

Attachment 7: Record of Engagement

ORAWAAHI – A COMPLETE COMMUNITY

Consultation with Auckland Council, Auckland Transport and Watercare Services Limited

Consultation Party	Consultation date	Summary
Auckland Council / Auckland Transport	<p>Pre-Application Meetings held:</p> <p>24 June 2025</p> <p>28 July 2025</p> <p>1 August 2025</p>	<p>Various meetings were held with Auckland Council.</p> <p>Written comments have been provided by Auckland Council and Auckland Transport and included in the various Meeting Records provided as Attachment A to this consultation summary.</p> <p>During consultation with Auckland Council, various updates to technical memoranda regarding effects were updated from draft versions. These changes include transport matters and clarity on stormwater management for industrial activities and been incorporated in Attachments 13 and 16 to the Referral Application.</p> <p>Separate advice via email was also sought from Auckland Council regarding groundwater availability.</p> <p>Further discussions will occur after referral stage.</p>
Watercare Services Limited (“WSL”)	<p>Various dates July - September 2025</p>	<p>Various meetings with both the Planning and Property teams at WSL regarding capacity for Orawaahi in the public networks.</p> <p>The Planning team at WSL provided Auckland Council with written comments (which were included in the Meeting Record from Auckland Council dated 24 June 2025) despite not attending any Auckland Council led pre-application meeting, and provided a further letter dated 22 September. Both sets of correspondence identified that WSL’s current position is to not provide public servicing to the Orawaahi Project. A copy of the Auckland Council meeting records are provided as Attachment A to this consultation summary and the WSL further letter is provided as Attachment B.</p> <p>WSL’s Property Team also provided a letter (included as Attachment 5 to the Referral Application) confirming that Watercare will endeavour to work with the applicant on water and wastewater requirements for the development.</p>

Consultation Party	Consultation date	Summary
		Further discussions will occur after referral stage, if the application to refer the project to the fast-track approvals process is accepted.
Franklin Local Board	Presentation 10 June 2025	Presentation to the local board – general agreement on the need for local employment opportunities and in this location and supportive of the front line heroes concept.

Consultation with Other parties

Consultation Party	Consultation date / Summary of correspondence	Response Summary
<p>New Zealand Police</p>	<p>11 June 2025 – Email sent by Daniel Nakhle, director of Knight Investments Limited to six individuals from NZ Police and the Police Association, receiving three responses</p> <p>Summary of email content:</p> <p>That Mr Nakhle, as land developer with 30 years of experience, is proposing a housing initiative in Clarks Beach to allocate 5% (50 out of 1000 homes) for frontline workers—specifically Police, Fire, Ambulance, Nurses, Teachers, and Doctors—under an affordable rent-to-buy scheme.</p> <p>Key points of the proposal that he highlights:</p> <ul style="list-style-type: none"> • Homes would be reserved for first-home buyers in these professions. • Eligibility may require a minimum of two years of service (e.g., with Police). • Restrictions would prevent subletting, except for taking in a boarder. • Rent payments would contribute toward a deposit and reduced interest rates. • Mr Nakhle intends to work with banks like Kiwibank, Westpac, and BNZ. • Homes would be affordable but maintain quality consistent with the area. <p>Mr Nakhle sought feedback on rules to ensure fairness and prevent abuse. If successful, he aims to replicate the model in future developments.</p> <p>Mr Nakhle also welcomed collaboration and input to refine the concept.</p>	<p>Response From s 9(2)(a) Date: Wed, 11 Jun 2025 at 13:57</p> <p>Inspector s 9(2)(a) appreciates Mr Nakhle’s housing proposal and believes it could benefit many police staff. He recommends that the proposal be handled through the Police Association to ensure transparency and independence, as the Police department itself must remain separate from such discussions to avoid conflicts of interest. He suggests contacting s 9(2)(a), the Police Association representative for Counties Manukau, as a good point of contact. He wished Mr Nakhle well with the initiative.</p> <p><i>Note: s 9(2)(a) was a contact included in Mr Nakhle’s initial email.</i></p> <hr/> <p>Response s 9(2)(a) Date: Wed, 11 Jun 2025 at 22:37</p> <p>s 9(2)(a), President of the New Zealand Police Association, thanked Mr Nakhle for reaching out and recalls their previous connection through the 300 officer rollout project and a social encounter. He expressed strong interest in Mr Nakhle’s housing proposal and was keen to discuss it further. Although he was busy with regional meetings, s 9(2)(a) planned to review the idea over that weekend and follow up next week to explore how they can move the opportunity forward.</p> <p>Further discussions will occur after referral stage, if the application to refer the project to the fast-track approvals process is accepted</p> <hr/> <p>Response From s 9(2)(a) Date: Thu, 12 Jun 2025 at 07:45</p> <p>s 9(2)(a) (Detective Sergeant – Counties Manukau District) expressed strong support for Mr Nakhle’s housing initiative, acknowledging its potential value to police staff given the increasing difficulty of entering the property market. s 9(2)(a) noted that the proposal has been escalated to senior levels within the New Zealand Police Association (NZPA) for direct engagement. s 9(2)(a) thanked Mr Nakhle for considering police staff in the proposal and wishes him well.</p>

Consultation Party	Consultation date / Summary of correspondence	Response Summary
Ministry for the Environment	<p>22 October 2025 – Email sent by Renee Fraser-Smith to Ministry for the Environment</p> <p>Summary of email content:</p> <p>A consultation email was submitted to MfE under section 11(1)(e) of the Fast Track Approvals Act 2024. The email outlined the <i>Orawaahi – A Complete Community Project</i> and included a Concept Plan and requested confirmation of receipt from MfE.</p>	<p>Response on 29 October 2025:</p> <p>The Ministry for the Environment acknowledged receipt of the pre-lodgement consultation for the <i>Orawaahi – A Complete Community Project</i> under the FTAA. As the administering agency for approvals under the RMA and EEZ Act, MfE outlined the requirement for the application to include assessments against relevant NPS and NES.</p> <p>The letter provided:</p> <ul style="list-style-type: none"> • A summary of applicable NPSs, including those for freshwater, indigenous biodiversity, urban development, and the coastal environment. • A summary of relevant NESs, such as those for air quality, freshwater, greenhouse gas emissions, and contaminated soil. <p>MfE advised that the application must include:</p> <ul style="list-style-type: none"> • A summary of this consultation. • An explanation of how the consultation has informed the project. <p>The Ministry thanked the applicant for engaging and provided contact details for further assistance with the FTAA process.</p> <p>The applicant confirms that this Referral Application includes an assessment of the proposal against the applicable NPS's and NES's, which are contained in the Planning Memorandum in Attachment 9.</p>
Heritage NZ	<p>Pre Application Meeting: 22 July 2025</p>	<p>Heritage NZ requested minor clarifications to the Archaeology Report (verbally, and not recorded in the minutes) and highlighted, in the minutes provided as Attachment C to this consultation summary, that further work would be required once the referral is accepted.</p> <p>The minor amendments were made to the Archaeology Report (Attachment 12 of Referral Application) in response to the feedback received.</p>

Mana Whenua Consultation Summary¹

Mana Whenua	Correspondence Sent Summary	Response Summary
<p>Ngāti Tamaoho Settlement Trust / Ngāti Tamaoho</p> <p><i>(Treaty Settlement Entity, Iwi Authority)</i></p>	<p><u>1 September 2025</u></p> <p>Email sent from Doyle Smith with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025</p> <p>Email was as below:</p> <p><i>We are writing to you as part of our consultation process for our proposed development at 156 & 162 Clarks Beach Road under the Fast-track Approvals Act 2024 (“FTAA”). Attached is a letter outlining the details of our project.</i></p> <p><i>We request that if you would like to be consulted further that you please get back in touch with us to discuss a suitable time to meet or discuss further.</i></p> <p><i>If you have any further questions, please feel free to contact me.</i></p>	<p>Email response received 2 September 2025 from s 9(2)(a)</p> <p>s 9(2)(a) Kaitiaki Taiao Matua for Ngāti Tamaoho, acknowledges the proposed development and highlighted its cultural and historical significance to the iwi. Due to the scale and location—particularly its proximity to the moana and relevance under the Marine and Coastal Area (MACA) framework—Ngāti Tamaoho sought to engage formally with the proposal. s 9(2)(a) proposed an on-site meeting to discuss the details and signals the intent to undertake a Cultural Values Assessment (CVA). She also suggested organizing a time for the site visit as the next step.</p>
	<p>Subsequent Emails in response to s 9(2)(a)</p> <ul style="list-style-type: none"> • 2 September 2025: Mr Smith requested meeting dates from s 9(2)(a) and proposed three options (Friday afternoon, 10 Sept, or 12 Sept), attaching a draft archaeology report for reference. • 10 September 2025: Mr Smith confirmed availability for 30 September or 1 October and that his planner (Renee Fraser-Smith) is also available. • 16 September 2025: Mr Smith sent two follow-up emails requesting confirmation of meeting dates and 	<p>Several emails to confirm an onsite meeting:</p> <ul style="list-style-type: none"> • 10 September 2025: s 9(2)(a) responds to s 9(2)(a) suggestion, agreeing an on-site meeting is needed. s 9(2)(a) offered availability on 30 Sept, 1 Oct, 7 Oct, or 9 Oct. • 12 September 2025: s 9(2)(a) updates availability, noting she now has a meeting on 1 October at 10 AM. • 16 September 2025: s 9(2)(a) confirms 30 September is the only available date due to scheduling conflicts.

¹ Iwi authorities with an interest in the Project Area have been identified using <https://www.tkm.govt.nz/>. In addition, the Iwi Authorities with an interest in the Project Area have been identified using the Auckland Council website (<https://www.aucklandcouncil.govt.nz/building-and-consents/resource-consents/prepare-resource-consent-application/Pages/find-hapu-iwi-contacts-for-your-area.aspx>)

Mana Whenua	Correspondence Sent Summary	Response Summary
	<p>suggesting 30 September after midday or all day 1 October.</p> <p>Meeting Invite Sent: On 16 September, Mr Smith sends a meeting invite for 30 September, 1:00–2:30 PM at 137 Clarks Beach Rd.</p>	
	<p>30 September 2025: Meeting held with s 9(2)(a) and Mr Smith from 1.00pm-2.30pm. Ms Tuhimata left at 2.00pm; while the remaining attendees visited the proposed site at 156 & 162 Clarks Beach Rd.</p>	
	<p>24 October – Meeting: Attendees – s 9(2)(a) (Ngāti Tamaoho) s 9(2)(a) (Ngaati te Ata representatives) Mr Smith and Mr Nakhle (Applicant). Attendees drove and walked the site at 156 & 162 Clarks Beach Road. At the adjournment of the meeting, the Applicant confirmed that, if the Project was referred, further engagement would continue as well as procurement of a CIA/CVA as required.</p>	
<p>Te Ara Rangatu o Te Iwi o Ngaati Te Ata Waiohua / Ngaati Te Ata</p> <p><i>(Treaty Settlement Entity, Iwi Authority and MACA Claim Entity)</i></p>	<p>12 May 2025 Email received From: s 9(2)(a)</p> <p>Tena Koe Daniel</p> <p>Please find letter of support attached regarding the above.</p> <p>Nga mihi</p> <p>s 9(2)(a) (Lead Negotiator Ngaati Te Ata)</p> <p>Note: This letter of support is included at Attachment 4 to the referral application.</p>	
	<p>24 September 2025 Email sent to s 9(2)(a) (Ngaati Te Ata Taiao Contact) with letter outlining the scope of the application and attached the archaeological assessment from CFG Heritage.</p>	<p>Email received from s 9(2)(a) (cc'd s 9(2)(a)) – 2 October 2025</p> <p>This confirmed that s 9(2)(a) had recently spoken with s 9(2)(a) (Ngāti Tamaoho) and they would like to meet onsite within the next two weeks. They would come back with dates/times.</p>
	<p>Subsequent communications:</p> <ul style="list-style-type: none"> Several emails were exchanged between 2 October and 7 October 2025 to coordinate a site visit . Emails were to confirm a suitable date, time, and meeting location for the visit, ultimately aiming to facilitate engagement on the Fast Track referral application. 24 October – Meeting (as noted above) for Ngāti Tamaoho. 	

