

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

<b>Project name</b>	Waimauku West
---------------------	---------------

Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

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

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

2. Please provide your comments on this application
<p>The following outlines the responses to the invitation for comments received by Auckland Council on 8 December 2025. This response has been compiled based on input from a range of experts from Auckland Council as well as comments from Council Controlled Organisations, and has taken into account the criteria that inform the Minister’s decision-making progress on referral applications at Section 22 of the Fast-Track Approvals Act (the Act).</p> <p>This follows a previous application for a similar project (FTAA-2508-1094/PRR00043251) that was withdrawn. This application is a subsequent re-lodgement of that application without the originally proposed solar farm element.</p> <p>The received supporting expert inputs are appended to this response as follows:</p> <ul style="list-style-type: none"> <li>• Attachment 1 – Plans and Places</li> <li>• Attachment 2 – Growth and Spatial Strategy*</li> <li>• Attachment 3 – Economist</li> <li>• Attachment 4 – Rodney Local Board*</li> <li>• Attachment 5 – Healthy Waters</li> <li>• Attachment 6 – Auckland Transport*</li> <li>• Attachment 7 – Watercare Services Limited</li> </ul>

- Attachment 8 – Stormwater
- Attachment 9 – Development Engineer
- Attachment 10 – Groundwater Diversion and Dewatering
- Attachment 11 – Groundwater Take and Bore
- Attachment 12 – Traffic Engineer\*
- Attachment 13 – Wastewater\*
- Attachment 14 – Soil Scientist (NPS: HPL)\*
- Attachment 15 – Streamworks and Freshwater Ecology
- Attachment 16 – Terrestrial Ecology\*
- Attachment 17 – Parks Planning\*
- Attachment 18 – Landscape Architect\*
- Attachment 19 – Urban Design\*
- Attachment 20 – Regional Earthworks\*
- Attachment 21 – Contaminated Land\*

\*These memos are unchanged from the previous referral application, and have not been updated to minimise unnecessary time charges. Where this is the case, the specialists have reviewed and confirmed the changes from the previous application have not affected their feedback, with that confirmation fronting the respective attachment. In these memos, where there may be any reference to a solar farm, we confirm that this is related to the earlier referral application, is not part of this application, and does not affect the specialist feedback.

## **Section 22**

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

The applicant cites several regional benefits. However, the referral application lacks sufficient evidence to substantiate that these benefits are significant in the context of the Auckland region.

- The proposal will deliver additional housing supply that would be a positive local benefit, but it is questionable as to whether this is significant on a regional scale. 14,020 dwellings were consented in the Auckland Region in the year ending March 2025. It seems unlikely, therefore, that the proposed 1600 dwellings would be regionally significant.
- Auckland Transport have not identified any regional transport benefits from the project, rather have raised potential adverse effects of concern. The efficient use of existing investment in transport infrastructure is not a significant regional benefit.
- The application documents are not sufficiently detailed to demonstrate that a positive ecological/environmental outcome will be achieved by the proposed development.
- Council's Economist has commented that the submitted report has not adequately demonstrated that the proposal will accommodate regional or national economic benefits, identifying a range of concerns with the methodology used to support the economic conclusions reached in the submitted information.
- The incorporation of two potential school sites is a social benefit of the proposal, however it is likely this will only serve the local community and would therefore not reflect a regional

social benefit. Additionally, the delivery of these schools is not secured by this proposal, but rather only provided as a future option which may or may not ultimately be delivered.

Therefore, while the project offers positive local benefits, the evidence provided in the referral documents does not sufficiently demonstrate that the project's overall benefits are significant in the context of the Auckland region, nor nationally.

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

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

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

Council have no comment in this regard.

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

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

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

No regionally or nationally significant infrastructure is proposed:

- Water Supply and Wastewater infrastructure will be required to be private as Watercare Services Limited have confirmed they cannot provide public servicing to this development.
- Healthy Waters have confirmed that they consider the most appropriate outcome will be for parts of the stormwater network to be vested as public infrastructure. Nevertheless, the stormwater network will largely only service the subject development and the application has not demonstrated that it would constitute regionally significant infrastructure.
- The proposed roading infrastructure will be local only, and given limited connectivity will only service the subject future community.

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

The project will increase housing supply, and from an urban design perspective appears to provide for a generally well-laid out and functional internal overall outcome (see Attachment 19).

There are, however, concerns pertaining to:

- The connectivity of the site with the surrounding Waimauku Township and wider Auckland region. Auckland Transport have identified that the “design, layout, and distribution of uses included within the proposal is not well integrated with the existing Waimauku township, where the resulting outcome is anticipated to be an isolated residential community highly dependent on short-vehicle trips to nearby education, employment, and other amenities.”

- The functionality of the on-going development of the site where no plan change is proposed. The land will remain zoned Rural – Production Zone without a plan change being sought. It is unclear in the application documents whether the development of all proposed lots will form part of this application (including all schools, industrial lots, etc). Should this not be proposed as part of this application, all future development of the proposed lots within this site will still be subject to Rural Production zoning, which could affect the practical delivery of some of the proposed outcomes and in turn the delivery of a well-functioning urban environment.
- There is the potential that this development could affect the delivery of planned urban development areas in the surrounding area, which in turn could affect the overall functioning of the wider urban environment.

As such it is unclear at this stage whether the application will contribute to a well-functioning urban environment and/or adequately resolves the challenges associated with the site location and context in achieving this.

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

The referral application lacks sufficient evidence to substantiate that any economic benefits are significant in the context of the Auckland region or nationally. Council’s Economist (Attachment 3) has commented that the submitted report has not adequately demonstrated that the proposal will accommodate significant economic benefits, identifying a range of concerns with the methodology used to support the economic conclusions reached in the submitted information.

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

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

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

No development of natural resources is proposed.

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

The application documentation has not at this stage demonstrated that the proposal will support climate change mitigation.

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

The application documentation has not at this stage demonstrated that the proposal will support climate change adaptation or recovery from natural hazards.

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

It does not appear likely that this proposal will address significant environmental issues.

There is, however, the potential for the development to exacerbate existing significant environmental issues, in particular flooding hazards, which has not yet been adequately addressed by the application documents.

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

The project is not consistent with local and regional planning documents, including the Auckland Unitary Plan: Operative in Part (AUP: OP), Plan Change 120 (PC120), Auckland Unitary Plan Regional Policy Statement (AUP RPS), Future Development Strategy 2023-2053 (FDS), Spatial Land Use Strategy – North-West, and National Policy Statement: Highly Productive Soils (NPS: HPL).

With respect to the NPS: HPL, we recognise the updates on the 18<sup>th</sup> December 2025, where the site is subject to LUC3 soils. At this referral stage, the notable changes to Clause 3.7 (re. LUC3 soils) in these updates do not affect the application at this stage (as this does not constitute a resource consent application) and the NPS: HPL is therefore still a relevant consideration.

A high-level assessment against these documents is included within the appended Plans and Places, Growth and Spatial Strategy, and Soil Scientist Memos (Attachments 1, 2 and 14).

In summary, the site is zoned Rural – Production Zone under the AUP: OP. The zone and correlating provisions of the AUP RPS do not anticipate urbanisation of rural land. The FDS similarly does not anticipate urbanisation of the site within the next 30 years. The AUP: OP, AUP RPS and NPS: HPL also all seek to maintain the productive capability of land and productive land is protected from inappropriate subdivision, use and development. Further, Plan Change 120 strengthens natural hazard controls, seeking to avoid new urban development outside existing urbanised areas which would give rise to significant flood hazard risk. The proposal accommodates the urbanisation of the site, and has not demonstrated adequately at this stage that it would not give rise to significant flood hazard risks. This is inconsistent with these anticipated outcomes of the relevant strategic and regulatory planning documents.

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

Infrastructure

- The development is outside the anticipated growth modelling for the Auckland Region. This will place significant and undue pressure on infrastructure planning and funding.
- There are infrastructure capacity issues and inability for the development to be serviced by public wastewater and water supply (as confirmed by Watercare Services Limited in Attachment 7). The application material has not yet suitably demonstrated feasibility and long-term functionality, management etc of the proposed on-site private servicing arrangements.
- Public stormwater servicing has been accepted by Healthy Waters as being the most appropriate outcome if this development proceeds, however it would require a private diversion and discharge consent as, given the zoning, it cannot be authorised under the Region-Wide Network Discharge Consent.

- The application proposes to connect to the public electricity supply provided by Transpower. Transpower confirmation will be required to ensure the development can be adequately serviced in this manner. We have not consulted with Transpower, and understand that they have not been invited for comment on this referral application. We would recommend consultation be undertaken prior to a decision to refer this application to ensure the development can be adequately serviced, but if not this will be something a substantive application will need to address.
- Auckland Transport opposes the application for referral, raising concerns that the effects of the proposed development on the road network will be significant and that wider transport infrastructure upgrades that likely will be needed to support the proposal will not be in place, or more fundamentally planned (and in turn funded), for such intensive growth.

#### Natural Hazards and Flooding

- There are significant flooding hazards within the subject site and wider surrounding area and likely associated exacerbation of these hazards as a result of this development. Healthy Waters, in their memo (Attachment 5), have advised that they do not have sufficient information at this stage to reach a position on whether or not the proposed development can and will appropriately avoid exacerbating existing flood hazards within the surrounding area.
- Areas of Future Urban Zoned land within the wider Kumeu-Huapai area have been identified by Council to potentially be removed and re-zoned as Rural zones in response to the scale risk of existing flood hazards.
- There is significant public interest associated with the flood hazards within the surrounding area.
- Plan Change 120 has been notified since the previous referral application feedback, and strengthens controls pertaining to natural hazards. These provisions have immediate legal effect, and as noted above seek to avoid new development outside existing urbanised areas that give rise to significant flood hazard risk.
- We would, therefore, encourage the identified missing information (by Healthy Waters) being provided ahead of a decision being made on this referral application to provide adequate certainty that acceptable outcomes can be achieved by the development and it will not exacerbate this already significant hazard within the wider area.

#### National Environmental Standard for Freshwater (NES: FW)

- There are several areas of wetland reclamation on the Master Plan. Wetland reclamation for any new/upgraded crossing is prohibited, by way of Regulation 53 of the National Environmental Standard for Freshwater, as the land is not urban and therefore would not comply with NES-F Regulation 45C. There is the potential for aspects of the application to be a prohibited activity pursuant to the NES-F. The application for referral has not yet adequately demonstrated that this is not the case.

### Outstanding Information

- The appended expert reviews have identified a range of additional information that would be expected to be provided with any substantive application should the application for referral be approved. We would encourage further pre-application consultation be completed with Council prior to a substantive application being made as the proposal develops and this information becomes available.

### Precedent

- There is the potential for significant precedent effects to be generated by this application. This will need to be carefully and thoroughly considered in any substantive application.

### Section 17(3)

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

Auckland Council confirms that no competing applications have been lodged.

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

Auckland Council confirms that no such consents exist.

### Conclusion

The following is noted in summary and in conclusion of the points raised above:

- The Council recognises that the proposal will deliver positive benefits with respect to the delivery of housing supply and has the potential for positive benefits in relation to the delivery of social infrastructure (schools), economic benefits, and ecological enhancement.
- Notwithstanding the above, a *significant regional benefit* has not been demonstrated in the referral material. Many of the benefits identified are localised or private. The potential economic benefits of the proposal have not been adequately demonstrated within the application information.
- The proposal is not consistent with the applicable local and regional strategic planning documents.
- The development is outside the anticipated growth modelling for the Auckland Region. This will place significant and undue pressure on infrastructure planning and funding.

- Significant environmental matters related to a wide range of matters require further detailed assessment should the project progress to the substantive application. This includes demonstrating that the activity status in relation to the NES: FW is not prohibited, and demonstrating how flood hazards will be appropriately managed.
- The above notwithstanding, it is encouraged that the further information identified with respect to flooding hazards and risks be requested prior to a decision being made on this referral application. This poses a significant risk and has a high degree of public interest, which would be beneficial to resolve ahead of a decision on the application being referred.

Overall, for the reasons outlined above, the Council opposes this referral application.

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



**Adonica Giborees**

Principal Project Lead

Premium Resource Consents

Auckland Council

23 January 2026

## Referral Application Feedback Form

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

### Respondent Information

Name: Ben Willis

Role: Policy Planner

Agency / Department: Regional, North, West, and Islands Unit, Planning and Resource Consents Department

### Project Information

Project Name: Waimauku West

### General Support or Opposition

- Support
- Oppose
- Neutral

### Agency/Department Response

Having considered the s22 assessment criteria, please explain your position and provide any other relevant details.

## **Assessment Criteria (Section 22 FTAA)**

Please consider the below assessment criteria in preparing your response:

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

# Policy Memo

## Executive Summary

The proposal seeks an extension of the existing Waimauku settlement. In my opinion the proposal is contrary to a number of factors:

- It does not meet the 'regionally significant' threshold of the Fast Track Approval Act by neither being of significant scale nor providing any regionally significant infrastructure.
- The development is also contrary to Auckland Council's Future Development Strategy 2023 - 2053 (FDS) by being an area of land which is not anticipated for urbanisation within the 30-year time frame of the FDS. This leads to the sites not being planned for in the infrastructure pipeline, consequently the lack of certainty on infrastructure requirements from this development could result in the development taking capacity within the network prior to well established and planned growth areas.
- The development is contrary to the objectives and policies of the AUP RPS and the Rural Production Zone. The urbanisation of prime / highly productive soils is contrary to the Objective and Policies of the AUP RPS Highly productive soils and the National Policy Statement for Highly Productive Land.

I oppose the application and recommend that it should be rejected on the bases identified.

