

4 August 2025

The Ministry for the Environment
PO Box 10362
Wellington 6143
New Zealand

Attention: Naz Buffkins
contact@fasttrack.govt.nz

Dear Naz,

Subject: Response to Notification under Section 30 of the Fast-track Approvals Act 2024

Thank you for your letter regarding your invitation for Auckland Council to provide written comments on the referral application to lodge a substantive application for Hobsonville Retirement Village under the Fast-track Approvals Act 2024 (FTAA). We have provided written comments to each of the four questions below.

We note that a request for written comments has been sent directly to Auckland Transport and Watercare Service Limited. We defer to their comments on those matters.

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 also confirm this in writing.

In terms of Consent applications under the Resource Management Act 1991, historical applications have been made to operate a cleanfill at the site that have either been cancelled after public notification, or rejected under s88.

Council has no records of any competing applications.

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 also confirm this in writing.

According to council's records, two consents under the Resource Management Act 1991 have been granted in relation to the site;

- **Resource Consent Number:** DIS80297633
- **Holder of Consent:** P & H Panayiodou
- **Description of Consent:** Discharge consent for residential septic tanks.
- **Issue Date of Consent:** 10.02.1998
- **Expiry Date of Consent:** 31.12.2006

Note: The Discharge consent (as a resource consent to undertake an activity s15 of the RMA) is a consent where section 124C(1)(c) could apply.

- **Resource Consent Number:** LUC80025128
- **Holder of Consent:** Peter Andrew Panayiodou
- **Description of Consent:** New dwelling exceeding site coverage.
- **Issue Date of Consent:** 20.01.1998

Under section 20(1) I also invite you to provide further information on whether the project would have significant regional or national benefits (refer to section 22 of the Act for the criteria for assessing referral applications). Additionally, and in this context, provide any high-level commentary regarding the project's alignment with the Council's relevant plans, policies, and/or strategies.

Executive summary:

1. Council has read the supporting information and from a coarse-grain assessment finds:
 - The proposal is unlikely to have significant regional or national benefits.
 - The proposal to be inconsistent with the policy direction the Auckland Unitary Plan, the sequencing set out in the Future Development Strategy 2023-2053, and the anticipated future zoning in the Whenuapai Structure Plan (2016).

Does the proposal have significant regional or national benefits?

2. There is no compelling evidence that this application would provide significant regional or national benefits. The economic report provided by the applicant states that the proposal will serve an under-served market in West Auckland, but also notes there are at least three large retirement living developments being developed in Hobsonville, Whenuapai and Huapai at the time of the report being written (February 2023) which suggests this type of proposal is relatively common within the locality.

Commentary regarding the project's alignment with the Council's relevant plans, policies, and/or strategies:

Auckland Unitary Plan

3. The site is located in the Future Urban zone of the Auckland Unitary Plan (AUP).
4. The proposal is contradictory with the policy direction of the Auckland Unitary Plan (AUP). A retirement village of the scale and intensity proposed has a fundamentally urban form and character, which Objective H18.2 (4) seeks to avoid in the Future Urban zone. The proposed retirement village raises concerns with respect to the consistency of the proposal with the Regional Policy Statement of the AUP B2.2.2(3) and (4).
5. Auckland Council v Matvin Group [2023] ELHNZ 260 is a particularly relevant piece of case law about urban development in the Future Urban Zone (FUZ). The appeal to the High Court challenged whether consent should be granted for a retirement village in the Future Urban Zone. In March 2023 an expert panel convened by the COVID-19 (Fast-Track Consenting) Act 2020 had granted consent for a 422 unit, 88 care bed retirement village (plus café and childcare facility) on a 10ha site at Riverhead, Auckland.
6. Paragraphs 34-38 of the decision state the following:

[34] Looking then to the policies of the FUZ, the only development specifically allowed is development which supports the policies of the Rural — Rural Production Zone unless that development is inconsistent with policies H18.3(2) to (6), (H18.3(1)). Policy H18.3(3) requires development to maintain and compliment rural character and amenity. Policy H18.3(5) prevents the establishment of more than one dwelling on a site except for the provision for minor dwellings and workers' accommodation. Finally, Policy H18.3(6) requires the avoidance of development of land that may result in one or more of seven specified results, one of which is to undermine the form or nature of future urban development.

[35] Again, quite strong words are used — “require”, “avoid” and “prevent”.

