comments are provided at a high-level only and reflect the limited detail supplied in the referral request in relation to public open space matters. It is anticipated that if the application is accepted for referral under the FTAA that more detail will have to be provided for substantive assessment.

Feedback has been received from the following specialist areas to support these written comments:

- Allan Christensen, Manager - Land Advisory Services – Land and Property Advisory – Property
- Kristen Greenfield, Parks & Places Specialist, Special Operations – Parks and Community Facilities
- Glenn Riddell, Land Advisory, Parks and Community Facilities

Open Space Provision

Attachment 2 Orawaahi Concept Document provides a concept masterplan for the application (shown above). The plan indicates a neighbourhood park to the central-east of the site, and a cultural centre / neighbourhood park at the southern end of the site. Indicative wetlands, stormwater management areas and riparian margins are shown along watercourses and throughout the site. Esplanade reserve is proposed along the southern coastline where an existing legal road is located currently.

- The provision of public open space is guided by the Manaaki Tamaki Makaurau: Auckland open space, sport and recreation strategy (May 2025). The integration of green infrastructure land and recreational areas using landscaping, path networks, and terrain is supported by the strategy. Exploring opportunities to consider how this land can incorporate informal recreation opportunities is encouraged as is leveraging of pedestrian movement patterns through green corridors between the formal neighbourhood parks.
- Any land used primarily for stormwater management purposes would not be acquired by council for neighbourhood park purposes. Vesting of such land would be for Healthy Waters to confirm. However, subject to the design and location of the open spaces with primary stormwater function, Parks would encourage the contribution these open spaces would play in terms of any secondary amenity and connectivity function in the wider open space network.
-
-
- The application site is owned by Knight Investments Limited, who are also developing the site at 115 Clarks Beach Road immediately to the north. Two neighbourhood parks are to be delivered within that development and to date have not been. A compensation certificate is registered on the parent titles of 115 Clarks Beach Road to ensure the two parks are delivered to council. As the two parks have not been delivered to council to date, they do affect the provision and analysis of open space for this fast-track proposal

PRR00043620. For information, the location of the two parks on the northern site is shown in light green below.

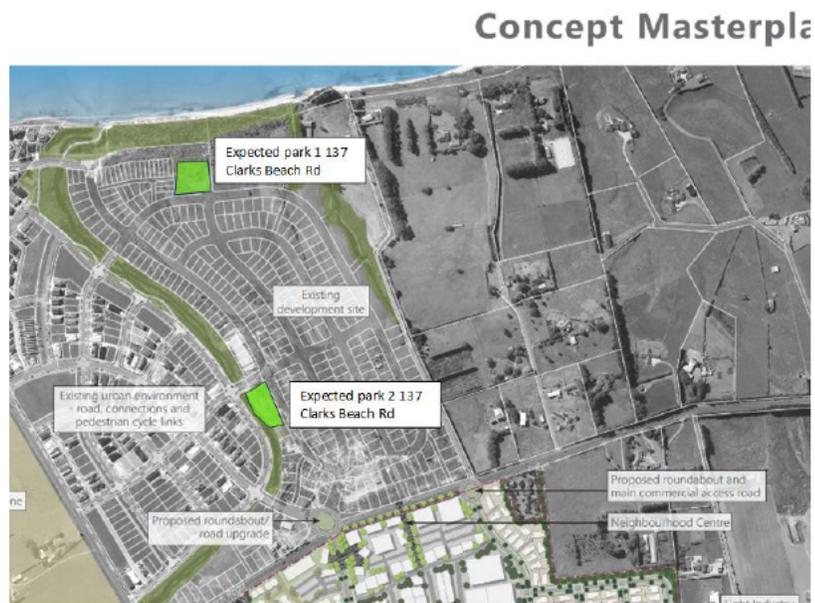


Figure 2: Anticipated neighbourhood park acquisition at 135 Clarks Beach Road

- There are two neighbourhood parks shown on the Concept Masterplan, one towards the central east (to the east of the proposed stormwater open space), and one to the southern edge of the development site where a cultural centre with a small café/dairy are proposed on the same site. Based on a preliminary review using radial proxies from the Manaaki Tamaki Makaurau Auckland Open Space, Sport and Recreation Strategy (May 2025), the preferred location of two indicative neighbourhood parks is shown below in the context of the surrounding subdivision developments.
- Parks can support the central-eastern park if it is relocated further to the south and more centrally given the radial proxy overlaps with the retirement village and industrial / commercial precincts. This will provide better overall accessibility for more residents, centralises the park, and allows for better linear and wetland path stormwater connectivity.
- We will support a neighbourhood park of a minimum of 5000m² in area in this location.

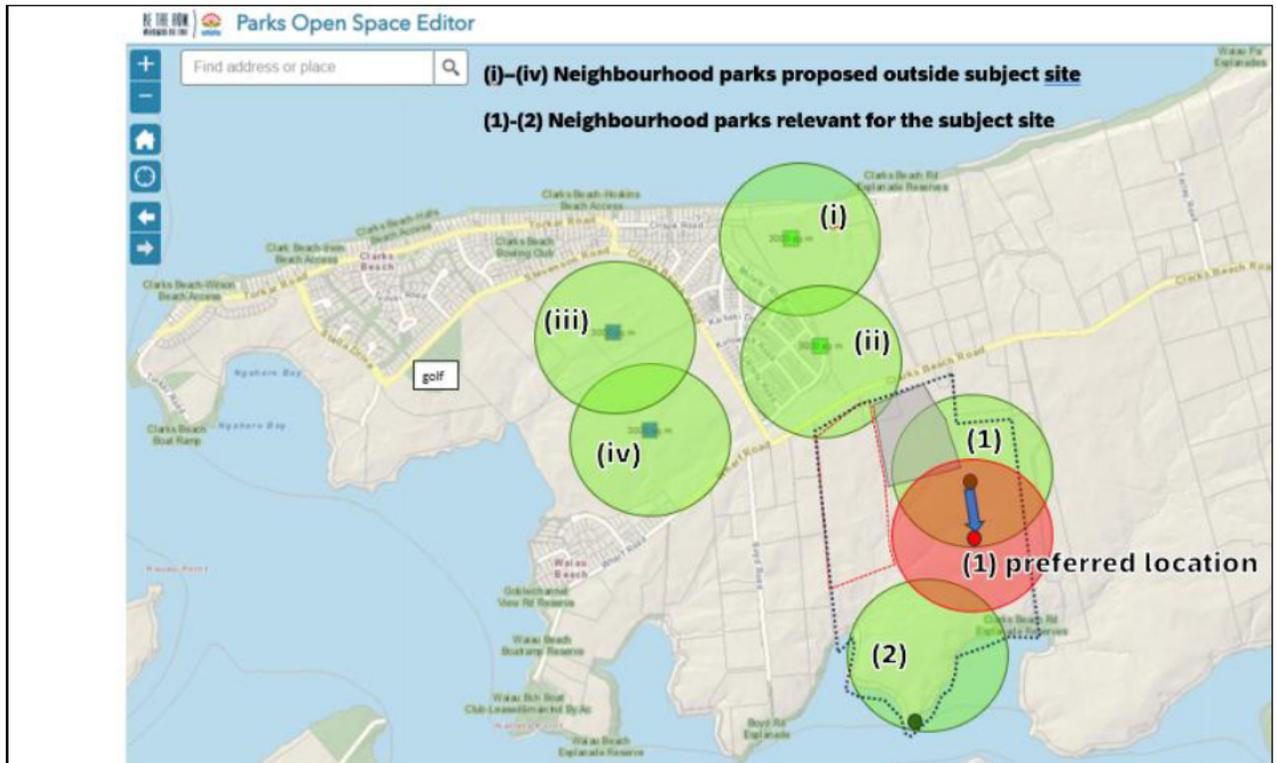


Figure 3: Recommended neighbourhood park location for the site

- The application indicates a cultural / community centre with a dairy and café on the southern proposed neighbourhood park. These uses would be incompatible with the purpose of the land for neighbourhood park if the land is owned by council. While further clarity is needed in regard with the ownership and management of the land, Council retains its right to make any decision on any further community facilities and buildings to be added on a park to be acquired by council as a neighbourhood park. A strategic assessment on the play network gaps analysis for the wider Clarks Beach area suggests that there is a play provision gaps in the network which is expected to be filled by the way of this proposal.
- Acquisition of neighbourhood parks by council will be subject to local board approval outside of the regulatory process, however the provision of suitable open space to address community needs and wellbeing should be addressed in terms of outcomes requirements.
- On the basis of the above assessment, Parks support the neighbourhood parks to be vested to council rather than being kept in private ownership or any other mechanism. It is to ensure that community expectations are met in a long term consistent with the wider open space network in the area.

Esplanade Reserve Provision

- Vesting of a full 20 metre esplanade reserve width would be expected along the southern coastal edge of the site where the existing paper road is shown adjoining the Clarks Beach Road Esplanade Reserve (Lot 4 DP 116708). However, as per the feedback provided in

pre-application PRR00043021 (31/07/2025), the road stopping process would need to be initiated for it to vest as esplanade reserve. This is a process separate from the resource consent process.

- Under s239 of the RMA any reserve land to be vested in Council must be free from encumbrances, covenants or protection mechanisms.
- Council also has discretion to require for a full top up to the existing reserve once a subdivision is occurred adjacent to Clarks Beach Road esplanade reserve in accordance with the requirements of s236 of the RMA,

Riparian margin and street landscaping

- A 'park boulevard road' provides a south-north connection through the site to Clarks Beach Road, with local roads provided in a grid pattern.
- Parks supports the provision of high-quality riparian and streetscape planting that helps deliver a healthy, resilient and well-connected urban forest in line with the outcomes sought by the Urban Ngahere (Forest) Strategy. Growing and protecting tree canopy across the public realm — including street corridors, riparian edges and open spaces — contributes to ecological function, shade, amenity and biodiversity values that benefit future residents and the wider community.
- Planting and landscape design should align with the Auckland Code of Practice Chapter 7 (Landscape), including the principles of selecting appropriate species (right tree in the right place), ensuring robust long-term performance, and achieving quality public realm outcomes that integrate with paths, road corridors and adjoining parks.
- Parks seeks streetscape and riparian planting that enhances canopy cover, supports ecological connections, and is designed to meet Council standards for species selection, growth characteristics and maintenance.