Mana Whenua	Correspondence Sent Summary	Response Summary
<p>Makaurau Marae Māori Trust / Te Ahiwaru - Waiohua</p> <p><i>(Treaty Settlement Entity and Iwi Authority)</i></p>	<p>1 September 2025 Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025</p> <p><i>Email was as described above.</i></p>	<p>No response received.</p>
<p>Te Ākitai Waiohua Iwi Authority / Te Ākitai - Waiohua and Te Ākitai Waiohua Settlement Trust</p> <p><i>(Treaty Settlement Entity and Iwi Authority)</i></p>		<p>No response received.</p>
<p>Te Whakakitenga o Waikato Incorporated / Waikato Tainui iwi</p> <p><i>(Treaty Settlement Entity, Iwi Authority and MACA Claim Entity)</i></p>		<p>Email response received 2 September from s 9(2)(a)</p> <p><i>Kia Ora Doyle</i></p> <p><i>I have included our Taiiao manager in the email and he will reply accordingly.</i></p> <p><i>Mauri Ora, Manaaki (Chief Advisor to CEO)</i></p> <p>No response was received.</p>
<p>Ngāi Tai ki Tāmaki Trust</p> <p><i>(Iwi Authority and MACA Claim Entity)</i></p>	<p>1 September 2025 Email sent from Mr Smith with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025</p> <p>Email was as below:</p> <p><i>We are writing to you as part of our consultation process for our proposed development</i></p>	<p>Email received 3 September 2025 from s 9(2)(a)</p> <p>s 9(2)(a) expresses interest in proposal and mentions that her team would be keen to connect, especially since she participates in Fast Track Approval (FTA) panels. s 9(2)(a) copied in s 9(2)(a) who handles reviewing paperwork and plans, so they can move forward with discussions. s 9(2)(a) also asked about timelines for the project.</p>

Mana Whenua	Correspondence Sent Summary	Response Summary
	<p><i>at 156 & 162 Clarks Beach Road under the Fast-track Approvals Act 2024 (“FTAA”). Attached is a letter outlining the details of our project.</i></p> <p><i>We request that if you would like to be consulted further that you please get back in touch with us to discuss a suitable time to meet or discuss further.</i></p> <p><i>If you have any further questions, please feel free to contact me.</i></p>	
	<p>3 September 2025 – 2x email from Mr Smith to S 9(2)(a) cc’d S 9(2)(a)</p> <p>Email sent as a follow up to S 9(2)(a) regarding a proposed meeting to discuss a Fast Track referral application.</p> <p>It was reiterated that the Project was in the early stages, with only high-level memos prepared. Detailed design and cultural impact assessments (CIA/CVA) will come later during the substantive application phase.</p> <p>Mr Smith proposed scheduling a meeting by the end of the following week</p> <p>A copy of the archaeology report from CFG Heritage was provided as an attachment.</p>	<p>Email received 25 September 2025 from S 9(2)(a) (Chief Executive) to Daniel Nakhle:</p> <p><i>Kia ora Daniel</i></p> <p><i>Please consider this email confirmation that while Ngāi Tai ki Tāmaki have historical interest in coastal areas around Te Manukanuka o Hoturoa/Manukau Harbour, for your Clark’s Beach development we are comfortable to create space for other iwi such as Ngāti Tamaoho and Ngāti Te Ata to engage.</i></p> <p><i>Mauri ora</i> S 9(2)(a)</p> <p>S 9(2)(a) <i>Chief Executive Te Kaiurungi</i></p>
<p>Nga Puhi nui tonu, Ngati Rahiri, Ngati Awa, Nga Tahu and Ngaitawake</p> <p><i>(MACA Claim Entity)</i></p>	<p>15 October 2025 Email sent with letter outlining the Fast-track scope to S 9(2)(a).</p> <p><i>Email was as described above.</i></p>	<p>On 28 October 2025, Te Rūnanga-Ā-Iwi O Ngāpuhi informed Doyle Smith that S 9(2)(a) no longer works at the organisation, and her position was discontinued sometime in the previous year. Doyle’s email was forwarded to management, who will respond once they’ve reviewed it.</p>

Mana Whenua	Correspondence Sent Summary	Response Summary
Nga Puhi nui tonu (MACA Claim Entity)	22 October 2025 Email sent with letter outlining the Fast-track scope to s 9(2)(a) Email was as described above.	No response received.
Ngati Whatua Orakei (MACA Claim Entity)	15 October 2025 Email sent with letter outlining the Fast-track scope. Email was as described above.	22 October 2025 Ngāti Whātua Ōrākei – Whai Māia advised that from 1 August 2025, all engagement and support requests to their Toi Tūhono team must be submitted via a new online enquiry form. This process is designed to improve efficiency and support across their rohe. A user memo was provided to guide the transition, and the existing email address will remain monitored for questions or support during the change.
	22 October – Doyle submitted the request through the online enquiry form at Toi Tūhono Enquiry Form Link No response received.	
Nga Puhi nui tonu (MACA Claim Entity)	15 October 2025 Email sent with letter outlining the Fast-track scope. Email was as described above.	Response received Oct 22, 2025 Kia ora Doyle, Thanks for the email. However, our iwi is located in Northland. Our name is very deceiving as our iwi rohe is Whangaroa – but our iwi rūnanga is called Te Rūnanga o Whaingaroa. I am unsure of the contact details for the local iwi in Whaingaroa.
Nga Tahuu (MACA Claim Entity)	15 October 2025 Email sent with letter outlining the Fast-track scope. Email was as described above.	Response received on Oct 24, 2025, Hi Doyla Thanks for your email. Looks to be quite an exciting project. As this specific area falls outside of our area (we are predominantly in the Kaipara but appreciate we are listed down under Auckland Councils large list of Iwi/Hapu) we don't have anything further to add here. Nāku, Nā s 9(2)(a) - Commercial Manager / Executive Assistant / Board Secretary Te Uri o Hau Settlement Trust

Mana Whenua	Correspondence Sent Summary	Response Summary
Ngāitawake <i>(MACA Claim Entity)</i>	<u>15 October 2025</u> Email sent with letter outlining the Fast-track scope. <i>Email was as described above.</i>	No response was received.
Te Hikutu Hapu <i>(MACA Claim Entity)</i>	<u>15 October 2025</u> Email sent with letter outlining the Fast-track scope. <i>Email was as described above.</i>	No response was received.
Ngati Kawau and te Waiariki Korora <i>(MACA Claim Entity)</i>	<u>15 October 2025</u> Email sent with letter outlining the Fast-track scope. <i>Email was as described above.</i>	No response was received.
Hako Tupuna Trust <i>(Iwi Authority)</i>	<u>1 September 2025</u> Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025: <i>Email was as described above.</i>	No response was received.
Ngaati Whanaunga Incorporated Society <i>(Iwi Authority)</i>	<u>1 September 2025</u> Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025 <i>Email was as described above.</i>	No response was received.
Ngāti Maru Rūnanga Trust <i>(Iwi Authority)</i>	<u>1 September 2025</u> Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025 <i>Email was as described above.</i>	No response was received.
Ngāti Paoa Iwi Trust <i>(Iwi Authority)</i>	<u>1 September 2025</u> Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025 <i>Email was as described above.</i>	No response was received.

Mana Whenua	Correspondence Sent Summary	Response Summary
<p>Ngāti Paoa Trust Board</p> <p><i>(Iwi Authority)</i></p>	<p><u>1 September 2025</u> Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025</p> <p><i>Email was as described above.</i></p>	<p>No response was received.</p>
<p>Ngati Tamatera Treaty Settlement Trust</p> <p><i>(Iwi Authority)</i></p>	<p><u>1 September 2025</u> Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025</p> <p><i>Email was as described above.</i></p>	<p>No response was received.</p>
<p>Te Ākitai Waiohū Iwi Authority</p> <p><i>(Iwi Authority)</i></p>	<p><u>1 September 2025</u> Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025</p> <p><i>Email was as described above.</i></p>	<p>No response was received.</p>
<p>Te Ākitai Waiohū Settlement Trust</p> <p><i>(Iwi Authority)</i></p>	<p><u>1 September 2025</u> Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025</p> <p><i>Email was as described above.</i></p>	<p>No response was received.</p>
<p>Te Patukirikiri Iwi Trust</p> <p><i>(Iwi Authority)</i></p>	<p><u>1 September 2025</u> Email sent with letter outlining the Fast-track scope and requesting a response by COB 12 September 2025</p> <p><i>Email was as described above.</i></p>	<p>No response was received.</p>
<p>Te Kawerau a Maki</p> <p><i>(Iwi Authority)</i></p>	<p><u>15 October 2025</u> Email sent with letter outlining the Fast-track scope.</p> <p><i>Email was as described above.</i></p>	<p>No response was received.</p>

Attachment A: Auckland Council Meeting Records

Planner-led Pre-Application Consenting Memo

Comments from Council's Growth & Spatial Strategy team

Note: These comments were presented to the applicant's team in memo form as "comments" and were not discussed at any meeting.

Part A: Site & Proposal Details

Pre-Application No. PRR00043021	
Applicant	Knight Investments Limited (Doyle Smith)
Contact details	Phone s 9(2)(a)
	Email s 9(2)(a)
Agent	Renee Fraser-Smith, Tollemache Consultants Limited
Contact details	Phone s 9(2)(a)
	Email s 9(2)(a)
Site Address	<p>Lot 3 DP 337204 Clarks Beach Road, Pukekohe (GIS say NULL street address) – see location plan below.</p>  <p>And 156 Clarks Beach Road (Lot 1 DP337204) Works will also be required on esplanade reserve and vested road.</p>
Proposal	<p>The applicant intends to lodge a Referral Application under the Fast Track legislation.</p> <p>The proposal is for: Approx 1,000 dwellings (222 retirement village units and the remainder residential lots). 1.7 ha of Neighbourhood centre activities, 5 ha of light industrial activities, supporting infrastructure, and associated works.</p>

The Auckland Unitary Plan became 'Operative in part' (AUP(OP)) on 15 November 2016. For the purposes of this pre-application and any Referral application that may be lodged, the AUP(OP) is the primary planning document that sets out the relevant zoning/overlays applying to the site, and the objectives and policies, rules and assessment criteria guiding development in this location.

Type	Y	N	Type	Y	N
(Potential) Contaminated Land	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Coastal Erosion	<input type="checkbox"/>	<input type="checkbox"/>
Land Instability	<input type="checkbox"/>	<input type="checkbox"/>	Coastal Storm Inundation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Floodplain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Coastal Storm Inundation (plus 1m sea level rise)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overland flow paths (ephemeral/intermittent/permanent stream)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cultural Heritage Inventory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Flood Sensitive	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Combined Network	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Arterial Roads	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Building Frontage Control	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vehicle Access Restriction Control*	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Geology (rock breaking)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- *Depending on sequencing of the roundabout shown in the draft layout - at least one of the proposed entrances could be in a Vehicle Access Restriction.