[36] In interpreting the FUZ provisions, it is not a question of weighing up the various objectives and policies for and against urban development. There are no provisions specifically allowing urban development.

[37] Here I agree with the dissenting opinion of the Panel Member, Dr Lee Beattie, when he states:

“This policy framework (Objectives and policies) sets a very high threshold test of ‘avoiding’ urbanisation until these issues can be appropriately addressed. In my view the current proposal represents ad hoc development, (non-sequenced and un-funded urban growth) which pre-determines the most appropriate form of urban growth for the site and the wider Riverhead area as a whole, thereby being contrary to both the intent and actual wording of the District Plan section of the AUP (Operative in Part) and therefore failing the ‘policy’ gateway test at s 104D.”

[38] I am therefore persuaded that the Panel made an error of law in finding that the overall purpose of the FUZ was to preclude activities that may compromise future urban development. The overall purpose of the FUZ is as a holding zone and to provide a transition from rural to urban use and development. The zone recognises the need for comprehensive and intentional design for soon-to-be urban areas. Until rezoned urban, the primary set of activities that are to occur in the FUZ are rural.

7. The Court is clear in its finding that urban development is not anticipated in the Future Urban Zone, and it is intended to maintain its rural character until it is rezoned.
8. The nature of the FUZ objectives and policies are to enable rural use of the land until a site has been through the RMA plan change process. The FUZ does not contain and provisions specifically allowing urban development until the site is re-zoned for urban purposes (e.g. consents required for infringement of FUZ yards).
9. I consider that the proposed activity is inconsistent with Part 2, 3 and 6 of the RMA, which enables zones for specific land uses: and this development proposes urban uses within a

zone not intended for such purposes. This raises concerns about effectively managing land use in the future, even if the Fast Track application is referred to the Substantive application stage and approved. I therefore consider that it is not appropriate for this development to occur in the FUZ, ahead of a structure plan and plan change process.

Future Development Strategy 2023-2025

10. The Future Development Strategy 2023-2025 (FDS) sets out the sequencing of when Future Urban zoned land is ready for urban development based on the provision of major infrastructure.
11. FDS specifies that this area, the Whenuapai East strategic area, is not development ready before 2035 and requires the following infrastructure projects to be undertaken before the rezoning of this land could be contemplated:
 - Brigham Creek Road upgrade
 - SH16-SH18 connections
 - Hobsonville Road Upgrade
 - Upper Harbour (SH18) Rapid Transit
 - Whenuapai Wastewater package 2
 - Trig Road Water Reservoir
 - North Harbour No. 2 Watermain Project
12. The proposal will reflect an 'out of sequence' development of the site and has the potential to undermine Council's infrastructure planning and funding programme.

Whenuapai Structure Plan (2016)

13. Furthermore, the Whenuapai Structure Plan (2016) identifies the subject land as future medium-density residential development. The proposed density and built-form are significantly beyond what is anticipated in medium-density residential development, until such a time as the land is re-zoned for urban purposes.

If you have any questions or require further clarification, please do not hesitate to contact me by email.

Yours sincerely,
Petra Burns
Senior Planner
Auckland Council
s 9(2)(a)

Hon Tama Potaka

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



22 July 2025

CORTP-4713

Hon. Chris Bishop
Minister for Infrastructure
c.bishop@ministers.govt.nz

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the Hobsonville Retirement Village project. This project comprises approximately 354 retirement units, with a mix of different housing typologies, including attached dwellings, apartments and care units.

Households moving into these units will free up housing elsewhere, helping to increase the supply of housing generally and to address Auckland's housing issues. With a median home sale price of \$965k and an average weekly rent of \$644 as at January 2025 – compared to \$750k and \$569 for New Zealand as a whole – Auckland is among the most expensive places in New Zealand to buy or rent a home. The aging population will benefit from this development, which will provide an alternative housing option for existing residents seeking to downsize.

The site is zoned Future Urban in the Auckland Unitary Plan and is identified in the Auckland Council Whenuapai Structure Plan as suitable for high density land use. It was recently included in Auckland Council's *Investment Priority Areas Infrastructure Investment 30 Year Programme*, meaning it is a growth area of focus for council investment. The site is currently occupied by a large commercial building.

As there is some flood risk on the site, the Expert Panel will need to consider appropriate mitigations as part of subsequent steps in the process.

I have no concerns, from the perspective of the Housing Portfolio, about this project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora

A handwritten signature in blue ink that reads "Tama Potaka".