Works on Council-Owned Land & Landowner Approvals

The existing reserve land that appears to be potentially affected by the proposal is Lot 4 DP 116708 (Clarks Beach Road Esplanade Reserve). The application makes reference to the potential for a public walking access route, vegetation removal and planting within the existing esplanade reserve to connect with the currently paper road which could potentially be stopped and classified as esplanade reserve.

Parks supports public access connections and ecological enhancements through the reserve where these are appropriately designed and consented. However, any works on the existing esplanade reserve — including path construction, vegetation changes, stormwater outfalls, earthworks or other infrastructure — will require a Landowner Approval from Auckland Council's Land Advisory Services, separate from the regulatory consenting process. This is to be initiated by the developer directly with the relevant team and does not fall within the scope of the resource consent for approval.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?

This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.

- Would referring the project facilitate its delivery in a more timely and cost-effective way?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Has the project been identified as a priority in any government or sector plan or strategy?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Will the project increase housing supply or contribute to a well-functioning urban environment?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Will the project deliver significant economic benefits?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Will the project support primary industries (e.g., aquaculture)?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Will the project support development of natural resources (e.g., minerals, petroleum)?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.

- Will the project support climate change adaptation or recovery from natural hazard events?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Will the project address significant environmental issues?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
Yes. The provision of two neighbourhood parks would be consistent with the Manaaki Tamaki Makaurau: Auckland open space, sport and recreation strategy (May 2025) if to be located in the preferred location and being of the required size.
- Are there any other relevant matters to consider?
Yes. Further comments are provided below from Parks and Community Facilities.

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
The development includes the provision of recreation reserves which is consistent with the outcome of the Auckland Plan in relation to “Outcome and belonging” focus area 1 noting “Create safe opportunities for people to meet, connect, participate in, and enjoy community and civic life” We, however, defer this assessment to the other relevant specialists for comment.
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
This is outside the scope of Parks and Community Facilities and we defer to the other specialists for comment.
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
The development proposed relevant parks infrastructure that is supported but didn’t provide sufficient information to determine whether it would be in public or private development. Parks for recreational purposes are preferred to be vested but require political approval for acquisition. We, however, defer this assessment to the other relevant specialists for comment.

- Is there the potential for significant adverse environmental effects to occur?
Parks and landscaping will be provided. Should it be appropriately located and designed it is envisaged not to have adverse environmental effects. We, however, defer this assessment to the other relevant specialists for comment.

Please note that the above is initial advice only and is based on the limited plans and information presented at this FTAA referral stage. The above is not a final specialist memo, **and does not constitute written approval**. Although the provision of parks are generally supported Parks and Community Facilities can only confirm its overall support once detailed information to address the current gaps is provided.

If you have any queries or questions relating to the above request, please do not hesitate to contact me on s 9(2)(a) or s 9(2)(a) or the Parks Planning Team s 9(2)(a)

Prepared by:



Andreas Lilley
Consultant Parks Planner
Parks Planning Team
Parks and Community Facilities

Date: 20 January 2026

Prepared by:



Hester Gerber - Manager Parks Planning
Agency Lead for
Parks and Community Facilities

Date: 21 January 2026

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Orawaahi – A Complete Community
Address	
FT application number	FTAA-2511-1135

Respondent Information

Name	Dani Guinto
Role	Senior Land and Soil Scientist
Agency / Department	EEMU/EATA
Date	16 January 2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

Doing a large residential development on LUC class 2 land that contains prime soils is not consistent with the National Policy Statement for Highly Productive Land (NPS-HPL) which aims to protect HPL from conversion into non-productive land uses now and in the future. Also, the proposal is inconsistent with the Objectives and Policies of the General Rural and Mixed Rural Zones in the Auckland Unitary Plan which aims to protect the productive capacity of rural land and to protect elite and prime soils.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Please see comments below this form.

Comments on Highly Productive Land at 156 (Lot 1) and Lot 3 DP 337204 Clarks Beach Road, Pukekohe (PRR00043620)

Background

A request was made to comment on the presence of highly productive land (HPL) at the above address in relation to a pre-resource consent application (PRR00043620) in accordance with the National Policy for Highly Productive Land (MfE and MPI, 2022 amended in 2024). Knight Investments Ltd proposes to deliver a master-planned residential development that will be a sustainable extension to the existing Clarks Beach coastal community to enable multigenerational living, local employment and community services.

Soil map of the property

Figure 1 shows the NZLRI soil map of the property. Two soil types are present, namely Karaka silt loam (**Ka**) and Te Hihi sandy clay loam (**Th**). Karaka silt loam is a Typic Impeded Allophanic Soil while Te Hihi sandy clay loam is a Pallic Orthic Brown soil (Claydon and others, 1997; Hewitt, 2010). Both soil types are considered versatile soils, i.e. capable of supporting a range of primary production land uses from arable, to pastoral and plantation forestry land uses (Martindale and others, 2018).

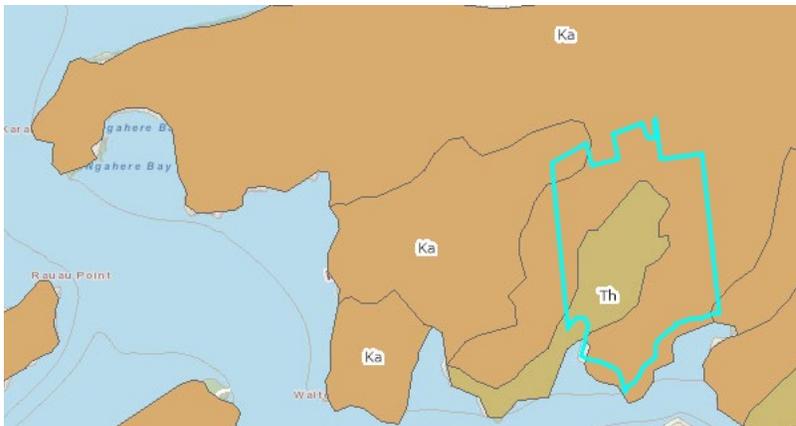


Figure 1. Soil map of 156 Clarks Beach Road, Pukekohe and Lot 3 DP 337204 from Auckland Council's Geomaps. **Ka** is Karaka silt loam, a Typic Impeded Allophanic Soil while **Th** is Te Hihi sandy clay loam, a Pallic Orthic Brown soil. Both soil types are versatile soils.

LUC classification maps of the property

Figure 2 shows the LUC classification map of the property from Auckland Council's Geomaps. The whole area is mapped as LUC class 2 with erodibility (**e**) limitation subclass **2e**. The LUC capability map from Our Environment website is shown in Figure 3. It is consistent with the Geomaps LUC classification showing the area to belong to LUC class 2 as well. However, it is more general and includes only the LUC class and omits the LUC subclass that provides information on limitations.



Figure 2. LUC capability classification map of 156 Clarks Beach Road, Pukekohe and Lot 3 DP 337204 from Auckland Council’s Geomaps. The whole area is classified as LUC Class 2e which is highly productive land.



Figure 3. LUC capability classification map of 156 Clarks Beach Road, Pukekohe and Lot 3 DP 337204 from Our Environment website. The whole area is classified as LUC class 2 which is highly productive land.

Assessment

Since the combined areas of the two land parcels are classified as LUC class 2 land, the proposed residential development is not consistent with the NPS-HPL which aims to protect HPL from being converted to non-primary production land uses as well as being inconsistent with the Objectives and Policies of the General Rural and Mixed Rural Zones in the Auckland Unitary Plan which aims to protect the productive capacity of rural land and to protect elite and prime soils.

In the Planner-led Pre-Application Consenting Memo and Meeting Record, mention was made of the intention to enable soil “re-use around the site, where possible and/or the top soil will be stored and sold to be used elsewhere (off-site) for productive purposes”. However, storing and spreading topsoil to other less productive areas outside the development area for use in primary production is not the same as preserving highly productive land containing versatile soils for primary production use now and in the future which is the intent of the NPS-HPL.

The soil is a natural body that develops in profile form in response to forces of **climate** and **organisms** acting on a **parent material** in a specific **landscape position** over a long period of **time**. Natural processes are involved in soil development that include organic matter accumulation, mineral weathering and

dissolution, new mineral formation, leaching, and the movement and deposition of soil materials by gravity, water, wind and ice. This produces a sequence of layers or horizons to form the soil profile. This arrangement and characteristics of the layers is what determines the productivity of soils and whether they are versatile or not. With disturbance (e.g., digging topsoil and transporting to another place), one cannot expect to preserve or replicate all the natural properties of the soil profile from topsoil to subsoil that makes a particular soil unique whether it is elite, prime, or otherwise. In other words, by doing this disturbance, the soil will lose its versatility to support a variety of productive land uses ranging from arable/vegetable farming, fruit growing, through to timber production.

References

Clayden, B., Hewitt, A. E., Mcleod, M. and Rijkse, W. 1997. North Island soil surveys: classification of named soils by subgroups of the NZ soil classification. Landcare Research, Lincoln, Canterbury.

Hewitt, A. E. 2010. New Zealand soil classification. 3rd ed. Landcare Research Science Series No. 1. Manaaki Whenua Press, Lincoln, Canterbury.