Summary of key considerations and issues raised by Council’s Growth & Spatial Strategy team

<p>Introduction</p>	<ul style="list-style-type: none"> • The information reviewed in preparing these comments included: <ul style="list-style-type: none"> - The ‘pre-application proposal summary’ memo prepared by Renee Fraser-Smith of Tollemach Consultants Ltd, dated June 2025 and the Concept Diagram prepared by Transurban Design, dated 4 June 2025; - The plan titled: ‘Concept Diagram – Orawahi Development – Clarks Beach’, by Transurban Design, C01, Rev 0, dated 4 June 2025; and - The ‘Draft Stormwater Assessment Report’, by Civil Plan Consultants, T05-10 v3, dated July 2025. • The land is currently zoned Rural Coastal and Mixed Rural in the Auckland Unitary Plan 2016 (Operative in Part) and it is not identified as an area for development in the Future Development Strategy (FDS) nor in its sub-part, the Southern Rural Strategy (SRS). • The comments to follow incorporates advice provided by the Council’s Growth & Spatial Strategy team, and includes consideration of the strategic planning implications of this fast-track referral application.
<p>Background</p>	<ul style="list-style-type: none"> • Strategic planning matters, in this case the Future Development Strategy (FDS), are a relevant consideration in fast-track application decision-making under clause 17 of Schedule 5 to the FTAA, which ‘imports’ the decision-making provisions of the Resource Management Act 1991 (RMA), including section 104 of the RMA. The FDS was prepared using the special consultative procedure in section 83 of the Local Government Act and is an important growth document required by the National Policy Statement on Urban Development (NPS-UD). It is a relevant planning document for the Panel to have regard to under section 104(1)(c) of the RMA. • Section 85(4) of the FTAA states that a panel may not decline an approval solely because it is inconsistent or contrary to provisions in an Act or other document. This does not prohibit consideration of relevant planning documents. Along with other matters, such as actual adverse effects, inconsistency with planning documents may contribute to a decision to decline.

<p>Strategic alignment</p>	<ul style="list-style-type: none"> • The subject site is rural land. The FDS anticipates minimal growth in rural areas to retain the rural environment and rural productivity. The development of a large extent of rural land is not consistent with the strategic direction set out in the FDS: see Principle 1(a)[1] and section 4.1.1 of the FDS. • The FDS does not anticipate this area being developed in the future. Enabling any unanticipated development would have implications on the later rezoning (2030+) of the nearby Clarks Beach future urban area. • The proposal is not aligned with planned growth within the Clarks Beach area nor the provision for infrastructure. • The pre-application material does not include consideration of how the proposed development can or will integrate with areas of planned growth zoned Future Urban to the north of the site. This raises concerns around the scale of the overall development around Clarks Beach. • A referral application is expected to provide a strategic planning assessment against the FDS in relation to the subject site.
<p>Residential capacity and well-functioning urban environment</p>	<ul style="list-style-type: none"> • At the regional level, Tāmaki Makaurau has broadly enough plan-enabled capacity to accommodate future residential growth, and the FDS and SRS do not anticipate an increase in housing capacity in this area. • A referral application is expected to consider the significant greenfield residential capacity available in the wider catchment, including at Clarks Beach, as well as future development across the broader catchment (Kingseat and Glenbrook Beach). The pre-application material as currently presented does not consider these factors, nor does it consider the effects which impact on the efficiency of enabling growth in different locations across the wider catchment and across the wider region (FDS principle 5). • No detail has been provided as to how the application is proposed to contribute to a well-functioning urban environment on a regional and local scale, particularly as it is not planned in the FDS. • The proposal as presented does not appear to factor in how the new centre would impact on other, planned centres in the wider area.

<p>Infrastructure</p>	<ul style="list-style-type: none"> • As the proposed development is in a rural area where development is not anticipated at any time in the future in the FDS, there is no current infrastructure to support the development nor is there a plan in the future for such provision. • The Referral application must consider transport matters and alternative transport modes, which relates both to FDS principle 1 and well-functioning urban environment requirements. • The site falls outside of Healthy Waters Regional Network Discharge Consent for stormwater. • It is understood that discussions are ongoing with Watercare related to right of entry to secure a wastewater pipeline transmission route through the site as part of the wider South-West Wastewater Servicing strategy. • Detailed information about the possibilities for provision and timing of these identified infrastructure requirements for the development should be discussed by other council and CCO specialists. • The proposed development, if reliant on network capacity, would come at the expense of the delivery of other developments and is not possible without displacing planned investment and infrastructure provision in existing live zoned areas and sequenced future urban areas (FDS principle 5). • These matters raise questions about the efficiency of the required infrastructure investments (FDS principle 3) and the cost implications on a local and regional scale to the council, AT, and Watercare for enabling and supporting strategic infrastructure at this location.
------------------------------	---

Concluding comments (Sam Redward)

The proposal is not aligned to the FDS, this is both in terms of the proposed location and the FDS principles for growth and changes.

Enabling the development, if reliant on network capacity and infrastructure, would have wide ranging local and subregional implications in terms of infrastructure investment and costs.

In addition to the feedback provided above, we note for completeness that the application for a Referral project under the FTAA should address the FTAA Referral Criteria. As part of this, we consider an Economic Assessment may be necessary to demonstrate the level of economic activity and benefit to the area.

This is a preliminary view only. A final determination on the overall merits of the application can only be made upon receipt of a formal application, site visit and review.

Important Information

The purpose of a pre-application is to facilitate communication between applicants and the council so that the applicant can make informed decisions about applying for consents, permits or licences.

The views expressed by council staff in or following a pre-application are those officers' preliminary views, made in good faith, on the applicant's proposal. The council makes no warranty, express or implied, nor assumes any legal liability or responsibility for the accuracy, correctness, completeness or use of any information or views communicated as part of the pre-application process.

The applicant is not required to amend their proposal to accommodate the views expressed by council staff. Further, it remains the applicant's responsibility to get their own professional advice when making an application for consents, permits or licences, and to rely solely on that advice, in making any application for consents, permits or licences.

To the extent permissible by law, the council expressly disclaims any liability to the applicant (under the theory of law including negligence) in relation to the pre-application process. The applicant also recognises that any information it provides to the council may be required to be disclosed under the Local Government Official Information and Meetings Act 1987 (unless there is good reason to withhold the information under that act).

All consent applications become public information once lodged with council. Please note that council compiles, on a weekly basis, summaries of lodged resource consent applications and distributes these summaries to all local boards and all mana whenua groups in the Auckland region. Local boards and mana whenua groups then have an opportunity to seek further details of applications and provide comment for council to take into account.

Prepared by:

Name: Adonica Giborees
Title: Principal Project Lead, Premium Resource Consents
Signed:



Date: 11/08/2025

Reviewed by:

Name: Samantha Redward
Title: Consultant Planner
Signed:



Date: 22/08/2025

Planner-led Pre-Application Consenting Memo & Meeting Record

Part A: Pre-Application Preparation

Pre-Application No. PRR00043021	
Date of request	24 June 2025
Applicant	Knight Investments Limited (Doyle Smith)
Contact details	Phone s 9(2)(a)
	Email s 9(2)(a)
Agent	Renee Fraser-Smith, Tollemache Consultants Limited
Contact details	Phone s 9(2)(a)
	Email s 9(2)(a)
Site Address	<p>Lot 3 DP 337204 Clarks Beach Road, Pukekohe (GIS say NULL street address) – see location plan below.</p>  <p>And 156 Clarks Beach Road (Lot 1 DP337204) Works will also be required on esplanade reserve and vested road.</p>
Proposal	<p>The applicant intends to lodge a Referral Application under the Fast Track legislation.</p> <p>The proposal is for: Approx 1,000 dwellings (222 retirement village units and the remainder residential lots). 1.7 ha of Neighbourhood centre activities, 5 ha of light industrial activities.</p>

The Auckland Unitary Plan became 'Operative in part' (AUP(OP)) on 15 November 2016. For the purposes of this pre-application and any resource consent application that may be lodged, the AUP(OP) is the primary planning document that sets out the relevant zoning/overlays applying to the site, and the objectives and policies, rules and assessment criteria guiding development in this location

Type	Y	N	Type	Y	N
(Potential) Contaminated Land	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Coastal Erosion	<input type="checkbox"/>	<input type="checkbox"/>
Land Instability	<input type="checkbox"/>	<input type="checkbox"/>	Coastal Storm Inundation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Floodplain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Coastal Storm Inundation (plus 1m sea level rise)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overland flow paths (ephemeral/intermittent/permanent stream)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cultural Heritage Inventory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Flood Sensitive	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Combined Network	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Arterial Roads	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Building Frontage Control	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vehicle Access Restriction Control*	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Geology (rock breaking)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- *Depending on sequencing of the roundabout shown in the draft layout – at least one of the proposed entrances could be in a Vehicle Access Restriction.

Meeting held		
Date and Time	3 July 2025 10am – 11.07am	
Meeting participants – Customer / Agents	Renee Fraser-Smith, Tollemache Consultants Limited	Planning Consultant
Meeting participants – Council	Samantha Redward, SLR Consulting Limited Adonica Giborees, Auckland Council Louise Thomas, Auckland Council Reference source not found.	Consultant Planner Principal Project Lead Parks Planning

Summary of key considerations and issues	
Overview (Renee Fraser-Smith)	<ul style="list-style-type: none"> This is Fast Track Referral only, so the level of information provided is intended to reflect the requirements for a Fast Track referral which is different to the level of detail required for a RC application. The applicant acknowledges that there is no funding in relations to Parks because this is not a forecasted development site. The applicant is the developer for the development to the north of the site / Clarks Beach Road. The existing urban zone is maxed out. This is an extension of the existing urban development.

- The applicant considers the proposal is considered regionally significant (including because it will provide approx. 1000 units).
- Proposal includes a retirement village (no current third-party operator but applicant will operate if no third party comes on board). There is no retirement village within a 25min drive to the existing Clarks Beach area. Neighbourhood Centre will also intend to provide services to retirement village.
- Clarks Beach is a commuter suburb or accommodates people working from home, there is no employment for services or light industrial services. Kingseat, Pukekohe and Waiuku are the closest nearby areas with light industrial zones. This proposal will provide for local employment.
- Neighbourhood and local service areas will have a specific list of activities that would be enabled in these areas.
- Enable site/development-specific controls for future outcomes (i.e. noise, lighting etc).
- Stormwater-driven proposal – private stormwater discharge is proposed as the site is outside the Healthy Waters Network Discharge Consent (NDC). If in future the stormwater discharge is not taken over by Healthy Waters, then will be owned/operated/maintained by a private entity (such as residents' association).
- Watercare discussions – we understand WSL intend to bring a pipe and pump station through this site to provide for the urban development in the wider area. Wastewater outfall is being constructed at Clarks Beach currently.
- Applicant team noted that if Watercare cannot provide connection into public wastewater, then may lose 2000sqm to provide an on-site wastewater solution. May need to provide an either/or option. Additional area may be required to support wastewater disposal.

Expert reports for Referral process

- The applicant intends to provide the following technical reports as part of the Referral process:
 - Landscape
 - Urban Design
 - Transport
 - Development Engineering (three waters)
 - Geotechnical engineering and coastal hazards
 - Ecology
 - Heritage / Archaeology

- Other technical inputs and full technical reports will be provided as part of a Substantive application (if Referral accepted).
- Productive Soils – the land is classified as Class 2 soils by the Auckland Council GIS. The intention is that the proposal will enable re-use around the site, where possible and/or the top soil will be stored and sold to be used elsewhere (off-site) for productive purposes. As the classification is shown on the Council's GIS no Soil Assessment is intended to be provided as part of the Referral process.

Esplanade reserve

- Along coastline, part of the site owned by Auckland Transport (paper road), part esplanade reserve.
- In other areas/recent subdivisions, it appears that where there are vested roads, there is a vested esplanade top up, but this was left as road. Further discussion on the paper road is addressed by Parks below.
- Regardless, the applicant intends this area will be treated as esplanade reserve.
- It is intended to provide walkways and coastal edge planting.

