

# Hon Nicola Willis

Minister of Finance  
Minister for Economic Growth  
Minister for Social Investment



17 NOV 2025

Hon Chris Bishop  
Minister for Infrastructure  
Parliament Buildings  
Wellington

REQ-0023652

Dear Chris

Thank you for the opportunity to comment on the referral application of Kingseat Village (FTAA-2510-1104) under the Fast-track Approvals Act (FTAA).

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether this application is 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.

### ***Kingseat Village, FTAA-2510-1104***

This is a proposal to build an urban and residential development in Karaka, South Auckland. The two-stage development over 2026 to 2031 is expected to deliver 1,655 new dwellings of varying densities, including an additional 300 new dwellings in a retirement village. The development also comprises a neighbourhood centre and a local centre zone that will provide approximately 11,000m<sup>2</sup> of commercial floorspace.

Based on the economic assessment provided by the applicant at the time of this request, the proposal is expected to deliver direct economic benefits over its ten-year construction and development period. This includes an estimated \$1.2 billion in development costs, creation of 629 direct full-time equivalent jobs, generating an additional \$158 million in direct household income and an estimated \$240 million direct contribution to GDP. Once the neighbourhood and commercial centres are operational, they are expected to support ongoing economic activity.

However, the primary long-term benefit of this proposal is its provision of additional housing catering to Auckland's projected growth in housing demand. Given that this application would provide a significant boost in the housing supply, it could also be assessed under increasing the supply of housing, address housing needs, or contribute to a well-functioning urban environment (s22(2)(a)(iii) of the Fast-track Approvals Act).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis'.

Hon Nicola Willis  
**Minister for Economic Growth**

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

<b>Project name</b>	Kingseat Village Project
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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.			
<b>*Portfolio</b>	Seniors		
<b>*First name</b>	Hon Casey		
<b>*Last name</b>	Costello		
<b>Contact person (if different from above)</b>			
<b>*Contact phone number</b>	+64 4 817 6827	<b>Alternative</b>	
<b>*Email</b>	c.costello@ministers.govt.nz		

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

Minister's signoff

Hon Casey Costello

Minister for Seniors

Date 20/11/25



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

21 NOV 2025

Hon Chris Bishop,  
Minister for Infrastructure  
Parliament Buildings  
Wellington

**Fast-track Approvals Act referral application: Kingseat Village Project,  
FTAA-2510-1104**

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 between 1655 to 1820 residential units across a range of densities.
- The construction of a retirement village of approximately 300 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, appearing to be 'Casey Costello', written over a white background.

Hon Casey Costello

**Minister for Seniors**



21 November 2025

PS-COR1696

Hon Chris Bishop  
Minister for Infrastructure  
[c.bishop@parliament.govt.nz](mailto:c.bishop@parliament.govt.nz)

## Response to invitation to comment on Kingseat Village project

Dear Chris,

Thank you for the invitation to provide comments on the application for referral of the Kingseat Village project to an expert panel (the Panel) under section 17 of the Fast-track Approvals Act 2024 (FTAA).

Having reviewed the referral application, I have some concerns about the level of information provided to determine the significance of potential adverse environmental effects of the project.

I note in particular the development is proposed on land with a number of perennial and ephemeral streams and wetlands occurring across the site. Reclamation works within a stream and waterbody are signalled, but the location, potential effects, and any accompanying mitigation measures are not assessed, or provided as part of the referral application.

The applicant will be required to provide more detailed assessments at the substantive stage. However, it would be more efficient to identify as soon as possible if there are likely to be significant adverse effects from the project. This would enable appropriate strategies to avoid, remedy, or mitigate them to be considered prior to lodging the substantive application.

You may wish to use your discretion to specify information that is required to be provided with the substantive application under section 27(3)(b)(ii) of the FTAA, including:

- a. A full ecological assessment by a suitably qualified person that covers the entire project site, including the following information:
  - i. mapped extent of the proposed wetland reclamation
  - ii. potential and adverse effects of the proposed works
- b. Additional plans and surveys that may be required as a result of the ecological assessment.

This approach will reduce the risk of unanticipated significant matters being identified late in the process and support the smooth and efficient conduct of the Panel's deliberations.

Thank you again for the opportunity to provide comments on this referral application.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Simmonds'.

Hon Penny Simmonds  
**Minister for the Environment**

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

<b>Project name</b>	Kingseat Village (FTAA-2510-1104) 956 Linwood Road, Kingseat
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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](mailto: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.		
<b>Organisation name (if relevant)</b>	Auckland Council	
<b>*First name</b>	Russell	
<b>*Last name</b>	Butchers	
<b>Postal address</b>	Private Bag 92300, Victoria Street West, Auckland 1142	
<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b> -
<b>*Email</b>	s 9(2)(a)	

2. Please provide your comments on this application
<p><b>Overview</b></p> <p>Thank you for the opportunity to provide comments on the referral application for 956 Linwood Road, Kingseat by Kingseat Village Limited. We provide feedback below from the various relevant departments and Council-Controlled Organisations (CCOs) that comprise Auckland Council, including Auckland Transport, who have a particular interest in this proposal due to the significant roading infrastructure upgrades that would be required to facilitate it.</p> <p>Overall, Auckland Council <b>opposes</b> the project proceeding through the fast-track consenting process. Whilst the proposal is likely to have localised benefits, the development is out of sequence with the Council's Future Development Strategy, has the potential to have significant impacts on infrastructure, and is unlikely to have a significant regional or national benefits.</p> <p>In the invitation letter, it has been requested that Auckland Council provide input on two questions pertaining to s17(3) of the Fast-track Approvals Act 2024 (the Act). We respond below:</p>

1. *Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.*

We are not aware of any applications that have been lodged with the Council that would represent a competing project.

2. *In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.*

Our understanding is that s42(4)(a) does not apply as Minister for Infrastructure is seeking comments on an application for referral. Notwithstanding this, we are not aware of existing consents issued under s124C(1)(c) or s165ZI of the RMA that apply in this case.

#### **Auckland Council Planning and Resource Consents Department**

The Kingseat Village project is a staged urban development expanding the existing settlement of Kingseat with around 2,120 dwellings, a retirement village, commercial and community centres, major wetland restoration, and supporting infrastructure.

The information presented within the application documents is consistent with our understanding of the project and its overall scope. Regarding section 22 of the Act, we provide our preliminary views:

#### ***Does the project have significant regional or national benefits?***

Auckland Council does not consider that the project will deliver significant regional or national benefits. The scale and nature of the proposal suggest that any benefits are likely to be localised. The Council's Chief Economist unit has identified limitations in the Economic Impact Analysis, noting that the contribution to Auckland's housing stock is not regionally significant, that servicing the location may be costly, that wider economic benefits have not been demonstrated, that resources are not underutilised, and that the proposal is unlikely to generate large spillovers or transformative economic effects

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

Referral may facilitate the delivery of the project in a timelier and cost-effective way; however, it is noted that:

- Stage 1 will develop existing urban zoned land, and could be progressed as a consent application, with the referral of this part of the project not necessarily resulting in any significant time or cost advantage.

- Stage 2 requires the consideration develop Rural -Mixed Rural land, and it is possible that referring the project would facilitate its delivery in a more timely and cost-effective way than pursuing a plan change and the necessary consents to develop the land.
- However, given the anticipated timeframes for the stages to occur (Stage 1 intended to occur 2026-2031, and Stage 2 from 2031-2036), it is unclear whether referring the project facilitates a timelier delivery than if the stages went through respective resource consent and plan change processes.

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

In our view, the economic benefits of the proposal have not been adequately demonstrated, and there are unresolved concerns regarding the delivery of supporting infrastructure (particularly roading), and the development of highly productive land. Accepting the project into the fast-track process could place additional demands on the Environmental Protection Authority (EPA), potentially reducing its capacity and affecting timeframes for future fast-track applications that may present clearer regional or national benefits.

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

Yes. The Kingseat area (which includes the Kingseat Precinct, chapter I418 of the Auckland Unitary Plan) has been identified in the Auckland Southern Rural Growth Strategy, the sub-regional strategy of the Future Development Strategy 2023-2053 as an area of projected growth. Primarily it is considered that this relates to the potential of the Kingseat Precinct area to experience the growth enabled by the precinct but is currently constrained by the infrastructure limitations. For the avoidance of doubt, the Future Development Strategy does not envisage the development of any Kingseat land zoned Rural – Mixed Rural between 2023-2053.

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

No regionally or nationally significant infrastructure is proposed.

AT have also noted in their feedback that the cost of transport infrastructure to support this development has not been assessed and costed in the context of wider cumulative growth impacting the Linwood Road/Hingaia Road corridor.

The proposal will be privately serviced for water and wastewater, and does not contribute to any regionally significant infrastructure upgrades for Watercare.