## Overall Summary

1. The proposal seeks to extension of the existing Waimauku settlement. The proposal will result in 1,593 residential dwellings at a range of densities including large lot blocks (avg 5000m<sup>2</sup> site area) to larger Single House zone lots (1600m<sup>2</sup> site area), medium density (300-400m<sup>2</sup> site area) and higher density (150m<sup>2</sup> site area with some attached). The proposal also includes light industrial development in the west fronting Great North Road and a neighbourhood Centre.
2. The proposed masterplan is shown below:



## 2.4 Illustrative Masterplan

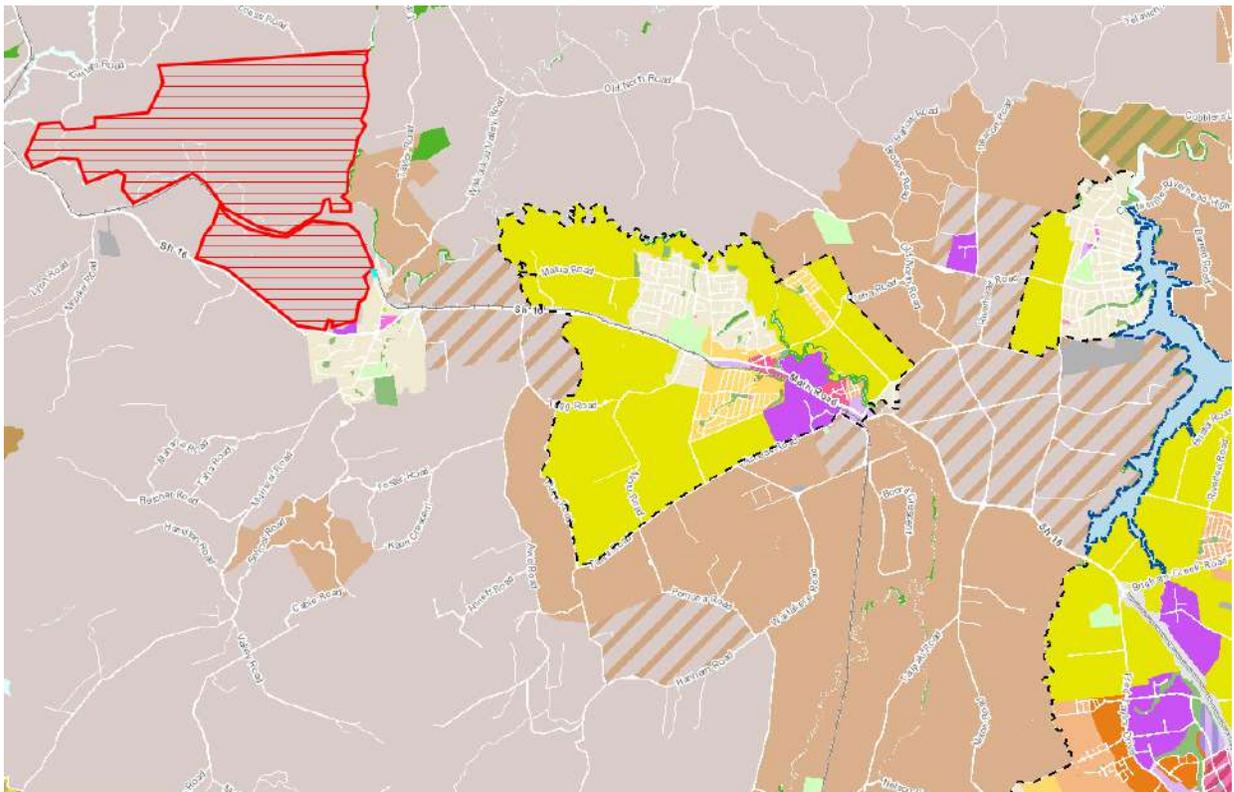
The Illustrative Masterplan presents a vision for urban development of the site. Key landscape and ecological features of the site are maintained whilst facilitating a variety of residential typologies that respond to the market. Depending on detailed design it is estimated that the site could accommodate between 1,500 and 2,000 new residential dwellings. Provision has also been made for two potential school sites (subject to further discussion with MoE), a neighbourhood centres and parks, land for business uses, stormwater management, and recreational trails.

3. In my opinion the proposal is contrary to a number of factors:
- It does not meet the 'regionally significant' threshold of the Fast Track Approval Act by neither being of significant scale nor providing any regionally significant infrastructure.
  - The development is also contrary to the FDS by being an area of land which is not anticipated for urbanisation within the 30-year time frame of the FDS. This leads to the sites not being planned for in the infrastructure pipeline, consequently the lack of certainty on infrastructure requirements from this development could result in the development taking capacity within the network prior to well established and planned growth areas.
  - The development is contrary to the objectives and policies of the AUP RPS and the Rural Production Zone.
  - The urbanisation of prime / highly productive soils is contrary to the objectives and policies of the AUP RPS Highly productive soils and the National Policy Statement for Highly Productive Land.

## Development outside the future development area

4. As the land is Rural production zoned land, the application is effectively rezoning by resource consent. This approach is contrary to the objectives and policies of the RPS and the underlying zone which does not anticipate urbanisation of the rural environment. Future urbanisation is instead anticipated in the Future urban zone.

5. Auckland Council's Future Development Strategy 2023 - 2053 (FDS) promotes integrated, long-term strategic planning to set a high-level vision for accommodating urban growth and identifying strategic priorities for development-related decisions. Public consultation for the FDS was held between 6 June – 31 July 2023, with the FDS adopted by Council's Planning, Environment and Parks Committee on 2 November 2023 (Resolution no. PEPCC/2023/144).
6. The FDS states "Around 9,500 hectares of future urban land remains identified for urban development across the region and the intention is for these areas to not further expand during the timeframe of this strategy. Growth in rural areas will be minimal to retain the rural environment and rural productivity."
7. The subject sites are not identified in the FDS as these sites are not anticipated for urban development at any time within the next 30 years. Seen in the below figure there are large areas of Future urban zoned land all of which are identified in the FDS including surrounding Huapai/Kumeu, Riverhead and Westgate/Whenuapai.



8. The FDS also identifies the bulk infrastructure required to service these identified future development areas, this information is used to feed into infrastructure timing and investment. Out of sequence development or in this case, development outside the anticipated growth modelling put undue pressure on infrastructure planning and funding.

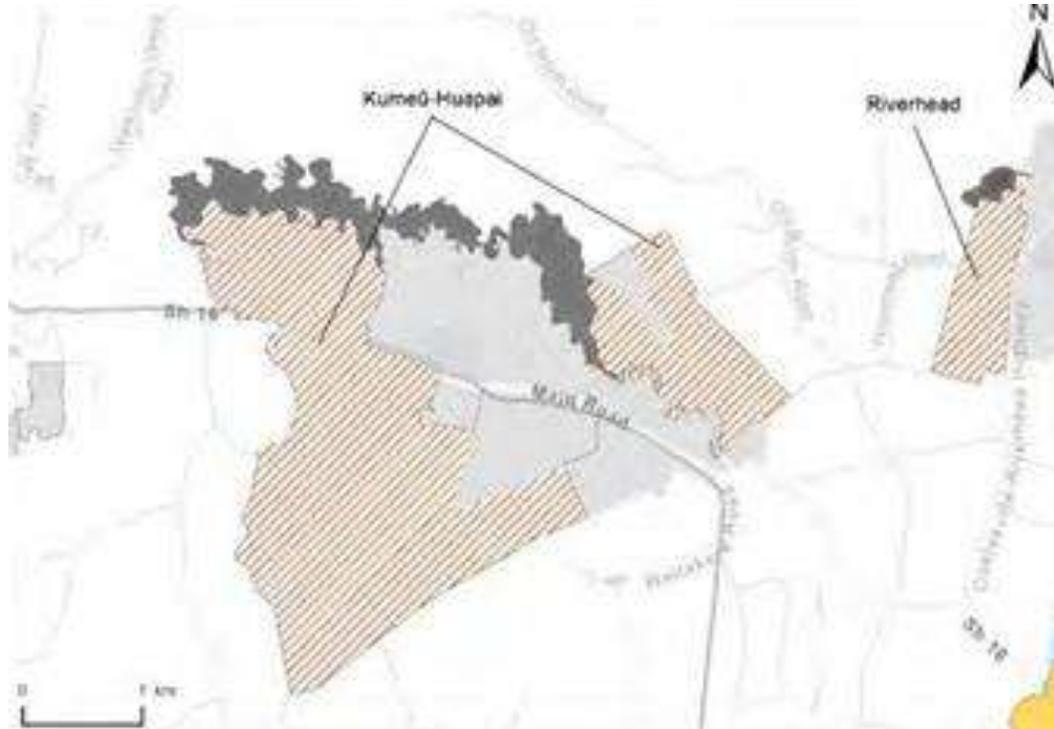
## **Regional Significance**

9. The application has been lodged under the Fast-track Approvals Act 2024 ('FTAA'). The purpose of the FTAA is (Section 3 of the FTAA):

*The purpose of this Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.*
10. The FTA in Schedule 5 s5(1)(h) requires an applicant to include an assessment of the activity against any relevant provisions in any of the documents listed in subclause (2). The documents in subclause (2) include a national policy statement, a regional policy statement and a plan. Subclause (3) states:

*(3) An assessment under subclause (1)(h) must include an assessment of the activity against—*

  - (a) any relevant objectives, policies, or rules in a document listed in subclause (2);...*
11. The economic assessment provided by Insight economics, identifies that the development makes a significant contribution to the regional housing supply and generates significant economic benefits. Economic matters have been considered by Mr. James Stewart, Council's Economist, and I defer conclusions in that regard to him. With respect to the regional supply benefits, I query whether the development of approximately 1600 houses over a 15-year period could be classed as regionally significant when 1535 dwellings were consented in Auckland in March 2025 alone and in the year ending in March 2025, 14,020 dwellings were consented (Auckland monthly housing update. May 2025). The 1600 houses proposed here would therefore only be a tiny fraction of what is typically provided in the Auckland Region in a month, however only over a 15-year period.
12. Insight economics report states that "We understand that Auckland Council now intends to rezone this red-flagged land back to a rural, thereby removing it from future residential development capacity". The assertion in the report is not correct. The FDS proposed to rezone a limited area with the 1% AEP floodplain along the Kumeu River. The remainder of the FUZ is red-flagged (see figure below) but still available and retains its FUZ zoning and therefore the capacity is not lost. The report uses this expected loss of capacity in the Kumeu-Huapai and Riverhead Future Urban areas as further justification for this proposed development. This however is not accurate, the Future Development Strategy (FDS) has identified red-flagged areas due to the impact urban development in these areas would have on increasing existing flood risk within the future urban area and downstream, and that any future development would require structure planning that meets the requirements of Section 4.2.7 in the FDS *Approach to natural hazard constrained areas*. These red-flagged areas have therefore been unduly removed from the reports capacity analysis which overinflates the significance of the capacity provided by this development.



13. The nearby Future Urban zoned areas of Kumeu-Huapai, Riverhead and Whenuapai are anticipated to accommodate around 26,000 dwellings in the next 30-years (Auckland Growth model AGSv1). In terms of dwellings and business land, this proposal is not significant in the context of the planned North West greenfield expansion areas of Auckland.
14. Given the 15-year time frame for the full build out and the relatively small scale of the development, the application should not be deemed to be regionally significant.
15. No regionally significant infrastructure upgrades are proposed as part of this application.
16. The Civil Engineering Infrastructure report, provided by Crang Civil Consulting, outlines that there have been discussions with Watercare in relation to Wastewater and Water Supply to service the development and that Watercare states there is no capacity in the wastewater or water networks to service the development. No regionally significant Transport infrastructure is proposed as part of this application.

#### **Underlying zoning remaining in place**

17. Granting resource consent for urban development while the underlying zoning remains Rural production Zone is problematic for ongoing development. Future activity will be subject the underlying zone rules and Auckland Wide rules that relate to the Rural production Zone. The activities provided for in the Rural production Zone are much more restrictive than for the residential zones that the resource consent seeks to apply. The applicant needs to address how this situation will operate and be managed.

## **National Policy Statement on Urban Development 2020**

18. The National Policy Statement on Urban Development (NPS UD), through various objectives and policies, requires that planning decisions contribute to well-functioning urban environments. Of particular relevance:

*Objective 6: Local authority decisions on urban development that affect urban environments are:*

*(a) integrated with infrastructure planning and funding decisions.*

The application considers that the proposal will result in a well-functioning urban environment.

19. I have reservations that this is the case as it is unclear whether the proposal integrates the provision of the necessary infrastructure. Clause 3.8 of the NPS UD speaks to responsive planning and refers to development contributing to a well-functioning urban environment. A well-functioning urban environment is not likely to be achieved if infrastructure is not certain as this could negatively affect currently zoned areas.

20. It is also not clear why the proposed development would not simply be creating a relatively remote commuter suburb, with reliance on the private car for all trips. There is no current or planned rapid or frequent public transport to Waimauku and this proposal does not seek to address this through any public transport provision. While the site is adjacent to the railway line, there are no passenger services (existing or planned) along this part of the network and there is no formal train station. There is also no pedestrian or cycling access to the Waimauku town centre, further exacerbating car-centric design, and while the application suggests a connection could be established through an adjoining privately-owned property, no arrangements have been made to secure this connection. The provision of infrastructure will be discussed in more detail by Council's other specialists.

## **Auckland Regional Policy Statement ("RPS")**

21. Chapter B2 Tāhuhu whakaruruhau ā-taone - Urban growth and form of the RPS sets out the strategic framework in relation to urban development and growth in relation to Future Urban Zoning (FUZ), through an integrated and orderly development process. The RPS does not anticipate urbanisation of rural land that is not identified for future development (by being zoned Future Urban).

22. Policies B2.2.2(2)(f), B2.2.2(3) and B2.2.2(8) in particular set out the process for urbanising future urban land to 'live' zoning, by requiring development to follow a structure plan to guide urbanisation and subsequent rezoning:

*Policy B2.2.2:*

*(2) Ensure the location or any relocation of the Rural Urban Boundary identifies land suitable for urbanisation in locations that:*

*(a) promote the achievement of a quality compact urban form*

*(b) enable the efficient supply of land for residential, commercial and industrial activities and social facilities;*

*(c) integrate land use and transport supporting a range of transport modes;*  
*(d) support the efficient provision of infrastructure;*

....

*(f) follow the structure plan guidelines as set out in Appendix 1;*

*Policy B2.2.2:*

*(3) Enable rezoning of future urban zoned land for urbanisation following structure planning and plan change processes in accordance with Appendix 1 Structure plan guidelines. [emphasis added]*

*Policy B2.2.2:*

*(8) Enable the use of land zoned future urban within the Rural Urban Boundary or other land zoned future urban for rural activities until urban zonings are applied, provided that the subdivision, use and development does not hinder or prevent the future urban use of the land.*

23. The proposal effectively urbanises the sites, by enabling approximately 1600 residential dwellings, commercial and industrial zoning on Rural Production zoned land. In my view, the application does not give effect to the RPS Policies in B2. Although this is a resource consent application and not a plan change, the application resembles a plan change and effectively ‘rezones’ the land without following the comprehensive plan change process.
24. The High Court case between Auckland Council and Matvin Group Limited and Maraetai Land Development<sup>1</sup> addresses aspects which are relevant to this application. The High Court considered in their decision that the Expert Consenting Panel had erred in law by approving resource consents for the Botanic Riverhead development in the FUZ under the FCTA process. The decision states that whilst urban activities are non-complying within the FUZ, given the zone’s objectives and policies, only urban activities with minor or less than minor effects would pass the Section 104D(1)(b) gateway test and could therefore be granted resource consent. While this case was for a large retirement village in the FUZ, I’m bringing this case to your attention as it does provide some direction particularly around urbanising rural areas via a resource consent and not using the plan change route.