Hon Tama Potaka
Associate Minister of Housing



28 JUL 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Three Fast-track Approvals Act referral applications – Received 26 June:

Dear Chris

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

- Hobsonville Retirement Village, FTAA-2504-1068

Out of Scope

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.

Hobsonville Retirement Village - FTAA-2504-1068

This proposal involves the construction of a retirement village in 82 Hobsonville Road, comprising approximately 354 units on a 4.05-hectare site. It includes communal facilities such as a residents' lounge, pool, croquet lawn, bowling green, and landscaped grounds.


The project is expected to generate substantial economic activity in Auckland over its five-year construction period, including \$207.8 million in direct construction spending and a \$192 million contribution to regional GDP. It is projected to create 1,917 full-time jobs over the construction period. Once operational, it is expected to contribute \$11 million annually to GDP, support 151 ongoing jobs, and generate over \$10 million in annual local household spending.

This development will generate short- to medium-term benefits from construction activity. It will deliver long-term economic benefits through sustained employment and providing additional infrastructure in the housing sector.


For these reasons, this project aligns with the Government's economic growth ambitions, however the primary benefits from the proposal relate to addressing housing needs. The application may be best assessed under section 22(2)(a)(iii) of the Act, which considers proposals that increase housing supply, address housing needs, or contribute to a well-functioning urban environment.

Out of Scope

Out of Scope



Out of Scope



Sincerely



Hon Nicola Willis
Minister for Economic Growth

Hon Judith Collins KC

Attorney General
Minister of Defence
Minister for Digitising Government
Minister for the Public Service
Minister Responsible for the GCSB
Minister Responsible for the NZSIS
Minister for Space



Hon Chris Bishop
Minister for Infrastructure

Dear Minister Bishop

ADDITIONAL FEEDBACK ON HOBSONVILLE RETIREMENT VILLAGE PROPOSAL

You invited me to comment on an application for referral of the proposed Hobsonville Road Retirement Village to an expert panel under the Fast-track Approvals Act 2024. The proposed site is located near Royal New Zealand Air Force Base Auckland and is within Ministerial designation 4311 in the Auckland Unitary Plan, which sets height restrictions (through Obstacle Limitation Surfaces – OLS) to protect flight operations. Key aspects of the proposal (including six-storey buildings) would breach these restrictions.

I want to highlight that the applicant has not sought approval for breaches of the OLS from the New Zealand Defence Force, nor from me as the requiring authority for Designation 4311.

This proposal appears identical to one referred to an expert panel under the Covid-19 Recovery (Fast-track Consenting) Act 2020. That proposal did not ultimately proceed to determination and I am concerned that referral has been allowed to proceed again without due consideration to the designation and related restrictions. These controls are in place for a good reason; regardless of the core intent of the fast track approvals process, we cannot put the operations of the New Zealand Defence Force at risk.

I have formally submitted that this proposal cannot proceed in its current form. I trust that this submission will be given its due weight and the reasons communicated clearly to the applicants.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Judith Collins'.

Hon Judith Collins KC
Minister of Defence



2.5 JUL 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application: Hobsonville, FTAA-2505-1068

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 a retirement village comprising 42 villas, 45 care units, and 267 apartment 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 'C' followed by a stylized 'S' and a horizontal line.

Hon Casey Costello

Minister for Seniors

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

Project name	Hobsonville Retirement Village
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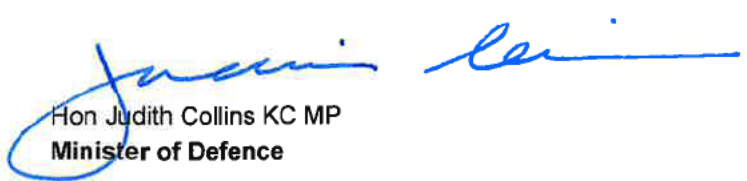
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
*Portfolio	Minister of Defence		
*Name	Hon Judith Collins KC MP		
Contact person (if different from above)			
*Contact phone number		Alternative	
*Email			