Martindale, M., Hicks, D. and Singleton, P. 2018. Soil information inventory: Karaka and related soils. Auckland Council soil information inventory, SII 7.
<https://knowledgeauckland.org.nz/media/1409/auckland-soils-sii-07-karaka-v2-oct-2018.pdf>

Ministry for the Environment and Ministry for Primary Industries (MfE and MPI). 2022 (amended 2024). National Policy Statement for Highly Productive Land.
<https://environment.govt.nz/publications/national-policy-statement-for-highly-productive-land-2022-amended-august-2024/>

Prepared by: Dani Guinto, Senior Land and Soil Scientist, EEMU; 15 January 2026

Referral Application Feedback Form

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Project Information

Project Name	Orawaahi
Address	<ul style="list-style-type: none"> • Clarks Beach Road – Lot 3 DP 337204 • 156 Clarks Beach Road – Lot 1 DP 337204
FT application number	FTAA-2511-1135

Respondent Information

Name	Martin Meyer
Role	Stormwater Specialist
Agency / Department	Specialist Unit, Planning & Resource Consents
Date	27.01.2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

The following is a review of the proposal 'Orawaahi' from a regional stormwater perspective, which involves a large-scale development of dwellings/retirement village over a 75.13Ha site.

This site is stated to currently have 1.2ha of impervious coverage with farm culverts to provide access over the stream. The site is located to the south of Clarks Beach Road and in general slopes down towards the south west where the majority of the sites overland flow paths and stream discharge into the Taihiki River and ultimately the Manukau Harbour

The site is zoned as Rural – Rural Coastal Zone and the Rural – Mixed Rural Zone.

AUP(OP) E8 Stormwater – Diversion and Discharge

The scale of proposed impervious areas will be considered a discretionary activity under E8.4.1(A10) for an activity otherwise not provided for.

Works on Clarks Beach Road are also proposed, this activity may be considered under E8.4.1(A4) as a permitted activity (up to 5,000m²) or as a restricted discretionary activity if it exceeds 5,000m².

Stormwater treatment proposed for the site involves quality treatment for 90th percentile storm, and 95th percentile storm extended detention treatment for road reserve areas where required. 5mm retention and extended detention for the 95th percentile storm are also expected to be provided where catchments drain to stream/wetlands.

The neighbourhood centre and light industrial area will have GD01 treatment for contaminants, these are currently unspecified but stated as likely to be 'stormfilters, raingardens, SW360 cartridge filters and underground vaults (or similar).

The site is currently outside the Regionwide NDC, and so will be required to manage stormwater assets via a residents association or similar. The design has tried to comply with NDC requirements should vesting occur in the future to Auckland Council.

While the stormwater assessments guidance in principle is an approach that should minimise environmental effects, the stormwater assessment also states that a comprehensive stormwater management plan (SMP) will be developed as part of the substantive application. This plan should detail and model the effects clearly on the receiving environment for assessment. While not required for a private discharge, it would be advantageous to develop this in accordance with the Schedule 4 requirements of the RWNDC in case future vesting of stormwater assets is sought.

E9 Stormwater Quality – High Contaminant Generating Areas

No areas of high contaminant have been identified at this stage, however more comprehensive plans may indicate high contaminant generating carpark (those exceeding 30 spaces) and may occur in the light industrial or neighbourhood centre areas. This may be a controlled activity if over 5,000m² under E9.4.1(A6) or may be assessed as a permitted activity (where GD01 quality treatment has been provided) under E9.4.1(A4).

Works on Clarks Beach Road where redevelopment is occurring and if traffic is expected to exceed 5000 vehicles per day on this road may need to meet permitted activity standards for E9.4.1(A3) or (A5), or if exceeding 5,000m² of new or redevelopment of a high use road a controlled activity under E9.4.1(A7). Noting the Transport Assessment acknowledges 2,950 vehicles per day currently according to the Mobile Road website and therefore along with other developing areas fed by Clarks Beach road may exceed 5000 vehicles per day.

E33 – Industrial or Trade Activities

The proposed activities within the neighbourhood centre and light industrial area may contain 'industrial or trade activities'. These activities will require assessment under E33, and may require individual discharge of contaminant consents, and land-use consents where risks require. At this stage it is unclear what activities may occur in the light industrial area, where these lots are sold or leased and it becomes clear what business will be conducted in the area, application to the council for a permitted activity check or ITA consent should occur. Where required these businesses may need additional treatment devices and environmental management plans to manage their risk of discharge of contaminants.

NES:F

An ecological report was submitted and identifies natural inland wetlands. The approach to addressing effects includes avoiding effects on hydrology to these wetlands, and includes hydrology mitigation, and incorporation of groundwater recharge.

Catchment 3 has been identified to discharge to a wetland, this may require consent under the NES:F 54(d) if the discharge is direct to the wetland, and hydrological changes/water level range changes may occur. Additionally NES:F 54(c) may trigger within this and other catchments identified as having hydrological connection to wetlands, where taking, use, damming or diversion of water within 100m setback from natural inland wetland occurs and hydrological function or water level range change transpires.

Consent Conditions

Consent conditions have not been provided. Standard stormwater conditions would be recommended for the private discharge consent, with a key focus on a table of stormwater management works and operation and maintenance requirements.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

The general principles discussed within the Stormwater Assessment and Infrastructure report appear to be in line with meeting the requirements of a private diversion and discharge consent (subject to additional information from a Stormwater Management Plan and detailed plans or land use, stormwater devices and consent conditions).

The project has the potential to provide positively to housing supply, including amenities through a neighbourhood centre, parks, and areas for light industrial business to operate aiding in the delivery of a well-functioning urban environment (in referenced to Section 22 FTAA).

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Prepared by:



Martin Meyer

Stormwater Specialist

Planning & Resource Consents

Date: 27 January 2026

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Orawaahi – A Complete Community
Address	Clarks Beach Road (various)
FT application number	FTAA-2511-113

Respondent Information

Name	Ripul Sachdeva
Role	Senor Traffic Engineer
Agency / Department	Resource Consents
Date	28 Jan 2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

<ol style="list-style-type: none"> 1. Any communal residential parking areas are to provide the required number of accessible parking spaces (including providing visitor parking spaces), in accordance with Plan Change 79, and include an assessment of related matters such as EV charging provision, traffic calming measures, and bicycle parking etc. 2. Rear-facing lots should be minimised. Where more than six lots are proposed off JOALS or private roads, a pedestrian path with a minimum 150 mm vertical separation (or a mountable path where a car park design is proposed) is to be provided. 3. Retirement villages are to include a vertically separated pedestrian pathway and the minimum required number of accessible parking spaces. 4. Retirement villages are also to provide clearly signed and designated visitor parking spaces. 5. Childcare facilities are to accommodate all pick-up and drop-off activities internally within the site, at a minimum ratio of one car parking space per ten children proposed.
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6. Light industrial developments are to provide a design that separates heavy commercial vehicle movements from visitors' light vehicles where public access to any retail component of the warehouse activity is proposed.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Prepared by:

Signed – RS

Name – Ripul Sachdeva

Date: 28 January 2026

Title – Senior Traffic Engineer

Planning & Resource Consents

Referral Application Feedback Form

Project Information

Project Name	Orawaahi – A Complete Community
Address	(a) Clarks Beach Road - Lot 3 DP 337204 (no address allocated) (b) 156 Clarks Beach Road - Lot 1 DP 337204.
FT application number	FTAA-2511-1135

Respondent Information

Name	Lauren White
Role	Consultant Urban Designer
Agency / Department	Urban Design Unit
Date	15 January 2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

The proposal constitutes a significant extension to the existing settlement and will change the inherent structure of its existing and potential future urban area. By including an area of retail/commercial use, it will essentially establish a new local centre for Clarks Beach which will serve both the existing settlement, identified future urban areas and additional potential future urban areas. When considered along with the existing future urban area and anticipating urbanisation of adjacent rural coastal zoned areas in the future, the project could become (in the long term) part of a logical urban area which integrates Clarks Beach and Wairau Beach around a new local centre. Whilst there may arguably be alternative (or better) locations for a local centre of services and employment, this is an opportunity for a design-led masterplan delivered by a single landowner to plan and deliver this valuable component to promote more sustainable and affordable living for both existing and future residents.

Acknowledging that the project is inconsistent with both the Auckland Unitary Plan and The Future Development Strategy, in my opinion, it has the ability to contribute to a well functioning urban environment in Clarks Beach due to the following urban design outcomes:

- it is a logical extension to the existing urban area of this coastal settlement;
- it establishes a new town centre for the future (enlarged) settlement, supporting both the existing township as well as future development in both the site and the Future Urban Zoned land;

- its commercial/business land will support a more sustainable and affordable way of life for existing and future residents by reducing the need for private car use for every day activities;
- the proposed local centre is north facing and positioned such that it can relate to future urban development on the northern side of Clarks Beach Road and its new retail “strip” be logically and legibly contained between two roundabouts for an appropriate (and walkable) distance (approximately 200m);
- it provides an open space and/or potential ecological corridor across the peninsula to link the harbour with Taihiki River, with potential ecological and community/ recreation benefits;
- it has the intention and ability to offer a range of housing choice, although understandably limited due to its location and accessibility;
- the larger town will better support public transport (bus) services and ;
- the project will provide improved public access to the coastal environment/recreational opportunity;
- the single land owner and masterplanning design and delivery process promotes connected, efficient and staged development;
- the intention to adopt design controls and guidelines has the opportunity to promote consistent and high quality architectural and landscape outcomes;
- the intention to adopt bespoke design controls and guidelines presents an opportunity to incorporate current/future aspirations of Auckland Council (e.g. including requirements for deep soil) prior to the completion of the PC150 process;
- the subdivision plan illustrates a generous amount of public open space with a high degree of accessibility and safety;
- The subdivision plan promotes active travel modes, supporting a reduction in use of private cars;
- The project adequately manages its external interfaces to avoid amenity and reverse sensitivity issues;
- Through further engagement, the project provides opportunities for mana whenua narratives to be referenced (particularly through cultural centre and passive open space design and naming).