### **National Policy Statement – Highly Productive Land**

25. The National Policy Statement for Highly Productive Land (‘NPS-HPL’) introduces new strong directives to protect Highly Productive Land.
26. All resource consent applications must have regard to the NPS-HPL under s104(b)(iii) of the Resource Management Act 1991 (‘RMA’). The transitional definition of Highly Productive Land (‘HPL’) is any rural zoned land (Mixed Rural, Rural Production, or Rural Coastal in the Unitary Plan) that is also LUC 1-3. The subject site is zoned Rural – Rural Production Zone and a portion of the land is

---

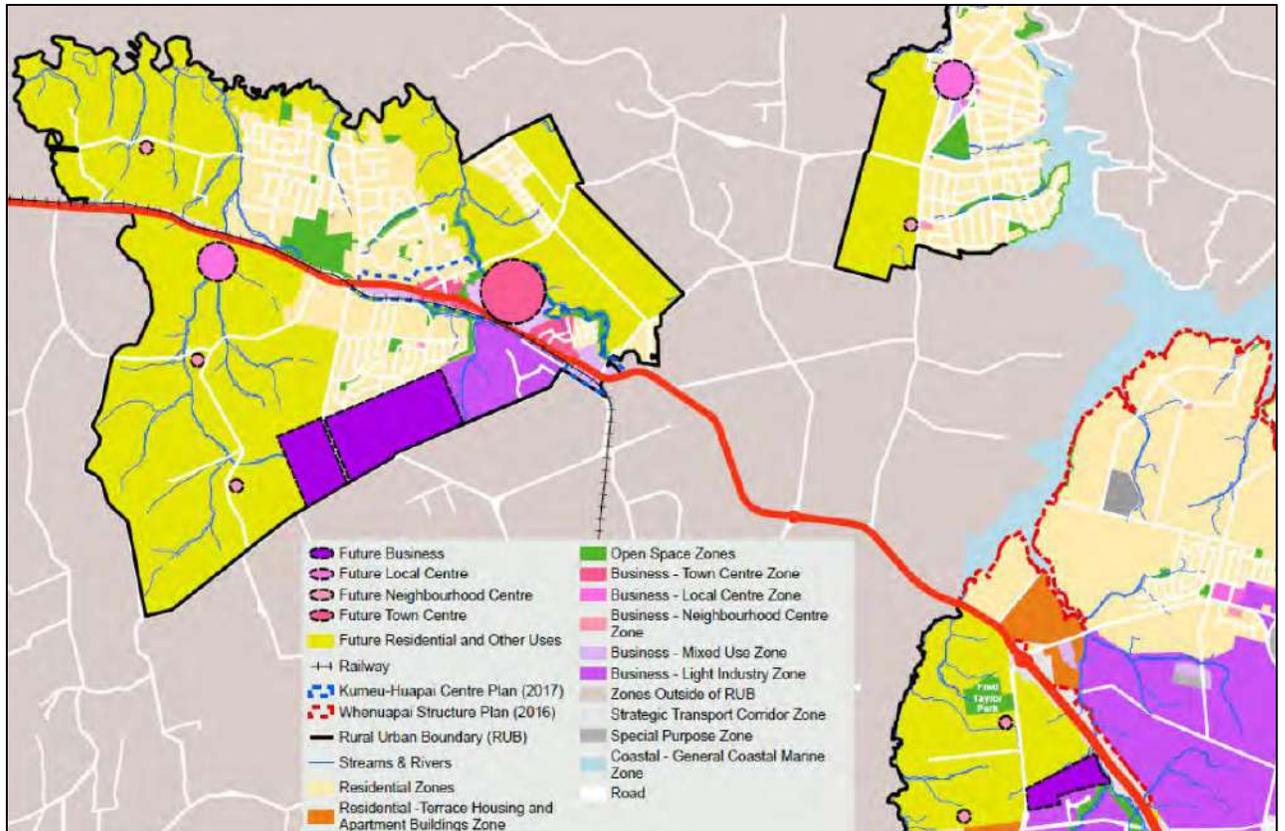
<sup>1</sup> Auckland Council v Matvin Group Limited [2023] NZHC 2481 [6 September 2023]

- shown in the New Zealand Land Resource Inventory (NZLRI) maps to contain Land Use Capability class 2 and 3 (LUC 2 and LUC 3) soils.
27. The NPS-HPL was updated on the 18<sup>th</sup> December 2025 making various changes, including amendment to the transitional definition of HPL in Clause 3.5(7). The applicant will need to address the impact of these changes on the proposal.
28. Despite this, the NPS-HPL is still relevant and assessment needs to be made against the NPS. For the application the most relevant policies of the NPS-HPL are:
- **Policy 1:** Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.
  - **Policy 2:** The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.
  - **Policy 4:** The use of highly productive land for land-based primary production is prioritised and supported.
  - **Policy 5:** The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.
  - **Policy 6:** The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement.
  - **Policy 7:** The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.
  - **Policy 8:** Highly productive land is protected from inappropriate use and development.
  - **Policy 9:** Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.
29. The most relevant of the Part 3 Implementation clauses of the NPS-HPL for this application are:
- 3.6 Restricting urban rezoning of highly productive land
  - 3.7 Avoiding rezoning of highly productive land for rural lifestyle
  - 3.9 Protecting highly productive land from inappropriate use and development
  - 3.10 Exemption for highly productive land subject to permanent or long-term constraints
30. Clause 3.6 states that council “may allow urban rezoning of highly productive land only if” all three of the exemptions in 3.6(1) apply. None of these exemptions are found to be relevant for this proposal. While this is not a proposal for rezoning, the effects of the application would be effectively a rezoning by allowing urban activities on a rural zone.
31. Clause 3.7 states that council “must avoid rezoning of highly productive land as rural lifestyle, except as provided in clause 3.10”. Again, while this is not a proposal for rezoning, the consent would be effectively a rezoning by allowing rural lifestyle sites to establish on highly productive soils.
32. Clause 3.9 states that council “must avoid the inappropriate use or development of highly productive land that is not land-based primary production” except where at least one of the exceptions applies to the use or development. None of the exceptions listed in 3.9(2) are found to be relevant for this proposal.

33. Clause 3.10 states the “Territorial authorities may only allow highly productive land to be subdivided, used, or developed for activities not otherwise enabled under clauses 3.7, 3.8, or 3.9 if satisfied” that all of the high-level exceptions identified in 3.10(1) are met. I consider that the proposal does not meet any of these exceptions and no justification has been provided by the applicant.
34. The Environment Court decision on the *Blue Grass* case [2024] NZEnvC 83 explored the question “Can more detailed LUC mapping since 17 Oct 2022 prevail over the NZLRI maps, for the purpose of determining whether the land is HPL?”. The court’s finding on this legal matter was ‘no’. The court determined that the transitional provisions in the NPS-HPL take a “deliberate holding position” and the intention is that HPL is not to be given permission for development for urban or lifestyle purposes before the mapping exercises are completed and given effect to. Therefore, applicants seeking to rezone Highly Productive Land must rely on the Land Use Classification contained in the NZRLI, and may not rely on site-specific assessment undertaken for an application. In light of this, those areas of the site shown as LUC 2 in the NZLRI maps are the determinant of where the NPS-HPL applies to this land (not the applicant’s site specific report).

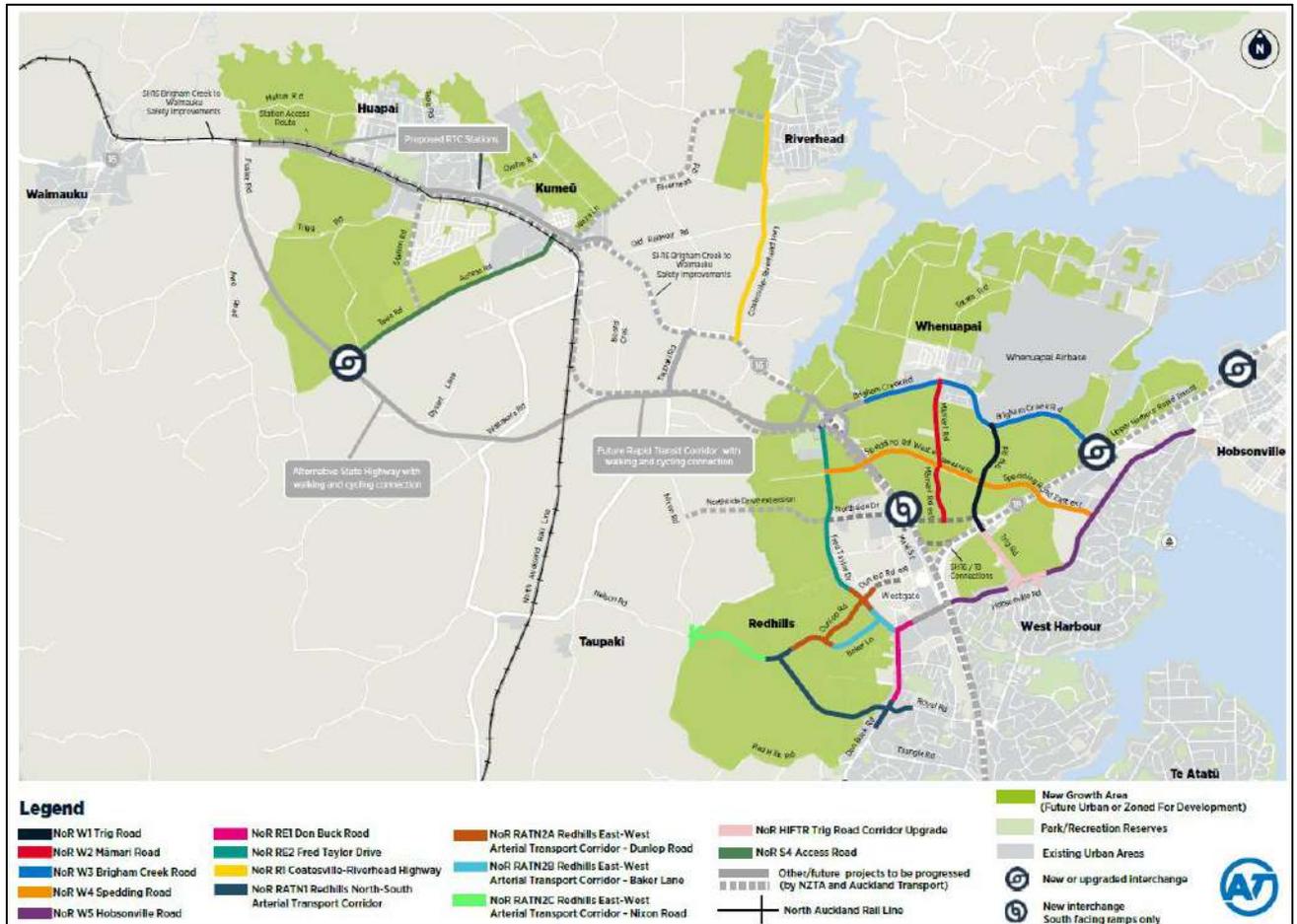
#### **Spatial Land Use Strategy – North West (2021)**

35. The Spatial Land Use Strategy was developed for the Kumeū-Huapai, Riverhead, and Redhills North Future Urban zoned areas to inform planning for the the future transport network.
36. The Strategy identifies locations for future centres and business land that the transport network will support and impact upon. The Spatial Land Use Strategy is not a detailed structure plan and is only intended to be a high-level outline of the future land uses in the Future Urban zone. A map of the adopted strategy is below.



37. The Spatial Land Use Strategy shows around 80ha of business land located in the south of Kumeū and the south of Redhills North. This amount is based on the forecast demand for industrial business land while taking into account the already large area of Whenuapai set aside for future industrial uses.
38. The Spatial Land Use Strategy shows an expansion of the existing Local Centre in Riverhead and a new Local Centre is shown in towards the west of Kumeū-Huapai along SH16. The location of this centre is preferred as it will be near the location of potential RTN stop in Kumeū-Huapai, will service a wide residential catchment, is on a major transport route (SH16), and is flat, greenfield land that can accommodate high density residential development around it. Smaller Neighbourhood Centres are shown in the west of Kumeū-Huapai, south of Riverhead, and within Redhills North.
39. This strategy is relevant to this Fast Track consent application because it demonstrates that significant growth at Waimauku has not been planned for. While the existing Waimauku settlement has a small amount of capacity for future growth, there is no Future Urban zoned land in Waimauku. Waimauku is not a settlement identified for any significant growth or expansion. This is in contrast to Kumeū-Huapai, Riverhead, and Redhills North which together have around 2,800ha of greenfield land for urban expansion.
40. The strategy was used to help inform a combined local and central government entity (the Supporting Growth Alliance) on what future transport networks would be required in the North West area. Between 2017-2023 the Alliance developed a long-term transport network for the area including public transport, walking and

cycling networks and new and improved roads. An overview of the transport network is shown below.



41. NZTA and Auckland Transport have now designated (route protected) most of these corridors and have begun to acquire parts of these routes. The construction of the whole network will be staged over 10-30 years and is anticipated to cost billions.
42. This demonstrates that properly planning for the required transport network of a large greenfield growth area requires a great deal of resources, along with a settled plan on where the growth is to occur. Ad-hoc development proposals such as this Fast Track consent undermine the time and investment spent by central and local government to comprehensively plan for the future transport infrastructure for this area.

### **Highly Productive soils in AUP RPS**

43. The following RPS objectives and policies are found to be relevant:

#### ***B9.3. Land with high productive potential***

### **B9.3.1. Objectives**

*(2) Land containing prime soil is managed to enable its capability, flexibility and accessibility for primary production.*

*(3) The productive potential of land that does not contain elite or prime soil is recognised.*

### **B9.3.2. Policies**

*(1) Avoid new countryside living subdivision, use and development on land containing elite soil and discourage them on land containing prime soil.*

*(2) Encourage activities that do not depend on using land containing elite and prime soil to locate outside these areas.*

*(3) Recognise the productive potential of land that does not contain elite or prime soil and encourage the continued use of this land for rural production.*

*(4) Provide for non-soil dependent rural enterprises (including post-harvest facilities) on land containing elite or prime soil where there are economic and operational benefits associated with concentrating such enterprises in specific rural localities.*

*(5) Encourage land management practices that retain the physical and chemical capability of rural soils.*

44. All of these Objectives and policies reinforce that development in the current proposal would not be protecting productive soils and this development should not be sited on highly productive land.

## **Auckland Unitary Plan – Rural Production Zone**

45. The following zone objectives and policies are found to be relevant:

### **H19.2.1. Objectives – general rural**

*(2) Rural production activities are provided for throughout the rural area while containing adverse environmental effects on site.*

*(3) Elite soil is protected, and prime soil is managed, for potential rural production.*

### **H19.2.2. Policies – general rural**

*(1) Enable activities based on use of the land resource and recognise them as a primary function of rural areas.*

*(2) Require rural production activities to contain and manage their adverse environmental effects on-site to the fullest extent practicable.*

*(3) Enable rural production activities on elite and prime soil and avoid land-use activities and development not based on, or related to, rural production from locating on elite soil and avoid where practicable such activities and development from locating on prime soil.*

*(4) Enable and maintain the productive potential of land that is not elite or prime soil but which has productive potential for rural production purposes, and avoid its use for other activities including rural lifestyle living except where these are provided for or enabled by Policy H19.2.2(5).*

*(5) Enable a range of rural production activities and a limited range of other activities in rural areas by: separating potentially incompatible activities such as rural production and rural lifestyle living into different zones; avoiding or restricting rural subdivision for activities not associated with rural production in areas other than those subdivision provided for in E39 Subdivision – Rural; managing the effects of activities in rural areas so that;*

*(i) essential infrastructure can be funded, coordinated and provided in a timely, integrated, efficient and appropriate manner; and*

*(ii) reverse sensitivity effects do not constrain rural production activities, acknowledging that, in some circumstances, the effective operation, maintenance, upgrading and development of infrastructure may place constraints on productive land and other rural activities; or*

### **H19.3 Rural – Rural Production Zone**

#### **H19.3.2 Objectives**

*(1) A range of rural production, rural industries, and rural commercial activities take place in the zone.*

*(2) The productive capability of the land is maintained and protected from inappropriate subdivision, use and development.*

#### **H19.3.3. Policies**

*(1) Provide for a range of existing and new rural production, rural industry and rural commercial activities and recognise their role in determining the zone's rural character and amenity values.*

46. In my opinion the proposal is contrary to these zone objectives and policies as it is seeking to urbanise the sites in a way not contemplated by the Rural Productive zone.