Subdivision

- Subdivision would be in early stages, currently unknown.
- Staging is likely to depend on whether a retirement operator comes on board with a set timeframe.
- The key road goes past the retirement village.
- Uncertain on whether the Neighbourhood centre area would be subdivided into individual uses/units.
- Rural road should consider the interface with adjacent properties.

Consultation

- Ngati te Ata have a more active interest in this area than other groups. Positive feedback received to date.
- Cultural Centre proposed (sought by Ngati te Ata during consultation). Other elements requested relate to design matters.
- Applicant has e-mailed all the iwi on the list (no feedback yet from other iwi).
- Iwi consultation will be ongoing.

Local Board

- The applicant has engaged with the Local Board who are overall supportive of the proposal.

	<ul style="list-style-type: none"> • Consultation will continue with the Local Board if the Referral application is accepted. <p><u>Other approvals</u></p> <ul style="list-style-type: none"> • Archaeology: Authority to Modify will be required for a destroyed feature to the north-east of Cultural Centre. The Referral application will request that the substantive applications include any authority required by NZHPT. • Wildlife Act: Will not be included in the Fast Track Referral application.
<p>Parks Planning (Louise Thomas)</p>	<ul style="list-style-type: none"> • Road stopping process would be initiated by Council to convert this as esplanade reserve. • The ‘road stopping’ process cannot be undertaken as part of the ‘referral process’ however, Council’s Parks / Community Facilities team will progress this if the application is successful in its bid for Referral. This process is expected to take at least 12 months. • Council’s Open Space Policy is close to being published. • Needs assessment for open spaces will need to be undertaken, including on whether Council want a park in this location based on the not yet published Open Space Policy. The layout of the development might be impacted in terms of where neighbourhood parks are to be located. • Council would not support neighbourhood parks away from coastal area (if the neighbourhood park to the south (Cultural Centre) is to be public). It is understood that the neighbourhood park in the southern part of the site is an element requested by iwi (and therefore likely to be privately owned). • Stormwater / wetland area – queried whether this would be accepted by Healthy Waters as drainage zone, but noted that the site falls outside the NDC and thus drainage reserves may not vest to the HW at all. • Parks would consult internally with Council teams – Acquisitions, Policy, Parks & Places, Healthy Waters (as required). • Applicant to explore the option to include a north-south blue/green area including the area of potential wetland.
<p>Planning (Sam Redward)</p>	<ul style="list-style-type: none"> • Whilst we understand the applicant has engaged with Watercare (Anna Jennings) directly, the Council have included Watercare in the brief to ensure we have oversight of these discussions as part of the Fast Track process. We will provide any comments we receive as part of this pre-application process. • It was acknowledged that as the applicant does not have certainty around servicing at the time of the pre-application meeting, it is acknowledged that the applicant may change aspects of the proposal. Critical factors including

	<p>water and wastewater servicing will change the layout and subsequent response, level of detail and consenting strategy/approvals required.</p> <ul style="list-style-type: none"> • Council’s Traffic Engineer and Auckland Transport have been engaged as part of the pre-application process. Once a Transportation Assessment is provided, we will schedule a meeting to discuss Traffic matters (to include Parks Planning & Stormwater specialist if necessary). • Council’s Stormwater specialist has been engaged as part of the pre-application process. Once a Stormwater Assessment is provided, we will schedule a meeting to discuss Stormwater matters. • Council’s Growth & Strategy team have been engaged to provide comments on the proposal as part of the pre-application process. We will share any feedback we receive from them. • Clarification that the ‘Cultural Centre’ includes a building and car parking – the comments made by Louise are re-iterated in regard to Councils assessment of the ‘need’ for parks and features within the proposed parks. The applicant acknowledged that the Parks would be held by a private entity (e.g. ‘Residents’ Society’) if Council didn’t want to manage/maintain these. • The interface of the ‘neighbourhood centre’ with Clarks Beach Road should be designed to ensure it engages with Clarks Beach Road. Applicant acknowledged their Urban Designer is analysing options. • Clarks Beach Road will be upgraded to an urban road with pedestrian access as part of the wider Clarks Beach development, the expectation is that the southern side would also be upgraded to an urban standard. • The coastal hazard is perceived to be ‘low’ as the location of the site in the inner harbour is not a ‘high energy’ environment. The applicant confirmed that they will not address in detail the coastal hazard now, but acknowledge that they will need to provide more detailed coastal hazard assessments for the substantive assessment. • The Council expect the substantive application (if accepted as a Referred project) to address the protection and enhancement of all streams and wetlands, including addressing the stream width (annual fullest flow) for assessment against the potential for an esplanade reserve within the site.
--	---

Actions arising from meeting	
Transport Assessment to be provided to Council	Renee Fraser-Smith
Schedule meeting with Auckland Transport and Council Traffic Engineer once the Transport Assessment is received (to include Parks Planning & Stormwater specialist)	Adonica Giborees
Stormwater Assessment to be provided to Council	Renee Fraser-Smith

Obtain feedback from Council Stormwater specialist once Stormwater Assessment is received. Schedule meeting with Stormwater specialist if necessary.	Adonica Giborees
Comments from Council's Growth & Strategy team.	Samantha Redward / Adonica Giborees
Watercare comments (if received) to be passed to applicant.	Samantha Redward / Adonica Giborees

Any other matters / items arising / corrections / clarification (post-meeting comments)

Watercare - the following input has been provided by Watercare on the 17th of July 2025.

Watercare has reviewed the Concept Diagram for the Orawaahi Development – Clarks Beach, prepared by Transurban Design and dated 4 June 2025. Based on this review, we can provide the following comments:

- *Watercare does not provide water or wastewater services to rural zoned land, including this application site. This is consistent with Watercare's statutory obligations to act consistently with the Auckland Unitary Plan (Operative in Part), the Auckland Plan 2050, and the Auckland Future Development Strategy 2023-2053 (FDS).*
- *This position is further outlined in Watercare's annual Statement of Intent, which responds to Auckland Council's Letter of Expectation. In alignment with these obligations, Watercare is committed to supporting the Auckland Plan 2050 by working closely with Council and its partners to service identified growth areas; following the FDS for infrastructure planning in future urban zones; coordinating infrastructure projects with other utility providers; ensuring full recovery of growth-related costs; and complying with expectations set for Council-controlled organisations.*
- *Furthermore, Watercare's south-west wastewater upgrade has recently presented a preferred option to the Watercare Board after extensive planning and community consultation. This work did not plan or provide for servicing the rural zone application site.*
- *We encourage the Applicant to engage with Watercare to discuss the proposal further.*

Stormwater – A draft stormwater memo was submitted by the applicant on 15/07/2025. This has been reviewed by Dr Arsini Hanna, Council's Senior Stormwater and Industrial or trade Activity Specialist. The specialist feedback will be provided after the pre-application meeting to discuss Stormwater.

Auckland Transport – No details from the applicant at the time of finalising this memo (25/07/2025). A separate meeting can be arranged when traffic comments are provided.

Auckland Council Growth and Strategy Team - as mentioned at the meeting, the Growth and Strategy Team have indicated that they would like to provide comments, as the date of finalising this memo, no comments have been received. When received, these will be circulated to the applicant, upon receipt.

Concluding comments (not discussed at the meeting)

High-level Planning feedback (Samantha Redward):

The current district and regional planning context for Clarks Beach relates to the Auckland Unitary Plan (Operative in Part) (AUP(OP)), where the site is both Rural – Mixed Rural and Rural Coastal in terms of zoning. However, the following high-level comments are made in relation to planning matters and the development of a large residential subdivision on a rural zoned site:

- Out of sequence development could lead to other pressures on the area, for example, lack of services including social infrastructure (schools/education facilities, for example).
- Out of sequence development could lead to other pressures on reticulated infrastructure – for example, capacity in future infrastructure networks planned to provide for the existing Future Urban Zoned area at the western end of Clarks Beach Road, bounded by Stevenson Road, and Wharf Road.
- The Objectives and Policies of the General Rural and Mixed Rural Zones seek to protect the productive capacity of rural land and to protect elite and prime soils.
- The Objectives and Policies of the Rural Zone and the Rural Coastal Zone do not support the intensity of development proposed. More specifically, the Objectives and Policies of both the Rural Zone and the Rural Coastal Zone seek to maintain the rural and rural coastal character and visual amenity. H19.5.9.2, Objective (2) specifically seeks to protect the ecological values of the Manukau Harbour, wader bird habitats and the visual and landscape interconnection between land and sea. Clarks Beach is identified as being of special character in the Rural – Rural Coastal Zone by Objective H19.5.9.2 (3) and Policy H19.5.9.3 (3)(a).
- The management of effects related to productive land and the potential total loss of land classed as productive (LUC2) is noted as a matter of concern which may not be able to be adequately mitigated, this is further supported by the Rural zones Objectives and Policies (noted above).
- The interface between other rural zoned properties and potential for reverse sensitivity effects arising (for example, spray drift, noise, dust) is a concern which will need to be addressed.
- Acknowledging the applicant is the developer of the adjacent Clarks Beach Precinct development, there are questions related to the economic impact of ‘out of centre’ development pulling away business from the other ‘local centre’ businesses which may also extend to impacts on areas of ‘future urban’ land which could be more flexibly developed as part of a comprehensive structure plan.
- The existing Clarks Beach settlement and precinct area is important in terms of the receiving environment.

As a rural zoned property which is not serviced by reticulated infrastructure, the burden of information, provision of servicing and associated assessment of actual or potential environmental effects, lies with the applicant. The applicant will need to resolve these matters, and it appears that all servicing will need to occur on-site and be retained as private infrastructure.

The above comments are high level and as mentioned, the detail is critical to understand the actual and potential effects of the proposal. From a planning policy perspective, the site does not appear suitable for such an intensive development, given the concerns raised above.

We encourage the applicant to continue engaging with the Council prior to lodgement of a Fast Track Referral application.

This is a preliminary view only. A final determination on notification and the overall merits of the application can only be made upon receipt of a formal application, site visit and review.

Important Information

The purpose of a pre-application is to facilitate communication between applicants and the council so that the applicant can make informed decisions about applying for consents, permits or licences.

The views expressed by council staff in or following a pre-application are those officers' preliminary views, made in good faith, on the applicant's proposal. The council makes no warranty, express or implied, nor assumes any legal liability or responsibility for the accuracy, correctness, completeness or use of any information or views communicated as part of the pre-application process.

The applicant is not required to amend their proposal to accommodate the views expressed by council staff. Further, it remains the applicant's responsibility to get their own professional advice when making an application for consents, permits or licences, and to rely solely on that advice, in making any application for consents, permits or licences.

To the extent permissible by law, the council expressly disclaims any liability to the applicant (under the theory of law including negligence) in relation to the pre-application process. The applicant also recognises that any information it provides to the council may be required to be disclosed under the Local Government Official Information and Meetings Act 1987 (unless there is good reason to withhold the information under that act).

All consent applications become public information once lodged with council. Please note that council compiles, on a weekly basis, summaries of lodged resource consent applications and distributes these summaries to all local boards and all mana whenua groups in the Auckland region. Local boards and mana whenua groups then have an opportunity to seek further details of applications and provide comment for council to take into account.