There are however a number of comments/issues I recommend are considered and/or addressed during the substantive planning and design stage as follows:

- Provision be made for a bus route along (some) internal roads to future proof the ability for this development to be better served by public transport in the future;
- The subdivision design and staging plan retain/futureproof opportunities for comprehensive residential development at higher density (such as terraces and low rise apartments), typically through the use of superlots;
- Support for the project is based (in part) on the potential long term urban area extent of this coastal settlement and this requires long term connectivity to be protected. Therefore, provision needs to be made for (all mode) connection to the west. Rural land in this area is divided into relatively small landholdings (2ha approx.) which have the potential to be urbanized in the long term and be part of a logical future urban area extent (joining with Waiau Beach) and supported by the proposed new local centre;

- Similarly, the vegetated buffers on both the eastern and western boundaries must not preclude integrated urban environments (and active street frontages) when future expansion of the urban area occurs;
- The length of roads which have residential on one side and business/light industrial on the other is reduced – in my opinion, this is not a preferred urban design outcome and the subdivision design can be amended to reduce this condition to deliver streets with greater activation and surveillance and built form consistency while successfully managing “mid-block” interfaces between these two uses;
- Interfaces between the esplanade and north facing lots be managed through design controls to ensure adequate passive surveillance and visual amenity;
- Provision for a primary school be explored/accommodated/future proofed – given the ultimate population of Clarks Beach/Waiiau Beach, the need/viability for a primary school may be established. This would further promote a more sustainable and affordable lifestyle for residents of this project site and other adjacent existing and future urban areas. It is acknowledged though that a school site could be accommodated in either nearby future urban zoned area or indeed rural zoned land.

In my opinion, there are no fundamental reasons why these urban design issues cannot be addressed/resolved during a substantive planning and design stage. As such, I support the request for referral from an urban design perspective.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Prepared by:



Lauren White
Consultant Urban Designer
Planning & Resource Consents

Date: 15 January 2026

To: Adonica Giborees
s 9(2)(a)

From: Helen Shaw

Re: Application for referral of the Orawaahi project
(Clarks Beach Road) under the Fast-track
Approvals Act 2024.

Dated: 23 January 2026

Dear Adonica,

Clarks Beach Fast-track Referral Application

Introduction

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Orawaahi Project at Clarks Beach Road referral application (**the Application**), made under section 13 of the Fast-track Approvals Act 2024 (**the Act**).
2. Knight Investments Limited (**the Applicant**) is proposing to develop the 75.8 hectare site legally described as Lot 3 DP 337204 and Lot 1 DP 337204, known as 156 Clarks Beach Road and the adjacent lot which has no street address (**the Site**), to form the Orawaahi project (**the Proposal**).
3. The Proposal seeks to develop:
 - a. Residential lots to accommodate approximately 700-800 dwellings;
 - b. A retirement village of approximately 220 units/villas;
 - c. A neighbourhood centre (likely to include activities such as a supermarket, retail, a community hub, commercial offices, food and beverage premises, childcare and/or fitness/wellness facilities);
 - d. A service / light industrial area (likely to include workshops, storage and warehouse facilities, associated retail and business premises); and
 - e. A multi-functional green / blue network across the site's stream and wetland features, with enhancements of the coastal edge. This will include neighbourhood parks, recreational walkways, and pedestrian/cycle connections throughout the site.
4. Dependent on the final infrastructure strategy, the Proposal may also include private water supply and wastewater infrastructure, and ecological offsetting on other nearby sites.

5. The Site is predominantly zoned a combination of the Rural – Mixed Rural Zone and the Rural – Rural Coastal Zone, Manukau Harbour coastal area, under the Auckland Unitary Plan (Operative in Part) (**AUP**).
6. The Site is also located outside the Rural Urban Boundary in the AUP.
7. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
 - Orawaahi - A Complete Community [Proposal Overview]
 - Letter from Watercare Services Limited, dated 17 September 2025 ("**Letter from Watercare**")
 - Record of Engagement [no date provided] ("**Record of Engagement**")
 - Planning Memorandum prepared by Tollemache Consultants Limited, dated 12 November 2025
 - Earthworks and Infrastructure Report, prepared by Civil Plan Consultants, dated 29 October 2025 ("**Infrastructure Report**").
8. Any amendment to the Application will require further review from Watercare.

Watercare's purpose and statutory obligations

9. Watercare is New Zealand's largest provider of water and wastewater services, operating as a substantive council-controlled organisation owned by Auckland Council with the purpose embodied in the Māori whakatauki "Ki te ora te wai, ka ora te whenua, ka ora te tangata" (When the water is healthy, the land and the people are healthy), reflecting the connection between its services and the wellbeing of the community and local environment.
10. Watercare is required to manage its operations efficiently with a view to keeping overall costs at minimum levels while maintaining long-term asset integrity, subject to economic regulation under the Watercare Charter with oversight by the Commerce Commission as the appointed Crown Monitor, and must give effect to relevant aspects of Council's Long-Term Plan and act consistently with other Council plans and strategies including the Auckland Plan 2050 and the Future Development Strategy 2023-2053 (**FDS**).
11. Through its annual Statement of Intent responding to Council's Letter of Expectation, Watercare commits to contributing to Auckland Plan 2050 outcomes by collaborating with the wider Council group to support areas of growth identified by Council, acting consistently with Council's FDS for major infrastructure development for future urban areas, ensuring alignment of infrastructure projects with other utilities, fully recovering growth costs so that growth pays for growth, and abiding by the Statement of Expectations of Substantive Council Controlled Organisations (**CCOs**) which requires working with Council and other CCOs to achieve the outcomes and objectives set out in the Auckland Plan 2050.

Watercare's comments

12. As noted earlier, the Site is predominantly zoned Rural – Mixed Rural Zone and Rural – Rural Coastal Zone, Manukau Harbour coastal area, and is located outside the Rural Urban Boundary in the AUP.

13. In line with Watercare’s statutory obligations, which include requirements to support growth areas identified by Auckland Council in the FDS and the Auckland Growth Scenario¹, Watercare does not provide water supply or wastewater servicing to rural zoned land, such as the Site for the following reasons:
- a. Servicing rural zoned land is unanticipated by Watercare and in accordance with Auckland Council’s Plans and Strategies, has not been provided for in Watercare’s Business Plan, Asset Management Plan, or Funding Plan.
 - b. This means that planned upgrades and projects in the network and associated treatment infrastructure do not provide capacity for servicing rural land, and therefore the provision of connections to rural land would significantly impact the available capacity for the anticipated growth of live-zoned areas and Future Urban Zone (**FUZ**) areas.
 - c. This position is consistent with Watercare’s statutory obligations to act consistently with any plan or strategy of the Council², including but not limited to, the AUP, the Auckland Plan 2050, and the FDS.
14. This position is outlined in Watercare’s Board-approved *Strategic Direction for Providing Services to Support Urban Growth* (approved 17 May 2015). Under that strategic direction, Watercare does not provide service to rural zoned land and/or land outside the Rural Urban Boundary. The strategic direction recognises a limited exception to that position, under which Watercare may provide services outside the Rural Urban Boundary where requested to do so by Auckland Council, and on the basis that the investment required to service the area is funded by the developer and full cost recovery is achieved.
15. No such Council request has been made as at the date of this letter, so the limited exception referred to above is not engaged.
16. As such, Watercare has no long-term plan to provide public reticulated wastewater or water servicing to the Site or surrounding rural area.
17. For completeness, Watercare notes that when its service categories and growth servicing framework were first developed in 2014–2015, it was assumed that a Rural Urban Boundary would ultimately be delineated around all urban areas, including smaller rural and coastal settlements such as Clarks Beach. The final AUP did not include a Rural Urban Boundary around all such settlements. In practice, Watercare may service **urban-zoned** land within certain existing settlements notwithstanding the absence of a formal Rural Urban Boundary. However, Watercare does not service **rural-zoned** land surrounding those settlements, and this distinction is important for the Site.
18. Any comments on the proposed private water supply and/or wastewater servicing for the Site will be made by Auckland Council. Additionally, any private water supply and/or wastewater servicing would be subject to regulation by Taumata Arowai as the Water Services Regulator.
19. Notwithstanding this position, the below comments are provided in relation to the existing and future capacity of the bulk networks and the local network servicing requirements.
20. Any infrastructure delivery dates provided in this letter are forecast dates only and are subject to change.

¹ Auckland growth scenario 2023 version 1.1 AGS23v1.1 [Currently being updated by Auckland Council].

² Local Government (Auckland Council) Act 2009, section 58.