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

The proposal will increase housing supply, and proposes an intensification of the current Precinct Area, as well as the urbanisation of Rural land for housing. However, given the scale of the proposal (approximately 2000 dwellings), and the timeframe for delivery of the two stages (2026-2036), the

contribution to the housing supply is limited, and as outlined above, the Council's Chief Economist Unit does not consider this contribution to be regionally significant.

The proposal has the potential to contribute to a well-functioning urban environment, being a master planned community and comprehensive design of housing, open space, and infrastructure within the project area.

***Will the project deliver significant economic benefits?***

As noted above and in the assessment from the Council's Chief Economist Unit, the proposal is not expected to deliver significant economic benefits.

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

The project will not directly support primary industries. To the contrary, the Council notes that the proposal would result in the loss of highly productive land due to development taking place on LUC Class 2 and 3 soils. This is further discussed as an 'other matter' below.

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

The project will not directly support the development of natural resources.

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

There is no evidence in the proposal that the project will support climate change mitigation.

As outlined in the feedback from AT, public transport is likely to be demand driven. Given the timeframe for the development, it is reasonably likely public transport as a travel mode will be limited in the short to medium term.

The ecological restoration is however reasonably expected to have some benefits.

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

It is reasonably expected that infrastructure to support the proposal (particularly stormwater infrastructure) will be designed to adapt to climate change. Primarily the natural hazard risks relate to flooding and instability, and would be addressed in the detailed assessment of the project.

***Will the project address significant environmental issues?***

The proposed development will not address any significant environmental issues.

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

The Kingseat area (and existing precinct area) has been identified in the Auckland Southern Rural Growth Strategy, the sub-regional strategy of the Future Development Strategy 2023-2053 as projected an area of growth. Primarily it is considered that this relates to the potential or the

existing precinct area to experience the growth enabled by the precinct, but currently constrained by the infrastructure limitations.

The primary statutory planning document governing development on the site is the Auckland Unitary Plan (Operative in Part) (AUP(OP)). Under the AUP(OP) Stage 1 of the development is within the Kingseat Precinct (Sub precincts B, C, and D), with the land zoned Residential – Single House, Residential – Mixed Housing Suburban, and Business – Local Centre, and Stage 2 of the development is outside of the Kingseat Precinct, and within the Rural- Mixed Rural Zone.

With respect to Stage 1, the land is zoned for urban development under the AUP(OP) and is located within the Kingseat Precinct, where residential and local centre activities are anticipated. In this sense, urbanisation of Stage 1 aligns with the zoning framework and the strategic intent for the land to transition from rural to urban use. However, while the zoning enables urban development, the scale and intensity of the proposal exceeds what was contemplated when the precinct provisions and associated infrastructure planning were established.

The proposal therefore has the potential to generate transport demands beyond the capacity of the existing and currently planned network, and may necessitate upgrades or interventions beyond the site boundary to maintain safety and network efficiency. As a result, while Stage 1 is zoned for urban use, the proposal does not yet confirm that it can be integrated with transport infrastructure in a manner consistent with the outcomes sought in Chapter B2 (Urban Growth and Form) and Chapter B3 (Infrastructure, Transport and Energy) of the AUP(OP).

With respect to Stage 2, the proposal is inconsistent with the strategic growth management framework established under the AUP (OP). Specifically, the development constitutes an out-of-sequence urbanisation of land currently zoned for rural purposes, contrary to the Regional Policy Statement provisions that require growth to be sequenced and integrated with the Future Urban Land Supply Strategy. In addition, the project is likely to require significant transport infrastructure upgrades beyond the site, and is potentially contrary to the objectives and policies of Chapter B2 (Urban Growth and Form) and Chapter B3 (Infrastructure, Transport and Energy).

On this basis, the proposal does not demonstrate that it will provide for integrated planning outcomes sought by the AUP:OP and does not represent sustainable or efficient use of natural and physical resources. As the Fast-track Act does not provide for a plan change, the land will remain zoned Mixed Rural, and any future residential development would therefore be fundamentally at odds with the objectives and policies for the zone.

***Are there any other relevant matters to consider?***

*National Policy Statement Highly Productive Land (NPS:HPL)*

The NPS:HPL requires consideration. Whilst the Stage 1 area is urban zoned, and is not subject to consideration under the NPS:HPL, the Stage 2 area is rurally zoned, and the land is identified as meeting the definition of highly productive land on the NPS:HPL.

The Council considers that the proposal does not meet any of the exceptions for subdivision or development of highly productive land in the NPS:HPL, and the applicant has not demonstrated

that there is a permanent or long-term constraint that means that the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years.

Moreover, the project has not demonstrated that the environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production. In particular:

- The economic benefits are anticipated to be limited.
- The project does not demonstrate that enabling development within the rural zoned land will support the loss of 'more productive' highly productive land within the district.
- The existing precinct is identified for growth (as it is currently underdeveloped), however there is not direct support in the growth strategies for the development in the rural land.
- Whilst there are anticipated to be benefits of ecological restoration, it is unclear if these will be regionally significant.

#### *Inputs from Auckland Council Departments and Organisations*

Inputs from various Auckland Council departments and organisations are appended to these comments as Appendix 1. An overview of the inputs is provided below:

#### **Auckland Council CCO: Auckland Transport (AT) (Development Planning)**

Overall, AT **opposes** the project being referred for fast-tracking.

Auckland Transport's feedback highlights that the Kingseat Village fast-track proposal involves urban and rural stages not anticipated in the Auckland Unitary Plan, that neither intensified zoning nor rural expansion has been identified as necessary in recent plan changes, and that the project raises unresolved transport infrastructure concerns. AT considers that cumulative growth pressures on Linwood Road and the wider corridor have not been assessed, that reliance on later Integrated Transport Assessment processes is insufficient, and that previous strategic decisions directed growth elsewhere due to limited network capacity.

Before determining whether referral of the application is appropriate, AT advises that a comprehensive transport assessment is required to address demand, necessary upgrades, and delivery responsibilities to confirm whether the proposal is viable within the existing transport network.

AT have provided detailed feedback, and in summary:

- The Kingseat Village fast-track (the Project) includes two major stages. Stage 1 applies to existing urban zoned areas within the Kingseat Precinct Plan in Auckland Unitary Plan (AUP). Whilst urban zoned, much of this area is included in the Single House Zone which is no longer subject to the Auckland Unitary Plan (AUP) Medium Density Housing Standards (MDRS) which were withdrawn, so the proposed density of development in Stage 1 appears

to be higher than the plan enabled density. Stage 2 of the Project is rural zoned land where the AUP does not envisage urban densities such as those proposed.

- Neither an intensified residential zoning in the part of Stage 1 in the Single House Zone nor extension of Stage 2 into adjacent rural zoned land has been identified in the recently notified Proposed Plan Change 120 (Housing Intensification and Resilience) as necessary to achieve required residential capacity for Auckland. There is no Future Urban Zone in the AUP around Kingseat indicating any planned future urban expansion of the village which already includes large urban zoned areas other than Stage 1 of this development proposal, that are yet to be developed.
- AT opposes the Project being accepted for fast-track consenting. The threshold for approved development on this corridor needs to take into account the transport demand of all surrounding development/ growth and dependency on Linwood Road as part of the wider (and limited) transport network. AT consider that the Minister is unable to make an informed decision on this fast-track referral application as the potential transport infrastructure requirements/ interventions, timing, costs and funding/delivery responsibilities have not been assessed. AT disagrees that the proposal “will contribute significant economic regional benefits” given the cost of transport infrastructure to support this development has not been assessed and costed in the context of wider cumulative growth impacting the Linwood Road/Hingaia Road corridor.
- AT disagrees with the Applicant’s assertion that the need for transport infrastructure to support this application can be addressed at later stages of the fast-track via an Integrated Transport Assessment (ITA). Arising from previous work on Proposed Plan Change 96 to adjust zones at various locations, supplementary transport work was undertaken by Auckland Council to understand the wider transport impacts in the Kingseat/Karaka North area. This work indicated that the existing capacity of Linwood Road will be used up by existing plan enabled development with additional growth expected to exacerbate any congestion.
- The wider area assessment acknowledged that there was limited ability to increase the traffic network in the area, so options to avoid travel at peak period congestion would be required to mitigate impact on the networks. The Applicant has provided no assessment of necessary road upgrades within the site (including required road widths), intersection treatments and importantly upgrades of the surrounding road network.
- Previous strategic decisions to cater for any further growth on this corridor included the feasibility of an alternative route via a bridge from Karaka to Weymouth, assessed during the AUP development stage. Due to significant costs and other issues, this proposal was not

progressed by Auckland Council and AT in 2013, and future southern growth was supported on the Pukekohe Paerata Corridor instead.

- On the assumption that the Applicant wishes to rely on the existing corridors available (being Linwood Road and Glenbrook Road), the Applicant would need to consider cumulative impacts of other developments affecting these corridors (e.g. Clarks Beach which is also subject to a fast-track project) which will put the existing road network under further stress including degradation of operating conditions over time in terms of a congested road network which will also adversely impact any planned public transport service improvements in the area.
  