Prepared by:

Name: Samantha Redward

Title: Consultant Planner

Signed: 

Date: 25/07/2025

Reviewed by:

Name: Adonica Giborees

Title: Principal Project Lead, Premium Resource Consents

Signed: 

Date: 31/07/2025

Planner-led Pre-Application Consenting Memo & Meeting Record

Part A: Pre-Application Preparation

Pre-Application No. PRR00043021	
Date of request	24 June 2025
Applicant	Knight Investments Limited (Doyle Smith)
Contact details	Phone s 9(2)(a)
	Email s 9(2)(a)
Agent	Renee Fraser-Smith, Tollemache Consultants Limited
Contact details	Phone s 9(2)(a)
	Email s 9(2)(a)
Site Address	<p>Lot 3 DP 337204 Clarks Beach Road, Pukekohe (GIS say NULL street address) – see location plan below.</p>  <p>And 156 Clarks Beach Road (Lot 1 DP337204) Works will also be required on esplanade reserve and vested road.</p>
Proposal	<p>The applicant intends to lodge a Referral Application under the Fast Track legislation.</p> <p>The proposal is for: Approx 1,000 dwellings (222 retirement village units and the remainder residential lots). 1.7 ha of Neighbourhood centre activities, 5 ha of light industrial activities.</p>

The Auckland Unitary Plan became 'Operative in part' (AUP(OP)) on 15 November 2016. For the purposes of this pre-application and any resource consent application that may be lodged, the AUP(OP) is the primary planning document that sets out the relevant zoning/overlays applying to the site, and the objectives and policies, rules and assessment criteria guiding development in this location

Type	Y	N	Type	Y	N
(Potential) Contaminated Land	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Coastal Erosion	<input type="checkbox"/>	<input type="checkbox"/>
Land Instability	<input type="checkbox"/>	<input type="checkbox"/>	Coastal Storm Inundation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Floodplain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Coastal Storm Inundation (plus 1m sea level rise)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overland flow paths (ephemeral/intermittent/permanent stream)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cultural Heritage Inventory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Flood Sensitive	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Combined Network	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Arterial Roads	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Building Frontage Control	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vehicle Access Restriction Control*	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Geology (rock breaking)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- *Depending on sequencing of the roundabout shown in the draft layout - at least one of the proposed entrances could be in a Vehicle Access Restriction.

Meeting held		
Date and Time	28 July 2025 11.30am – 12.30pm	
Meeting participants – Customer / Agents	Renee Fraser-Smith, Tollemache Consultants Doyle Smith, Nakhle Group Anthea Abbott, CivilPlan Harneet Singh, CivilPlan	Planning Consultant Development Manager Stormwater Engineer Stormwater Engineer
Meeting participants – Council	Samantha Redward, SLR Consulting Limited Adonica Giborees, Auckland Council Dr Arsini Hanna Maria Baring	Consultant Planner Principal Project Lead Senior Stormwater and Industrial Trade Activity Specialist. Development Engineering

Summary of key considerations and issues

<p>Overview (Renee Fraser-Smith)</p>	<ul style="list-style-type: none"> • This is Fast Track Referral only, so the level of information provided is intended to reflect the requirements for a Fast Track referral which is different to the level of detail required for a RC application. • The applicant acknowledges that the site falls outside the Healthy Waters Network Discharge Consent and is unable to change this through the Fast Track process. • The application requires and proposes private stormwater discharge • However, future discussion will be undertaken with Healthy Waters to determine if there would be a pathway to acceptance of assets. If not taken over by Healthy Waters, then will be owned/operated/maintained by a residents' association (or similar).
<p>SW Overview (Anthea Abbott and Renee Fraser-Smith)</p>	<ul style="list-style-type: none"> • A draft stormwater memorandum was pre-circulated which outlined at a high-level catchments, considerations for future catchments (i.e. flooding/wetlands etc), treatment, retention and detention. • The applicant team acknowledged that the draft will be updated as it currently does not expand enough on the future treatment for "industrial trade activities" (ITA's) as the applicant team has experience with another industrial project approved under the Covid fast track legislation and the approach will be the same.
<p>SWWWITA (Dr Arsini Hanna)</p>	<ul style="list-style-type: none"> • Diversion and Discharge consent is required. Assessed against A10 as a discretionary activity. • High level assessment is good. • Can include Industrial Trade Activity (ITA) advice note. • For Stormwater we would need more detail in regard to Chapter E9 – for example high use road or high contaminant generating car parks will generate RC based on area. Agreed this is a substantive application matter as the draft high-level assessment has addressed this. • Wetland to be addressed – Ecological Report will be required where output is into the wetland or within 100m of the wetland. Any diversion from the wetland will need to be supported by the ecological report. Agreed this is a substantive application matter as the draft high-level assessment has addressed this. • In terms of E8 and specifically E8.6.1.1 – the applicant cannot provide an either/or scenario – must be specific as Council need to be certain that the device is sized to do the job. At least need the sizing calculations (not all the details), this will ensure Council can confirm compliance with the

	<p>standard. Agreed this is a substantive application matter as the draft high-level assessment has addressed this.</p> <ul style="list-style-type: none"> • Happy to answer questions and help support the process. • Detailed feedback on Stormwater matters is set out below.
Development Engineering (Maria Baring)	<ul style="list-style-type: none"> • It is suggested that flooding matters, affecting catchments which drain into areas covered by the HW NDC, will be reviewed by Healthy Waters at substantive application stage • Overland flow path – need to understand final levels of earthworks. Agreed this is a substantive application matter. • Majority of flooding is localised (Catchments 1,2 & 3) so can design for the subject site. Any flooding that falls to another site will need to be carefully managed. Agreed this is a substantive application matter as the draft high-level assessment has addressed this. • The downstream effects are important (wetlands for example). Agreed this is a substantive application matter as the draft high-level assessment has addressed this. • In relation to stormwater, as unlikely to vest, keep the design and location of stormwater lines within the private lots. • Wastewater and water supply can be in the public road (vested).
Planning (Sam Redward)	<ul style="list-style-type: none"> • Comments provided by Arsini Hanna are comprehensive and address all matters related to stormwater (appended below).

Actions arising from meeting

Update stormwater proposal to include ITA discussion

Renee Fraser-Smith

Any other matters / items arising / corrections / clarification (post-meeting comments)

STORMWATER

The following summary is provided by Dr Arsini Hanna, Senior Stormwater and Industrial Trade Activity Specialist.

The assessment herein presents comments from the perspective of a regulatory stormwater on behalf of the SWWWITA Team of Planning & Resource Consents. The draft application has been reviewed in relation to the relevant sections of the AUP (OP). The following draft application document has been reviewed as part of this assessment:

- DRAFT Stormwater assessment report prepared by Civil Plan Construction Ltd and dated 15 July 2025.

Existing stormwater management

- Currently there is no existing stormwater drainage. Two existing farm culverts provide farm access over the permanent stream.
- Stormwater runoff from the site drains to the permanent stream that flows in a south-west direction discharging to the Taihiki River estuary at the south-western corner of the site, and the Taihiki River along the southern boundary and ultimately into Manukau Harbour.
- Natural wetlands were identified primarily along the tributaries of the mainstream channel.

Auckland Unitary Plan operative in part (AUP(OP))

The applicant has described six discharge points for SW runoff from the site impervious areas, the discharge points are not part of the public network, therefore this catchment is to be assessed as a private discharge under Chapter E8.

E8 – Diversion and discharge of stormwater

Consent to divert and discharge stormwater is required as a **Discretionary Activity** under rule E8.4.1 (A10), as the site is classified as rural with more than 5000m² of impervious area, and the diversion and discharge of stormwater from the total site impervious areas is not authorised by other stormwater diversion and discharge rules.

Water Quality

- The proposed development will result in increased impervious area, increases in runoff flowrates, and an increase in contaminant loading.
- The provisions of Chapter E8 together with the overarching objectives and policies outlined through Chapter E1 of the AUP set a framework for water quality management from runoff from all impervious surfaces including directive policies E1.3(2)(a) (*to maintain or enhance water quality, flows, stream channels and their margins and other freshwater values...*) and E1.3(8)(b)/(e) (*minimising the generation and discharge of contaminants... and providing for the management of gross stormwater pollutants...*).
- In line with the requirements of E1 of the AUP the downstream environment should be protected and where possible, enhanced.
- The Applicant's Agent has proposed water quality treatment of runoff from roads and parking areas within the development by means of rain garden.
- The applicant is proposing communal raingardens, which will provide stormwater quality treatment (90th percentile storm), and extended detention (95th percentile storm) where required for the impervious road reserve areas.
- The raingardens shall be designed in accordance with GD01 to treat the 90th percentile water quality storm.
- In my opinion, the proposed water quality treatment is considered appropriate in the context of the development and the anticipated contaminants such that the effects of stormwater discharging to the receiving environment will adequately avoided or suitably mitigated.
- However, it is not clear whether Auckland Transport are supportive of the proposed management of stormwater runoff from the road. Agreement for the detailed design of the stormwater management for the road, or ultimate vesting of any device or infrastructure will need to be provided by Auckland Transport.

- The applicant stated that devices within each lot such as stormfilter, raingarden, SW360 cartridge filters (or similar type underground devices) and underground vaults (or similar).
- Please note (when Council processes a regional quality diversion and discharge of stormwater, normally we do not accept either / or. We need to know the type of the proposed stormwater treatment device and the preliminary device sizing calculations this is required as part of the E8 Standards assessment.

Note

- Our understanding is that: Some work may be required on **Clarks Beach Road**.
- We are not sure if the applicant considered Rule E8.4.1(A4): This Rule allows for the diversion and discharge of stormwater from Road impervious areas of 5,000m². As the diversion and discharge of stormwater from existing Road areas is Permitted (Either Rule 8.4.1(A1)/8.6.2.1 or 8.4.1(A3)/8.6.2.2 this rule should be applied for additional (new) impervious areas **up** to 5000m² of road impervious area. Please note that general standards in E8.6.1 and the Standards of Rule 8.6.2.3 apply.

Stormwater management - quality

- The Application identifies the proposal includes the development of new and redevelopment of existing impervious areas associated with both a High Use Road and a High Contaminant Generating Car Parking Area. An assessment against the Chapter E9 standards must be provided.

Stormwater quality – high generating car parks and high use road

These regional land use rules are applied in accordance with RMA section 9(2) and give effect to regional council functions (see RMA s30(1)(c)) to control land use to:

1. Maintain and enhance water quality ((c)(ii)); and
2. Maintain and enhance ecosystems in waterbodies and coastal waters ((c)(iii)).

- Our understanding is that the development may create more than uncovered 30 car spaces across the development. The definition of *High contaminant generating carpark* within the AUP does not provide clarity on whether individual uncovered residential carparks as part of a wider comprehensive development should be included.
- In case the applicant is proposing specific car parking within specific areas (lot(s)) within the development with more than 5000m² of impervious areas, this is considered a *high contaminant generating carpark* (HCGC) by definition under Appendix J of the AUP(O-P).
- The proposed development may therefore require consent as a Controlled Activity under E9.4.1.(A6) for the creation of a new *High contaminant generating carparking area* greater than 5,000m².

Additional note:

- It should be noted that once a carpark is identified as a HCCP, and the 1,000m² threshold has been met, treatment is to be applied to all relevant areas including parking spaces, access and manoeuvring areas, entry and exit ways and any other areas that would reasonably be considered part of the carpark.

Stormwater management – Flow (E10)

- Consent **is not** required under rule E10.4.1 as the site is not within the SMAF overlay.

- The discharge of stormwater runoff from the development is to a stream receiving/coastal and wetland (natural environment). This has been considered and hydrology mitigation in general accordance with best practice stormwater management has been proposed.
- The applicant is proposing to provide the hydrology mitigation. On individual lots by way of tanks (above or below ground) for roof runoff.
- The retention and extended detention devices will discharge via a piped outlet to streams or wetlands to ensure water flows are maintained to pre-development levels. Again, when we process a regional D & D of Stormwater consent under Rule E8, the applicant needs to demonstrate compliance with the Standard E8.6.1 and specifically (2): “*The diversion and discharge must not cause or increase scouring or erosion at the point of discharge or downstream*”.
- Non-potable reuse is proposed to achieve the retention volume of runoff from the roof areas. All dwellings must be plumbed to the proposed tanks for the retention volume of the required hydrology mitigation to be achieved.