## **History of development proposals on the site**

47. The site at 1080 State Highway 16, Reweti has been the subject of major development proposals in the past. In the mid-2000s a development proposal was promoted by Cornerstone Group, the owners of the subject site at the time. They lodged a private plan change to extend the urban zoning of the existing Waimauku Township to the northwest.
48. The development was proposed to include approximately 1,375 dwelling units in a generally mixed use format, with associated community and service activities, including retail, offices, sport fields, a school, public square and an aquatic centre. The development was proposed within an area covering roughly the same of approximately 60 hectares or some 13% of the overall land holding. The balance included 27 hectares of open space amenity area, with the majority to remain rural in nature, including significant native plantings and orchards/vineyards.
49. The legacy Rodney District Council (RDC) undertook a structure plan process for the future growth of Waimauku and included the Cornerstone proposal along with other growth options for public consultation. There was very strong community opposition to the Cornerstone proposal. The structure plan was adopted in 2009 by RDC with a growth plan for limited expansion of Waimauku to the south (i.e. not the land subject to this application).
50. The private plan change request was rejected (under Clause 25) by RDC on the grounds that the proposal was inconsistent with a Structure Plan it had recently adopted for Waimauku. The applicant appealed the decision to the Environment Court. The Environment Court found that RDC was justified in rejecting the application on the grounds that the request was not in accordance with sound resource management principles and that it had already considered the development of this area as part of the Structure Plan process. The Court noted that the consultation process used to develop the Structure Plan had been “broad, public and participatory.”
51. The Environment Court’s decision was subsequently appealed to the High Court who also rejected the appeal in May 2010.

## **Recommendations**

In my opinion the proposal is contrary to a number of factors:

- It does not meet the ‘regionally significant’ threshold of the Fast Track Approval Act by neither being of significant scale nor providing any regionally significant infrastructure.
- The development is also contrary to the FDS by being an area of land which is not anticipated for urbanisation within the 30-year time frame of the FDS. This leads to the sites not being planned for in the infrastructure pipeline, the lack of certainty on infrastructure requirements from this development could result in the development taking capacity within the network prior to well established and planned growth areas.

- The development is contrary to the objectives and policies of the AUP RPS and the Rural Production Zone.
- The urbanisation of prime / highly productive soils is contrary to the Objective and Policies of the AUP RPS Highly productive soils and the National Policy Statement for Highly Productive Land.

I oppose the application and recommend that it should be rejected on the bases identified.

## Emma Chandler

---

**From:** Eva Zombori s 9(2)(a)  
**Sent:** Monday, 12 January 2026 3:23 pm  
**To:** Emma Chandler  
**Cc:** Claire Gray  
**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input

**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to HelpMe@itconfidence.co.nz

Hi Emma,

Thank you for checking with us the status of our feedback on the newly lodged application for residential development in Waimauku.

I confirm that our comments remain unchanged and we do not have any further comments other than those in our feedback on the previous application you attached.

Ngā mihi,

Eva

**Eva Zombori | Senior Advisor, Growth and Spatial Strategy  
Policy| Policy, Planning & Governance**

**Auckland Council**

Mobiles 9(2)(a)

Level 25, 135 Albert Street, Auckland

Private bag 92300, Victoria Street West, Auckland 1142

Visit our website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)



[www.aucklanddesignmanual.co.nz](http://www.aucklanddesignmanual.co.nz)



[www.admblog.co.nz](http://www.admblog.co.nz)



[#akldesignmanual](https://twitter.com/akldesignmanual)



[aucklanddesignmanu](https://www.pinterest.com/aucklanddesignmanual/)

**ADM AUCKLAND  
DESIGN MANUAL**  
TE PUKA WHAKATAIRANGA I A TAMAKI MAKAURAU

## Referral Application Feedback Form

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

### Respondent Information

Name: Eva Zombori

Role: Senior Advisor, Growth and Spatial Strategy

Agency / Department: Policy

### Project Information

Project Name: FAST-TRACK Referral: Waimauku West - FTAA-2508-1094 (PRR00043251)

### General Support or Opposition

- Support
- Oppose
- Neutral

### Agency/Department Response

Having considered the s22 assessment criteria, please explain your position and provide any other relevant details.

## Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

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

### Strategic alignment

1. Waimauku is identified as a small rural settlement with a population of 1,317 in the FDS 2023-2053 that is not anticipated to undergo any sizable growth in the next 30 years.
2. The applicant proposes residential development of varying density and light industrial land use on rural zoned land that is contrary to the land uses set out in the Auckland Unitary Plan 2016 (Operative in Part) for the area.
3. The application proposes medium density residential development and light industrial land uses on land containing highly productive soil.
4. The nearby Kumeu-Huapai-Riverhead Future Urban Area is identified as a 'red flagged' area due to increased potential effects on exacerbating existing flood risks downstream. The application site is located 2km to the west from this 'red flagged' area that requires a detailed flood risk assessment.
5. A section of the Kumeu-Huapai-Riverhead Future Urban Area is identified as an area for removal in the FDS due to flood hazards. It is noted that the removal of this area does

not mean that any lost development capacity in the area due to removal will have to be provided in the same area it was removed from. Principle 5(c) of the FDS states that *'overtime this lost capacity [due to removal of areas from future development] will be offset by increasing capacity in good locations elsewhere'*. Furthermore, Subpart 3.2 of the NPS-UD requires that councils provide sufficient development capacity across the region/district and does not mandate one-for-one replacement of lost capacity in the same suburb/neighbourhood.

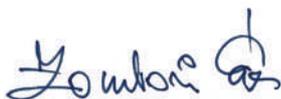
6. Principle 5 of the FDS aims to achieve a well-functioning urban environment by enabling sufficient capacity for residential and business growth in the right place and in the right time. As Waimauku is not identified for growth in the FDS, the application is not aligned to the long-term strategic direction for the area.

### **Infrastructure**

7. Waimauku has no long-term wastewater capacity, and there are no plans to increase the network capacity in the future.
8. The application does not address the transport needs of the proposed 1596 future households.
9. The application also does not address the social infrastructure needs of future Waimauku after more than doubling its population.

### **Summary**

10. Our view is that the proposal is not supported from regional growth perspective because it is not aligned to the FDS in terms of the proposed residential development in a rural area in a location that is not identified for future growth, and where parts of the site contain highly productive soils.
11. The proposal is also misaligned to the FDS by the proposed density in an area with infrastructure constraints where there are no plans to invest at any time in the future.



Eva Zombori  
Senior Advisor, Growth and Spatial Strategy  
Auckland Council

24 September 2025

### Project Information

Project Name	Waimauku West Fast Track
Address	1080 State Highway 16, Waimauku
FT application number	FTAA-2511-1134

### Respondent Information

Name	James Johannes Stewart
Role	Economist
Agency / Department	Chief Economist Unit, Policy, Planning and Governance Division (Auckland Council)
Date	13/01/2026

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

- Support  
 Oppose  
 Neutral

### Agency/Department Response

1. This is a review of an Insight Economics Ltd report (**the report**) dated 13 November 2025 which is in support of a proposed Fast Track Approvals Act application. The Proposed Development consists of circa 1,500 – 2,020 residential dwellings, a small retail centre, and industrial development near Waimauku, Auckland.
2. In preparation for this I reviewed the following information:
  - a. Insight Economics Ltd. (2025, November 13). *Economic assessment of proposed Waimauku West development for fast-track referral*. Prepared for Halberd Holdings Limited.
  - b. Insight Economics Ltd. (2025, August 18). *Economic assessment of proposed Waimauku West development for fast-track referral*. Prepared for Halberd Holdings Limited.
  - c. Market Economics Ltd. (2025, July 18). *Initial review of applicant's economic assessment for Waimauku FTAA application*. Prepared for Auckland Council.

- d. Insight Economics Ltd. (2025, June 13). *Economic assessment of proposed Waimauku West development for fast-track referral*. Prepared for Halberd Holdings Limited.

#### Critique of Economic Impact Analysis methodology

3. The report relies on an Economic Impact Analysis (EIA) using input-output multipliers to estimate a one-time impact and on-going impact(s) from the Proposed Development. EIAs are not helpful for weighing up resource trade-off decisions that impact societal welfare because they measure activity rather than economic benefits or costs. For the avoidance of doubt this means the figures summarised in the executive summary of the report (at page 1) and detailed further at section 4 of the report, do not represent economic benefits.
4. EIAs have several flaws that make them inappropriate for decision making. In my view the largest draw backs of EIAs is they:
  - a. measure activity rather than economic benefits
  - b. are gross rather than net i.e., they do not subtract economic costs but present activity as a gross figure
  - c. do not consider opportunity costs i.e., whether resources could be used for other purposes – including better opportunities for those resources.
  - d. assume unlimited resources or slack in the economy – which is unrealistic.
  - e. assume prices and relationships between industries are fixed over time – which is unrealistic.
5. These types of analyses have been widely discredited in the field of economics, including by prominent economists in New Zealand. A recent salient example is the independent peer review<sup>1</sup> of another fast-track application (Sunfield) by Dr William Cheung where he states in section 2.2 of his report: "...IO analysis [input-output analysis], by design, cannot measure net economic benefit, and tends to overstate gross economic effects by assuming unlimited, fixed-cost inputs and no crowding-out effects. This is not simply an academic limitation. It materially affects the reliability of the EIA presented. IO multipliers are static, linear, and insensitive to market constraints. They assume all input demands (labour, materials, services) are met without affecting other sectors or prices. ..."

---

<sup>1</sup> William Cheung. *Independent Expert Comments on Economic Evidence for the Sunfield Fast-Track Application* (Environmental Protection Authority, 30 October 2025). Retrieved from [https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0014/15314/Independent-Expert-Comments-on-Economic-Evidence-for-the-Sunfield-Fast-Track-Application\\_Dated\\_20251113\\_FINAL.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0014/15314/Independent-Expert-Comments-on-Economic-Evidence-for-the-Sunfield-Fast-Track-Application_Dated_20251113_FINAL.pdf)

6. Treasury guidance for Social Cost benefit Analysis<sup>2</sup> is also dismissive of the EIA methodology stating, "EIA can provide useful contextual information for decision-makers, but it is not suitable as a tool for measuring the balance of costs and benefits of a decision to society".
7. It is also worth highlighting that the latest input-output tables that have been produced by Stats NZ to show the interrelationship between industries are for the year ended March 2020<sup>3</sup>. These tables are intended to show the structural relationship between industries in New Zealand and are a common data source for EIAs produced in the New Zealand context. It is likely that the inter industry relationships have changed significantly since these tables were produced i.e., pre-pandemic, which could materially affect the results of the EIA. It is unclear whether the applicant has relied on these tables. However, I consider this a subordinate issue to the methodology itself being inappropriate for the task at hand.
8. Employment is cited as a key benefit of the Proposed Development, both during development and ongoing in the Proposed retail centre and industrial land. However, it is not appropriate to consider employment a benefit unless it can be demonstrated that the newly employed people would be idle (unemployed) if the project did not occur. These people would be transferred from other opportunities reducing employment at those locations or in those industries.
9. The report would also need to address the skill requirements as certain labour tasks during development and on-going after development will require skilled labour. People are not frictionlessly interchangeable in this regard and those with in-demand skills tend to have competing opportunities.
10. Even if there were instances where people would be otherwise unemployed without the proposed development, the opportunity cost of people's leisure time must be considered and netted out as this carries an economic value. This is not addressed in the report.
11. I recognise that other fast-track applications and RMA applications have applied the practice of EIA historically, however, I contend that it is not an appropriate methodology to assist with this type of decision making. It is not economic best-practice and the figures derived from it do not represent a welfare-relevant measure or assessment of economic benefits and costs. In my view, EIAs are not suited for fast-track applications or RMA applications.

#### Purported benefits of the Proposed Development

<sup>2</sup> New Zealand Treasury. *Guide to Social Cost Benefit Analysis*. Wellington, NZ: New Zealand Treasury, 2015, p. 54. Retrieved from <http://www.treasury.govt.nz/publications/guidance/planning/costbenefitanalysis/guide>

<sup>3</sup> <https://www.stats.govt.nz/information-releases/national-accounts-input-output-tables-year-ended-march-2020/>

12. The report identifies the following "housing market impacts" (Section 7, at page 17) of the report as benefits. These purported benefits somewhat align with section 22(2)(a) of the FTAA and the checklist in the report (Table 11, at page 23). I address each below.
13. The report also identifies several "wider economic impacts" as benefits (at section 8, page 20). I address these briefly afterward.
14. The purported benefits must be considered at the margin relative to what would occur in the absence of the Proposed Development and in the context of the costs that arise. This would demonstrate any additionality resulting from the Proposed Development i.e. greater net benefits than otherwise.
15. An important step that has been omitted in the report is defining the counterfactual. This makes it difficult to understand what the purported benefits are being measured against.
16. I have significant reservations regarding report's claim that the Proposed Development amounts to a "significant boost in housing supply". The Proposed Development may represent a large number of dwellings (up to circa 2,020) built at the local level (e.g. relative to the existing township of Waimauku) but at a Regional or National level this is questionable and does not consider displacement of dwellings from other parts of the region or country (i.e., it may not be additionality). Indeed, the displaced dwellings may represent a better outcome than the Proposed Development's dwellings in terms of management of effects or efficiency of infrastructure investment. Relevant market failures, such as externalities, are not capitalised into cost of development and therefore not considered by developers.
17. As a salient comparator, Auckland grew by 12,967 dwellings per annum in the intercensal period of 2018 to 2023 (Stats NZ Census data). If the residential portion (assuming 2,000 dwellings) of the development takes 15-years, this would represent an annual average of 135 dwellings per annum, about 1% (133/12,967) of Auckland's annual dwelling growth over the last intercensal period. It is important to recognise that this high-level calculation ignores potential displacement effects and assumes additionality of dwellings.
18. The report does not put forward any evidence to suggest that the Proposed Development represents additionality in terms of housing supply over what would occur in the absence of the Proposed Development but instead assumes it. In my view, this is a bold assumption.
19. Given the small scale of the proposed development relative to the region or country, it is not clear and, in my view unlikely, that there would be a material change in the competitiveness in land markets resulting from the Proposed Development.