- Before a decision on the referral is made, the scope of the necessary transport assessment to properly consider this proposal should be determined and agreed on. This is critical given the potential transport network impacts resulting from cumulative planned and unplanned development. In this regard, the assessment should provide a methodological document around:
  - The change in transport demands
  - What transport upgrades/interventions are proposed to address effects; and
  - Who/how these will be delivered based on the staging of:
  - The area covered by the fast-track application i.e. Stage 1 within live zoned Kingseat Precinct and Stage 2 (extension into rural zoned land);
  - Balance of live zoned Kingseat Precinct beyond Stage 1 (noting that there is a large approved and unimplemented residential development with a consent expiry in 2028 – BUN60318271); and
  - Any other known or committed developments impacting the Linwood Road corridor.
  
- AT consider that the above information is necessary to address prior to referral (rather than as a subsequent Integrated Transport Assessment in a substantive application) to confirm the proposal in its current form or any modified form is viable in this location given the available transport corridor infrastructure.

#### **Auckland Council CCO - Watercare Services Limited (WSL)**

Overall, WSL are **neutral** on the application for referral.

Feedback from WSL reflects that the applicant intends to privately service the development, and outlines that:

- Future provision of water and supply will be designed by the population requiring connection and funded via growth charges.
- WSL would not be providing capacity for this development unless specifically requested and funded by the developer or residents prior to the installation of infrastructure.

- WSL does not provide water supply and wastewater to service rural zoned land.

### **Auckland Council - Healthy Waters and Flood Resilience**

Overall, the Auckland Council – Healthy Waters Unit is **neutral** on the application for referral.

The feedback records that stormwater discharges will require site-specific authorisation, that proposed approaches to water quality and hydrology mitigation do not align with Regionwide Network Discharge Consent (RWNDC) requirements, and that clarification is needed regarding the long-term ownership and management of restored stream and wetland areas.

A summary of their comments is provided below:

- Authorising the stormwater diversion and discharges
  - The RWNDC does not automatically authorise the diversion and discharge of stormwater from Stage 1. Authorisation must be sought (applies to urban land only) with a site-specific Stormwater Management Plan (SMP).
  - Development in the Rural zone will require a private stormwater diversion and discharge permit.
- Water Quality Treatment
  - The approach to treat high contaminant generating impervious areas (except where for reuse) does not meet the requirements of the RWNDC, with all impervious surfaces requiring treatment.
  - The restoration of wetland and stream areas will provide notable downstream benefits.
- Stormwater Management Area Flow (SMAF)/Hydrology Mitigation
  - Providing retention of volume 10mm for impervious surfaces  $\geq 25 \text{ m}^2$  does not meet the requirements of the RWNDC, with SMAF mitigation required for all new impervious areas.
  - The best practicable option for hydrology mitigation will need to demonstrate within the SMP
- Vesting of Assets
  - The application will need to be clear on the ownership or long-term operation and maintenance structure for the 81ha of stream and wetland restoration. Healthy Waters do not see any stormwater management reason for these areas to be vested.

### **Auckland Council – Parks and Community Facilities**

Overall, Auckland Council – Parks and Community Facilities is **neutral** on the application for referral.

The feedback recommends that reconsideration be given to the provision of open space, favouring fewer suitably sized open spaces and a sports field, rather than smaller open spaces, and emphasises connectivity between open spaces. The feedback also identifies that while the proposal

has the potential to deliver local recreational value, it does not provide significant national or regional benefit.

A summary of their comments is provided below:

- There is concern over the number of parks proposed to be vested, with a higher number of smaller parks with overlapping catchments proposed, which may result in duplication of users and higher operational costs.
- three suitably sized and located publicly vested neighbourhood parks and a sports field to serve the future community is considered sufficient for this development
- Connectivity between open spaces within and outside of the development are encouraged.
- While proposal does not provide significant national or regional benefit from a Parks and Community facilities perspective, it does have potential to provide some recreational benefit for the local area.

#### **Auckland Council – Chief Economist Unit**

The Auckland Council – Chief Economist Unit is **neutral** on the application for referral.

Of note is that the Auckland Council – Chief Economist Unit identify limitations in the analysis provided, and regional or national economic benefits are not likely to be realised by the project. A summary of their comments is provided below:

- Comments on Economic Impact Analysis
  - There are limitations to the Economic Impact Analysis (EIA) that has been provided, and an EIA does not assist decision makers to determine whether a project improves overall societal wellbeing or whether it has significant benefits for society.
  - The statement that the project has “significant economic benefits” cannot be justified.
  - Recommended approach – employ a cost-benefit analysis. This approach aligns with the Fast-track Approvals Act’s requirement to assess significant regional or national benefits and is focused on improving societal wellbeing.
- Assessment of Regional Significance:
  - In the context of the Auckland housing stock, the contribution to housing does not appear to be regionally significant, although may be significant at a local level.
  - Due to the location, the development may be costly to serviced with infrastructure
  - Regional or National economic benefits have not been demonstrated.
  - There is no evidence that resources are being underutilized
  - Given the scale of the proposal, it is unlikely to generate any large spillovers or have a transformative effect on the economy.

### **Franklin Local Board**

The Franklin Local Board have advised that they **oppose** this application for referral on the following basis:

- The application is sought on highly productive land.
- If it is approved, an upgrade to the road infrastructure would be required including:
  - An upgrade of Hingaia Road through to the intersection of Walters Road and Linwood Road to allow for public transport
  - Upgrades to linking roads would also be required (e.g. Blackbridge Road and SH22).

### **Houkura – Independent Māori Statutory Board**

Houkura **support** the application for referral, with the following comments received:

- *The Houkura Secretariat has read through the related documentation we are comfortable for this to proceed to the next stage of the process where applicant will lodge a substantive application other approvals through an expert consenting panel. It would be good to kept in the loop of how this progress, so that we can have visibility on how both CVA and the CIA to come as well as other considerations for Ngāti Tamaoho and Ngāti Te Ata Waiohua can be incorporated into the next stage. As such, no further comment is required from Houkura at this stage.*

### **CONCLUSION**

Overall, Auckland Council **opposes** the project proceeding through the fast-track consenting process. Whilst the proposal is likely to have localised benefits, the development is out of sequence with the Council's Future Development Strategy, has the potential to have significant impacts on infrastructure, and is unlikely to have significant regional or national benefits.

List of Appendices:

1. Auckland Transport Comments
2. Watercare Services Ltd
3. Healthy Waters & Flood Resilience
4. Parks & Community Facilities
5. Chief Economist Unit

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.

**Comments prepared by:**



Colin Hopkins

Consultant Planner (DCS)

For Resource Consents

Date: 26 November 2025

**Comments reviewed by:**



**Russell Butchers**

Principal Project Lead

Planning & Resource Consents

Auckland Council

Date: 28 November 2025

**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	Kingseat Village
Address	956 Linwood Road, Kingseat
FT application number	FTAA-2510-1104 (PRR00043412)

**Respondent Information**

Name	Hedré Dednam
Role	Team Leader - Development Planning South
Agency / Department	Auckland Transport (AT)
Date	19 November 2025

**Do you support the proposal proceeding through fast-track?**

- Support
- Oppose
- Neutral

**Agency/Department Response**

**Overall Summary of Auckland Transport Position**

- The Kingseat Village fast-track (the Project) includes two major stages. Stage 1 applies to existing urban zoned areas within the Kingseat Precinct Plan in Auckland Unitary Plan (AUP). Whilst urban zoned, much of this area is included in the Single House Zone which is no longer subject to the Auckland Unitary Plan (AUP) Medium Density Housing Standards (MDRS) which were withdrawn, so the proposed density of development in Stage 1 appears to be higher than the plan enabled density. Stage 2 of the Project is rural zoned land where the AUP does not envisage urban densities such as those proposed.
- Neither an intensified residential zoning in the part of Stage 1 in the Single House Zone nor extension of Stage 2 into adjacent rural zoned land has been identified in the recently notified Proposed Plan Change 120 (Housing Intensification and Resilience) as necessary to achieve required residential capacity for Auckland. There is no Future Urban Zone in the AUP around Kingseat indicating any planned future urban expansion of the village which already includes large urban zoned areas other than Stage 1 of this development proposal, that are yet to be developed.