National Environment Standards for Freshwater (NES-F (2020))

- The plan (SK01-2 attached to the stormwater assessment report) shows natural inland wetlands were identified within the proposed works.
- In terms of the consents required under the NES-F for the catchment that discharges directly to the wetland, please be advised that the NES-F Regs have been amended to the extent that the discharge of water (containing contaminants) is excluded from consideration and the focus is now on the hydrological connection between the diversion/discharge of water and the wetland and the effects of the diversion/discharge on the wetlands water levels or hydrological function. These changes came into effect on the 5th January 2023.
- In accordance with MfE’s guidance on the interpretation of the NES:F, all criteria need to be satisfied in order to trigger the need for a consent under the Regulations. The diversion of water and the discharge of water are addressed separately as follows:

54(c) the taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland if—

- i there is a hydrological connection between the taking, use, damming, or diversion and the wetland; and*
- ii the taking, use, damming, or diversion will change, or is likely to change, the water level range or hydrological function of the wetland.*

54(d) the discharge of water into water within, or within a 100 m setback from, a natural inland wetland if—

- i there is a hydrological connection between the discharge and the wetland; and*
- ii the discharge will enter the wetland; and*
- iii the discharge will change, or is likely to change, the water level range or hydrological function of the wetland.*

- Notably, a hydrological connection between the diversion and discharge of stormwater must be demonstrated for consent to be required under Reg 54(c)(i) and 54(d)(i). Similarly, it must be demonstrated that the diversion and discharge of stormwater will result in a change (or likely to change) of the water level range or hydrological function of the wetland for consent to be required under Reg 54(c)(ii) and 54(d)(iii).

- For completeness, in respect of Reg 54 d(ii) the proposed discharge location is not to the identified wetlands.
- The decision if consent is required or not depends on the ecological information, location of the discharge (into the wetland or within 100m of the wetland and hydrological information). An Ecological report must be provided in this respect.

E33 – Industrial or Trade Activities (ITA)

- Light industrial impervious areas – the level of detail is unclear - what type of light industry? If it is unknown at this stage an advice note in this regard can be provided.

Other notes

- The SW assessment summarised above focuses on matters relevant to the regional stormwater consent framework and should be read in conjunction with separate Development Engineering assessments which will address natural hazards, other flooding, overland flowpaths and pipe capacities.

Concluding comments (Sam Redward)

Council acknowledges the design-led approach to stormwater which has informed the overall concept design of the development. The applicants preparedness meant that the discussion was targeted and useful. The main points to confirm are the end users for ITA purposes, the stormwater devices and sizing calculations and the balance between hydrological mitigation and downstream effects, acknowledging the details of these are expected to be provided in a substantive application, but the Referral application should address these at a high-level.

We encourage the applicant to continue engaging with the Council prior to lodgement of a Fast Track Referral application.

This is a preliminary view only. A final determination on notification and the overall merits of the application can only be made upon receipt of a formal application, site visit and review.

Important Information

The purpose of a pre-application is to facilitate communication between applicants and the council so that the applicant can make informed decisions about applying for consents, permits or licences.

The views expressed by council staff in or following a pre-application are those officers' preliminary views, made in good faith, on the applicant's proposal. The council makes no warranty, express or implied, nor assumes any legal liability or responsibility for the accuracy, correctness, completeness or use of any information or views communicated as part of the pre-application process.

The applicant is not required to amend their proposal to accommodate the views expressed by council staff. Further, it remains the applicant's responsibility to get their own professional advice when making an application for consents, permits or licences, and to rely solely on that advice, in making any application for consents, permits or licences.

To the extent permissible by law, the council expressly disclaims any liability to the applicant (under the theory of law including negligence) in relation to the pre-application process. The applicant also recognises that any information it provides to the council may be required to be disclosed under the Local Government Official Information and Meetings Act 1987 (unless there is good reason to withhold the information under that act).

All consent applications become public information once lodged with council. Please note that council compiles, on a weekly basis, summaries of lodged resource consent applications and distributes these summaries to all local boards and all mana whenua groups in the Auckland region. Local boards and mana whenua groups then have an opportunity to seek further details of applications and provide comment for council to take into account.

Prepared by:

Name: Samantha Redward

Title: Consultant Planner

Signed: 

Date: 30/07/2025

Reviewed by:

Name: Adonica Giborees

Title: Principal Project Lead, Premium Resource Consents

Signed: 

Date: 31/07/2025

Planner-led Pre-Application Consenting Memo & Meeting Record

Part A: Pre-Application Preparation

Pre-Application No. PRR00043021	
Date of request	01 August 2025
Applicant	Knight Investments Limited (Doyle Smith)
Contact details	Phone s 9(2)(a)
	Email s 9(2)(a)
Agent	Renee Fraser-Smith, Tollemache Consultants Limited
Contact details	Phone s 9(2)(a)
	Email s 9(2)(a)
Site Address	<p>Lot 3 DP 337204 Clarks Beach Road, Pukekohe (GIS say NULL street address) – see location plan below.</p>  <p>And 156 Clarks Beach Road (Lot 1 DP337204) Works will also be required on esplanade reserve and vested road.</p>
Proposal	<p>The applicant intends to lodge a Referral Application under the Fast Track legislation.</p> <p>The proposal is for: Approx 1,000 dwellings (222 retirement village units and the remainder residential lots). 1.7 ha of Neighbourhood centre activities, 5 ha of light industrial activities.</p>

The Auckland Unitary Plan became 'Operative in part' (AUP(OP)) on 15 November 2016. For the purposes of this pre-application and any resource consent application that may be lodged, the AUP(OP) is the primary planning document that sets out the relevant zoning/overlays applying to the site, and the objectives and policies, rules and assessment criteria guiding development in this location.

Type	Y	N	Type	Y	N
(Potential) Contaminated Land	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Coastal Erosion	<input type="checkbox"/>	<input type="checkbox"/>
Land Instability	<input type="checkbox"/>	<input type="checkbox"/>	Coastal Storm Inundation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Floodplain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Coastal Storm Inundation (plus 1m sea level rise)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Overland flow paths (ephemeral/intermittent/permanent stream)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cultural Heritage Inventory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Flood Sensitive	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Combined Network	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Arterial Roads	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Building Frontage Control	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vehicle Access Restriction Control*	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Geology (rock breaking)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- *Depending on sequencing of the roundabout shown in the draft layout - at least one of the proposed entrances could be in a Vehicle Access Restriction.

Meeting held		
Date and Time	11 August 2025 11.00am – 12.15pm	
Meeting participants – Customer / Agents	Renee Fraser-Smith, Tollemache Consultants Terry Church, Flow Transportation Specialists	Planning Consultant Traffic Engineer
Meeting participants – Council	Samantha Redward, SLR Consulting Adonica Giborees, Auckland Council Ripul Sachdeva, Auckland Council Maria Baring, Auckland Council Hedre Dednam, Auckland Transport Scott Macarthur, Urban Planning Consultants Paul Schischka, PTM Consultants	Consultant Planner Principal Project Lead Traffic Engineer Development Engineer Major Developments Interface Lead Consultant Development Planner - Auckland Transport Traffic Engineer

Summary of key considerations and issues

<p>Overview (Renee Fraser-Smith)</p>	<ul style="list-style-type: none"> • This is Fast Track Referral only, so the level of information provided is intended to reflect the requirements for a Fast Track referral which is different to the level of detail required for a RC application. • Neighbourhood Centre is intended to directly link to the retirement village to provide a range of personal services. • Business area is aimed at local employment (none at present). • Southern-most boundary is treated as an esplanade reserve but, this is a vested 'paper' road. The application will seek an esplanade 'top up' and leave as vested road. It was acknowledged that this will go through the relevant process at the appropriate time, should the project be referred.
<p>Transport Overview (Terry Church and Renee Fraser-Smith)</p>	<ul style="list-style-type: none"> • A draft transport memorandum was pre-circulated which outlined at a high-level: <ul style="list-style-type: none"> ○ The site and immediate location and the wider transport matters. ○ Opportunity for development has been explored in this area since 2015 (SHA). Have assessed live-zoned area to north of the site. ○ The assumption agreed back in 2015 have continued (distribution of traffic etc). ○ Stage 8-15 Clarks Beach Road – active modes are front of mind. This will be continued for this development. ○ 2015 ITA – there was a need to consider intersection upgrades on Clarks Beach Road when traffic gets to a threshold. ○ Plan Change 96 Open Space Plan change (not Kingseat PC). Modelling etc went through hearings process, see section 3.0 of the traffic memo – as with Kingseat, a key aspect is how to get people more attracted to public transport. ○ The ability to provide for employment opportunities in the area will mean people don't need to travel for work. ○ Ferry Service is a current community project (not being relied on for this development).
<p>Auckland Transport feedback (Paul Schischka and Scott Macarthur)</p>	<ul style="list-style-type: none"> • Identified that the matters raised would be addressed at the substantive application stage unless specifically stated. • There is a confirmed bus route from Clarks Beach to Papakura and Onehunga. Please refer to Attachment A for further details. • Transport memo should be updated to reflect this information. • The draft Transport Assessment Report (TAR) prepared by Flow proposes a new three-arm roundabout at the entry to Clarks Beach and an additional

arm on the proposed roundabout at the Clarks Beach Road/Wharf Road/Kaitiaki Drive. The new three-arm roundabout is an appropriate entry treatment to slow traffic passing the new neighbourhood centre.

- Master planning - Crossover between Urban Design and Transport. Interface of employment areas and residential or general location of these needs to be addressed.
- Five-arm roundabout – needs some further assessment. Potential to relocate the main employment road currently proposed to the eastern side, which the applicant confirmed is not given any dominance.
- During the meeting the applicant indicated that they would upgrade the frontage of their site onto Clarks Beach Road between a point east of the eastern roundabout, around the existing speed limit reduction to 50 km/h, to the west edge of the retirement village site. This outcome is supported.
- Further post meeting comments on the master plan are attached for your consideration.
- Renee and Terry confirmed:
 - *Function of north-south road is to serve wider function as a connection from neighbourhood park at south, to the development on northern side of Clarks Beach Road, which then provides a coast-to-coast connection, and pedestrian and cyclist amenity is provided for.*
 - *No reason the eastern road couldn't be the main vehicle access.*
 - *Could be a park (adjacent) boulevard with walking/cycling connectivity. Vehicle crossings on this road should be avoided to maximise active mode amenity and safety.*
- Suggest service lane between the neighbourhood centre area and light industry, so that there are less service vehicles around perimeter, and to allow retail in the neighbourhood centre to be serviced from the rear for deliveries and rubbish collection.
- Light industry is surrounded by residential – interface of trucks against residential and retirement village. Could be amenity issues.
Renee – Urban Design team are working on this issue. Reverse sensitivity and amenity between activities will be managed carefully. Will nominate specific activities.
- Internal layout – where there are cross-roads (especially major roads), roundabouts are the preferred intersection form. This is a matter for the substantive application to address.
- Land to the west is not urban zoned, but provision should be made to allow for a potential active modes link if this were to change. It is suggested that this could take the form of a park located at the south end of the retirement

village, which would allow an active modes link to be created in future if required.

- The posted speed limit changes from 50km/h to 80km/h approximately 200m east of development.

Road Reserve vs Esplanade

- Auckland Transport is supportive of the road stopping process for the road running along the coastal edge of the site. Please refer to Attachment A further commentary post meeting.