2. Please provide your comments on this application
<p>1. The Minister for Infrastructure has invited me to comment on an application for referral of the Hobsonville Road Retirement Village proposal ("the proposal") to an expert panel under the Fast-track Approvals Act 2024 ("FTAA").</p> <p>2. The proposal site is located near Royal New Zealand Air Force (RNZAF) Base Auckland and is within Minister of Defence designation 4311 included in the Auckland Unitary Plan. Designation 4311 sets obstacle height restrictions through Obstacle Limitation Surfaces ("OLS") which protect flight operations at RNZAF Base Auckland. Key aspects of the proposal (including proposed six-storey buildings) will breach the OLS.</p> <p>3. Designation 4311 provides that the OLS cannot be breached without prior approval from the NZDF. My approval as the requiring authority for Designation 4311 is also required under section 176 (1)(b) Resource Management Act 1991. The applicant has not sought approval for breaches of the OLS from the NZDF, nor from me as the requiring authority for Designation 4311.</p> <p>4. I understand that the NZDF will not approve the proposed breaches because of impact on flight operations and safety, and that it will advise me that I do not give approval for the same reasons. I understand that the proposal cannot proceed without those approvals.</p>

5. This proposal appears identical to a project that was referred to an expert panel under the Covid-19 Recovery (Fast-track Consenting) Act 2020. Although the (then) Minister of Defence and Chief of Defence Force requested that it not be referred, it was referred with a direction that the applicants provide a report that building heights would not breach the OLS. It did not proceed to determination under the FTCA. This current proposal includes the key aspects that breach the OLS.
6. For the reasons above, I do not consider that this proposal should be referred to an expert panel under the FTAA.
7. The NZDF has provided separate comment, which complement mine.



Hon Judith Collins KC MP
Minister of Defence

Date: 24 July 2025

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

Project name	Hobsonville Retirement Village
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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		
*First name	Matthew		
*Last name	Richards		
Postal address	20 Viaduct Harbour Avenue, Auckland Central, Auckland 1010		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

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.

Matthew Richards

Managers signoff

1. Introduction

Thank you for the opportunity to provide comments on the Hobsonville Retirement Village Fast Track Project (the Project) for consideration under the Fast Track Approval Act 2024. In summary, Auckland Transport (AT) notes and adopts the position of Auckland Council that the development has provided no compelling evidence that the proposal will deliver significant and regional benefits. The proposal will not deliver any new regionally or nationally significant transport infrastructure and is located on a Limited Access Road. Additional access to Hobsonville Road as proposed could be contrary to the efficient and safe operation of this key arterial road and a Limited Access Road approval process would need to be undertaken. AT cannot provide a position on whether this would be successful, however it is noted that the development is 'out of sequence' and contrary to the timing and sequencing of development as set out in the Auckland Council Future Development Strategy, has the potential to impact on future development of the corridor and the delivery of the infrastructure projects set out in the Whenuapai East area and that these projects are clearly indicated as prerequisites that need to be in place prior to development. These factors would be taken into account in the consideration of the LAR process.

2. Comments for consideration

AT requests that, should the Project be accepted for the Fast Track approvals process then the following comments are taken into account by the applicant and formally referenced in the letter approving the proposal as matters to be addressed in the substantive application

2.1 Wider Transport Network Strategy Impacts

Auckland Transport (AT) is of the view that the proposed development will not deliver significant regional or national benefits as it does not deliver any of the infrastructure outlined in the Auckland Council FDS which is required to be in place to support the development area. AT notes that the Whenuapai Structure Plan is in the process of being updated and hence the integration and alignment of this site as part of that broader process cannot be confirmed and AT considers that it should not proceed unless there is confidence that the development is consistent and achieves the outcomes of that process.

2.2 Localised Transport Infrastructure Impacts

To minimise impacts on the immediate transport environment, the proposal would need to be refined to include the following new and upgraded transport infrastructure being provided by the applicant:

2.2.1 Notice of Requirement W5 – Hobsonville Road FTN Upgrade

The development falls within the Notice of Requirement (NoR) W5, which proposes a change in the function of Hobsonville Road from an existing two-lane road to an urban arterial road with two to four lanes. This upgrade includes mixed-use components for vehicles, public transport, active modes (walking and cycling), and freight.