3. AT opposes the Project being accepted for fast-track consenting. The threshold for approved development on this corridor needs to take into account the transport demand of all surrounding development/ growth and dependency on Linwood Road as part of the wider (and limited) transport network. AT consider that the Minister is unable to make an informed decision on this fast-track referral application as the potential transport infrastructure requirements/ interventions, timing, costs and funding/delivery responsibilities have not been assessed. AT disagrees that the proposal “*will contribute significant economic regional benefits*” given the cost of transport infrastructure to support this development has not been assessed and costed in the context of wider cumulative growth impacting the Linwood Road/Hingaia Road corridor.
4. AT disagrees with the Applicant’s assertion that the need for transport infrastructure to support this application can be addressed at later stages of the fast-track via an Integrated Transport Assessment (ITA). Arising from previous work on Proposed Plan Change 96 to adjust zones at various locations, supplementary transport work was undertaken by Auckland Council to understand the wider transport impacts in the Kingseat/Karaka North area. This work indicated that the existing capacity of Linwood Road will be used up by existing plan enabled development with additional growth expected to exacerbate any congestion. The wider area assessment acknowledged that there was limited ability to increase the traffic network in the area, so options to avoid travel at peak period congestion would be required to mitigate impact on the networks. The Applicant has provided no assessment of necessary road upgrades within the site (including required road widths), intersection treatments and importantly upgrades of the surrounding road network.
5. Previous strategic decisions to cater for any further growth on this corridor included the feasibility of an alternative route via a bridge from Karaka to Weymouth, assessed during the AUP development stage. Due to significant costs and other issues, this proposal was not progressed by Auckland Council and AT in 2013, and future southern growth was supported on the Pukekohe Paerata Corridor instead.
6. On the assumption that the Applicant wishes to rely on the existing corridors available (being Linwood Road and Glenbrook Road), the Applicant would need to consider cumulative impacts of other developments affecting these corridors (e.g. Clarks Beach which is also subject to a fast-track project) which will put the existing road network under further stress including degradation of operating conditions over time in terms of a congested road network which will also adversely impact any planned public transport service improvements in the area.
7. Before a decision on the referral is made, the scope of the necessary transport assessment to properly consider this proposal should be determined and agreed on. This is critical given the potential transport network impacts resulting from cumulative planned and unplanned development. In this regard, the assessment should provide a methodological document around:
  - the change in transport demands
  - what transport upgrades/interventions are proposed to address effects; and
  - who/how these will be delivered based on the staging of:
    - a. The area covered by the fast-track application i.e. Stage 1 within live zoned Kingseat Precinct and Stage 2 (extension into rural zoned land);

- b. Balance of live zoned Kingseat Precinct beyond Stage 1 (noting that there is a large approved and unimplemented residential development with a consent expiry in 2028 – BUN60318271); and
  - c. Any other known or committed developments impacting the Linwood Road corridor.
8. The above information is necessary to address prior to referral (rather than as a subsequent ITA in a substantive application) to confirm the proposal in its current form or any modified form is viable in this location given the available transport corridor infrastructure.

**Plan Enabled Development**

9. The AUP includes the indicative number of dwellings envisaged in Kingseat in the I418.10.11 Kingseat: Precinct Plan 11 as shown in Figure1 below. The area covered by Stage 1 of the development provides for approximately 760 dwellings. Whilst Stage 1 includes existing urban zones, the proposed number of dwellings is 1145, an increase from anticipated plan enabled development of approximately 350 dwellings. The 810 dwellings in Stage 2 are located outside of the planned Kingseat urban zones, further exceeding the plan enabled development for Kingseat.

**1418.10.11. Kingseat: Precinct plan 11 – Adaptive reuse areas and development potential**

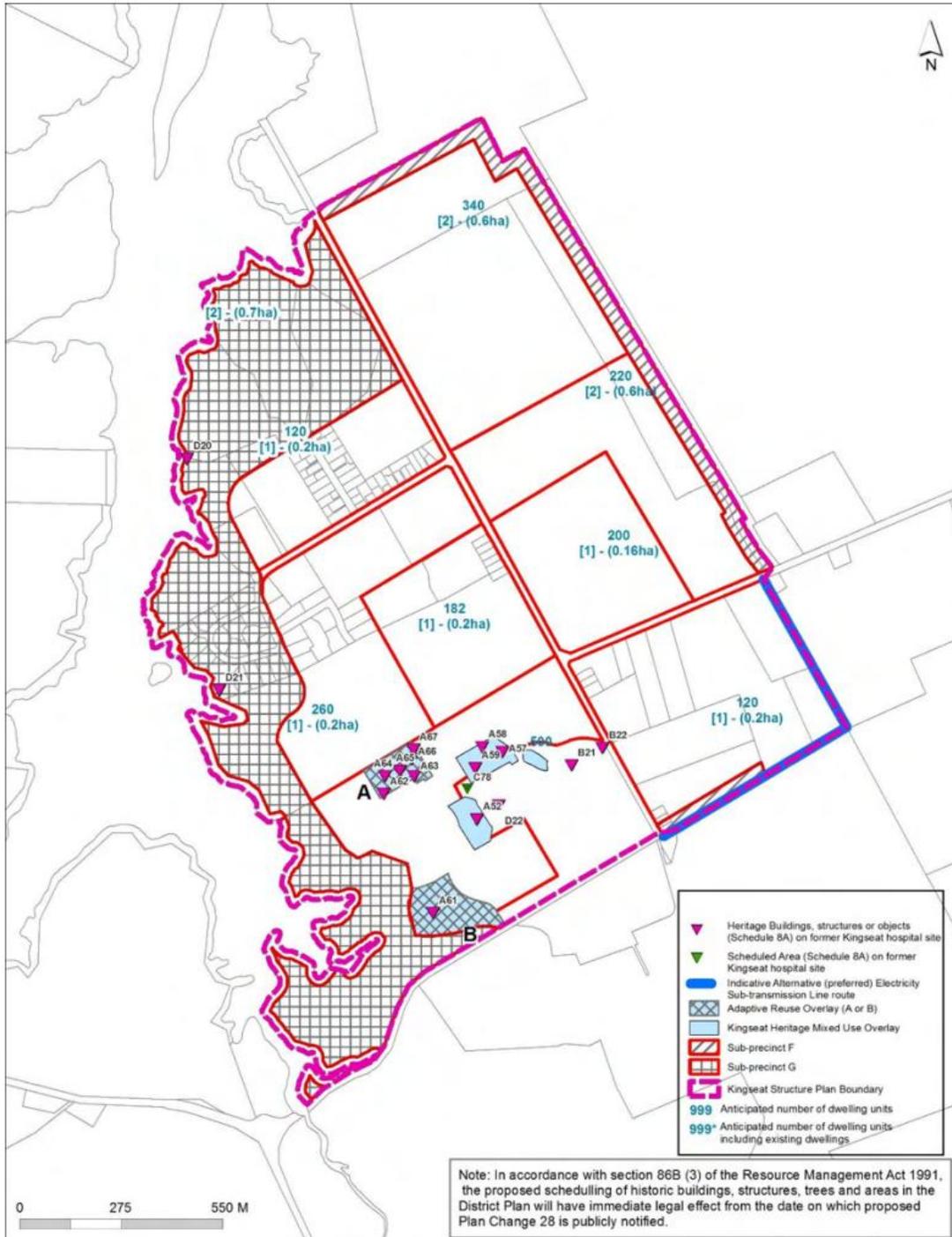


Figure 1: Kingseat Precinct Plan 11.

### Transport Assessment Review – Road Safety and Traffic Engineering Specialist Comment

10. Our assessment of the Transport Assessment is informed by internal AT specialists and our external transportation engineering advisor PTM Consultants.

#### ***Potential Capacity and Congestion Effects on the Linwood Road/Hingaia Road Corridor***

11. AT has concerns that the additional vehicle trips on the public road network associated with dwellings proposed by the Project which are over and above those already anticipated by the AUP could result in significant adverse effects on traffic congestion and travel times on the Linwood Road / Hingaia Road corridor. This corridor forms the most direct link between the site and the Auckland motorway network.
12. These concerns were brought to the Applicant's attention when feedback on this application was first sought from AT in August 2025 and was discussed with the Applicant and their traffic specialist, John Parlane of Parlane & Associates (Parlane), during a meeting held on 6 August 2025. Parlane have subsequently updated their Transport Assessment Report (TAR) now dated 9 October 2025 which covers effects on traffic congestion and travel times on the Linwood Road / Hingaia Road corridor in greater detail.
13. However, AT considers that it still does not contain a sufficiently detailed assessment of the potential effects of traffic congestion and travel times on the Linwood Road / Hingaia Road corridor relating to the proposal for there to be sufficient confidence that there will not be significant adverse effects. We recommend that more assessment is carried out before the Project is referred to a panel for fast-track consenting.
14. Section 2 of the TAR states that Linwood Road and Kingseat Road are collector roads. This is not correct; both have arterial road controls on them in the AUP planning maps and both are shown as arterial roads on the AT Future Connect website.
15. The TAR explains that the proposal consists of approximately 1,955 new dwellings. Of these 1,145 are located within Stage 1 which is located within the Kingseat Precinct Plan area, and 810 are located withing Stage 2 which is outside the Precinct Plan area. The Stage 2 dwellings are over and above those anticipated by previous planning for Kingseat and the Linwood Road / Hingaia Road corridor. There is also a question about the intensity of development in Stage 1 given it is within the Single House Zone in regard to the previous growth assumption for Kingseat.
16. Section 7.2 of the TAR gives per dwelling peak hour trip generation rates of 0.85 trips per dwelling in the morning peak hour and 1.02 trips in the evening peak hour based on survey data from a site in Waiuku. These rates are generally consistent with rates from published sources such as NZTA Research Report 453, and assessments for similar developments which AT's consultant transport engineer has previously reviewed, so this assumption is considered to be reasonable.
17. Section 7.2 of the TAR states that *"While we have not yet tested the additional 1000 houses in the Auckland Forecasting Centre Model we can estimate the impacts."* It is not clear where the 1000 houses figure came from, as other parts of the TAR state that there will be around 810 dwellings in Stage 2.