Wider environment

- Agree Waiau Pa Road / Clarks Beach Road / McKenzie Road intersection needs to be upgraded at some point.
- Active modes path through to the school at Waiau Pa is required and this could be linked to a specific trigger (i.e. 200 dwellings) if this project is not already delivered by the Local Board funding initiative.
- Public Transport – bus confirmed as 30min frequency in peak times and hourly at interpeak.

Renee: Local Board have also expressed interest in getting a bus service to Paerata Station, over Papakura. Renee explained the community initiative to operate a Ferry Service from Clarks Beach Wharf (RC approved for the wharf structure and the community have obtained the ferry's which used to operate from Pine Harbour).

Hingaia-Linwood Road

- Capacity issues & trip generation are an existing problem that would be exacerbated by this development. The applicant should investigate mitigation measures as part of the substantive application. Peak periods are the key issue/s.
- Modelling shows the road already is over capacity and the morning (a.m.) peak is the worst (also noting that the recently completed Linwood Rd / Blackbridge Rd roundabout construction was not included in the model). Therefore, to assess this, an updated SATURN model is needed for the Linwood Rd / Hingaia Rd corridor and surrounding area.
- Whilst not specifically discussed at the pre-application meeting, Working From Home (WFH) arrangements was noted in the Transportation memo as being **one factor** (amongst others) which is changing where people may travel to from this area which is not represented by older trip generation rates. If this applicant wishes to use this as a sole justification for reduced trips it is suggested that additional data will be required on this matter.

	<ul style="list-style-type: none"> • Retirement village would be supported as it would not be likely to drive up capacity issues. • <i>Terry: The challenge will be how the reasonable operation of the road network is defined. In relation to the wider roading network, locations where future delays are predicted are in response to managing speed, such as at the local centre at Blackridge Road. At these locations, delays should not be solely attributed to its effects, as the reduction in speed and management of flows at these sections is to create a safe environment for all road users.</i>
<p>Traffic Engineering (Ripul Sachdeva)</p>	<ul style="list-style-type: none"> • Identified that the matters raised would be addressed at the substantive application stage. • Confirmed that Clarks Beach Road frontage will need to be upgraded to an urban standard. • Information will be required on which private roads/JOALs would be proposed. Subject to the number of rear dwellings proposed off private road or Jointly Owned Access Lot (JOAL), the development must comply with the provisions set out in Plan Change 79, unless there are demonstrable on-site constraints that prevent compliance. • The scheme should have an active mode transport focus, safety for retirement village + industrial area interface. • There is a clear differentiation of public vs private roads – information will be required to demonstrate how intersections etc would be treated.
<p>Development Engineering (Maria Baring)</p>	<ul style="list-style-type: none"> • Identified that the matters raised would be addressed at the substantive application stage. • Confirmed that Clarks Beach Road frontage will need to be upgraded to an urban standard, margins extend slightly further than the development edge.
<p>Planning (Sam Redward)</p>	<ul style="list-style-type: none"> • Agree with the comments that the roading layout could be flipped to have the heavier traffic come in through the first (eastern) entrance, which may lead to some better outcomes related to the interface between residential and industrial/business areas of the proposal. • Support linkages (active mode) to the adjacent properties. • As previously discussed, the Parks Planning team will review and follow up the road stopping proposal once an application is received and Scott will confirm with AT what they prefer in terms of the 'paper' road, or traditional esplanade.

Actions arising from meeting

Confirm with AT preference re: esplanade vs vested 'paper' road. *Action complete (refer to below).*

Scott Macarthur

Any other matters / items arising / corrections / clarification (post-meeting comments)

Refer to post-meeting comments from Auckland Transport in **Attachment A**.

Concluding comments (Sam Redward)

The meeting was productive and parties generally agreed on the central issue being the capacity of the Hingaia—Linwood road network, acknowledging that development in the wider area including the extensive developments at Paerata and Drury, Karaka North have changed the local context and likely have an influence on travel patterns for locals, meaning the substantive assessment (if the referral is accepted) will need to include up to date data to confirm upgrades required.

The provision of local employment opportunities and the retirement village are supported from a traffic perspective, as are the urbanisation of the road frontage of the site and active mode connections both within the site and connections to Waiiau Pa. It was confirmed that there may be opportunities within the site itself to improve amenity for residential sites in proximity to the industrial / mixed use area and the use of the proposed roads to promote active modes.

As noted, detailed assessment is required, and it is expected that significant upgrades will be required to the road network to mitigate the capacity issues.

We encourage the applicant to continue engaging with the Council prior to lodgement of a Fast Track Referral application.

This is a preliminary view only. A final determination on notification and the overall merits of the application can only be made upon receipt of a formal application, site visit and review.

Important Information

The purpose of a pre-application is to facilitate communication between applicants and the council so that the applicant can make informed decisions about applying for consents, permits or licences.

The views expressed by council staff in or following a pre-application are those officers' preliminary views, made in good faith, on the applicant's proposal. The council makes no warranty, express or implied, nor assumes any legal liability or responsibility for the accuracy, correctness, completeness or use of any information or views communicated as part of the pre-application process.

The applicant is not required to amend their proposal to accommodate the views expressed by council staff. Further, it remains the applicant's responsibility to get their own professional advice when making an application for consents, permits or licences, and to rely solely on that advice, in making any application for consents, permits or licences.

To the extent permissible by law, the council expressly disclaims any liability to the applicant (under the theory of law including negligence) in relation to the pre-application process. The applicant also recognises that any information it provides to the council may be required to be disclosed under the Local Government Official Information and Meetings Act 1987 (unless there is good reason to withhold the information under that act).

All consent applications become public information once lodged with council. Please note that council compiles, on a weekly basis, summaries of lodged resource consent applications and distributes these summaries to all local boards and all mana whenua groups in the Auckland region. Local boards and mana whenua groups then have an opportunity to seek further details of applications and provide comment for council to take into account.

Prepared by:

Name: Samantha Redward

Title: Consultant Planner

Signed:



Date: 08/09/2025

Reviewed by:

Name: Adonica Giborees

Title: Principal Project Lead, Premium Resource Consents

Signed:



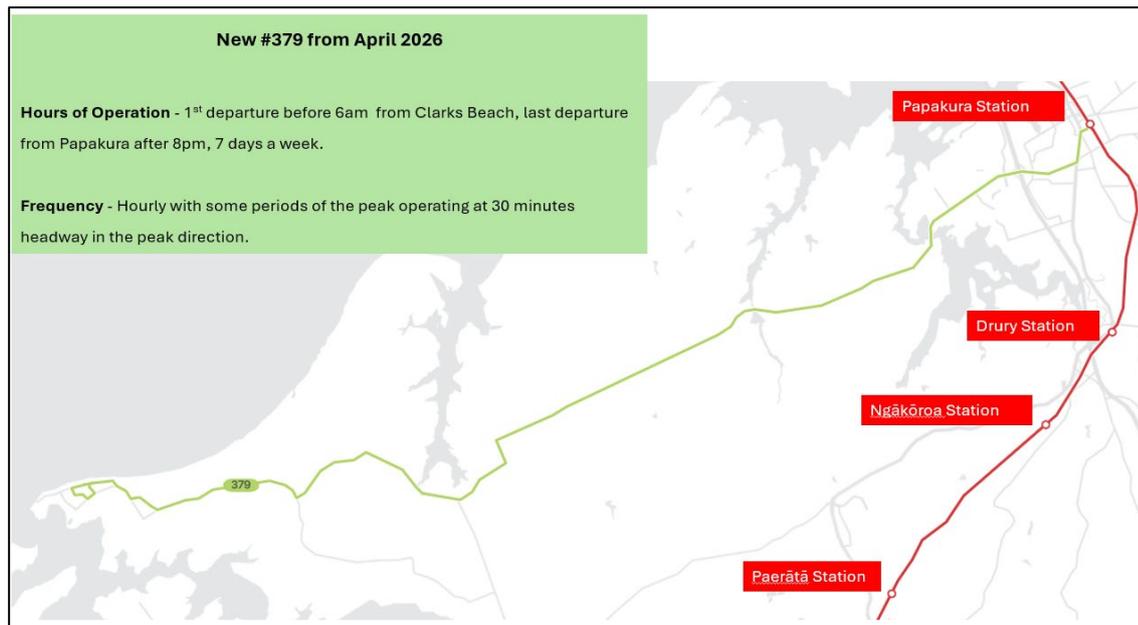
Date: 09/09/2025

Attachment A – AT post meeting comments

The following comments are provided to provide further context to the matters discussed at the meeting and Auckland Transport would expect these matters to be addressed/ responded to in the substantive application.

Public Transport

- Auckland Transport has confirmed the provision of the #379 bus service travelling from Clarks Beach to Papakura station.



- The bus service will be hourly with a short burst of 30 minutes head in the peak direction at peak times. This is a seven-day service. The first service out of Clarks Beach before 6am, last service from Papakura Station just after 8pm, seven days a week.
- Bus services will travel along Clarks Beach Road and will not enter the Fast Track site. Consideration therefore needs to be given to bus stop locations and allowing residents in this application site to walk down to the proposed service.
- The transport assessment should be updated to reflect this more recent information around bus services.

Master Plan

- Adding a fifth arm to the Clarks Beach Road/Wharf Road/Kaitiaki Drive roundabout could potentially result in some safety and/or operational issues, however this is subject to the design of the intersection. Having more than four arms on a roundabout often necessitates a larger intersection.
- We would recommend that the design of the master plan is re-considered to focus the main employment traffic route on the more easterly north-south road. Consideration should be given to making the existing north-south road (in bold black) to a walking and cycling connection only through to the existing roundabout to avoid this issue.
- While Clarks Beach Road is not an arterial road direct vehicle access onto it from the neighbourhood centre should be minimised or avoided, and Auckland Transport would like to see a Vehicle Access Restriction noted

on the master plan. Access to the area should be from the local roads at either end of the proposed neighbourhood centre or industrial zonings.

- During the meeting the applicant indicated that the Park Boulevard Road (in bold black) was intended to have high quality active modes facilities. Vehicle crossings across these facilities should be avoided.
- We suggest that the light industry area may be best placed adjacent to Clarks Beach Road, to the north of the proposed retirement village. This would avoid bringing large vehicles into a primarily residential area.
- There are some internal intersections where the roads intersect at angles which are not right angles. Where practical roads should intersect at between 80 to 100 degrees. Where this is not practical the use of roundabouts should be investigated.
- The internal road network should be designed to ensure that vehicle operating speeds are at or around 30 km/h (regardless of whether a formal 30 km/h speed limit is set for the development). Traffic calming will be needed to achieve this.

Wider network issues

- The Kingseat Wider Area Review Transport Assessment Report prepared by Flow and dated January 2024 identified significant capacity constraints on the Linwood Road / Hingaia Road corridor stating that *“Demands for private car travel on the Linwood Road/Hingaia Road corridor are predicted to exceed capacity in the future, as will demand for travel through Papakura interchange.”* According to the draft TAR the proposal would generate an additional 265 trips per hour along this corridor. More assessment of the effects on this corridor, including updated SATURN modelling, should be provided with the substantive application. This assessment should include specific assessment in regard to the Blackbridge Rd / Linwood Rd roundabout and the Oakland Road / Hingaia Road signalised intersection.
- The draft TAR discusses the Clarks Beach/Waiiau Pā/McKenzie Road intersection and recommends further investigation at substantive application stage. Auckland Transport considers that it is likely that this intersection will require an upgrade to mitigate the effects of increased traffic generated by the development and this should be more fully assessed in the substantive application.
- The draft TAR discusses a planned shared path connecting Clarks Beach and Waiiau Pa via Clarks Beach Road being promoted by the Franklin Local Board. While Auckland Transport considers that the distance between Waiiau Pa and Clarks Beach is too far for walking, this will have an important function as a cycling facility. The substantive application should provide certainty that this shared path is constructed should it not be delivered by the Local Board for any reason.