A 24-metre-wide arterial road is required, consisting of two vehicle lanes, separated active mode facilities in both directions, a median strip, and berm space. The indicative cross-section arrangement is shown below:

Insert Fast-track logo

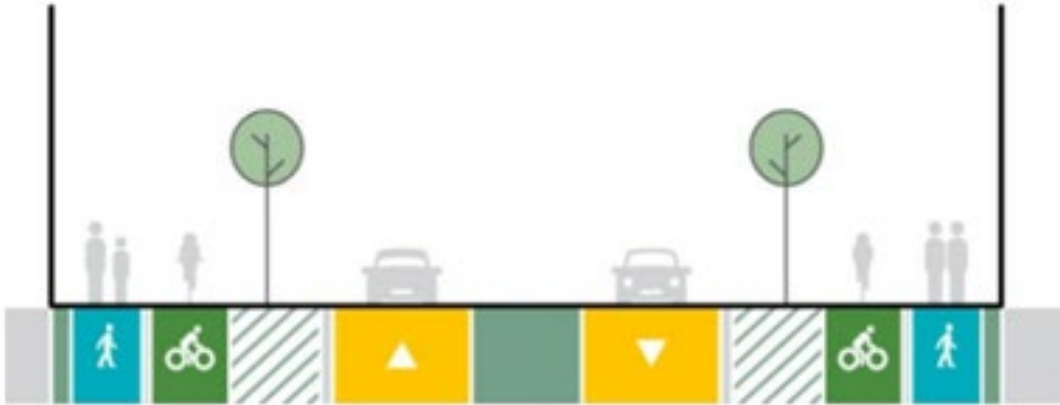


Figure 1 – Indicative cross section arrangement for Notice of Requirement W5 – Hobsonville Road FTN Upgrade

Additional detail is required to ensure the development aligns with the Inner North West Transport Network Strategy and demonstrates how it will integrate with Hobsonville Road—an arterial route planned to include enhanced walking and off-road cycling facilities, supported by limited access from adjacent sites.

The Auckland Transport (AT) and Auckland Council (AC) funding plans for the delivery of North West transport infrastructure include a top-up contribution (i.e., partial funding) for frontage upgrades necessary to support development of the site. This funding is currently scheduled for delivery in 2037.

Any infrastructure upgrade funding must be agreed upon with AT. To date, AT has not been approached to consider a specific agreement outlining the upgrades to be provided by the developer. If development proceeds without an agreement or ahead of the anticipated delivery timeframe, the developer will be responsible for ensuring that all necessary frontage upgrades are delivered independently.

Upon reviewing the submitted plans, it appears that the developer is not proposing to provide any active mode infrastructure along the Hobsonville Road frontage. The extent of the designation's impact on the property varies along the boundary, with more land required on the western end (approximately 4.8 metres from the front of the existing property boundary to the back of the future berm) compared to the eastern side.

Given the limited information provided by the applicant, the following details are required to assess whether the development may hinder or prevent the delivery of NoR W5:

- An assessment of how the development has considered and appropriately integrates with AT's planned road widening.
- An overlay of NoR W5's concept design and designation boundary on the general overview plan and cross-sections of the site frontage to illustrate how the development interacts with the designation.

- A cross-section showing the proposed development.
- A finished contours plan showing the location and cut/fill profile of the proposed bulk earthworks.
- A long section showing the finished contours along the property frontage. This will help AT assess whether the proposed levels can integrate with Hobsonville Road's future levels and identify any necessary regrading.
- AT recommends that the developer apply for s178/s176 approval from AT in parallel with seeking Fast Track approval. This approval is required prior to commencing any works within the NoR W5 designation.

The applicant's architectural plans indicate the construction of structures such as decks within the operational footprint of the NoR W5 Hobsonville Road upgrades, as well as proposed tree planting within the NoR boundary. These elements will need to be relocated outside the operational footprint. As currently proposed, the development has the potential to hinder the implementation of NoR W5 designation works.

2.2.2 Access onto Hobsonville Road

The applicant appears to have submitted two different schemes for the proposed development. One scheme proposes a single access point onto Hobsonville Road (Figure 2), while the second scheme proposes two access points (Figure 3).



Figure 2 – Proposed scheme from Attachment 5 - Infrastructure Report

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Figure 3 – Proposed scheme from Attachment 3 – Architectural Drawings

Section 5 of the Infrastructure Report states:

“It is proposed to create a new vehicle crossing to provide a site connection to Hobsonville Road at the southern boundary of the site. The access, off the site to Hobsonville Road, is likely to be towards the east of the site. The private vehicle crossing will be constructed in accordance with Auckland Transport standards.”

This statement implies that the applicant is proposing a single access point. However, this is not reflected in the architectural drawings, which appear to show two separate access points.