18. Table 4 of the TAR allocates the additional trips generated by the additional dwellings based on the direction of travel of existing traffic flows on Linwood Road. The justification for this is not stated and is not considered to be appropriate. The current population of Kingseat is only 489 people and AT's consultant transportation engineer considers that the bulk of traffic passing through on Linwood Road will not be travelling to or from Kingseat itself and these existing traffic patterns may not reflect traffic patterns for trips to or from the settlement itself.
19. Table 3 of the TAR shows modelling by the Auckland Forecasting Centre for Linwood Road near Kingseat for years 2016, 2018, 2031, 2038, and 2048 along with volume to capacity (V/C) ratios. From this the TAR calculates a maximum peak hour capacity per direction of 1,600 vehicles per hour (vph). AT's consultant transportation engineer considers that this is a reasonable estimate for the mid-block sections of a two-lane rural arterial. Drivers are advised to leave two seconds of headway between them and the car in front, and while not all drivers follow this, it is instructive when considering lane capacity. With 3,600 seconds in an hour, a two second headway equates to 1,800vph. However, it is not realistic to expect that all vehicles will be evenly spaced without some larger gaps between some vehicles so a 1,600vph figure is appropriate.
20. The TAR assumes that adverse traffic related effects will only occur when demand exceeds capacity and anything under the capacity of 1,600vph will be acceptable. In reality as traffic volumes on a route increase and begin to approach the maximum capacity average traffic speeds will decrease, so there can be significant effects before the maximum capacity is exceeded. More assessment is needed in regard to this matter. According to Table 4 of the TAR, the estimated eastbound flow on Linwood Road near the morning peak in 2038 is 1,446vph with the proposal, and this is 90% of the maximum capacity of 1,600vph.
21. In 2048 future eastbound flows in the morning peak are estimated to be 1,652vph with the proposal exceeding the maximum capacity of 1,600vph. The TAR makes reference to falling trip rates as resolving this, and while acknowledging that trip rates for residential developments have been dropping over the last two decades, more elaboration is needed in the TAR as to why this trend can be reliably projected into the future, particularly for a village located away from the major employment centres of the Region.
22. While the 1,600vph figure is appropriate for mid-block locations it is not suitable for intersections where drivers need to stop for other traffic. At a roundabout or signalised intersection, a constant flow of a little under one vehicle every two seconds per lane is not considered to be attainable on all approaches.
23. AT consider that additional modelling is required using (the SIDRA traffic modelling software package or similar) to better understand the effects on the following intersections along the Linwood Road / Hingaia Road corridor;
  - a. The existing intersection of McRobbie / Linwood / Kingseat Roads and any proposed upgrade (i.e. as per that required under Condition 180 of BUN60318271).
  - b. Existing roundabout at the Linwood Road / Dykes Road / Blackbridge Road intersection.

- c. Existing signalised intersection of Hingaia Road and Oakland Road (noting that this intersection only has a single through lane in each direction which limits capacity).
  - d. Existing signalised intersection of Hingaia Road and Harbourside Drive.
24. The Papakura Motorway interchange should also be modelled. While ramp metering on the on-ramps can protect the motorway itself from demand in excess of its capacity, to some extent this can cause queuing onto the local road network resulting in adverse operational and road safety effects.
25. The TAR only assesses the effects of additional traffic on Linwood Road in close proximity to the site. No assessment has been provided for Linwood Road much further to the east or on Hingaia Road. The Hingaia Bridge appears to be the most likely location for a mid-block capacity issue to occur. The Auckland Forecasting Centre Travel Demand Forecasts for 2034 show 2,483 (morning eastbound) and 2,454 (evening westbound) two-hour peak estimate.
26. The TAR uses a 0.55 factor to convert the two-hour peak traffic volumes into one-hour peak values. Using this same factor we calculate that in 2034, without the additional traffic from the proposal, there will be 1,366vph travelling eastbound in the morning peak and 1,350vph travelling westbound in the evening peak. Based on a capacity of 1,600vph per lane this equates to the bridge being at 85% of maximum capacity for eastbound traffic in the morning peak and 84% of maximum capacity for westbound traffic in the evening peak in 2034 without any additional traffic from the proposal. This bridge is already close to capacity by 2034, and more assessment should be undertaken by the applicant to confirm what effect additional traffic generated by their proposal will have.
27. AT reviewed the Kingseat Wider Area Review Transport Assessment Report dated January 2024 prepared by Flow Transportation Specialists (Flow) for Plan Change 96 (PC96). This document is publicly available from the Auckland Council website. This report looked at development proposals in Kingseat and the surrounding area and compared them to previous land use projections. It identified that the density of some developments in the area was greater than previously anticipated, resulting in a higher number of vehicle trips on the network. The effects of this additional trip generation, along with growth anticipated in past planning and accounted for in the AUP, were modelled Auckland Transport's Southern Sector SATURN Model (S3M).
28. The traffic modelling results provided in the Flow report found that sections of Hingaia Road and Linwood Road, particularly those around and to the west of the intersection with Blackbridge Road are expected to operate with congested conditions, with the morning peak period being more critical.
29. It is not clear if the Auckland Forecasting Centre Travel Demand Forecasts which the updated TAR is based on have taken account of the higher than anticipated density. The Applicant should confirm this has been considered as part of their traffic assessment for the Kingseat resource consent application. This update should include but not be limited to reviewing consents which have been issued to date for the Karaka North (near the intersection of Linwood Road and Dykes Road) and 9 McRobbie Road (BUN60318271), any other consented developments along the Linwood Road / Hingaia Road corridor.

30. The report was prepared in January 2024 and did not anticipate the fast-track application which is the subject of this memorandum. AT expects that the additional trips generated by the additional dwellings included in the application over and above those already allowed for by the AUP/approved developments will further exacerbate the already anticipated congestion and travel time issues on the Linwood Road / Hingaia Road corridor.
31. It appears that density in proposed Stage 1 area may be in excess of what was assumed for when the Kingseat Precinct Plan was prepared. This should be assessed and the traffic assessment updated to include additional trips to account for it if this is the case.
32. AT note that potential means by which the effects of additional trip generation from the proposal can be mitigated are limited. Additional capacity on the corridor may be able to be provided by upgrading key intersections, but this is not certain, and extending the four-lane section of Hingaia Road, which currently stops between Kuhanui Drive and Oakland Road intersections, further westward may also be required. Identifying the necessary mitigation measures needed would require an updated traffic model.

#### ***Road Safety Effects***

33. Section 5 of the TAR contains information on the existing recorded crash history for Linwood Road between Kingseat Road and the crossing over the Te Hihi Creek.
34. Higher traffic volumes on rural arterial roads can have road safety effects and additional assessment should be provided by the Applicant on these effects, both adjacent to the development itself and along the Linwood Road / Hingaia Road corridor. The road safety assessment should be extended to examine the whole corridor.
35. There are at least five existing intersections to the east of Kingseat along the corridor where there are no existing right turn bays and vehicles turning right into side roads must wait in the live traffic lane. This increases the risk of a rear-end crash and this can be more serious in a rural area due to higher speed limits. It can also increase the risk of a side impact crash as the turning driver may feel social pressure to take smaller gaps when turning to avoid blocking traffic waiting in the lane behind them.
36. Additional assessment of these potential safety effects should be provided by the Applicant. Mitigation measures, such as upgrading intersections to provide right turn bays should be considered.
37. Similar effects can also occur where drivers are turning right into property accesses, and these should also be assessed in the TAR.
38. Where traffic volumes on a road are near capacity this can result in drivers turning out of side roads and vehicle crossings taking shorter gaps, resulting in an increase in crash risk. This should be assessed in the TAR.
39. As the volume of traffic using a road increases, the likelihood of a head-on crash also increases. For an undivided carriageway like Linwood Road a doubling of the number of vehicles can be expected to roughly equate to a fourfold increase in the risk of head-on crashes because drivers are much more likely to encounter another vehicle travelling in the opposite direction if they

inadvertently stray into the opposing lane for any direction. This should also be assessed in the TAR.