20. It is not clear that providing a greater range of dwelling types results in any economic benefit (distinct from additional dwellings). Households face trade-offs when choosing where to locate and will maximise their own welfare subject to their respective budgets and other constraints. Relative to Waimauku township (as suggested in the report at page 18), and assuming that smaller lots will be offered by the profit maximising developer, households trade off land area for a lower prices suggesting no economic welfare improvement through this mechanism. If there is some affordability improvement for households, it would arise from the increased supply of urban land and, as stated above, it is unclear whether the Proposed Development represents a material change in the quantum of urban land to impact prices in Waimauku, Auckland or New Zealand.
21. The report cites well-functioning urban environments as a benefit arising from the Proposed Development which at face-value appears to double count the above purported benefits based on my reading of Policy 1 of the NPS-UD.
22. The report cites project acceleration as a benefit. I understand that the counterfactual the Panel works with is the project not occurring if the FTAA application is declined otherwise an assessment of effects can become unmanageable and inconsistent. Elsewise, this would imply that any increase in housing supply or industrial land arising from the Proposed Development are only transfers from a future period and need to be treated as such. This would imply any benefits would be even smaller than indicated.
23. The report cites “Critical Mass and Support for Nearby Centres” as a benefit. Households have fixed budgets for consumption and will choose a basket of goods that maximises their happiness or utility, it does not matter where the businesses are located. This consumption would happen regardless of location so does not arise from the Proposed Development.
24. The report cites “Boost in Industrial Supply” as a benefit. This is a benefit that should be considered but in the context of the costs such as the cost of the supporting infrastructure, the opportunity cost of the land and any environmental externalities that arise.
25. The report cites “Residential and Non-Residential Land Use Synergies” as a benefit. It is not clear that this is a benefit as additionality has not been demonstrated – this potentially represents a cost as households and businesses are transferred from more efficient locations with existing residents, jobs and amenities.
26. The report cites “Highest and Best Use of Land” as a benefit. This appears to double count the benefits of increased housing and industrial supply.

27. The report cites "Investment Signal Effects" as a benefit. It is not clear that this is a benefit as it is not demonstrated that any of the growth will be additional but rather a transfer of timing and location. In this instance it could mean resources are diverted from higher value opportunities.

#### Purported costs of the Proposed Development

28. The report identifies a single cost, "infrastructure servicing cost and risk" but suggests that this would be offset by the applicant delivering all the site level infrastructure and the off-site infrastructure is mostly recoverable through development contribution charges.

29. There is a risk that the infrastructure costs that are socialised would be displacing investment in other Council priorities (potentially displacing development offering greater benefits) or represent an increase in costs to ratepayers which would otherwise consume or invest those dollars to maximise their individual utility. In my view, this represents a significant adverse impact as described by section 85 of the FTAA that needs to be addressed.

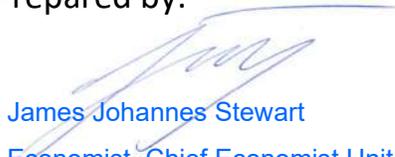
#### Conclusions and recommendations

30. In my view, the report does not follow best economic practice and does not demonstrate that the Proposed Development represents a net benefit.

31. The report does not demonstrate that the Proposed Development would result in a significant regional or national benefit as described by the FTAA.

32. A cost-benefit analysis, undertaken relative to a clear counterfactual, is required to provide a robust basis for determining whether the Proposed Development delivers net benefits consistent with section 22 of the FTAA. Such an analysis enables the systematic weighing of benefits against costs, including opportunity costs, infrastructure servicing costs, and external environmental impacts that materially affect economic welfare. This reflects the balancing exercise envisaged by the FTAA and recognises that, in a resource management context, an economic assessment is not a separate or competing discipline, but an integrative framework through which trade-offs are evaluated from a welfare perspective.

Prepared by:

  
James Johannes Stewart  
Economist, Chief Economist Unit (Auckland Council)

Date: 13 January 2026

## Emma Chandler

---

**From:** Rebekah Devonshire s 9(2)(a) on behalf of RES Local Board  
Rodney s 9(2)(a)

**Sent:** Wednesday, 21 January 2026 2:13 pm

**To:** Emma Chandler

**Cc:** Adonica Giborees

**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Local Board Feedback

**Follow Up Flag:** Follow up

**Flag Status:** Flagged

**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to HelpMe@itconfidence.co.nz

Hi Emma

Apologies for the late response.

I have spoken with the Chairman, and the Rodney local board does not have any further feedback.

Nga Mihi

**Rebekah Devonshire**

Personal Assistant / Office Manager | Rodney Local Board

s 9(2)(a) | s 9(2)(a)

Visit our website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)



# Local Board Feedback Template – Fast-track Approvals Act 2024

**Project Name:**

Waimauku West

**Location:**

1080 State Highway 16, Waimauku

**Date:**

22<sup>nd</sup> of September.

**Prepared by:**

Louise Johnston, resource consent lead for the Rodney Local Board with input from Guy Wishart, Brent Bailey, Geoff Upson and Mark Dennis. Note: local community comments are included.

---

## 1. Context – About Fast-track Applications

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

It is important to note:

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

---

## 2. Local Board Feedback

General:

- 1) In the Rodney Local Board area, we already have massive infrastructure deficits in our greenfield developments that are lived zoned. There is no funding allocated to address these issues in the near term. It is our view that out-of-sequence and unplanned developments without the necessary infrastructure prerequisites will only worsen this funding gap and ultimately result in overcrowded schools, parks with no facilities, limited open green space,

unbearable traffic congestion, and temporary waste and water solutions. As detailed in the Future Development Strategy, we need to ensure that there is a planned approach to delivering infrastructure, not ad hoc developments that ultimately lead to urban sprawl and poor outcomes.

- 2) There are large, live-zoned areas for housing in Auckland which are still not developed, are fully serviced and are within walking distance to the park and rides, secondary schools and established community facilities. If we continue to allow out-of-sequence and unplanned greenfield development, areas that are development-ready will continue to remain vacant, as land values are significantly lower in rural areas for developers.
- 3) The area within the proposed fast-track application is not scheduled for development, and without the necessary infrastructure prerequisites identified in the Future Development strategy for nearby Kumeu, this will have adverse effects on traffic safety, congestion, the environment, and community facilities.

Current Zoning, Future Development Strategy and protection of highly productive land:

- 4) The proposed site has a history of proposals for development in which there has been widespread community opposition, these historical proposals have been rejected for sound resource management reasons, and we do not support this application being processed via the fast track act, as the proposal does not have any significant regional or national benefit and the community voices must have the opportunity to be heard.
- 5) There is capacity for urban development in Rodney Northwest in live-zoned areas such as Redhills and there is still scope for further growth in Waimauku within the current zone provisions. There is additional capacity in the future urban zones where development will be staged to ensure infrastructure prerequisites are delivered in line with growth.
- 6) The Council engaged in a structure planning exercise for Waimauku, and after a wide consultation, a Waimauku Structure Plan was adopted, and during the Unitary plan process, this plan was adopted into the zoning of Waimauku. This plan:
  - a. Kept the compact shape of the township
  - b. Provided for limited future development in scale with the character of the township
  - c. Kept a clear boundary between urban and rural land
  - d. Retained a balance between open space and urban development
  - e. Recognised the rising contour and landscapes of the surrounding land as the environmental setting for the township to be retained.

- 7) Any change to the shape, scale, style and timing of the development of Waimauku should be determined by a careful, public and principled programme- not by an opportunistic single landowner-driven proposal via a fast-track process where the community do not have a voice.
- 8) Maintaining rural land and character (especially where large landholdings are involved) is one of the strongest policies of the Auckland Unitary Plan. Even very small-scale subdivision proposals that do not have commensurate, positive, environmental improvement offsets are routinely opposed by the Council. To propose a fast-track application that would enable large-scale subdivision of land zoned for rural production when it is not part of a considered and adopted strategy for growth is contrary to the Unitary plan policies and sound resource management principles. Significant investigation by the Council and Auckland Transport is required to fully understand the trade-offs to be made.
- 9) This application is urban in nature and would adversely impact the rural character of Waimauku. The proposed site is prominent from many places and viewpoints. It is inappropriate to develop large blocks of productive rural production for this use. Large productive farms with areas of prime soils need to be retained and safeguarded for rural production use and landscape values. This contentious application should be publicly notified so that the community's voices can be heard.

Note the Auckland Federated farms in a letter dated the 20 March 2025 Auckland Federated Farmers objected to the compulsory acquisition by Auckland Council of 172ha of this property at 1080 State Highway 16, Waimauku for cemetery development due to concerns around the loss of productive farmland as they *'are aware that the property is at least partly located on land classified as LUC 1-3 land, meaning it is classified as 'highly productive land' (HPL) under the National Policy Statement; refer <https://fedfarm.org.nz/FFPublic/Policy2/Regional/2024/Letter-of-objection-to-the-Compulsory-Acquisition-for-Cemetery-20-Mar-2025.aspx>*

Lack of integrated transport infrastructure:

- 10) This proposed greenfield development is not zoned for future urban use in the unitary plan, but for rural production. It is not earmarked in Auckland's Future development strategy (FDS) for growth, this application if consented, will result in urban sprawl, ad hoc urban development that will not be integrated with the future urban areas of Kumeu and Huapai, there is no infrastructure in place

except for roads near the development and these cannot cope with the current volumes of traffic. This application, if consented, will place significant and undue pressure on infrastructure planning and funding

11) There is inadequate transport infrastructure to support this development, as this development has not been considered in Council or Auckland Transport strategic plans. There is no funded feeder bus service from the proposed development to the local bus service. There is no direct public transport service into the city from Waimauku, and the local bus service has poor connections to the city. There are no walking and cycling connections proposed from the development into the surrounding township of Waimauku and Kumeu. This development will be car-centric, resulting in further congestion in this part of Northwest Auckland. It is congestion on SH16 that is slowing down economic growth in this part of the Northwest, and this development will worsen an already dire situation for commuters.

The significant transport projects proposed to ease congestion in this part of the Northwest are not funded/delivered and need to be included as infrastructure prerequisites for this development. These include:

- a. The currently unfunded proposed Kumeu bypass road
- b. The unfunded rapid transport corridor to Kumeu
- c. The Northwest busway from Westgate into the City which may be decades before construction is completed.

12) We express concern about the proposed entranceway into and out of this development is on SH16 at this point the road is narrow and on hill and these entrance ways need to be future proofed to ensure safety and efficiency of this State Highway.

#### Flooding issues:

13) We express serious concern that this development will increase the flood risk in the Kumeu/Huapai/Waimauku catchment due to the new impermeable surfaces proposed because of the change of use from a productive farm. The application proposes managing only a 10-year rainfall event within the development, which will significantly increase the flood risk for the entire integrated catchment for events exceeding a 1-in-10-year event and exacerbate flooding effects both upstream and downstream.

14) Given the history of regular and dangerous flooding and the known hazards and risks in the surrounding area, storm water management needs to contain a 1 in

100-year event within the footprint of the farm, as has been done in other developments where there is a high risk of flooding

- 15) We fully support Healthy Waters with their concerns that the flood hazard maps have been developed with the assumption that this land remains zoned as rural production.
- 16) If this application is referred to the fast track, we request that the integrated catchment plan be completed, and flood modelling and flood hazards maps be updated to reflect the change of land use proposed.
- 17) We believe that referring this application to the fast track with concerns that the development will exacerbate flooding effects is too much of a risk to the surrounding community.

Onsite Wastewater:

- 18) There is no capacity for Watercare to service this development with public wastewater and water supply, and this development will require a large onsite wastewater treatment plant. We are concerned that there will be an increased risk to the environment if, during extreme weather events, this onsite treatment plant of this size fails.
- 19) If this application is processed as a fast-track consent, we request that the conditions of consent include strict monitoring by both the applicant and the Council compliance team.
- 20) We express concern that the onsite wastewater treatment plant may have adverse effects on neighbouring properties concerning odour and noise and have high operating costs for residents.
- 21) We express concerns that these negative environmental effects will be caused by the introduction of a light industrial zone, housing, and loss of natural habitat and wetland reclamation

Other:

- 22) We express concern that the earmarked schools in this application are not funded and there is no indication that the Ministry of Education supports them. There is widespread support for a future secondary school to be located closer to Kumeu and Riverhead.

23) We request clarification as to how this development aligns with another fast-track application that is on the list for assessment under Schedule 2A i.e the Green Cycle Composting Limited advanced composting facility, which is also proposed at this address.

---

### **3. Conclusion**

We do not support this development being processed under Fast Track approvals legislation. This development is not planned for by Council or Auckland Transport in the Future Development Strategy and will result in urban sprawl without the necessary infrastructure prerequisites, and it will contribute to congestion, which is stifling economic growth in this area of the Northwest. The development of this size, in a catchment with major flood hazards is not a good allocation of resources as we should be developing in climate resilient areas and if consented will ultimately increase insurance premiums of the surrounding areas as result of increased risk of flooding, as the 10 year bypass model is unfit for this catchment and the developer needs to contain up to a 100 year rain event within the boundary of their own land. The proposed onsite wastewater plant poses an environmental risk if it fails during extreme weather events, given its sensitive receiving environment, the Kaipara River. We must protect our large rural production areas with productive soils from development and fragmentation,

This development will harm the rural character of Waimauku, given its prominent position that is viewed from many places across Waimauku.

There is widespread opposition from the community to this application, and we request that this application be publicly notified and not processed as a fast-track application.

---

### **4. Contact for Further Information**

Name: Louise Johnston

Role: Deputy Chair of the Rodney Local Board, Resource Consent Lead for the Rodney Local Board

Email: s 9(2)(a)

## Referral Application Feedback Form

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

### Respondent Information

Name: Hillary Johnston

Role: Fast Track Lead – Growth and Development

Agency / Department: Healthy Waters & Flood Resilience

### Project Information

Project Name: Waimauku West

### General Support or Opposition

Support

Oppose

Neutral – At this stage HWFR requires further information before we can provide comment on whether the development would be suitable from a stormwater management perspective. Further detail is provided in the below assessment.

### Agency/Department Response

*Having considered the s22 assessment criteria, please explain your position and provide any other relevant details*

#### Executive Summary

Healthy Waters & Flood Resilience (HWFR) has reviewed the Referral Application for the proposed Waimauku West development. The Application outlines a large-scale residential subdivision located in a rural zone not identified for urban growth under the Auckland Unitary Plan.

At this stage, HWFR adopts a neutral position on the referral. While the project may offer regional benefits in terms of housing supply, key areas require further clarification before the project can be considered suitable for referral. These include:

- Stormwater and flood risk management: The Stormwater Management Plan (SMP) requires more detail to assess whether effects of the development can be appropriately managed.
- Environmental and catchment impacts: Preliminary flood modelling and hydrological analysis are needed to understand upstream, downstream, and cumulative effects.

HWFR recommends that referral be contingent on the provision of additional technical information that demonstrates any potential stormwater effects can be appropriately managed.

### ***Zoning and Application Context***

The site is within the Rural Production Zone, to the northwest of the Waimauku township. Urban development within this zone will not be anticipated in the Auckland Unitary Plan (AUP) and the impacts of a development such as that proposed will not be accounted for within the published catchment flood hazard mapping.

HWFR holds a Regionwide Network Discharge consent (RWNDC) which authorises the diversion into and discharge from public stormwater networks within the Auckland Region. The RWNDC is only applicable to existing urban zoned land or land rezoned urban through a Plan Change process. As the development is proposed within a rural zone and it is not proposed to go through a Plan Change to rezone the land, the development cannot be authorised by the RWNDC. A private diversion and discharge consent will be required to authorise the stormwater diversion and discharges from the development.