Auckland Transport (AT) has concerns regarding the proposal for two vehicle crossings onto Hobsonville Road. Multiple crossings are likely to increase the potential for adverse impacts on pedestrian and cyclist safety and impact the efficiency and safety of the road for freight, general traffic and passenger transport. Given that Hobsonville Road is a Limited Access Road (LAR), a separate approval will be required from AT for any new access arrangements. An LAR approval is not considered as part of a Fast track application. It is advisable to apply for this approval prior to or in parallel to any substantive application. AT would require clear justification for access to a LAR and particularly if more than one access point is proposed..

2.2.3 Access to public transport and pedestrian amenity

Auckland Transport (AT) notes that bus stop #1697 (151D Hobsonville Road), serving routes 12, 050, and 120, is located approximately 86 metres east of the development. Bus stop #1544 (Luckens Road), serving routes 12 and 120, is approximately 177 metres west of the site.

The applicant has stated in Traffic Report that there is currently no footpath along the site frontage. They also note that a pedestrian refuge crossing to the west of the site is considered a key provision for staff, residents, and visitors to the proposed retirement village.

Given the nature of the proposal, it is expected that a significant number of residents will rely on public transport services. Many of these residents are likely to be vulnerable road users. With 354 units proposed—a substantial increase in residential density within the immediate area—it is essential that the applicant assess whether residents will be able to safely and conveniently access nearby bus stops.

AT recommends that the applicant provide a pedestrian accessibility assessment, including:

- Safe and direct pedestrian connections to both bus stops.
- Integration of footpaths along the site frontage.
- Consideration of crossing facilities and pedestrian safety measures.
- Alignment with AT's standards for pedestrian infrastructure.

2.2.4 Hobsonville Cycling Connection

The proposed development falls within the Hobsonville Cycling Connection project area. Hobsonville Road is a key corridor in the cycle network, providing connections to the north and west, including access to the Northwestern Path leading to the City Centre and beyond. It also links local users to bus stations, ferry terminals, schools, businesses, and retail or entertainment destinations.

The cycleway is intended to improve safety and accessibility for cyclists traveling to the Hobsonville Ferry Terminal and the Northwest Bus Station at Westgate, which serves local services and the Western Express (WX1).

The applicant has not provided any information regarding how the proposed development would interact with the Hobsonville Cycling Connection. As such, further details are required to assess whether the development would hinder or prevent the delivery of this important infrastructure.

AT recommends that the applicant provide:

- An assessment of how the development integrates with the planned cycleway.
- Cross-sectional drawings showing the interface between the development and the cycleway corridor.
- Confirmation that no structures or landscaping will obstruct the future cycleway alignment.
- Consideration of cyclist safety and connectivity in the site design.

3. Integrated Transport Assessment (ITA) to be included in a substantive application

Should the Project be accepted for the Fast Track approvals process, Auckland Transport (AT) requests that the full application material include an Integrated Transport Assessment (ITA).

The ITA should address, but not be limited to, the following matters:

- Operational and safety effects of proposed intersections, including:

Insert Fast-track logo

- Engineering drawings with dimensions
- Details of intersection width
- Vehicle tracking (including for larger vehicles)
- Pedestrian visibility and sight distance assessments
- Pedestrian safety and amenity, including:
 - Assessment of existing and proposed pedestrian infrastructure
 - Evaluation of how infrastructure meets user demand and safety requirements
- Trip generation expected from the proposed development
- Loading and servicing arrangements, including:
 - Confirmation that refuse and loading vehicles will not reverse onto any road
- Bicycle parking requirements for the proposal
- Electric vehicle charging infrastructure, including:
 - Details of proposed facilities
- Construction methodology, including:
 - Assessment of construction and earthworks-related heavy vehicle trips
 - A Draft Construction Traffic Management Plan (CTMP) covering:
 - Effects of construction traffic
 - Measures to maintain safe and efficient operation for all road users
 - Duration and scope of construction and associated earthworks
- Mitigation measures to address any identified adverse effects on the adjacent transport network and road user safety

Date 24 July 2025

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

Project name	Hobsonville Road Retirement Village
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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.