**Kingseat Village Master Plan – Linwood and Kingseat Road**

40. The Kingseat Village Masterplan prepared by Barker & Associates dated 10 August 2025 contains the potential road layout for the proposed development along with lot boundaries but is not a detailed engineering design for the road network. Whilst this contains matters of detail to be considered if the matter is referred, AT's transportation engineering advisor has provided some suggestions on potential key issues to be addressed.
41. Consent BUN60318271 for 9 McRobbie Road, Kingseat included Condition 180 requiring the intersection of Kingseat Road and Linwood Road to be upgraded to address potential safety issues and provide capacity for traffic turning out of McRobbie Road:

**Upgrading of Existing McRobbie Rd / Linwood Rd / Kingseat Rd intersection**

180. Design and install an upgrade to the intersection of McRobbie / Linwood / Kingseat Roads. The intersection shall be designed in accordance with ATCOP.

**Advice Note:**

*The consent holder may negotiate an interim solution for the intersection to allow the first stage of the development to proceed. All other stages will require the final intersection layout to be established prior to the obtaining of 224c certification for that stage. The interim solution is likely to include widening and a right turn bay on Linwood Road for traffic turning into McRobbie Road. The final intersection layout will likely involve a roundabout.*

42. This consent has not yet been implemented (consent expiry is in 2028). The condition does not specify the form of intersection but includes an advice note stating that it is likely to be a roundabout. AT envisages that the proposed Kingseat Village development would have similar effects on the intersection and that, if the intersection is not already upgraded to a roundabout by the time the first dwelling is occupied, that the Applicant should be required to do this as a condition of consent.
43. Figure 2 below shows an excerpt from the masterplan document showing potential intersection locations on Linwood Road. ATs' transport engineering advisor has annotated the location of each intersection and discussed each of them below.



Figure 2: Excerpt from Masterplan document showing intersections on Linwood Road.

44. Intersection A is a crossroads intersection. While an intersection in this location is useful to provide access to the east side of the local centre zone, priority-controlled cross-roads will not operate safely in this location, and this intersection should take the form of a roundabout.
45. Intersections B, C, and D are T-intersections off Linwood Road. It is recommended that these are designed as left-in / left-out only. Alternatively, intersections B and D could be closed off to vehicular traffic entirely and only provide active mode (pedestrian and cyclist) connections.
46. The Kingseat School site is located opposite intersection B and an appropriate pedestrian crossing facility should be provided directly outside of the school.
47. Intersection E is the first intersection on Linwood Road where urban development is zoned on both sides. As such it will be a gateway to the local centre and should be designed as a roundabout to slow through traffic as it enters and signal to drivers that they have transitioned from a rural to an urban environment.
48. Roadside areas on both sides of Linwood Road between the Kingseat Road intersection and Intersection E should be upgraded to urban standards as part of the proposal.
49. Intersection F should be made an active modes only link providing a connection between the internal road network and the path running along the stream edge. Driver sight lines looking eastward from this intersection along Linwood Road are limited by a vertical crest curve and it appears unlikely that applicable engineering standards relating to minimum sight distances can be met, resulting in a road safety hazard. Even if the sight line issue were to be addressed, vehicle operating speeds along with high traffic volumes in this location mean that the risk of a high severity crash at an intersection in this location are likely to be above the level acceptable for a new intersection.

### ***Kingseat Village Master Plan – Internal Road Network***

50. ATs public transport specialists have provided information on a potential future public transport route through the development. To avoid delays to buses, on-street parking should be avoided along this route, vehicle crossing numbers minimised by ensuring lots have alternative access, and wider lanes (3.5m in each direction) should be provided. Intersections should be designed to allow for bus tracking. Specific details on other requirements for bus routes can be found in Auckland Transport’s Transport Design Manual. This route is indicated with a dashed yellow line and the letter H in Figure 1 above.
51. The intersections indicated with a G should be designed as roundabouts capable of accommodating buses.
52. Major roads within the site should have separate off-road bike paths running parallel to the footpath and providing cycling access to the local centre and school. Vehicle crossings across these paths should be avoided.
53. There are a significant number of crossroads intersections shown in the masterplan layout. These can have higher crash rates than T-intersections depending on the layout. These intersections should be designed as roundabouts. For minor local to local road intersections mini roundabout designs which take minimal additional space can be provided, but intersections on more major roads will require larger roundabouts.
54. Some of the intersections have roads intersecting at angles which are not right angles. Ideally roads should intersect at right angles (plus or minus ten degrees). Angles more or less than this can result in difficult viewing angles for some drivers, higher operating speeds for some turn movements, and wider intersections to allow for vehicle tracking (which requires more land and results in higher crossing distances for pedestrians).
55. Some cul-de-sacs are proposed as part of the design. These are generally not favoured as they are not conducive to good permeability for walking and cycling travel modes, but it is recognised that the riparian margins within the site impose a constraint on the road layout. If cul-de-sacs are provided, they should have good walkway connections to the pathways in the riparian margin.

### **Public Transport**

56. Public Transport Services to Clarkes Beach, Waiau Pa, Kingseat and Karaka are programmed to run at 30 -minute interval in peak times and hourly at other times from April 2026. AT has no plans for further upgrading of services after this time which would be demand driven.
57. Section 7.1 of the TAR addresses public transport. It includes a statement that a population of 6,000 should be seen as a tripping point at which it becomes possible to make major public transport improvements. No information is included on the TAR to justify why a population of 6,000 should be considered to have special significance in regard to public transport. We have not identified any AT policy or standard which would require or recommend better public transport provision at this particular threshold.

58. More assessment should be provided by the Applicant to support their contention that the additional population in the Stage 2 area would facilitate improved public transport for the Kingseat Precinct. Many of the dwellings in the Stage 2 area are located at a substantial walking distance from where the nearest bus stop can be reasonably located, and this is likely to limit public transport as a travel mode.

#### **Stormwater Matters**

59. Whilst these are matters of detail, should the proposal proceed to a further stage, AT's water infrastructure advisor has the following comments:

- a) AT does not support the proliferation of small, individual stormwater devices within the road reserve due to the high operation and maintenance costs. Given the requirement for providing communal treatment devices under the Kingseat Precinct Plan and given that the Applicant is proposing this for water quality, we expect there is an opportunity to achieve hydrology mitigation within the proposed treatment devices. We note the following is outlined in the Kingseat Precinct Plan:
  - i. Kingseat Precinct plan states in I418.2.(vi) that 'On-site management and the use of communal devices or facilities to reduce stormwater contaminants, volumes and peak flows and minimise adverse effects'
  - ii. And in I418.3.(11)(b) Establishing open space, stormwater reserves, approved stormwater infrastructure (quality and detention) and approved wastewater infrastructure, in an appropriate and timely manner, cognisant of
    - i. the full life cycle costs of the asset.
- b) Overland flow paths within the road reserve are to be designed such that they do not create hazardous conditions for road users in the 1% AEP + 3.8-degree climate change event. This hazard is measured in terms of depth x velocity and energy grade line, as outlined in Table 3 of the Road Drainage chapter of the Transport Design Manual (TDM).

18 November 2025

Russell Butchers  
Principal Project Lead, Auckland Council  
s 9(2)(a)



Dear Russell,

**Kingseat Village Fast-track Application  
Several properties in Kingseat**

**Introduction**

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Kingseat Village Fast-track referral application (**Application**), made under section 13 of the Fast-track Approvals Act 2024 (**Act**).
2. Kingseat Village Limited, Karaka Centre Limited and Karaka Lakeview Limited (**Applicant**) propose a residential-led development comprising 1,955 dwellings (ranging in density from Large Lot Residential, Standard residential to Medium Density Residential), a retirement village, a neighbourhood centre/community hub, a local centre, wetland redevelopment and restoration, and associated infrastructure located across several properties in Kingseat ("**Project Area**").
3. The zoning of the Project Area is Rural – Mixed Rural, Residential – Single House, Residential – Mixed Housing Suburban, Business – Light Industry and Open Space – Sports and Active Recreation Zones under the Auckland Unitary Plan – Operative in Part (**AUP-OP**). The Applicant is proposing to privately service the development for both water supply and wastewater.
4. The Applicant is proposing to privately service water supply via a reticulated network which will be installed and managed by a Utility company set up by the Applicant. Water will be extracted from three bores which the Applicant holds existing resource consents for. Collection and storage of roof runoff for purpose of retention and re-use for non-potable uses will also be implemented across the site.
5. For wastewater the Applicant holds an existing resource consent for the construction and operation of a wastewater treatment plant consisting of a Membrane Bioreactor (MBR) treatment process before discharging through three constructed treatment wetlands to a tributary of the Te Hihi Creek to service the Project Area.

### Watercare's comments

6. Any comments on the proposed private water supply and/or wastewater servicing for the Kingseat Village Project Area will be made by Auckland Council.