### ***Stormwater Management Plan (SMP)***

The SMP provided appears to have been prepared to support a Waimauku West Plan Change and has now been repurposed to support the Fast Track Referral Application. For clarification, this plan change has not been lodged with Auckland Council previously.

The SMP is presented as a high-level preliminary document, with hydrological analysis and stormwater design deferred to later stages of the project. A more comprehensive assessment at this stage is required including flood hazard mapping and detail of performance requirements for stormwater management to demonstrate that stormwater effects can be appropriately managed. In the context of the referral criteria, this detail would provide confidence that potential environmental effects including those related to flooding and natural hazards can be addressed through stages of development.

Further detail is required before HWFR can provide informed comment on the suitability of the development in respect of the effects on flood hazards and any proposed management or mitigation. HWFR recommend that the Applicant also consider the requirements of PC120 and the National Policy Statement for Natural Hazards (2025).

### ***Supporting Technical Reports***

The SMP references a number of technical reports and supporting data that are external to the SMP itself and not appended. As a consequence, it is not possible for HWFR to confirm whether what has been referenced in the SMP is correct or for HWFR to validate the context of referenced information. It is

recommended these documents and their relevant findings are incorporated into the SMP to ensure a complete and transparent assessment of flooding and stormwater management.

#### *Water Sensitive Design and Treatment Train*

The SMP references water sensitive design principles and proposes the implementation of a treatment train approach, both of which are strongly supported by HWFR. However, more detail is needed on the feasibility of implementing these measures at this scale, including indicative device footprints, ownership, integration with natural wetlands, and management of flood hazards.

#### *Risk Register*

The Risk Register categorises changes to the floodplain as low risk, to be addressed at resource consent and detailed design phases of development. The SMP does not qualify or quantify what the potential effects could be on the floodplain and the buildings immediately downstream of the development area. As these effects are not known, it is not clear to HWFR that any potential effects could be mitigated. Further information is required on the technical basis of this classification. Given known flooding constraints, further investigation and justification is needed to support this risk rating.

#### ***Flood Modelling***

The surrounding communities both upstream and downstream of the development site were severely impacted by the significant weather events of early 2023. Providing robust flooding analysis is essential for demonstrating that development effects will be managed appropriately and there are no increased risks of flooding to these communities.

The Application defers the flood hazard modelling of the proposed development to the detailed design phase of the development. Given the significance of existing flood hazards in the immediate area, modelling at this stage is important to identify potential impacts and effects. As noted above this level of detail is essential for informing and justifying development layout.

It is noted that the SMP outlines that the site is located mid-catchment within the Kaipara Stream catchment, and therefore a pass forward approach (no attenuation) could be possible. HWFR consider that this approach could not be supported without appropriate flood hazard modelling. HWFR consider it high risk to accept the Application for referral without supporting analysis, as it is more difficult to retrofit attenuation into urban design at a later stage than to design for it from the outset. Providing at the least a concept-level flood modelling assessment for both 10% and 1% AEP events would assist Council in understanding upstream and downstream impacts and the feasibility of the proposed layout.

#### *Downstream Hydraulic Controls*

The SMP does not currently include an assessment of the capacity of downstream culverts under both Waka Kotahi SH16 and KiwiRail North Island Main Trunk assets, which is fundamental for managing increased flows and the risk to these critical infrastructure assets. As these are not Auckland Council assets, Waka Kotahi and KiwiRail should be given the opportunity to comment on whether changes to flood

hazards related to their assets are acceptable. An assessment of these structures is considered necessary to demonstrate that the proposed development will not exacerbate flooding on adjacent land or transport infrastructure.

### ***Stormwater Infrastructure Ownership***

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

The SMP proposes that public stormwater network will be constructed and vested to Auckland Council at each stage of development.

In urban areas, for a development of this scale elements of the proposed stormwater network, specifically any large-scale communal devices and their associated networks that service multiple residential lots and public roads that are proposed and have been accepted by Auckland Transport, are typically vested as public assets.

HWFR seek further information on the proposed stormwater assets, together with clarification of the intended ownership so that there is opportunity to comment on long-term operation and maintenance requirements in this remote and rural zoned settlement. Further information should be provided at the Substantive Application stage on stormwater management that may have the potential to be vested to HWFR in future as public assets.

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

### ***Consent Conditions***

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

### ***Conclusion***

At this stage, HWFR is unable to confirm whether the Application would result in significant flood hazard effects beyond the development boundary, what the effects on Third Party infrastructure may be, or whether these effects could be mitigated in a sustainable way. HWFR suggest that the further information

outlined above should be provided to allow comment on whether the development would be suitable to be referred.

In considering the Section 22 referral criteria, it is acknowledged that the proposed development has the potential to contribute positively to housing supply and the delivery of a well-functioning urban environment through the provision of 1,500–2,000 dwellings. However, at this stage the potential effects of the proposed development on the existing flood hazard have not been determined. While there may be regional benefits in terms of housing delivery, these must be weighed against the uncertainty surrounding flood risk.

## **Assessment Criteria (Section 22 FTAA)**

*Please consider the below assessment criteria in preparing your response:*

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

## Emma Chandler

---

**From:** Development Planning West (AT) <DevelopmentPlanningWest@at.govt.nz>  
**Sent:** Monday, 15 December 2025 3:17 pm  
**To:** Emma Chandler  
**Cc:** adonica.giborees@aucklandcouncil.govt.nz  
**Subject:** Re: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input

**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to [HelpMe@itconfidence.co.nz](mailto:HelpMe@itconfidence.co.nz)

Good afternoon,

Thank you for sending the updated referral app to us.

I just had a quick look, and the Transport Memo has not been updated. Our previous comments will still stand (with the exception of those related to the solar farm), so we won't provide any further input (unless requested/required).

Have great break (nearly there!).

Ngā Mihi

Auckland Transport

**Tessa Craig | Acting Manager Development Planning**

M s 9(2)(a) s 9(2)(a)

## Referral Application Feedback Form

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

### Respondent Information

Name: Nicholas Simpson

Role: Consultant Planner to Auckland Transport's Development Planning Team (*Elevate Planning on behalf of Auckland Transport*)

Agency / Department: Auckland Transport – Network Operations Planning

### Project Information

Project Name: Waimauku West - FTAA-2508-1094 (*EPA Reference*) & PRR00043251 (*Council Reference*)

### General Support or Opposition

- Support
- Oppose
- Neutral

### Agency/Department Response

Having considered the s22 assessment criteria, please explain your position and provide any other relevant details.

## Technical Specialist Memo – Waimauku West – Auckland Transport (Referral Application)

To:

Emma Chandler, Consultant Planner (*Sentinel Planning on behalf of Auckland Council ("AC")*);  
Fennel Mason, Principal Project Lead – AC

From:

Nicholas Simpson, Director – Elevate Planning Ltd (*on behalf of Auckland Transport ("AT")*)

Qualifications &  
Relevant  
Experience:

I hold the qualification of Bachelor of Urban Planning (Honours) and have eight years of experience in planning. I am an Intermediate Member of the New Zealand Planning Institute ("NZPI"), I have prepared expert evidence and technical assessments for resource consent applications and fast-track applications, and have appeared as expert witness before consent authorities and the Environment Court on multiple occasions.

Preparation in  
Accordance  
with the Code  
of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date:

24<sup>th</sup> September 2025

### 1.0 APPLICATION DESCRIPTION

#### Application and property details

Fast-Track project name:

Waimauku West

Fast-Track application number:

FTAA-2508-1094 (*EPA Reference*) & PRR00043251 (*Council Reference*)

Site address:

1080 State Highway 16, Reweti, Auckland 0883

## 2.0 Executive Summary / Principal Issues

Overall, it is Auckland Transport's (AT) position that the application for the referral application for Waimauku West be declined for further consideration under the provisions of the Fast-track Approvals Act 2024 ("FTAA"). The documentation that has been provided in support of the referral application does not contain any substantial further information or assessment to respond to the concerns AT had previously identified at pre-application stage (Council reference PRR00042916) nor suitably characterize the resulting adverse impacts upon the existing and proposed transport networks.

Whilst the assessment provided is limited, AT is concerned that any actual and potential adverse impacts upon the existing and proposed transport networks will be significant. The Auckland Unitary Plan (Operative in Part) ("AUP(OP)") clearly does not anticipate such a significant increase in residential capacity, or supporting industrial and other commercial uses, given the nature of the operative Rural – Rural Production Zone ("RPZ") for the subject site. Other high-level strategy documents and other workstreams, such as the Inner Northwest Transport Strategy or the Supporting Growth Alliance ("SGA") programme and resulting designations, does not anticipate or consider in any way the transport related effects resulting from the proposed development. Any required transport infrastructure required to cater for the intended growth is unlikely to be in place, or more fundamentally planned for such intensive growth, due to the uncertainties of funding and timing of delivery of planned network upgrades.

Given the significant departure from the operative planning framework in terms of the uses that are anticipated within the RPZ, and need for integration with wider strategic transport direction and future planning, a more appropriate pathway for the consideration of enabling such uses could be via a Private Plan Change ("PPC"). The application material is clear in that this pathway has been considered, as can be observed in the references in some reports.

The design, layout, and distribution of uses included within the proposal is not well integrated with the existing Waimauku township, where the resulting outcome is anticipated to be an isolated residential community highly dependent on short-vehicle trips to nearby education, employment, and other amenities. This is not considered to contribute to a well-functioning urban environment, as outlined in Policy (1) of the National Policy Statement on Urban Development.

Notwithstanding the position reached above, should the Minister be inclined to accept the application as a listed project, a fully detailed Integrated Transport Assessment ("ITA") will be required for the substantive application to suitably establish any actual and potential adverse transport related effects from the proposal, including any measures necessary to avoid, remedy, or mitigate any resulting adverse upon the environment. The specific requirements, which can be identified based on the high-level information available at this stage, of the ITA, are outlined in [Section 5.0](#) of this memorandum.

### 3.0 Documents Reviewed

- Planning Memorandum, prepared by Barker & Associates (“B&A”), and dated 18<sup>th</sup> August 2025;
- Consultation Record, prepared by B&A, and n.d.;
- Urban Design Statement / Waimauku Masterplan, prepared by B&A, and dated 14<sup>th</sup> August 2025;
- Transport Memorandum, prepared by CKL, and dated 15<sup>th</sup> August 2025;
- Stormwater Management Plan (“SMP”), prepared by GHD Ltd, and dated 18<sup>th</sup> August 2025; &
- Infrastructure Memorandum, prepared by Crang Civil, and dated 18<sup>th</sup> August 2025;

### 4.0 Additional Reasons for Consent Not included in AEE

The level of detail that has been provided is not sufficiently detailed to undertake an exhaustive assessment to identify all supporting reasons for consent. There may be additional reasons for resource consent should the application be accepted as a listed project.

### 5.0 Specialist Assessment

AT is a Council-Controlled Organisation and the Road Controlling Authority (“RCA”) for the Auckland region (excluding the State Highway network including State Highway 16 (“SH16”) which the New Zealand Transport Agency (“NZTA”) is the RCA). AT has the legislated purpose to contribute to an ‘effective, efficient and safe Auckland land transport system in the public interest’<sup>1</sup>. In fulfilling this role, AT has an interest in the Project as Road Controlling Authority and as an asset owner. Given the interface between SH16 and the proposed development and need to establish additional intersections onto the State Highway, consultation with NZTA is also required to understand any concerns that this RCA may have.

In undertaking this analysis, the following AT Subject Matter Experts (“SMEs”) were also consulted:

- Road safety;
- Traffic Engineering;
- Design & Standards (Incl. Urban Design & Transport Mobility);
- Stormwater;
- Strategic Development Partnerships;
- Spatial Planning and Policy Advice;
- Rail Systems Director;
- Pavement & Surfacing; &
- Corridor Access Coordinator;

For the avoidance of doubt, I have relied upon the feedback provided by the aforementioned specialists in preparing the assessment below. A site visit to the general vicinity and immediately surrounding locality was undertaken on 13<sup>th</sup> September 2025.

<sup>1</sup> Section 39 of the Local Government (Auckland Council) Act 2009.

### Consenting Strategy & Assessment Approach

There are inconsistencies across the application material as many of the specialist reports and supporting plans refer to a “Plan Change”, rather than application for resource consents under the FTAA. This is evidenced by the SMP and Infrastructure Assessment, which specifically refer to being prepared to support a Private Plan Change (“PPC”). With regard to the Infrastructure Assessment, it is unclear why the supporting earthworks plans solely show the cut / fill depths with respect to the proposed roading network. No earthworks have been identified within the areas which are intended to contain future development nor the proposed parks and open spaces. The approach suggests that it is intended to enable vacant lots / super lots, rather than delivering the intended dwellings as outlined within the Planning Memorandum. Clarification is needed to confirm what is intended through the consenting approach, whether this is to enable the capacity for the stated number of dwellings and other uses or if the applicant intends to build and construct such activities.

The approach set out within the master plan and supporting Planning Memorandum are similarly unclear in terms of the intended consenting strategy regarding the aspects that are to be delivered by the applicant. In particular:

- In relation to the proposed school sites, it is not clear through the application material as to whether these are to be constructed by the applicant, in lieu of any confirmation for the necessary resource consent(s) or Notice of Requirement (“NoR”) needed to secure the school, or simply if the land is to be set aside for future development by the Ministry of Education (“MoE”). If the provision of these two schools, as means of establishing critical social infrastructure, is to be relied upon for the purposes of identifying regional benefits and/or positive effects confirmation is required to identify whether this does form part of the scope of the proposal or not; &
- A similar issue is observed with respect to the land that has been identified within the Neighbourhood Centre and Light Industrial land included within the masterplan. The supporting reasons for consent, being retail, commercial, and/or light industry activities, being not provided for within the Rural – Rural Production Zone (“RPZ”) have been included within the Planning Memorandum, yet there is no clear detail or commitment in outlining what those uses entail nor the size of built form designed to accommodate such uses. The way that the Planning Memorandum is framed is suggestive of an approach comparable to a PPC in that the intent is to enable a certain gross floor area (“GFA”) of activities, rather than facilitating the construction of such activities. No specific details relating to the intended typologies or uses within this component of the proposal have been identified within either the master plan or supporting Planning Memorandum.

To establish any resulting adverse impacts upon the environment, commitment by the applicant is needed in identifying the form, scale, and nature of proposed uses within these activities is essential. Particularly in the context of the light industrial identified land, as the nesting table of “*Industrial activities*” included within Chapter J of the AUP(OP) includes a range of specific uses that can result in a range of different adverse impacts upon the environment. This ranges from freight depots, through to manufacturing, wholesalers, and waste management facilities to a range of other uses. Each activity provided for under the nesting table of “*Industrial activities*” may result in different operational effects, which should be suitably qualified and assessed to understand whether the existing and proposed transport networks maintain sufficient capacity to be able to accommodate the intended combination of uses.