Previous consultation with Watercare

21. Watercare has had previous involvement with the Proposal as part of the pre-application meeting held on 3 July 2025 between the Applicant and Auckland Council. It was discussed that Watercare intends to locate a wastewater pipe and pump station within the Site to provide for the anticipated urban development in the catchment, and that a wastewater outfall was being constructed at Clarks Beach at the time (now complete). The Applicant's team noted that if Watercare cannot provide a connection into the public wastewater network for the Project, then the Applicant may lose 2000m² of developable area in order to provide an on-site wastewater solution, including land to support wastewater disposal, and it may need to provide an either/or option to support its Referral Application.
22. The Applicant's Planning Consultant sent through a list of questions via email on 22 August 2025 related to water supply and wastewater capacity to service the Site. Watercare responded to the Applicant formally on 22 September 2025 via a letter providing its stance on the Proposal. In summary, the letter raised the following:
 - a. In line with Watercare's statutory obligations, which include requirements to support growth areas identified by Auckland Council, Watercare does not provide water supply and wastewater servicing to rural zoned land, such as the Site.
 - b. Servicing rural zoned land is unanticipated by Watercare and in accordance with Auckland Council's Plans and Strategies, has not been included in Watercare's Business Plan, Asset Management Plan, or Funding Plan.
 - c. This means that planned upgrades and projects in the network and associated treatment infrastructure do not provide capacity for servicing rural land, and therefore the provision of connections to rural land would significantly impact the available capacity for the anticipated growth of live-zoned areas and FUZ areas.
 - d. The wastewater planning for the Clarks Beach, Glenbrook, Kingseat and Waiuku area has not anticipated servicing any rural land or growth within rural land. Watercare also undertook a water supply servicing study in 2022 for Patumahoe and the surrounding areas, including Kingseat, Clarks Beach, Waiau Beach and Glenbrook Beach. As the Site is zoned rural, it was not included in this study and has not been factored into any future or current growth servicing or planning. Therefore, the rural land which the Applicant is proposing to develop cannot be serviced by Watercare.
23. The Applicant has also been in discussions with Watercare's property team regarding the need to acquire an easement over some of the Applicant's land within the Site to build a new bulk wastewater transmission line as part of the Southwestern Auckland Servicing Scheme, anticipated for completion in 2028. A letter dated 17 September 2025 was sent to the Applicant from Watercare's Head of Property regarding the need for this work under the Public Works Act 1981. The Letter from Watercare has been attached to the Application and titled 'Letter of Support Watercare Services Limited'. In addition, the Record of Engagement notes "*WSL's [Watercare's] Property Team also provided a letter (included as Attachment 5 to the Referral Application) confirming that Watercare will endeavour to work with the applicant on water and wastewater requirements for the development.*" Section 5 of the Infrastructure Report also notes "*It is the applicant's intention to continue to work with Watercare Services Ltd (WSL) to pursue an integrated public solution.*"
24. While the Letter from Watercare does include a statement that Watercare would endeavour to work with the Applicant on their water and wastewater needs associated with the

development, this by no means provides support to the Proposal, nor a commitment to provide the Applicant with public water and wastewater supply, or an integrated solution.

Applicant's proposed Water and Wastewater Servicing

25. The Infrastructure Report notes the following in terms of water and wastewater servicing for the Proposal:

- a. For water: The report acknowledges that there is no existing public water reticulation servicing the site. The nearby Clarks Beach settlement is supplied via a local network watermain connected from the Patumahoe reservoir. Within Clarks Beach, there is a booster pump station and underground reservoir located at Leaming Place. The Proposal would be serviced for water infrastructure (including for firefighting purposes) by either, or a combination of the following methods:

(i) Option 1: Private Bore/Treatment supplemented by on lot tanks.

(ii) Option 2: Connection to the Water Services Limited ("WSL") network.

The water servicing strategy would be developed further if the referral application is granted.

If a bore is utilised, the report mentions that water can be treated via an onsite Water Treatment Plant either at the Site or at another private site the Applicant owns nearby.

- b. For wastewater: The report acknowledges the Site is not serviced by public wastewater infrastructure. Again, two options are highlighted for potential wastewater servicing options:

(i) Option 1: An onsite private wastewater treatment plant solution such as a Membrane Bio Reactor Wastewater Treatment Plant ("WWTP") (with local discharge).

(ii) Option 2: Connection to the Water Services Limited ("WSL") network.

Option 1 assumes a private WWTP will be provided onsite. Following treatment, the wastewater is proposed to be further treated using a polishing wetland or land contact device. Discharge is expected to be to a combination of land and/or to a nearby permanent stream or inland tributary.

Option 2 would be to construct a connection to the Clarks Beach WWTP.

Bulk Wastewater

26. For background, Watercare has planned for wastewater servicing of the live-zoned and FUZ Southwest communities of Kingseat, Clarks Beach, Glenbrook Beach and Waiuku. As part of this, a new wastewater discharge consent at Clarks Beach for servicing a population equivalent (**PE**) of 30,000 was granted in 2018.

27. Watercare identified a preferred location for a new centralised wastewater treatment plant as part of this scheme and initiated a Notice of Requirement (**NoR**) process to designate this land for use as a WWTP to service the catchment. In May 2024, the Independent Commissioners appointed by Auckland Council issued their recommendation that Watercare withdraw its NoR. Watercare withdrew its NoR given the community sentiment and the position of the Independent Commissioners and moved this project back to the planning phase.

28. Since moving this project back into the planning phase, Watercare has developed a long list of options, undertaken several rounds of consultation, assessed the various options which eventuated in a preferred solution. The preferred option is a decentralised scheme utilising Watercare's existing Clarks Beach and Waiuku wastewater treatment sites, to service up to 29,000 PE.
29. The preferred scheme includes:
- a. An upgraded Clarks Beach WWTP with capacity up to 9,000 PE, which will service Clarks Beach, Glenbrook Beach and Kingseat.
 - b. A new Waiuku WWTP with capacity up to 20,000 PE, which will service Waiuku.
 - c. A treated effluent conveyance pipeline running from Waiuku to Clarks Beach, which is proposed to run through the Site.
30. Based on Auckland Council's current growth scenario (AGS23v1.1), the combined population of the planned service area (Waiuku, Clarks Beach, Glenbrook Beach, and Kingseat) is not expected to reach 29,000 Population Equivalent (**PE**) before 2050. However, within this overall service area, the Clarks Beach WWTP will service Clarks Beach, Glenbrook Beach, and Kingseat only. Considering the live-zoned and FUZ land only, these communities are projected to reach approximately 9,000 PE by 2050, which is the ultimate capacity of the Clarks Beach WWTP.
31. The current upgrade of the Clarks Beach WWTP (and Waiuku WWTP) will be delivered in stages in line with the projected population growth. This upgrade to the Clarks Beach WWTP will take the capacity of that plant from 2,500 PE to 6,000 PE, which is expected to be completed later in 2026. This upgrade is expected to cater for the anticipated growth in the catchment serviced by the WWTPs until 2030. The next upgrade to the Clarks Beach WWTP to 9,000 PE will only occur when projected growth requires it.
32. There is no dedicated funding to upgrade the Clarks Beach WWTP beyond the 9,000 PE capacity limit and as noted above, the Site and surrounding rural area was not factored into the planning and design stages due to its rural zoning.
33. Watercare's wastewater planning for the Clarks Beach WWTP has not anticipated servicing any rural land. Therefore, the rural land which the Applicant is proposing to develop cannot be serviced by the Clarks Beach WWTP without undermining the ability of the WWTP to service the existing live zones and future urban zones.

Local wastewater networks

34. Table 1 of the Infrastructure Report suggests a low-pressure system (**LPS**) option to service the development. Watercare would not support this for the following reasons:
- a. The designer must provide evidence that a gravity system is not feasible. This is not demonstrated in the report.
 - b. The Proposal is for approximately 1,000 Dwelling Unit Equivalents (**DUEs**), which far exceeds the Watercare Code of Practice ³ upper limit of 50 DUEs for an LPS.

³ Section 5.3.12.3 - The Auckland Code of Practice for Land Development and Subdivision: Water and Wastewater Code of Practice for Land Development and Subdivision, Chapter 5: Wastewater (2019)

Bulk Water Supply

35. Watercare undertook a water supply servicing study in 2022 for Patumahoe and the surrounding areas, including Kingseat, Clarks Beach, Waiau Beach and Glenbrook Beach. This study considered the servicing of the live-zoned and FUZ areas of Kingseat, Clarks Beach, Waiau Beach and Glenbrook Beach.
36. The study identified the need for the following upgrades:
 - a. Developments in Patumahoe and including additional storage towards Kingseat and Clarks Beach areas require an additional 1 million litre (**ML**) reservoir and an upgrade to the pump station.
 - b. Developments in Kingseat require a new 315PE (DN) water main and a new 4.5 ML reservoir and pump station.
 - c. Developments in Clarks Beach and beyond require a new pump station on Sydney Owen Road.
 - d. Developments in Clarks Beach and Waiau Beach require an additional 1.2 ML reservoir.
 - e. Developments in Glenbrook Beach require an additional 1.4 ML reservoir and pump station.
37. These upgrades were identified only to meet projected future demand of the live-zoned and FUZ areas of Patumahoe, Kingseat, Clarks Beach, Waiau Beach and Glenbrook Beach. The project mandate approval process for the Patumahoe reservoir and pump station upgrades is currently underway. Watercare has acquired 1 Carter Road in Patumahoe for this purpose. Feasibility of this project is scheduled to start in January/February 2026, with an anticipated completion and closure date of June 2030.
38. Watercare's water supply planning for the Clarks Beach area has not anticipated servicing any rural land. Therefore, the rural land which the Applicant is proposing to develop cannot be serviced by the planned bulk infrastructure without undermining its ability to service the existing live zones and FUZ.

Watercare's comments on private servicing

39. As noted above, any comments on the proposed private water supply and/or wastewater servicing for the Site will be made by Auckland Council.
40. Notwithstanding the above, Watercare note Section 4.20 of the Infrastructure Report states that if a private scheme is adopted, "*Wastewater will be treated to a very high level and discharged via wetland/land contact prior to discharge into the freshwater environment and ultimately to the Manukau Harbour*". The Māngere, Waiuku, Kingseat and Clarks Beach WWTPs also discharge treated wastewater towards to Manukau Harbour. If the Applicant seeks to also discharge to the Harbour, the cumulative impacts of the discharge on the receiving environment need to be appropriately considered to ensure there is no impact on Watercare's existing operations.
41. Watercare also recommends that any private scheme be designed in accordance with the relevant infrastructure Code of Practice⁴ and be subject to robust long-term governance

⁴ The Auckland Code of Practice for Land Development and Subdivision
<https://www.aucklanddesignmanual.co.nz/en/developing-infrastructure/infrastructure-codes-of-practice.html>

arrangements that ensure long-term maintenance and financial sustainability for the community.