7. It is noted that although the Applicant is intending to privately service, in Attachment 8 Infrastructure Memorandum in Section 7.1.2, for water supply its states:

*"There is no publicly reticulated water network within the Kingseat Precinct or the site. Watercare have extended a trunk watermain to Clarks Beach and provided for an extension to cater for the Kingseat Precinct. This pipeline currently terminates 1.2km from the precinct boundary and approx. 2.7km to the site boundary. **Should additional public reticulation supply be required this can be sourced from an extension to the existing OD315 PE pipeline.**"*

8. Watercare wishes to state that any future provision of water supply to the Kingseat area will be designed to the population requiring connection (and funded via growth charges). Due to the applicant's statement that private servicing will be provided for this development, Watercare would not be providing capacity for this development (and therefore connection would not be available) unless specifically requested and funded by the developer or residents prior to the installation of infrastructure. Further, 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 part of the Project Area.

9. Watercare requests that the Applicant confirm that they will privately service the Project Area for both wastewater and water supply and are not intending to rely on a future connection to the public water supply network.

Yours faithfully,



Helen Shaw  
Head of Strategy and Consenting

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

<b>Project name</b>	Kingseat
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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](mailto: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.			
<b>Organisation name (if relevant)</b>	Healthy Waters and Flood Resilience Department, Auckland Council		
<b>*First name</b>	Hillary		
<b>*Last name</b>	Johnston		
<b>Postal address</b>			
<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>	
<b>*Email</b>	s 9(2)(a)		

2. Please provide your comments on this application
<p><i>If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.</i></p> <p>The proposal includes 2 stages of a master planned residential development that will enable approximately 2,120 dwellings, including a 300-unit retirement village.</p> <p>Stage 1 is located within the existing Kingseat Precinct and will include development across a range of differing urban residential and business zoned land. Stage 2 is within the Mixed Rural Zone to the east of the Kingseat Precinct. The overall site drains predominantly to Te Hihi Creek, with the balance draining west towards Whatapaka Creek. The Applicant proposes extensive wetland redevelopment and stream restoration works within the eastern part of the site, which is supported in principle.</p> <p>Section 5 of the Infrastructure Memo outlines the proposed stormwater management approach. In general, the principles align with GD01 and the Kingseat Precinct provisions; however, several matters require clarification and/or refinement to ensure alignment with the RWNDC framework and Schedule 4 requirements.</p>

Insert Fast-track logo

### **Stormwater Authorisation Mechanism**

Section 5.11 of the Infrastructure Memo does not correctly describe the applicable stormwater authorisation process. The diversion and discharge of stormwater runoff from Stage 1 is not automatically authorised by the Region Wide Network Discharge Consent (RWNDC). There is no adopted Stormwater Management Plan (SMP) for this area.

The Applicant may seek authorisation of the diversion and discharge of stormwater through the RWNDC for urban zoned land (only) by submitting a site-specific SMP for assessment, preferably as part of the substantive fast-track application. The SMP will need to demonstrate compliance with Schedule 4 or justify a suitable alternative as the BPO.

For development within rural zoned land, the Applicant must seek a private stormwater diversion and discharge consent.

### **Water Quality Treatment**

The Applicant's Agent has proposed treatment of high-contaminant generating impervious areas (roads, parking, and accessways servicing >50 vpd) in accordance with GD01, with roof runoff excluded where captured for reuse purposes. This approach does not fully meet the requirements of Schedule 4 of the RWNDC, which requires treatment of *all* impervious areas.

It is acknowledged that 81 ha of wetland and stream restoration is proposed, which will provide notable downstream benefits. Treatment of roof areas by means of capture for reuse purposes is also considered acceptable.

Whilst water quality treatment appears generally consistent with the Kingseat Precinct, a SMP which clarifies the proposed water quality treatment as a BPO approach should be provided as part of a substantive application.

### **SMAF / Hydrology Mitigation**

A retention volume of 10 mm is proposed for impervious areas  $\geq 25 \text{ m}^2$ , which is consistent with the Kingseat Precinct provisions. However, this approach is not fully compliant with the RWNDC, which requires SMAF mitigation for *all* new impervious areas.

Runoff which is not directed to a reticulated stormwater network and discharges as sheet flow to land (e.g. grassed areas) rather than directly to a stream environment does not need to comply with the hydrology mitigation requirements of the RWNDC. A SMP which clarifies the proposed hydrology mitigation as a BPO approach should be provided as part of a substantive application.

### **Peak Flow Attenuation (PFA)**

Section 5 of the Infrastructure Memo initially proposes that peak flow attenuation will be provided to pre-development levels for the 1% AEP + climate change event. However, through the pre-application process it was confirmed that attenuation is not required for the Te Hihi Creek catchment due to the size of the upstream contributing catchment and the site's location at the

downstream extent of the catchment. Section 5.1.4 reflects the pre-application discussions. This inconsistency should be resolved to avoid misunderstanding at further stages of development.

#### Vesting of Assets

The Application does not clarify the proposed ownership or long term operation and maintenance structure for the proposed 81ha of stream and wetland restoration. HWFR see no stormwater management need to have these areas vested in Council.

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**



Date: 19/11/2025

Mark Iszard

Growth and Development Manger

Healthy Waters and Flood Resilience

## 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	Kingseat Village
Address	956 Linwood Road, Kingseat (The application site comprises several parcels of land, including Lot 2 DP 337090, Lot 2 DP 441714, Lot 1 DP 500236, Lot 1 DP 537875, Lot 3 DP 400117, Lot 1 DP 417814, Lot 2 DP 537875, and Sect 2 SO 544696).
FT application number	FTAA-2510-1104 (PRR00043412)

### Respondent Information

Name	Kathleen Hudson
Role	Parks Planner (Consultant) on behalf of Council.
Agency / Department	Parks Planning
Date	18/11/2025

### Do you support the proposal proceeding through fast-track?

- Support  
 Oppose  
 Neutral

### Agency/Department Response

<p><b>Auckland Council Parks Planning review and response</b></p> <p>Auckland Council Parks and Community Facilities have reviewed the material provided with the referral application, including the Planning Memorandum, Masterplan and Urban Design Statement. The review has been focused on the proposed open space network.</p> <p>Our position on the referral is <b>Neutral</b>. The project is not considered unsuitable for the fast-track process from a Parks perspective as the draft plans demonstrate a high-level commitment to providing a comprehensive open space network within the wider site.</p>
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Parks comments regarding the s22 assessment criteria are as follows;

- Does the project have significant regional or national benefits? **Not from a PCF (Parks and Community Facilities) perspective.**
- Would referring the project facilitate its delivery in a more timely and cost-effective way? **Not from a PCF perspective. Modeling is required for open space provision in the area not within the Kingseat structure plan area**
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process? **No comment from a PCF perspective**
- Has the project been identified as a priority in any government or sector plan or strategy? **Not identified as a priority in any Parks and Community Facility strategic documents.**
- Will the project deliver new or support existing regionally/nationally significant infrastructure? **Not from a PCF perspective.**
- Will the project increase housing supply or contribute to a well-functioning urban environment? **No comment from a PCF perspective.**
- Will the project deliver significant economic benefits? **No comments from a PCF perspective.**
- Will the project support primary industries (e.g., aquaculture)? **No comment from a PCF perspective.**
- Will the project support development of natural resources (e.g., minerals, petroleum)? **No comment from a PCF perspective.**
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)? **No comment from a PCF perspective.**
- Will the project support climate change adaptation or recovery from natural hazard events? **No comment from a PCF perspective.**
- Will the project address significant environmental issues? **No comment from a PCF perspective.**
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)? **Not entirely consistent with PCF strategic documents.**
- Are there any other relevant matters to consider? **Please see further comments below**

**Parks neutral position is based on the following considerations:**

The proposal is for a large-scale urban development that will create significant new demand for parks and recreation. The proposed Masterplan includes the provision of a Sports Park within the Open Space zoned land previously acquired by Council and five new Neighbourhood Parks. The proposal also involves an 81ha wetland restoration reserve with associated blue/green corridors which Healthy Waters is responsible for reviewing for acceptability. It is understood HWs position is that there is no stormwater management need to have this area vest in council. This will be for this unit to confirm.

*Key regulatory documents*

The land to be developed at Stage 1 (8.8ha approximately) is part of the Kingseat Precinct and is guided by Precinct Chapter I418 of the Auckland Unitary Plan. Three Neighbourhood

Parks and a Sports Park is proposed at this stage. The Sports Park located within the Open Space land is envisioned by the Precinct Plans.

The land proposed to be developed in stage 2 is 220.9 ha approximately. Two neighbourhood parks are proposed at this stage. This site is not part of the Precinct, rather is zoned Mixed Rural Zone. This zone does not have any specific provisions for large-scale residential development or associated reserve and open space development.

The Kingseat Structure Plan is relevant to the consideration of the Masterplan. The Structure Plan identifies the need for a connected open space network which provides both active and passive recreational opportunities. Stage 1 of the Masterplan appears to achieve this through the provision of dispersed neighbourhood reserves and a Sports reserve. As Stage 2 is not located within the Precinct, the structure plan is not relevant to the development at this stage. However, as this area is considered out of sequence an assessment is still required to ensure the future community is served with necessary infrastructure.