Whilst it is anticipated that AC are to undertake an exhaustive assessment against the relevant statutory documents, AT recognises that the approach to obtaining consent(s) against the operative planning framework, which involves uses not provided for within the RPZ, will be inconsistent with relevant provisions of the AUP(OP).

There is no detailed analysis of consistency with the operative objectives and policies included within the AUP(OP) within the Planning Memorandum, outside of an assessment against the Regional Policy Statement (“RPS”). Rather than a fast-track consent, a more appropriate pathway for consideration, which would allow a much broader assessment against wider strategic transport policy, could be via a PPC.

There is also a clear lack of detail in terms of how the solar farm is intended to operate, particularly in terms of how access is to be secured and maintained over the existing railway corridor. Further details of this would be required via the ITA.

### **Construction Effects & Staging**

The application material outlines that redevelopment is to occur on a staged basis. Stage (1) has been identified as involving the new development further south of the existing rail corridor, whereas Stage (2) being in relation to the establishment of the solar farm towards the north of the railway line. However, no information has been provided to establish how the intended staging is to occur; number and volume of construction vehicles necessary for the earthworks and/or construction phases; the total construction duration of the whole proposal or the duration for each individual stage; and/or whether Stage (1), which includes a considerable extent of different activities, would be broken down into sub-stages.

The sequencing of staging and overall approach to managing construction is crucial to understand and to assess any resulting adverse impacts upon the transport network to ensure safe and continued effective operation. As part of AT’s earlier involvement, a Construction Traffic Management Plan (“CTMP”) was requested in order to establish any adverse impacts upon AT’s and NZTA’s networks during construction, particularly with regards to the nearby Waimauku School alongside the likes of increased traffic during the summer period for people travelling towards Muriwai Beach. A draft CTMP is considered necessary for review, alongside a supporting Integrated Transport Assessment (“ITA”) which is discussed further below, to ensure that any necessary principles and additional mitigation measures are included within the CTMP prior to a decision being made on a substantive application<sup>2</sup>. Management via conditions of consent is not considered appropriate given the nature of the existing transport conditions of the surrounding environment and anticipated scale of construction-based activity, which will likely occur over a reasonable length of time.

AT currently provides two bus services that must be considered in the approach to delivering the intended staging, which is the 125-route connecting Helensville to Westgate alongside a school route from Kumeu / Huapai to Kaipara College. To ensure that the existing bus services are to be maintained, any through roads should be the first roads built within the development. This will allow the provision of safe bus stops to be established within the extent of the proposal, as there are no existing safe bus stops along State Highway 16 (“SH16”) due to the high-speed nature of the road and lack of suitable pedestrian infrastructure, such as footpaths and kerb / channels. Interim turnaround facilities, such as roundabouts, would need to be incorporated into the development to ensure that buses suitably turn around the development in order to enter / exit from SH16 in a safe manner.

It is anticipated that the required construction will necessitate a high number of heavy vehicle trips for the earthworks and construction component of the proposal, which has the potential to significantly affect the condition of both the existing and proposed (taking into account the timing / delivery of the stages) roading networks. A Pavement Impact Assessment (“PIA”), prepared in accordance with AT’s Transport Design Manual

---

<sup>2</sup> Please note, this position does not preclude other commentary in relation to overall position that AT has reached pertaining to the suitability of the application as being accepted for further consideration under the FTAA.

("TDM") is considered necessary in this regard to demonstrate whether the transport network can accommodate the level of construction traffic to be generated by the proposal. The PIA must include provisions for remediation of any damage(s) caused as the result of the required construction. The PIA should take into account post-construction effects through the use of any roading required to service the light industrial area located towards the west of the subject site.

**Connectivity & Pedestrian Amenity**

The applicant’s assessment details that the location of the intended proposal functions as an extension of the Waimauku township; however, the proposal represents a significant departure from the existing, and anticipated, character of the locality and does not suitably integrate the existing township. One minor pedestrian link is proposed, being Link (11) towards the north-eastern portion of the subject site, whereas the majority of access into the development is to be achieved by the two-intersection proposed onto SH16. Even within the proposed development, the proposed layout is significantly fragmented with the more intensive terrace housing blocks being scattered throughout the subject site and reasonably removed from the potential public transport route along the main collector. Within the current master plan, the only way to feasibly service the area with public transport and school buses is through the path that has been marked up below (in red). This creates a relatively long diversion to the #125 route to Helensville, which is the only existing public transport route available within the area. The design of this road would need to be built to a collector road standard.

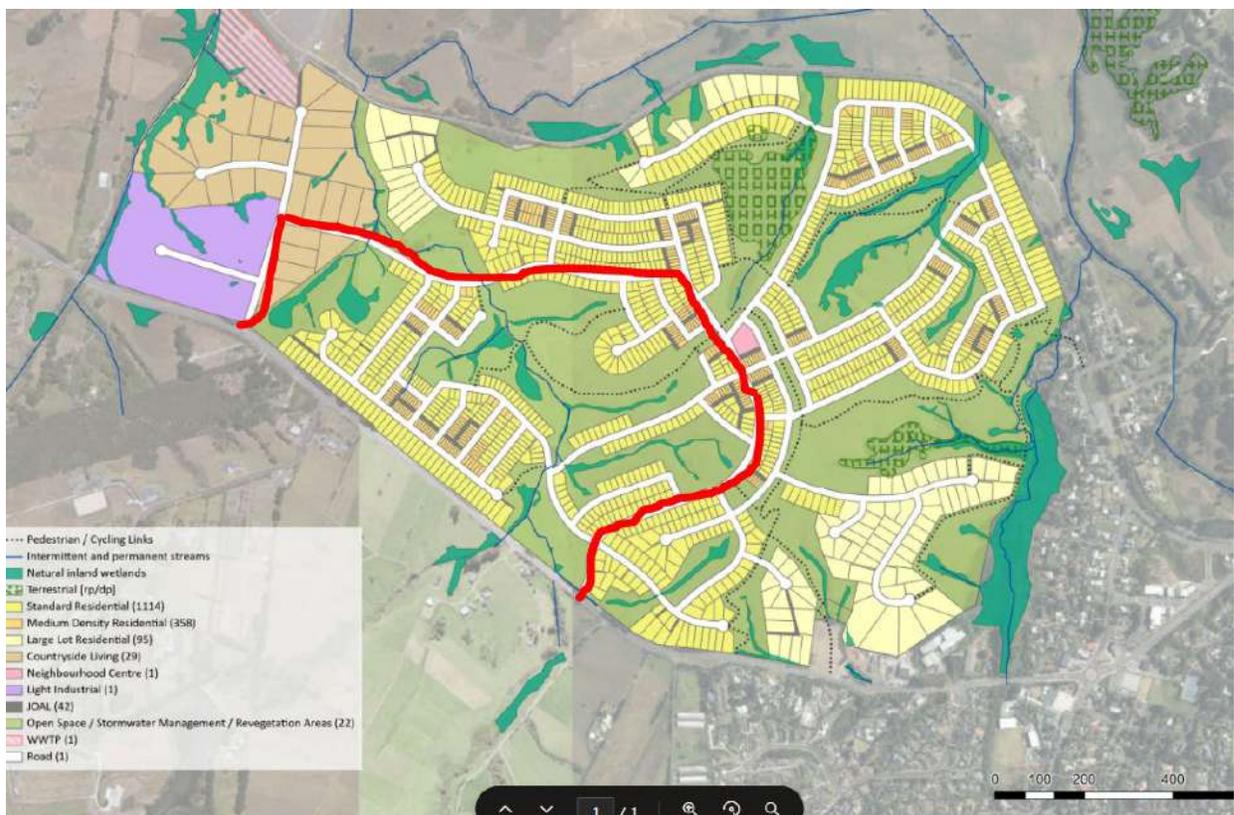


Figure (1): Source, B&A Master Plan provided at pre-application stage with mark ups provided by AT.

Despite notations included within the supporting masterplan that intends to avoid significant retaining over 2m in height, the Infrastructure Assessment details that retaining walls up to 3m in height will be required along road and lot boundaries to achieve levelled building platforms. This will significantly impact on the levels of amenity that

would be experienced by pedestrians traversing the proposed road network, which is exacerbated by the reasonably steep topography that the site must work with, and will likely reinforce the car dependency that is anticipated for such a development.

The dispersal of low-density housing across the proposed development will be clearly disconnected from the existing township, resulting in a high number of short car journeys that will be heavily reliant upon access via SH16, and will not deliver a thriving community to support the proposed neighbourhood centre, existing Waimauku centre, and will not achieve walkable access to nearby education, health services, or public transport. Increased reliance on short car journeys will not support the reduction in greenhouse gas emissions to the anticipated frequent use of vehicles to get to any nearby shops and services, and the level of connectivity proposed at this stage is considered to achieve good accessibility for people between their intended place of residence to employment and other amenities. Overall, the design has not been well considered to respond to the sensitivity of the surrounding environment and will not contribute to a well-functioning urban environment with particular regard to Policy (1)(c), & (1)(e).

#### **Transport Network Safety & Efficiency**

No substantial additional assessment that directly responds to the matters previously raised by AT, and other transport specialists, at pre-application stage have been provided outside of confirmation that an updated ITA will be prepared should the referral application be accepted for further consideration under the FTAA.

Notwithstanding, the only significant change is the addition of two possible school sites that have been also assessed above. This is a welcomed addition as a school(s) will better serve the new community. However, the locations are not ideal as they are on the periphery of the site and therefore not as accessible compared to a more central location. Furthermore, the northern site is poorly located for students that may be attending from the wider Waimauku area. The location almost opposite the light industrial zone is also a concern due to the proximity of Heavy Commercial Vehicles (“HCV”) and potential conflict with pedestrians. A number of matters originally identified by AT, including further supporting detail, has been identified below:

- A full ITA will be required in accordance with AT’s Guidelines. The ITA should also include, but not be limited to, an assessment of the following matters:
  - How the development would affect the operation of the State Highway, including any AT maintained roads connecting into it, and an assessment of wider network effects, including the following intersections (at a minimum):
    - SH16 / Muriwai Road roundabout;
    - SH16 / The Avenue (new intersection just being constructed);
    - SH16 / Access Road;
    - SH16 / Old North Road roundabout;
    - SH16 / Coatesville Riverhead Highway; and
    - SH16 / Brigham Creek Road roundabout.

- Wider developments, including (but not limited to) Plan Change 100 Riverhead and the Rangitooopuni fast track consent(s). This should take into account any required measures to mitigate any adverse impacts identified;
- The accessibility of the site to local amenities such as schools, Waimauku local centre, and to jobs and employment. This assessment should consider accessibility for all modes, including active modes and public transport and include details of what measures will be provided to facilitate active modes and public transport use, including how safe and convenient connections will be provided to key locations such as Waimauku local centre;
- The operational requirements of the solar farm in terms of service vehicles and the potential for glare to occur to road uses given the positioning of the infrastructure relative to SH16 and nearby local road networks;
- The potential effects on the future road network including (but not limited to) the SGA proposals and the Alternative State Highway; urbanising rural roads; upgrades to SH16, linkages through Kumeu to Riverhead; upgraded Rapid Transit Network with future park and ride at Brigham Creek, and potential rail improvements;
- The site is accessed from two intersections, with the eastern intersection providing access to the majority of the proposed development. The eastern intersection primarily provides access to the light industry and large lot residential. An assessment of the resilience of the proposed road network to cater for the scale of development, including the types of activities that are anticipated to be established within the likes of the industrial and commercially zoned areas / waste water pump station, must be undertaken;
- Details of the intended road hierarchy, including supporting road cross-sections and gradients, and confirmation whether the proposed road design is to an urban or rural standard. The Civils memo states that most roads will be 8% or less but some will be up to 12.5% with alternative facilities for footpaths through reserves. Details of these will be required to review the accessibility of the road grades and alternatives. Departures from Standard may be required in some instances;
- The suitability of roads within the development to allow for public transport. This includes appropriate cross-sections, bus tracking, and bus stop locations (the road will need to be a collector road). The road design should allow for a logical bus routing;
- There are many cross-road intersections within the development. Details of the design of each of the intersections will be required to ensure that they operate safely and efficiently. These will need to provide for pedestrians and cyclists (where cycle facilities are provided through the development). Visibility assessments at all intersections will be required, and for vehicle crossings within the development (Commonly Owned Access Lots ("COAL") and vehicle crossings onto proposed roads to vest);
- How roads are to be designed to operate at suitable and safe design speeds, including an outline of what measures will be implemented to ensure that speeds will be controlled;
- Where active modes facilities are to be provided, including details of facilities to connect to the centre of Waimauku township;
- A pedestrian / cycle link is shown connecting to Waimauku Station Road and onto SH16 east of the proposed eastern intersection. The feasibility of providing these links should be demonstrated, particularly if this is through land not owned by the applicant. Facilities to extend these connections to the wider areas will be required; &
- Plans showing the design of intersection(s) onto SH16;

It is understood that consultation and engagement is underway with NZTA, who is the Road Controlling Authority (“RCA”) responsible for the management and operation of State Highway 16. Liaison with NZTA is essential as the RCA, as any new intersections will need to incorporate a safe right turn facility.

Notwithstanding any additional assessment that might be forthcoming through a future ITA, concerns remain that the existing and future planned transport networks may not be currently designed or constructed for accommodating such significant increases in residential growth and other proposed land uses. Current funding provided through Development Contributions for the proposed Inner Northwest Transport Strategy which uses a full buildout model to 2065 does not anticipate or consider in any way the impacts of the proposed development. Likewise, the Supporting Growth Alliance (“SGA”) designation/requirements similarly does not anticipate the proposed development. The transport upgrades needed to support this proposal are likely to be significant and it is unlikely that the development will incorporate construction of the level of transport infrastructure (upgrades and new) to the immediate and surrounding roads that is needed to enable the development. Furthermore, whilst there may be some Notices of Requirement / Designations in place for some of the projects, there is no certainty on funding or timing of delivery. Supporting information in the ITA focuses on the investigation of walking and cycling linkages and a potential upgrade to intersections providing access to the development; however, the consideration must be extended to the link with the wider transport network at a more strategic regional level. The transport upgrades that have been recommended by the applicant at this stage are considered to not have any intended regional or national benefit.

The proposal will affect the State Highway directly with two accesses on to SH16 and potentially have wider effects on SH16 further to the south e.g. through Huapai, Kumeu and south of Kumeu around Coatesville Riverhead Highway through to Brigham Creek Road. Development of this intensity was not anticipated in this location based on the operative zoning and the inclusion of such growth is likely to have significant effects on the State Highway operation as well as AT’s network, where this connects into SH16.

#### **Stormwater Management & Flooding Effects**

Similarly, no substantial additional assessment and/or detail has been provided in the updated Stormwater Management Plan (“SMP”) and supporting Infrastructure Assessment. Subsequently, the comments that were originally supplied at pre-application stage remain valid for EPA’s consideration, which are repeated below:

- The application proposes either wetlands or large communal raingardens for stormwater management, which is a cost-effective means of managing stormwater. AT recommends this approach be supported if the referral application is accepted to be progressed; &
- The subject site is upstream of the Kaipara River, where any increase in impervious area on-site may lead to an increase in flooding effects downstream. However, given the scale of the existing floodplain any potential effects may be minimal and likely to be limited to immediately downstream of the site. No supporting assessment into potential flooding effects has been provided. Whilst it does not appear that AT maintains any assets in the vicinity of downstream from the subject site, it is recognised that any displacement of flood waters may affect KiwiRail’s North Auckland Line.