Conclusion

42. In line with its statutory obligations and Board-approved strategic direction, Watercare does not provide wastewater or water services outside the Rural Urban Boundary, including to rural-zoned land, other than in the limited exceptional circumstances discussed earlier in this letter (which do not apply here). Extending services to such areas using existing or planned infrastructure would significantly impact Watercare's ability to plan for and service the existing live-zoned and FUZ areas. Planned upgrades to the bulk wastewater and water supply networks are designed to support / meet the needs of those areas, in accordance with Auckland Council's growth scenario and the FDS, and do not provide for any rural zoned land. Therefore, the Proposal/Site cannot be serviced by Watercare for public wastewater or water supply without undermining the ability of the existing and planned assets to service existing live zones and planned FUZ.
43. For the avoidance of doubt, Watercare's previous correspondence and statements regarding working with the Applicant do not constitute support for the Proposal, nor any commitment to provide public water or wastewater services to the Site.
44. Any comments on, or assessment of, potential private water supply and/or wastewater servicing will be made by Auckland Council, whilst noting again that the cumulative impacts of any wastewater discharges to the Harbour proposed by the Applicant would need to be appropriately considered to ensure there is no impact on Watercare's existing WWTPs.
45. Watercare is happy to discuss more details of the Proposal with the Applicant and any further options that could be explored.

Yours faithfully,



Helen Shaw
Head of Strategy and Consenting
Watercare Services Limited

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Orawaahi – A Complete Community FTAA-2511-113
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Auckland Transport		
*Name	Hedré Dednam		
*Rile	Team Leader - Development Planning South, Auckland Transport		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
<p>Overall Summary of Auckland Transport (AT) Position</p> <ol style="list-style-type: none"> The project comprises an extension of the existing and zoned extent of Clarks Beach. There is development potential in existing urban zones and an area of Future Urban Zone. The proposed development, whilst an extension to this existing and proposed urban area, is located primarily in rural zoned land not currently envisaged in the Auckland Future Development Strategy 2023 (FDS) as urban. Accordingly, any additional transport effects on the wider transport network are of particular interest, particularly in relation to the Linwood Road/Hingaia Road corridor which has existing capacity constraints that do not include any funded projects or designations to address. There is development potential at Kingseat Village that will also put further pressure on this corridor that should be taken into account in any assessment. AT acknowledges that Clarks Beach is not fully reliant on the Linwood Road/Hingaia Road corridor for transport connections with alternative road access to proposed train stations at

Insert Fast-track logo

Paerata, Ngakoroa and Drury (noting there are no currently planned bus services to link Clarks Beach to these stations). However, AT will require a full assessment of effects on the Linwood Road/Hingaia Road corridor as part of any substantive application should the matter be referred for fast-track for AT to confirm an overall position on this proposal.

3. The #379 bus route and new rail stations provide options for access to employment land and education, but both options have constraints.
4. Whilst the application outlines a number of positive economic effects, it has not considered any adverse effects and costs in relation to the wider transport network.
5. The detailed layout of the development, road network and intersections will be important considerations at the substantive application phase should this application be referred for fast-track.

General Information for a substantive application

6. AT envisages that the following information would be required in an Integrated Transport Assessment to support any substantive application:
 - Traffic modelling and data to support trip generation assumptions and assess the impacts on the local and wider network. This also includes trip movements to and from the neighbourhood centre.
 - An assessment of effects of the development on the local and wider transport network, and any mitigation measures to address the effect of additional vehicle trip generation on the wider network. Particularly to address capacity issues and trip generation along Hingaia-Linwood Road (notably during peak hours).
 - Further details on potential uptake of non-private vehicle modes.
 - Vehicle access restrictions along Clarks Beach Road and active mode facilities.
 - Cross-sections of proposed roads or road function tables, and details on the proposed active transport facilities.
 - Development thresholds that trigger requirement for transport infrastructure provision/upgrades (intersections, shared paths, other mitigation measures).
 - Traffic calming measures to achieve a vehicle speed of 30km/h within the development.
7. Several specific recommendations on matters to be addressed from specialist transport engineering advice are provided at the conclusion of these comments which we recommend are addressed in a substantive application should the matter be referred for fast-track.

Transport Mitigations - General

8. In addition to confirming there are no overriding constraints to the development (such as capacity of the Linwood Road/Hingaia Road corridor), a number of more localised transport mitigations will need to be considered.
9. The Applicant's Transport Memo confirms that a shared path to Waiiau Pa would be appropriate. Should the matter be referred for fast-track, the requirements will be further assessed.
10. An upgrade to the Clarks Beach Road/Waiiau Pa Road/McKenzie Road intersection to accommodate development would be required. The form and design of the upgrades will be determined following additional traffic surveys and modelling.
11. More detailed specialist transport engineering advice is provided at the conclusion of these comments which we recommend are addressed in a substantive application should the matter be referred for fast-track.

Road Safety

12. There is no assessment regarding road safety as part of the transport memo.
13. AT would support use of roundabouts at intersections where the development meets Clarks Beach Road.
14. AT recommends a Safe System Audit be carried out in the design stages.
15. Detailed design would need to ensure safe pedestrian/cycle crossing points are provided for residents wanting to walk/cycle from the development to Clarks Beach.
16. Clarks Beach Road/Wharf Road intersection currently has a sharp bend with priority on the curve, which is a typical layout that may attract issues when traffic volumes increase including boat trailers. AT requests further consideration of this in any substantive application.

Proposed Road Closure

17. As outlined in previous pre-application feedback, AT is supportive of the proposal road stopping process for the unformed road running along the coastal edge of the site.

Insert Fast-track logo

Public Transport

18. It is not clear from the indicative development plans whether any of the internal roads will be suitable for buses, especially school buses.
19. As part of concept design should the application be referred for fast-track, AT would encourage the design of the road layout to enable future public transport connections to the east and west should that land be subject to future fast-track or urban plan change proposals.
20. The official name of the branch line that goes to the Glenbrook Steel Mill is the “Mission Bush Branch line”, not the “Glenbrook Railway”. This is a freight only line owned by KiwiRail. AT does not have any plans to use the line for passenger services.
21. The official name of the branch line from Glenbrook Station Road to Waiuku is the “Waiuku Branch line”. This is owned by the Glenbrook Vintage Railway, a private trust. AT does not have any plans to use the line for passenger services.
22. Transport Assessment – Page 5. It should be noted that:
 - With the new #379 bus there will only be a public transport connection to Papakura.
 - There will be park and ride facilities at Drury, Ngakoroa, and Paerata.
 - At this stage, no work has been undertaken to see if higher productivity lanes (T2 or T3) on Hingaia Road are warranted.
23. Transport Assessment – Page 17. It is noted that there are some people in the community who support a ferry link to Onehunga from Clarks Beach as a privately funded operation. There are no plans to provide public funding for infrastructure or services. It should be noted that a ferry would only provide a connection to “Onehunga Wharf”, not “Onehunga” where there are buses and trains. However, it is acknowledged that the Applicant is not relying on this ferry service to mitigate effects.
24. Overall, this proposal creates a larger isolated settlement which will have a limited public transport bus service to connect into the wider Auckland region via the Papakura train station.

Road Network Stormwater

25. For any substantive application, the Applicant should refer to the latest AT design guidelines (e.g. AT’s Bioretention Design Guide Version 2) for any solutions intended to treat road runoffs.
26. Assessments of the impacts of development on downstream flood hazard within the road reserve will be required for any substantive application. The requirements for flood hazard within the road reserve are set out within Table 2 and 3 of the Road Drainage chapter of AT’s Transport Design Manual (TDM). This assessment should include a range of storm events and

storm durations and should consider the frequency of flooding as well as the duration of flooding. Where the limits are already exceeded in the existing scenario, opportunities to reduce the existing flood hazard to the public should be considered.

27. Assuming overland flow paths within the development are to be conveyed via the public road reserve, careful consideration of how they are managed will be required at the consenting stage to ensure that they can be safely managed in accordance with Table 3 of the Road Drainage chapter of the TDM and section 4.3.5.6 of the Auckland Council Stormwater Code of Practice Version 4 once detailed design is underway. Failing to consider this early on could lead to the need to redesign earthworks, road networks and lots at Engineering Approval stage as Auckland Transport will not support piping of overland flow paths due to the lower resilience and risk of blockages.

Matters to Consider within site and local network for a substantive application (specialist transport engineering advice received from PTM Consultants)

28. The Transport Assessment Report (TAR) prepared by Flow proposes a new three-arm roundabout at the entry to Clarks Beach and an additional arm on the proposed roundabout at the Clarks Beach Road/Wharf Road/Kaitiaki Drive. Specialist transport engineering advice is that constructing a new roundabout on Clarks Beach Road at either end of the new neighbourhood centre will help moderate the operating speeds of vehicles as they pass the centre. The new three arm roundabout at the eastern end is an appropriate entry treatment to help slow traffic on Clarks Beach Road as it leaves the rural area and enters the Clarks Beach settlement.
29. When AT met with the Applicant in August 2025, they indicated that they would upgrade the frontage of their site onto Clarks Beach Road between a point east of the eastern roundabout, starting around the existing speed limit reduction to 50 km/h, to the west edge of the retirement village site. This is considered appropriate and important for both pedestrian safety and amenity and for signaling to drivers that they have entered an urban area and need to reduce speed. This is not shown on the concept drawings for the site provided in December 2025. Confirmation is sought from the Applicant that they still intend to do this.
30. Adding a fifth arm to the Clarks Beach Road/Wharf Road/Kaitiaki Drive roundabout could potentially result in some safety and/or operational issues. However, this is subject to the design of the intersection. Having more than four arms on a roundabout often necessitates a larger intersection. A detailed design for the intersection should be provided with any substantive application.
31. Pedestrian facilities to allow safe crossing of Clarks Beach Road near the roundabouts at each end will be critical to allow pedestrians to walk between the neighbourhood centre and the existing residential areas in Clarks Beach to the north.