#### *2025 Manaaki Tamaki Makaurau Open Space Policy*

The 2025 Manaaki Tamaki Makaurau Open Space Policy document is also relevant and provides guidance on the development of new Neighbourhood and Sports Parks. The metrics relevant for parks is included in the document. The Masterplan is not consistent with the relevant provisions of the Open Space Policy document in terms of Parks provisions noting Neighbourhood and Sports Parks are recommended to have a radial catchment of 450m where the proposed parks provision exceeds this. Further information on the recommended parks metrics of the document include;

- Radial catchment of 450m per park.
- 3000m<sup>2</sup> minimum, 5000m<sup>2</sup> maximum park size
- 30x30, unobstructed flat kick ball space at a gradient no greater than 3%. Remainder of the park to be no more than 5% gradient.
- Park land must also be free from encumbrances including infrastructure, utility devices and easements.

Parks raises concern around the number of parks proposed to be vested. As the radial catchment of 450m per park is exceeded, a higher number of smaller parks with overlapping catchments may result in duplication of users and consequent higher operational costs. From an open space provision perspective, Parks seek to maximise the utility of each park catchment to improve long term usability and maintenance of these open spaces.

#### *Connectivity*

Connection within a wider network should be carefully considered when designing and locating public spaces. The Masterplan should aim to maximise off-road links.

To the northeast, open space provision should be laid out to ensure these areas are well served by off road connections.

To the South, the Kingseat Sports Park could be linked via greenways. A safe crossing at Linwood Road would be required. While this park is not currently used for organised sports, growth in Kingseat Village may create future demand for investment in this space.

The plan should also be designed to ensure good connectivity to Parks and Reserves outside of the development site including the tennis courts and play space on McRobbie Road and any esplanade reserves in the wider area.

*Conclusion*

In conclusion, while the Masterplan appropriately incorporates Sports and Neighbourhood Parks for recreational benefits as envisioned within the Kingseat Precinct, the density of Parks provided exceeds the need for the community and doesn't justify the additional operational cost associated with it. From a Parks perspective three suitably sized and located publicly vested neighbourhood parks and a sports field to serve the future community is considered sufficient for this development. As a large proportion of the site is also outside the Precinct and not zoned for large scale residential, further details are, however, required to form an opinion on the specific needs.

It is noted the decision for acquisition of the parks land ultimately lies with the local board. Notwithstanding, it is critical that the applicant ensures open space provision and site-specific metrics are considering the wider open space network and wider connectivity,

While proposal does not provide significant national or regional benefit from a Parks and Community facilities perspective, it does have potential to provide some recreational benefit for the local area. Parks and Community Facilities position on the proposal is therefore neutral.

**Prepared by:** Kathleen Hudson - Parks Consultant Planner

*Kathleen Hudson*

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**Date:** 18/11/2025

**Released by Parks Agency Lead:** Hester Gerber - Manager Parks Planning

*Hester Gerber*

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**Date:** 18/11/2025

## Referral Application Feedback Form

### Project Information

Project Name	Kingseat Village
Address	956 Linwood Road, Kingseat
FT application number	FTAA-2510-1104 (PRR00043412)

### Respondent Information

Name	James Stewart
Role	Economist
Agency / Department	Chief Economist Unit, Auckland Council
Date	13/11/2025

### Do you support the proposal proceeding through fast-track?

- Support
- Oppose
- Neutral

### Agency/Department Response

#### Critique of Economic Impact Analysis

1. Sections 4 and 5 of the Insight Economics report<sup>1</sup> adopt an Economic Impact Analysis (EIA) using input-output modelling. This methodology has several limitations.
  - a. It estimates gross economic activity in terms of GDP and employment rather than net economic benefits.
  - b. It combines costs and benefits together as economic activity, overstating the value of the project to society.
  - c. It ignores opportunity costs of land, labour, and capital resources and omits environmental and social costs.

<sup>1</sup> Insight Economics Ltd. Economic Assessment of Proposed Kingseat Village Development for Fast-Track Referral. Prepared for Kingseat Village Limited. Final Report, 21 October 2025.

- d. It assumes fixed prices and resource availability, ignoring scarcity.
2. The results from an EIA do not assist decision makers in determining whether a project improves overall societal wellbeing or whether it has significant benefits for society.
  3. The report relies on the results of the EIA to determine the project has “significant regional economic benefits.”<sup>2</sup> In my view, this statement cannot be justified with an EIA. The GDP and employment estimates are not meaningful indicators of the Proposed Development’s value.
  4. I understand the legislative intent of the Fast-track Approvals Act is to improve societal wellbeing and GDP flows are not a good measure of this. GDP is a flow measure and can increase following adverse events (e.g., Christchurch earthquakes), without implying a net benefit. GDP does not imply improvements in wellbeing or net resource gains.
  5. Employment is not inherently a benefit; labour could be employed elsewhere, representing an opportunity cost and unemployed individuals value leisure or may be searching for better opportunities and choosing to remain unemployed. However, if it could be shown that the Proposed Development would employ otherwise unemployed people with the requisite skills in the area and only to the extent that those people value working over not working.

**Recommendation: Employ Cost-Benefit Analysis (CBA)**

6. As an alternative, a cost-benefit analysis (CBA) should be adopted. CBA evaluates both costs and benefits to determine the net impact on societal wellbeing. It incorporates opportunity costs, environmental effects, and long-term outcomes, providing a more robust and transparent basis for decision-making. This approach aligns with the Fast-track Approvals Act’s requirement to assess significant regional or national benefits and is focused on improving societal wellbeing.
7. CBA is supported by NZ Treasury<sup>3</sup>, the Australian Government<sup>4</sup>, and regularly adopted by Government agencies such as Waka Kotahi and the Ministry for the Environment.

**Other Observations**

8. The report lists several benefits without quantifying them or presenting them within a cost-benefit framework. The absence of cost considerations undermines the credibility of the analysis. Economics is fundamentally concerned with trade-offs due to resource scarcity – we have unlimited wants but limited means. Listing benefits without acknowledging costs

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<sup>2</sup> Insight Economics Ltd. Economic Assessment of Proposed Kingseat Village Development for Fast-Track Referral. Prepared for Kingseat Village Limited. Final Report, 21 October 2025. (Page 23)

<sup>3</sup> The Treasury. Guide to Social Cost Benefit Analysis. Wellington, New Zealand: The Treasury, July 2015. ISBN 978-0-478-43698-3.

<sup>4</sup> Commonwealth of Australia. Handbook of Cost-Benefit Analysis. Department of Finance and Administration, January 2006. ISBN 1 921182 01 6.

does not assist decision-makers in evaluating the net value of a project (or policy) so is unhelpful in understanding the resource trade-offs we face as a society.

### **Assessment of Claimed Regional Significance**

9. The proposed development includes circa 2,000 dwellings over five years. In the context of Auckland's housing stock (~609,000 dwellings by August 2024<sup>5</sup>), this represents approximately a 0.3% increase. Compared to around 17,500 dwellings consented annually<sup>6</sup>, the project adds almost 400 dwellings per annum, which, in my view, does not appear regionally significant, though may be significant at a more localized level e.g., significant to (former) Franklin District.
10. At face-value, the location of the Proposed Development may be more costly to service with infrastructure, given it is in a location not anticipated to grow within the life of the Future Development Strategy or Auckland Unitary Plan. These areas have no planned infrastructure investment to enable urbanisation and the planning and reprioritization of investment may be costly.
11. In my view, the report does not demonstrate significant regional or national economic benefits. Purported benefits are not quantified or assessed against the trade-offs that arise. Applying criteria from Dr Tim Denne's advice to a panel on previous fast-track application<sup>7</sup> to determine if a project meets the threshold for significant under the Fast-track Approval's Act (paraphrased):
  - Does the project have a large positive net present value?
  - Does it utilise significantly underutilised resources?
  - Will it generate large spillovers into other industries?
  - Will it have a transformative effect on the economy?
12. No evidence has been presented that the Proposed Development would give rise to a large net present value. This would require an assessment of the marginal costs and benefits of the Proposed Development which has not been undertaken in the report.
13. There is no evidence to suggest that resources are being underutilized, in fact, the Proposed Development will likely require significant additional resources to construct supporting growth infrastructure. This suggests that the resources are not being underutilized.
14. At face value, the Proposed Development is unlikely to generate large spillovers or have a transformative effect on the economy given the proposed uses and scale of the development.

<sup>5</sup> James Allan Jones, Ryan Greenaway-McGrevy, and Chris Crow, "Using Council Valuation Records to Estimate Auckland's Housing Stock," Policy Quarterly 21, no. 1 (February 2025): 63–68.

<sup>6</sup> Calculated as the 5-year annual average ending September 2025. Source: Stats NZ.

<sup>7</sup> Denne, T. (2025). Delmore Fast Track Approvals Act Application – Review of Economic Analyses. 13 August 2025. Page 5.