Organisation name (if relevant)	New Zealand Defence Force		
*First name	c/o Mark Brunton (Head of Defence Estate and Infrastructure)		
*Last name	As above.		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application

1. The Minister for Infrastructure has invited the New Zealand Defence Force ("NZDF") to comment on an application for referral of the Hobsonville Road Retirement Village proposal ("the proposal") to an expert panel under the Fast-track Approvals Act 2024 ("FTAA"). The location of the proposal site is located close to Royal New Zealand Air Force (RNZAF) Base Auckland.
2. The proposal site is located within Minister of Defence designation 4311 (Whenuapai Approach and Departure Path Protection) included in the Auckland Unitary Plan – Operative in Part ("AUP"). Designation 4311 identifies obstacle height restrictions through Obstacle Limitation Surfaces ("OLS") which protect flight operations at RNZAF Base Auckland. The designation provides that the OLS cannot be breached without prior approval from the NZDF. Approval from the Minister Defence, as the requiring authority for Designation 4311, is also required for breaches of the OLS (pursuant to section 176(1)(b) Resource Management Act 1991).
3. The height of the OLS above ground level varies from approximately 1m – 27m across the proposal site. The application does not specify building heights, however, buildings of up to six-storeys are proposed, which will breach the OLS.
4. The applicant has not sought approval for breaches of the OLS from the NZDF, nor from

the Minister of Defence as requiring authority (as required under section 176(1)(b) RMA. The NZDF will not approve such breaches because of impact on flight operations and safety.

5. The proposal appears to be identical to a project the applicants sought to be referred to an expert panel under the Fast-track Consenting (Covid-19 Recovery) Act 2020. Although the (then) Minister of Defence and Chief of Defence Force requested that it not be referred (for the reasons above), it was referred with a direction that the applicants provide a report that building heights would not breach the OLS. It did not proceed to determination under the FTCA. The current proposal includes the key aspects that breach the OLS.
6. The proposal cannot proceed as currently proposed. The NZDF's position is that this current proposal should not be referred to an expert panel under the FTAA.
7. The Minister of Defence has also provided comments, which complement the NZDF's comments.



T DAVIES

Air Marshal
Chief of Defence Force

Date 18 July 2025

To: Ilana Miller (by email)

From: Anna Jennings

Re: Application for referral of the Hobsonville Retirement Village project under the Fast-track Approvals Act 2024.

Dated: 25 July 2026

Introduction

1. Kings Heights Group Limited (**Applicant**) is proposing to develop an approximately 4.05ha site located at 82 Hobsonville Road, Hobsonville (**Site**) to form a retirement village (**Proposal**). It is proposed to apply for referral for processing under the Fast Track Approval Act 2024.
2. The Proposal would result in administrative and reception areas, four five or six storey buildings accommodating 267 residential units with each building having undercroft parking, 42 villas including 25 two bedroom and 17 three bedroom units, a 45 bed/ room care unit providing hospital level care for residents, shared facilities including a resident's lounge, pool, croquet lawn, bowling green, and landscaped grounds including walkways throughout the Site, an open space area around the waterway that passes through the Site.
3. The Site is zoned Future Urban Zone (**FUZ**), within the Whenuapai 3 Precinct, and is in the Whenuapai East future urban area as outlined in the Future Development Strategy (**FDS**) which is timed to support development from 2035+. The listed pre-requisites, as stated in the FDS, for this area are the Trig Road Water Reservoir and the North Harbour No. 2 Watermain Project. However, it is important to note that as stated in the FDS, this is not an exhaustive list.
4. A technical memorandum from Airey Consultants Limited dated 20th February 2023 proposes:
 - a. For wastewater, a private low pressure wastewater system which will be installed within the site to limit the additional flow to the existing downstream network. Airey state that as a result, there would be no stormwater infiltration into the sealed LPS pipework or chambers and, eventually less flow will be discharged into the downstream public wastewater reticulation network.
 - b. For water supply, connection to the public system on the northern side of Hobsonville Road. A private water supply network within site would be provided to ensure potable water and firefighting supply to the development.

Watercare's purpose and statutory obligations

5. 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.
6. 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 FDS.
7. 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 CCOs which requires working with Council and other CCOs to achieve the outcomes and objectives set out in the Auckland Plan 2050.

Watercare's existing network

8. For wastewater, the subject site lies within a catchment that ultimately discharges to Pump Station 68 (**PS68**) via the existing 400mm PE wastewater main crossing the motorway. Flows from PS68 are then conveyed to Pump Station 70 (**PS70**) (Hobsonville Peninsula Wastewater Pump Station (**WWPS**)). Both PS68 and PS70 are currently operating at capacity and are unable to accommodate additional flows from the proposed development. The existing wastewater pipeline on the eastern side of Rawiri Stream was not designed to service catchments on the western side, where the development is located.
9. For water, premature use, and overallocation of capacity in the North Harbour 1 (**NH1**) Watermain will ultimately result in reduced levels of service to the wider western and north Auckland community, particularly at peak times. This includes the network being unable to meet levels of service in peak demand, provide sufficient pressure and volumes for firefighting water supply, and maintain network resilience during planned and unplanned events. While the Trigg Road Water Reservoir, forecast to be delivered after 2034, will help balance peak demands, the North Harbour 2 Watermain (**NH2**) is the primary infrastructure requirement to support growth. Refer to the below section for more information on NH2 requirement.