Insert Fast-track logo

32. While Clarks Beach Road is not an arterial road, direct vehicle access onto it from the neighbourhood centre should be minimised or avoided. Access to the area should be from the local roads at either end where practical and a service lane providing access for rubbish collection and deliveries separate from the customer parking areas should be considered along the south edge of the neighbourhood centre adjacent to the light industrial zone. It is recommended that the Applicant investigate ways to separate vehicle access to the new neighbourhood centre for customers from the access used for heavy vehicles servicing these sites, so that trucks making deliveries to the supermarket or other businesses do not mix with pedestrians walking to and from vehicles in the customer parking areas.
33. During a meeting with the Applicant in August 2025 AT noted that Park Boulevard Road was intended to have high quality active modes facilities, and this is annotated on the concept plan. However, the plan does not have any details of the proposed active mode facilities. Vehicle crossings across these facilities should be avoided. The lot layout shown in the concept plan shows lots with frontage onto the Park Boulevard Road, which do not have any alternative vehicle access. It is recommended that alternative lot layouts or potentially rear jointly owned service lands are investigated for these lots to provide alternative vehicle access which is not directly off the Park Boulevard Road.
34. The internal layout of the site indicates a number of cross-roads intersections. These should be designed as roundabouts, especially at the intersections of the key local roads.
35. There are some internal intersections where the roads intersect at angles which are not right angles. Where practical, roads should intersect at between 80 to 100 degrees. Where this is not practical the use of roundabouts should be investigated. Angles lower than this result in poor viewing angles for drivers, increased space requirements for vehicle tracking, and increased crossing distances for pedestrians.
36. The land to the west of the site is not urban or future urban zoned, but a plan change or fast track application could result in it being developed as urban. A small reserve located at the south end of the retirement village between the road and the western boundary should be provided. If the land to the west is urbanised an active modes link could be provided via this reserve.
37. The internal road network should be designed to ensure that vehicle operating speeds are at or around 30 km/h (regardless of whether a formal 30 km/h speed limit is set for the development). Traffic calming will be needed to achieve this.
38. The TAR (page 11) explains that the neighbourhood centre will comprise a small supermarket, supporting retail, a community hub with medical services, a childcare centre, and similar local amenities. For the light industry zone small workshops and other small businesses are proposed. The trip generation estimate in the TAR assumes that the neighbourhood centre and light industry will have no net trip generation outside of Clarks Beach because any trips they generate from outside the settlement will be offset by providing local employment and shopping opportunities (meaning that local residents do not need to leave Clarks Beach for work or shopping as frequently).

39. There is a risk that these areas could develop differently than assumed in the TAR. Neighbourhood centre zoning allows residential use and if it were to be developed like this then dwellings inside the neighbourhood centre zone could generate trips on the wider network and that the dwellings outside the zone would also generate more trips as there would be less opportunity for local employment and shopping.
40. The same could happen with the light industrial area. Small workshops and businesses focused on servicing customers in the nearby settlement can be expected to generate far less trips on the wider network than a single (or small number of) larger businesses servicing a much wider area. Accordingly, the Applicant should assess this in terms of AT's ITA guidelines, if the application is referred.
41. Provision for bus stops near the neighbourhood centre should be included in the engineering drawings provided with any substantive consent application.

Matters to consider with wider transport network for a substantive application (specialist transport engineering advice received from PTM Consultants)

42. The Kingseat Wider Area Review Transport Assessment Report prepared by Flow and dated January 2024 identified significant capacity constraints on the Linwood Road/Hingaia Road corridor stating that *“Demands for private car travel on the Linwood Road/Hingaia Road corridor are predicted to exceed capacity in the future, as will demand for travel through Papakura interchange.”*
43. According to Section 6.2.4 of the TAR the proposal would generate an additional 265 trips per hour travelling north/east along this corridor away from Clarks Beach in the AM peak hour period. The same section of the TAR then notes that *“by the time the development is constructed and occupied, the rail station at Paerata or Drury will be completed and operational, the development offers employment, goods and services which will reduce the need to travel outside of Clarks Beach, and further developments in working patterns will assist in providing people options as to whether travel is needed on a day to day basis.”*
44. It is not clear if the 265 trips per hour figure accounts for the new railway stations, employment opportunities, and developments in working patterns. It is anticipated that some private vehicle trips in the AM peak hour originating inside the site will go via the Linwood Road/Hingaia Road corridor and the proposal will have some effect on its capacity. Any substantive application should include an estimate of the number of trips allowing for these things, and an assessment of how the trips will affect the Linwood Road/Hingaia Road corridor. The nearest station (Paerata) is approximately 22km driving distance from the site, and this will affect how many people are prepared to travel to the station before switching to public transport. Specialist transport engineering received is that it is considered that only a minority of travellers leaving Clarks Beach in the AM peak hour will use public transport as part of their journey.

Insert Fast-track logo

45. More assessment of the effects on this corridor, including updated SATURN modelling, should be provided with any substantive application. This assessment should include specific assessment in regard to the Blackbridge Rd/Linwood Rd roundabout and the Oakland Road/Hingaia Road signalised intersection.
46. Sections 5 and 7.2 of the TAR discuss the Clarks Beach/Waiiau Pā/McKenzie Road intersection, noting that the 2016 predicted queues forming on McKenize Rd when assessing the extent of the structure plan with 1,500 dwellings. The TAR recommends further investigation at substantive application stage. Specialist advice is that it is considered likely that this intersection will require an upgrade to mitigate the effects of increased traffic generated by the development (potentially in the form of a roundabout) and this assessment should be included in any substantive application.
47. Section 4.1 of the TAR discusses a planned shared path connecting Clarks Beach and Waiiau Pa via Clarks Beach Road being promoted by the Franklin Local Board. This will provide an active modes connection to Waiiau Pa School and will benefit both school children and recreational users. Page 7 of the TAR gives an estimate of 550 primary and intermediate school aged children living in Clarks Beach (including existing, the Future Urban Zone land and the proposed fast track development). While the distance between Waiiau Pa and Clarks Beach is too far to walk riding to school is viable with an appropriate facility and this path would help mitigate the trip generation effects of the development in the critical AM peak hour. The provision of this path either by the Local Board or the Applicant should be set as a condition of consent for the proposal.

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

AT is neutral in regard to use of fast track as a process to further consider this matter.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Matthew Richards

Date 29/1/2026

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



30 JAN 2026

Hon. Chris Bishop
Minister for Infrastructure
c.bishop@ministers.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for Orawaahi, located in Clarks Beach, Auckland.

The project seeks to deliver a retirement village of approximately 220 units and supporting communal facilities, subdivision for approximately 700 – 800 residential lots, a neighbourhood centre, light industry, and to provide servicing infrastructure to enable future construction (noting that the application references infrastructure being provided by third parties). This is to include a multi-functional green/blue network including parks, walkways and pedestrian and cycle links across the site that connect into existing networks in the community.

As you know, Auckland remains one of the most expensive areas in the country to live, with a high proportion of renting households and significant housing need. Adding supply of any sort, including the retirement village units and residential lots included in this project, would help to address these issues. It is important that we provide for our growing older population by ensuring there are a range of housing choices.

The site is not identified for future urban development in Council documents and so some infrastructure investment would be required as part of its delivery. However, wastewater upgrades are underway in Clarks Beach and are expected to enable additional growth from mid-2026, while some public transport improvements are planned as part of wider southwest Auckland upgrades.

Auckland Council is likely to raise concerns regarding infrastructure provision and natural hazard exposure associated with flood plains/coastal inundation. These issues can be addressed at the detailed consenting stage should this application proceed.

Accordingly, I support this application being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora,

A handwritten signature in black ink, appearing to read 'Tama Potaka'.

Hon Tama Potaka
Associate Minister of Housing

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



20 JAN 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0025854

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act (FTAA) on the following applications:

- Out of Scope [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- Orawaahi – A complete community, FTAA 2511-1135
- Out of Scope [Redacted]

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Out of Scope [Redacted]

Out of Scope



Out of Scope

Orawaahi – A complete community – FTAA 2511-1135

The proposed application is to establish a retirement village and urban development in the Auckland region, over an eight-year development period. The development includes a retirement village of approximately 220 units/villas, residential lots to accommodate approximately 700-800 dwellings, a neighbourhood centre, a service/light industrial area, a cultural centre, pedestrian and cycleways, and a mixture of community parks, reserves and stream improvements.

According to the economic assessment provided by the applicant, the total economic impact within the Auckland region is estimated to be \$806 million net present value over the development period. Full-time employment for 1,504 people is also forecast during the peak-development and operation year, with a total full-time employment (FTE) of 6,985 people over the eight-year development period.

The primary long-term benefit of this proposal is its provision of additional housing which is critical for a growing economy. Given that this application would provide a significant boost in the housing supply, it could also be assessed under the criteria “increasing the supply of housing, address housing needs, or contribute to a well-functioning urban environment” (s22(2)(a)(iii) of the FTAA).

Out of Scope

Out of Scope

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', with a stylized flourish at the end.

Hon Nicola Willis
Minister for Economic Growth

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Orawaahi – A Complete Community project
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
*Portfolio	Seniors		
*First name	Hon Casey		
*Last name	Costello		
Contact person (if different from above)			
*Contact phone number	§ 9(2)(a) [redacted]	Alternative	
*Email	[redacted] § 9(2)(a) [redacted]		

2. Please provide your comments on this application
My comments are attached below.

Minister’s signoff

Hon Casey Costello
Minister for Seniors

15/1/2026

Date



Minister of Customs
Minister for Seniors
Associate Minister of Health
Associate Minister of Immigration
Associate Minister of Police

15 JAN 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application: Orawaahi – A Complete Community project, FTAA-2511-1135

Dear Chris,

Thank you for the opportunity to comment as Minister for Seniors on this application for referral under the Fast-track Approvals Act 2024 (the Act). I have considered whether this application is likely to 'increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)', under s22(2)(a)(iii) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

The following aspects of the project are likely to meet this criterion:

- The construction of approximately 700-800 residential lots alongside infrastructure to enable future construction.
- The construction of a retirement village of approximately 220 units.