The following comments were not directly discussed at the meeting. Auckland Transport would recommend that the applicant address/ respond to these in the substantive application

Roading Stopping

- Auckland Transport is agreeable to the proposed road stopping along the coastal edge. This would be conditional on the master plan being updated to provide for east-west connections through the site and removal of the Vegetative buffer in at least one location along each boundary so that through movements are not precluded in future should further development happen.

- We would also ideally like to see park edge roads running along adjacent to any new esplanade reserve that is created to avoid CPTED issues that are created when housing backs onto such reserves. Any road to be vested in Auckland Transport would need to be shown as being outside of any coastal erosion areas.

Traffic Impacts and Modelling

- Page 10 of the draft TAR explains that the neighbourhood centre will comprise a small supermarket, supporting retail, a community hub with medical, etc, a childcare centre, and similar local amenities. For the light industry area small workshops and other small businesses are proposed. The trip generation estimate in the draft TAR assumes that the neighbourhood centre and light industry will have no net trip generation outside of Clarks Beach because any trips they generate from outside the settlement will be offset by providing local employment and shopping opportunities (meaning that local residents do not need to leave Clarks Beach for work or shopping as frequently).
- The applicant confirmed that the application will include also proposed activities. AT is concerned that is the list of activities may include dwellings inside the neighbourhood centre area which would then generate trips on the wider network and that the dwellings outside the area and would also generate more trips as there would be less opportunity for local employment and shopping. AT suggest that the application specifically exclude dwellings in the neighbourhood centre area to avoid this outcome.
- The applicant confirmed that the application will include proposed activities. AT is concerned that is the small workshops and businesses focused on servicing customers in the nearby settlement can be expected to generate far less trips on the wider network than a single (or small number of) larger businesses servicing a much wider area, and as such suggest that the application specifically identify sizes for activities to avoid this outcome.

Attachment B: Watercare Services Limited Preapplication Letter

22 September 2025

Daniel Nakhle
Nakhle Group
By email: s 9(2)(a)



Dear Daniel,

Clarks Beach Fast-track Referral Application - Pre Application

Introduction

Watercare Services Limited (**Watercare**) welcomes the opportunity to provide a response to Knight Investments Limited (the **Applicant**) following the Auckland Council pre-application process. This assessment is only valid at the time of this review.

The Applicant has contacted Watercare as part of their pre-application process. The Applicant intends to lodge a Referral Application under the Fast Track legislation. The proposal is located at 156 Clarks Beach Road (Lot 1 DP337204 and at the surrounding site that has no property number but is also described as Lot 3 DP337204) (the **Project Area**) and is for approximately 1,000 dwellings (222 retirement village units and the remainder residential lots), 1.7 ha of neighbourhood centre activities, and 5 ha of light industrial activities (the **Project**).

The Project is located within land zoned Rural – Mixed Use Zone and Rural – Rural Coastal Zone under the Auckland Unitary Plan – Operative in Part (**AUP-OP**).

Previous consultation with Watercare

As part of the pre-application meeting held on 3 July 2025, it was discussed that Watercare intends to bring a pipe and pump station through the Project Area to provide for the urban development in the wider area and a wastewater outfall is being constructed at Clarks Beach currently. The Applicant team noted that if Watercare cannot provide a connection into the public wastewater network for the Project, then the Applicant may lose 2000m² of developable area in order to provide an on-site wastewater solution, including land to support wastewater disposal, and it may need to provide an either/or option to support its Referral Application.

The Applicant's Planning Consultant sent through a list of questions via email on 22 August 2025 related to water supply and wastewater capacity to service the Project. We set out Watercare's position below, noting that the Project Area is zoned rural. Beyond providing the information Watercare holds on the existing and planned water supply and wastewater servicing to the live zoned area of Clarks Beach, Watercare does not have any modelling or further information available to inform development of the Project Area.

Watercare's position

In line with Watercare's statutory obligations, which include requirements to support growth areas identified by Auckland Council, Watercare does not provide water supply and wastewater servicing to rural zoned land, such as the Project Area.

Servicing rural zoned land is unanticipated by Watercare and in accordance with Auckland Council's Plans and Strategies, has not been included in Watercare's Business Plan, Asset Management Plan, or Funding Plan.

This means that planned upgrades and projects in the network and associated treatment infrastructure do not provide capacity for servicing rural land, and therefore the provision of connections to rural land would significantly impact the available capacity for the anticipated growth of live zoned areas and Future Urban Zone (**FUZ**) areas.

This position is consistent with Watercare's statutory obligations to act consistently with any plan or strategy of the Council¹ including, but not limited to, the AUP-OP, the Auckland Plan 2050, and the Auckland Future Development Strategy 2023-2053 (**FDS**). As stated in Auckland Council's Southern Rural Strategy 2025, growth should be focused on the existing urbanised extent of settlements and future urban areas and **avoid** growth outside settlements.

This position is further outlined in Watercare's annual Statement of Intent, which responds to Auckland Council's Letter of Expectation. In alignment with these obligations, Watercare is committed to supporting the Auckland Plan 2050 by working closely with Council and its partners to service identified growth areas; following the FDS for infrastructure planning; coordinating infrastructure projects with other utility providers; ensuring full recovery of growth-related costs; and complying with expectations set for Council-controlled organisations.

Any comments on, or assessment of, potential private water supply and/or wastewater servicing will be made by Auckland Council. Additionally, any private water supply and/or wastewater servicing would be subject to regulation by Taumata Arowai as the Water Services Regulator.

Bulk Wastewater

For background, Watercare has planned for wastewater servicing of the live zoned and FUZ Southwest communities of Kingseat, Clarks Beach, Glenbrook Beach and Waiuku. As part of this, a new wastewater discharge consent at Clarks Beach for servicing a population equivalent (**PE**) of 30,000 was granted in 2018. Work is currently underway to build the new outfall and undertake upgrades at our Clarks Beach Wastewater Treatment Plant (**WWTP**). Watercare identified and acquired 372 Glenbrook Beach Road as the preferred location for a new centralised wastewater treatment plant as part of this scheme and initiated a Notice of Requirement (**NoR**) process to designate this land for use as a WWTP. In May 2024, the Independent Commissioners appointed by Auckland Council issued their recommendation that Watercare withdraw its NoR. Watercare withdrew its NoR given the community sentiment and the position of the Independent Commissioners and moved this project back to the planning phase.

¹ Local Government (Auckland Council) Act 2009, section 58

Since moving this project back into the planning phase, Watercare has developed a long list of options, undertaken several rounds of consultation, assessed the various options which eventuated in a preferred solution. The preferred option is a decentralised scheme utilising Watercare's existing Clarks Beach and Waiuku wastewater treatment sites, to service up to 29,000 PE.

This scheme considers:

- A more permanent Clarks Beach WWTP with capacity up to 9,000 PE, which will service Clarks Beach, Glenbrook Beach and Kingseat.
- A new Waiuku WWTP with capacity up to 20,000 PE, which will service Waiuku.
- A treated effluent conveyance pipeline running from Waiuku to Clarks Beach.

Based on Auckland Council's current growth scenario (AGS23v1.1), the combined population of the planned service area (Waiuku, Clarks Beach, Glenbrook Beach, and Kingseat) is not expected to reach 29,000 PE before 2050. However, within this overall service area, the Clarks Beach WWTP will service Clarks Beach, Glenbrook Beach, and Kingseat only. These communities are projected to reach approximately 9,000 PE by 2050, which is the ultimate capacity of the Clarks Beach plant.

Additionally, the upgrade of the Clarks Beach WWTP (and Waiuku WWTP) will be staged in line with the projected population growth. The current upgrade of Clarks Beach WWTP will take the capacity of that plant to 6,000 PE. The subsequent upgrade to 9,000 PE will only occur when projected growth requires it.

This planning has not anticipated servicing any rural land. Therefore, the rural land which the Applicant is proposing to develop cannot be serviced by Watercare.

Bulk Water Supply

Watercare undertook a water supply servicing study in 2022 for Patumahoe and the surrounding areas, including Kingseat, Clarks Beach, Waiau Beach and Glenbrook Beach. This study considered the servicing of the live zoned and FUZ areas of Kingseat, Clarks Beach, Waiau Beach and Glenbrook Beach.

The study identified the following upgrades:

- Developments in Patumahoe and including additional storage towards Kingseat and Clarks Beach areas require additional 1 ML reservoir and an upgrade pump station.
- Developments in Kingseat require a new 315PE (DN) main and a new 4.5 ML reservoir and pump station.
- Developments in Clarks Beach and beyond require a new pump station on Sydney Owen Road.
- Developments in Clarks Beach and Waiau Beach require an additional 1.2 ML reservoir.
- Developments in Glenbrook Beach require an additional 1.4 ML reservoir and pump station.

These upgrades were identified only to meet projected future demand of the live zoned and FUZ areas of Kingseat, Clarks Beach, Waiau Beach and Glenbrook Beach. Scoping work is currently underway for the Patumahoe reservoir and pump station upgrades. Watercare has acquired 1 Carter Road in Patumahoe for this purpose. Feasibility of this project is scheduled to start in January/February 2026, with a completion and closure date of June 2030.

As the Project Area is zoned rural, it was not included in this study and cannot be serviced by Watercare.

Conclusion

In line with its statutory obligations, including the requirement to support growth areas identified by Auckland Council, Watercare does not provide wastewater or water supply connections to rural zoned land. Extending services to such areas would significantly impact Watercare's ability to plan for and service the existing live zoned and FUZ areas. Planned upgrades to the bulk wastewater and water supply networks are designed to support / meet the needs of those areas, in accordance with Auckland Council's growth scenario and the FDS, and do not provide for any rural zoned land. Therefore, the Project / Project Area cannot be serviced by Watercare for wastewater or water supply.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'H. Shaw', is positioned below the closing text.

Helen Shaw
Head of Strategy and Consenting

Attachment C: Heritage NZ Meeting Minutes

Clarks Beach Residential Development: Pre-application Meetings and Associated Work



HERITAGE NEW ZEALAND
POUHERE TAONGA

Date:22/07/2025	
Start Time: 1.00pm	End Time:1.45pm
Matter: Fast-track Application Proposal – 156 Clarks Beach Road, Auckland	
Attendees: HNZPT – Greg Walter, Stuart Bracey, Craig Reidy Applicant – Doyle Smith, Renee Fraser-Smith, Matthew Campbell	
Description of Activity: Coastal Residential development with a Neighbourhood centre	
Location of Activity: Clarkes Beach, Karaka, Auckland	
Consideration/Notes regarding documents provided prior to meeting: Site Archaeological Assessment Report (7 July 2025)	
Discussion <ol style="list-style-type: none">Renee Fraser-Smith introduced the proposed development<ul style="list-style-type: none">Residential development with some 750 unitsNeighbourhood shopping and services centreCultural CentreEsplanade reserve with coastal walkway.Matthew Campbell went through the highlights from the Archaeological Assessment report. Only highly modified archaeological sites currently identified along the coastal margin.Greg Walter outlined the information requirements for HNZPT to support an authority application recommendation within the Fast Track process.Stuart Bracey discussed how to address the archaeological values within the Fast Track process.Craig Reidy highlighted the detailed iwi consultation process required to be recorded for the Fast Track process.	
Additional Information Required: HNZPT emphasized that full information was required for the completeness check if the referral application is supported.	

Action Steps:

Applicant:

The referral application is to be lodged shortly.

Heritage New Zealand Pouhere Taonga:

No further action at this stage.