Watercare's position on public servicing of the Proposal

10. The present position in the Hobsonville area, in terms of both wastewater and water servicing, is as follows:

- a. For wastewater, Watercare has reviewed the application and identified several concerns and deficiencies in the information that has been provided as follows:
 - The wastewater flow calculations provided do not appear to fully align with Watercare's Code of Practice and other relevant standards and guidelines.
 - As the proposal includes an extension to the public gravity network, the appropriate peaking factors for gravity systems must be applied in the flow calculations.
 - There are inconsistencies in the development yield — particularly in the reported number of villas, apartments, and care units across the infrastructure report and other submitted documents. These discrepancies must be resolved to support an accurate capacity assessment.
 - PS68 currently does not have the capacity to service this development. However, its capacity is expected to increase and be able to service this Proposal upon completion of the Rosedale Northern Interceptor Integration project, which is scheduled for completion in late 2026.
 - Watercare's wastewater servicing plan for the subject catchment requires extending a new local gravity main that connects directly to the upstream manhole of the existing 400mm PE pipeline crossing the motorway. This pipeline is not accounted for within the current Proposal and must be designed and constructed by the developer and appropriately sized to accommodate flows from the entire FUZ catchment located south of the motorway. If this network is proposed to be vested to Watercare then it must be designed in accordance with Watercare's standards.
- b. For water supply, the site cannot be supported with bulk water supply until the construction of the NH2 watermain; currently anticipated to be completed by 2034. The NH2 is a significant project that will run for 33 kilometres between the proposed Manuka Road Reservoir in Titirangi and the Albany Reservoirs. It is a critical infrastructure project designed to support growth and ensure resilience of water supply across the North-West future urban areas, including Whenuapai, Red Hills, Kumeu-Huapai, Riverhead, the Hibiscus Coast, and surrounding suburbs. While the NH2 is currently forecast for completion in 2034, there are risks associated with its delivery timeline, and this could extend beyond 2035. Watercare's Asset Management Plan for FY25–34 includes \$785 million in funding for the construction and commissioning of NH2. Given these factors, NH2 is considered an infrastructure prerequisite for development in future urban areas timed for 2035+ as identified in the FDS.

With regard to the local water network, Watercare are planning on undertaking Network Servicing Plan for the area in the next 3 – 5 years. Any projects or watermain upgrades associated with network capacity and servicing will be identified as part of this work.

11. It is noted that in Appendix D of Attachment 5 - Infrastructure Report the Applicant has included a letter from Watercare dated 30/08/2022 that states that there *"is capacity in the local water supply network"* and *"there are capacity constraints in the wastewater network"*. However, as stated in the letter, *"this letter does not constitute a pre-approval from Watercare, and the assessment is valid for two years from the date of this letter"*. Therefore, as more than two years has passed since this advice was given, that advice is no longer valid and the advice given in this letter dated 25/07/2025 should be relied upon. Further, since writing the letter, Watercare has identified a bulk water constraint in the NH1 which was not referred to in the letter dated 30/08/2022.

Conclusion

12. We have identified deficiencies in the Applicant's Referral Application that need to be addressed for both water and wastewater servicing. These need to be addressed by the Applicant to meet the completeness threshold.
13. Watercare is unable to support connection for public wastewater servicing until the completion of the Rosedale Northern Interceptor Integration project which scheduled for completion in late 2026 and fully budgeted in Watercare's Business Plan. Additionally, Watercare notes that the proposed local servicing approach does not align with Watercare's servicing strategy (not accounting for a significant local network extension which would be required), and the flow calculations appear inconsistent with relevant standards.
14. Watercare is unable to support connection to public water supply until the completion of the NH2 watermain which is currently anticipated to be completed by 2034 are completed and commissioned. Watercare notes that while the NH2 is currently forecast for completion in 2034, there are risks associated with its delivery timeline, and this could extend beyond 2034.
15. Watercare is happy discuss more details of the Proposal with the Applicant and any further options that could be explored.