Based on this information, the project is suitable for referral to the fast-track process. If the application is referred, I would welcome the opportunity to comment on the project in more detail.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'C' followed by a horizontal line.

Hon Casey Costello
Minister for Seniors

From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: RE Invitation to comment on Fast-track referral application for the Orawaahi - A Complete Community project under the Fast-track Approvals Act 2024 – FTAA-2511-1135
Date: Tuesday, 20 January 2026 12:16:41 pm
Attachments: [image002.png](#)
[Comments Form for Invited Ministers.docx](#)

From: Environment Portfolio <Environment.Portfolio@parliament.govt.nz>
Sent: Tuesday, 20 January 2026 11:00 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE Invitation to comment on Fast-track referral application for the Orawaahi - A Complete Community project under the Fast-track Approvals Act 2024 – FTAA-2511-1135

Kia ora Hon Bishop

Thank you for the opportunity to comment on Knight Investments Limited Fast-Tack referral of Orawaahi – A Complete Community project.

Minister Simmonds (Environment) **does not wish** to comment on this referral.



Nicholas Smith

Private Secretary – Environment | Office of Hon Penny Simmonds
Minister for the Environment | Minister for Vocational Education
Associate Minister for Social Development | MP for Invercargill

Mobile: [§ 9\(2\)\(a\)](#) Email: [§ 9\(2\)\(a\)](#) Website: www.beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Thursday, 11 December 2025 10:52 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Casey Costello (MIN) <C.Costello@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>
Cc: FTAreferalls <ftareferalls@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Orawaahi - A Complete Community project under the Fast-track Approvals Act 2024 – FTAA-2511-1135

To:
Minister for Economic Growth
Minister for Regional Development
Minister for the Environment
Minister for Seniors
Associate Minister of Housing

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Knight Investments Limited for referral of Orawaahi – A Complete Community project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2511-1135).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email, **being 29 January 2026**. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Orawaahi – A Complete Community
Applicant	Knight Investments Limited
Location	Clarks Beach, Auckland
Project description	<p>The project is to establish a master-planned development on approximately 75 hectares at 156 Clarks Beach Road. The project involves:</p> <ol style="list-style-type: none">A retirement village of approximately 220 units and supporting communal facilities.Subdivision to create:<ul style="list-style-type: none">approximately 700 – 800 residential lots and provide servicing infrastructure to enable the future construction including by third partiesa neighbourhood centre of approximately 6,000m² gross floor area on 1.7 hectaresa service / light industrial / trade supply hub approximately 25,000m² gross

floor area on 5 hectares

c. A multi-functional green/blue network including neighbourhood parks, recreational walkways and pedestrian and cycle links across the site that connect into existing networks in the Clarks Beach community.

Yours sincerely

Hon Chris Bishop

Minister for Infrastructure



Office of Hon Chris Bishop

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3
Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: Invitation to comment on Fast-track referral application for the Queenstown Cable Car project under the Fast-track Approvals Act 2024 – FTAA-2510-1124
Date: Wednesday, 28 January 2026 9:57:55 am

Please see Minister Watt's comments below

From: Emily Young [s 9\(2\)\(a\)](#)
Sent: Wednesday, 28 January 2026 9:42 AM
To: Rob Schick [s 9\(2\)\(a\)](#)
Cc: Steve Mason [s 9\(2\)\(a\)](#)
Subject: FW: Invitation to comment on Fast-track referral application for the Queenstown Cable Car project under the Fast-track Approvals Act 2024 – FTAA-2510-1124

Morning Rob,

Please see below a comment from Minister Watts, as the Minister of Climate Change on the Queenstown Cable Car fast-track project:

The project is likely to be regionally (and not nationally) significant in terms of climate mitigation. The initial assessment concludes that the risk from natural hazards can be mitigated to an acceptable level, and that the development is feasible from a geotechnical perspective.

Regards,
Emily

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Friday, 12 December 2025 1:56 PM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Chris Penk (MIN) <C.Penk@ministers.govt.nz>; Louise Upston (MIN) <L.Upston@ministers.govt.nz>; James Meager (MIN) <J.Meager@ministers.govt.nz>; Simon Watts (MIN) <S.Watts@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Queenstown Cable Car project under the Fast-track Approvals Act 2024 – FTAA-2510-1124

To:

- Minister for Economic Growth
- Minister for the Environment
- Minister for Conservation
- Minister for Land Information
- Minister of Tourism and Hospitality
- Associate Minister of Transport
- Minister of Climate Change
- Minister for the South Island

PLEASE NOTE

Minister Bishop, as Minister for Infrastructure, has declared a conflict of interest with this application, and has therefore transferred decision-making to Minister Jones for this referral application. The Office of Minister Bishop will continue to process the application on behalf of Minister Jones' Office, however, the final decision on this application will rest with Minister Jones.

Dear Ministers,

Hon Shane Jones, the Acting Minister for Infrastructure (the Minister) for this project, has asked for me to write to you on his behalf.

The Minister has received an application from Southern Infrastructure (Cable Car) Limited for referral of the

Queenstown Cable Car project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2510-1124).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email (30 January 2026). The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Acting Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Office of Minister Bishop (as the administrating office for this application) they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform the Office of Minister Bishop (as the administrating office for this application) and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Queenstown Cable Car
Applicant	Southern Infrastructure (Cable Car) Limited
Location	Queenstown, Otago

Project description

The applicant describes the project as the establishment and operation of a mass rapid transit cable car network connecting the central Queenstown with Frankton, Queenstown Airport and Ladies Mile. The project includes the construction and operation of a series of cable car lines with associated stations, towers, cableways and other supporting infrastructure and activities across multiple sites in the network.

Yours sincerely

Hon Chris Bishop

Minister for Infrastructure

**Office of Hon Chris Bishop**

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3

Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: SJC3010 Invitation to comment on Fast-track referral application for the Orawaahi - A Complete Community project under the Fast-track Approvals Act 2024 – FTAA-2511-1135
Date: Friday, 12 December 2025 1:26:43 pm

Please note that Minister Jones will not be commenting on this project.

From: Ashleigh Munn [s 9\(2\)\(a\)](#)
Sent: Friday, 12 December 2025 11:00 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: SJC3010 Invitation to comment on Fast-track referral application for the Orawaahi - A Complete Community project under the Fast-track Approvals Act 2024 – FTAA-2511-1135

Kia ora,

Minister Jones won't be commenting on this application.

Thanks,
Ashleigh

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Thursday, 11 December 2025 10:52 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Casey Costello (MIN) <C.Costello@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>
Cc: FTAreferalls <ftareferalls@mfe.govt.nz>
Subject: SJC3010 Invitation to comment on Fast-track referral application for the Orawaahi - A Complete Community project under the Fast-track Approvals Act 2024 – FTAA-2511-1135

To:
Minister for Economic Growth
Minister for Regional Development
Minister for the Environment
Minister for Seniors
Associate Minister of Housing

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Knight Investments Limited for referral of Orawaahi – A Complete Community project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2511-1135).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email, **being 29 January 2026**. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Orawaahi – A Complete Community
Applicant	Knight Investments Limited
Location	Clarks Beach, Auckland
Project description	<p>The project is to establish a master-planned development on approximately 75 hectares at 156 Clarks Beach Road. The project involves:</p> <ol style="list-style-type: none">a. A retirement village of approximately 220 units and supporting communal facilities.b. Subdivision to create:<ul style="list-style-type: none">● approximately 700 – 800 residential lots and provide servicing infrastructure to enable the future construction including by third parties● a neighbourhood centre of approximately 6,000m² gross floor area on 1.7 hectares● a service / light industrial / trade supply hub approximately 25,000m² gross floor area on 5 hectaresc. A multi-functional green/blue network including neighbourhood parks, recreational walkways and pedestrian and cycle links across the site

that connect into existing networks in the Clarks Beach community.

Yours sincerely

Hon Chris Bishop

Minister for Infrastructure



Office of Hon Chris Bishop

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport |
Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

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Comments on a referral application under the Fast Track Approvals Act 2024

Orawaahi – A Complete Community

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	Ben Henson
Contact Number	s 9(2)(a)
Email	fasttrack@heritage.org.nz

General Comments

1. Knight Investments Limited (Applicant) has lodged an application for referral of the Orawaahi- A Complete Community (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has been provided application documents that are relevant to the archaeological authority application and the resource consent application, insofar as it affects historic heritage. These have been assessed and HNZPT comments as follows:

Consultation and Engagement

4. Mana Whenua have been, and are being, actively engaged throughout the planning and development of the project. Ngaati Te Ata have gifted the name “Ōrawaahi” to the development. Mana Whenua as kaitiaki of the land help embed cultural identity and heritage into the physical and social fabric of the development. Consultation with Mana Whenua is considered adequate for this project.

Archaeological Authority Application

5. The Applicant has provided an archaeological assessment that identifies two recorded archaeological sites within the project area. The works proposed as part of the project will modify or destroy those recorded sites, and there is potential to encounter further archaeological material or sites. As such, an archaeological authority is required prior to those works commencing.

Effects on Archaeological Values

6. In order to mitigate the adverse effects on archaeological values, a suite of conditions will be required.



7. This has been discussed with the Applicant and will continue through the application process.

Conclusion

8. If the project is referred, HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:
 - A fulsome archaeological assessment;
 - Appropriate methodologies and strategies proposed;
 - Appropriate draft management plan and research strategy;
 - Evidence of appropriate consultation with tangata whenua; and
 - Appropriate proposed conditions.