The lack of detail within the SMP and supporting assessment does raise additional concerns in relation to the feasibility of the communal stormwater treatment devices. Should consents be granted on the basis of the stormwater management strategy put forward, there is a risk that at detailed design stage the applicant may be unable to achieve what has been recommended which might put AT in a position where they are asked to accept assets that impose a much greater operation & maintenance regime; an increase whole of life cost burden; and

potential safety concerns through the use of these assets. For example, if the communal treatment devices are not feasible, then this may result in the proliferation of many small treatment devices within the road corridor. Should EPA accept the project as a listed project, it is considered essential that the applicant provide a concept design and supporting assessment that suitably demonstrates the feasibility of the communal devices.

### **Public Transport**

KiwiRail Holdings Limited is the Requiring Authority for land designated “Railway Purposes” (or similar) in District Plans throughout New Zealand. KiwiRail owns and maintains the North Auckland Line Railway which crosses Jowsey Access Road. KiwiRail input would be required to provide comment on this referral application to establish any resulting impacts upon the railway corridor. Notwithstanding, AC /AT maintain the responsibility for specifying and funding, typically with NZTA’s share, any passenger transport service in Auckland. However, there are a few exempt services that do not follow this model. It is essential that a broader analysis of how the development interfaces with wider strategic plans is undertaken to ensure the safe and convenient access to public transport alternatives is achieved. The extent of growth, not otherwise anticipated by the AUP(OP) or wider transport policy documentation, results in a significant divergence from current zoning which may necessitate a need to review broader transport network plans for the north-west. Consequently, the preferred public transport option for the North-West, which is currently the Rapid Transit Network (“RTN”) on SH16’s existing alignment. This may bring back into consideration the provision of passenger rail as an alternative, or in addition. To ensure that the future potential provision of passenger rail is protected, no works should be undertaken that would preclude the future expansion of the railway for metro services and/or provision of freight. A two-track railway would be required for service level increases. Notwithstanding, it is acknowledged that the provision of the necessary rail infrastructure required to enable passenger rail would result in significant capital expenditure to install the necessary facilities to operate the service.

One of the key considerations that is also needed for the existing operation of the railway network, as the masterplan shows a number of residential lot boundaries that are hard up against the existing designation boundary. There is the issue of noise against the rail corridor as freight trains (diesels) through here are more and more likely to be at night due to the limited capacity within the Auckland Urban network whilst the passenger services are operating. This would likely give rise to reverse sensitivity effects if sufficient buffers cannot be achieved to ensure that residents are protected during nighttime periods. KiwiRail would be required to provide comment on such considerations pertaining to the interface with the existing rail corridor.

It is also unclear as to how access to the solar farms is to be secured across the existing railway corridor in regard to the north-western section of the subject site. No development should increase risk across level crossings, and no development should introduce additional at grade crossings of the rail corridor. If a significant increase in traffic is proposed across an existing crossing, provision should be made for grade separation.

There is a question of school capacity at Waimauku Primary School, which currently maintains a role of over 700 students based on the numbers as of July 2024. This is large for a primary school. The secondary school in the area is Kaipara College in Helensville, which may have capacity to accommodate the growth from the intended development as the school has a student roll of 700 being relatively small for a secondary school. AT have identified that there is a question for MoE around whether another primary school is needed as a direct result of the proposed development. AT does provide a school bus service from Kumeu / Huapai to Kaipara College in Helensville. This proposal will likely necessitate another school bus, which should be directly funded by the applicant. This section should be read in conjunction with the concerns expressed above insofar as it relates to the

overall connectivity within the proposed roading layout, as limited opportunities to maintain a logical bus route are available through the intended masterplan.

## 6.0 Section 67 Information Gap

At the time of writing this Memo I have identified the following information gaps:

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
<p>1. Fully detailed ITA, addressing the requirements outlined in in Section 5.0 of this memorandum</p>	<p>Significantly lacking in information to understand how the transport network will be impacted by the proposal</p> <p>No details available to understand how the design of the proposed local road, or supporting intersections with SH16, will be managed and whether these are to be compliant with the TDM to achieve a safe and efficient network</p>	<p>Cannot accurately assess the resulting adverse impacts upon the existing transport network, nor able to ascertain whether the proposed scale of growth is able to be catered within the existing and/or planned transport networks.</p>	<p>That the transport network cannot cater for the extent of growth anticipated by the proposal</p> <p>That the roading layout proposed will not achieve AT's TDM and be of a design that is safe and efficient. A sub-standard asset may be intended to be vested to AT, which may not be approved at Engineering Approval Stage.</p>
<p>2. No information on the approach to staging, overall construction duration and levels of movement, nor an accompanying CTMP</p>	<p>No information provided to establish the scale of construction effects so as to inform the necessary measures that may be required to maintain a safe and reasonable operation of the immediate and wider transport networks. The approach to staging is unclear, as no commitment has been made to the overall duration of works and extent of disruption that might occur to the transport network.</p>	<p>Cannot make a conclusion on whether the transport network can cope with the level of delay that may occur directly associated with the required construction.</p> <p>The likely principles that might be needed to be incorporated into a CTMP condition are not able to be identified</p>	<p>A deficient CTMP is prepared, and implemented throughout the course of construction, which is not commensurate with the level of adverse impacts nor does the approach to staging ensure that continued provision of the likes of public transport maintained throughout the course of construction.</p>

<p>3. <i>No concept design or feasibility analysis for communal stormwater devices</i></p>	<p><i>A conceptual design and supporting feasibility assessment of the proposed communal stormwater devices are needed, which should be supported by a draft operation and maintenance plan demonstrating how the continued effective operation of any proposed device(s) is maintained.</i></p>	<p><i>Cannot confirm whether the stormwater treatment approach is feasible or would be accepted for vesting</i></p>	<p><i>That AT may be left in a situation of accepting assets with high-ongoing operational costs and/or will not be accepted for vesting resulting in the need for further consent(s) and/or a s127 be applied for to update the stormwater management approach.</i></p>
<p>4. <i>Flooding Assessment</i></p>	<p><i>No flooding assessment has been provided to assess what the adverse impacts are through the increased impervious areas to the downstream environment.</i></p>	<p><i>Unable to confirm whether any changes in flood dynamics will occur to any assets, whether these are owned by AT or the likes of KiwiRail, downstream of the subject site and establish any resulting effects upon the operation of the asset.</i></p>	<p><i>Displaced floodwaters may occur, which will increase the risk to the operation of the local road network and/or railway corridor that would require the respective asset owner to mitigate.</i></p>

## 7.0 Recommendation

Overall, it is AT's position that the application for the referral application for Waimauku West be declined for further consideration under the provisions of the FTAA. The documentation that has been provided in support of the referral application does not contain any substantial further information or assessment to respond to the concerns AT had previously identified nor suitably characterize the resulting adverse impacts upon the existing and proposed transport networks. Whilst the assessment provided is limited, AT is concerned that any actual and potential adverse impacts upon the existing and proposed transport networks will be significant. The AUP(OP) clearly does not anticipate such a significant increase in residential capacity, or supporting industrial and other commercial uses, given the nature of the operative RPZ for the subject site. Other high-level strategy documents and other workstreams, such as the Inner Northwest Transport Strategy or the SGA programme and resulting designations, does not anticipate or consider in any way the transport related effects resulting from the proposed development. Any transport required infrastructure required to cater for the intended growth is unlikely to be in place, nor planned for, due to the uncertainties of funding and timing of delivery of planned network upgrades.

Notwithstanding the position reached above, should the Minister be inclined to accept the application as a listed project, a fully detailed ITA is essential for the substantive application to suitably establish any actual and potential adverse transport related effects from the proposal, including any measures necessary to avoid, remedy, or mitigate any resulting adverse upon the environment. The specific requirements, which can be identified based on the high-level information available at this stage, of the ITA, are outlined in [Section 5.0](#) of this memorandum.

## 8.0 Proposed Conditions

No draft conditions have been proffered by the applicant at this stage; however it is anticipated that further conditions may be available for AT's peer review should the referral application be accepted for further consideration under the FTAA. AT respectfully requests an opportunity to provide comment on any recommended conditions should this application progress further.

16 January 2026

Emma Chandler

s 9(2)(a)

Adonica Giborees

s 9(2)(a)



Dear Emma,

**Waimauku West Fast-track Application  
1080 State Highway 16, Waimauku**

**Introduction**

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Waimauku West Fast-track referral application (**Application**), made under section 13 of the Fast-track Approvals Act 2024 (**the Act**).
2. Halberd Holdings Limited (**Applicant**) proposes to undertake master planning, consenting and design of Waimauku West located at 1080 State Highway 16 (**Project Area**). The proposed Waimauku West Project consists of the following (**the Proposal**):
  - Approximately 1,500 – 2,020 dwellings ranging in density from Large Lot Residential (approximately 50-120 dwellings), Standard Residential (approximately 1,100-1,400 dwellings) to Medium Density Residential (approximately 350-500 dwellings);
  - A neighbourhood centre to provide for residents day to day needs;
  - A green network incorporating existing ecological areas and features, stormwater management and public open spaces;
  - A light industrial area to the west surrounded by Countryside Living (approximately 5 dwellings); and
  - Associated infrastructure.
3. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
  - Planning Memorandum for Waimauku West, prepared by Barker and Associates dated 13<sup>th</sup> November 2025 (**Planning Memorandum**).
  - Civil Engineering Infrastructure Summary Memo, prepared by Crang Civil dated 18<sup>th</sup> August 2025 (**Infrastructure Memo**).
  - Waimauku West Consultation Record.

4. The zoning of the Project Area is Rural – Rural Production Zone under the Auckland Unitary Plan – Operative in Part (**AUP-OP**). The Applicant has acknowledged that Watercare has provided previous feedback that the Waimauku West Project cannot be serviced by Watercare for water supply or wastewater. Therefore, the Applicant is proposing a fully private water supply solution with water being sourced from groundwater (the Kaipara Sands Aquifer and the Kumeu-Hobsonville Aquifer) and the Kaipara River as well as roof runoff. For wastewater, the Applicant is proposing two options within the Planning Memorandum, with the first option being to connect to the public network which would involve installing a new pump station within the development area and a new 6.55km public rising main to the Huapai Pump Station, or option 2 which is installing an onsite private wastewater treatment plant with treated effluent being discharged to either the stream or onto residual farm land for irrigation. This appears to be inconsistent with the Infrastructure Memo, which only refers to private servicing.
5. Any amendment to the Application will require further review from Watercare.

#### **Watercare's purpose and statutory obligations**

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

#### **Watercare's comments**

9. As noted, the Project Area is zoned Rural – Rural Production Zone under the AUP-OP.
10. In line with Watercare's statutory obligations, which include requirements to support growth areas identified by Auckland Council, Watercare does not provide water supply or wastewater servicing to rural zoned land, such as the Project Area for the following reasons:

- a. Servicing rural zoned land is unanticipated by Watercare and in accordance with Auckland Council's Plans and Strategies, has not been provided for in Watercare's Business Plan, Asset Management Plan, or Funding Plan.
  - b. This means that planned upgrades and projects in the network and associated treatment infrastructure do not provide capacity for servicing rural land, and therefore the provision of connections to rural land would significantly impact the available capacity for the anticipated growth of live-zoned areas and Future Urban Zone areas.
  - c. This position is consistent with Watercare's statutory obligations to act consistently with any plan or strategy of the Council<sup>1</sup>, including but not limited to, the AUP-OP, the Auckland Plan 2050, and the Auckland Future Development Strategy 2023-2053 (**FDS**).
11. This position is outlined in Watercare's Board approved Strategic Direction for Providing Services to Support Urban Growth (approved 17 May 2015), which restricts the provision of water supply and wastewater services outside of the rural urban boundary. This Board direction allows Watercare to provide services outside of the rural urban boundary, only if expressly requested to do so by Council and where the cost of servicing the development is fully funded by the developer.
  12. As such, Watercare has no long-term plan to provide public reticulated wastewater or water servicing to the Project Area.
  13. Any comments on the proposed **private** water supply and/or wastewater servicing for the Waimauku West Project 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**

14. Watercare notes that while section 1.1.2 of the Planning Memorandum refers to two options, one connecting to the public system and the other privately servicing; section 6.6 of the Planning Memorandum and the Infrastructure Memo state that the Waimauku West Project will be privately serviced for wastewater. It is assumed the reference to public servicing in section 1.1.2 of the Planning Memorandum is an error.
15. There is an existing public Wastewater Treatment Plant (**WWTP**) at Waimauku which services 18 lots within Waimauku.
16. The current network does not have the capacity to support large scale developments, such as this one. Furthermore, there are no planned upgrades to accommodate this unanticipated growth. Watercare's priority is the existing live zoned areas and substantial Future Urban Zone in the Northwest, in alignment with the FDS. Watercare notes that the Huapai Pump Station that the Applicant refers to in section 1.1.2 of the AEE is not functioning as a standard wastewater pump station. Instead, it serves as a top-up water

---

<sup>1</sup> Local Government (Auckland Council) Act 2009, section 58.

and chemical dosing facility. The local wastewater network within Huapai discharges directly to the Riverhead Pump Station. The Riverhead Pump Station itself lacks capacity for this development, and downstream infrastructure, including Pump Station 68, Pump Station 70, and even the Northern Interceptor, have been sized and planned with staged upgrades to serve their respective catchments based on live zoning and the Future Urban Zone as set out and sequenced by the FDS. Providing connections to significant development in rural areas, such as this one, would undermine the ability of these assets to serve existing live zones and the planned Future Urban Zone.

17. Overall, Watercare reiterates that the proposed wastewater solution for this Project, if approved, must be independent from the public network.

### **Bulk Water Supply**

18. The Applicant is proposing to privately service for water supply.

### **Watercare's comments on private servicing**

19. As noted above, any comments on the proposed private water supply and/or wastewater servicing for the Waimauku West Project will be made by Auckland Council.
20. However, Watercare considers that if the private wastewater discharge is discharged to a nearby stream or tributary, then it should be held to a high standard to ensure no impact to the downstream receiving environment; cumulative effects of the discharge, together with the existing Helensville and Waimauku WWTP discharges (which Watercare owns and operates), should be considered.
21. Watercare also recommends that any private scheme be designed in accordance with the relevant infrastructure Code of Practice <sup>2</sup> and be subject to robust long-term governance arrangements that ensure long-term maintenance and financial sustainability.
22. Watercare is happy discuss more details of the Proposal with the Applicant and any further options that could be explored.

Yours faithfully,



---

<sup>2</sup> The Auckland Code of Practice for Land Development and Subdivision  
<https://www.aucklanddesignmanual.co.nz/en/developing-infrastructure/infrastructure-codes-of-practice.html>

**Helen Shaw**

Head of Strategy and Consenting

## Referral Application Feedback Form

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

### Respondent Information

Name: Martin Meyer

Role: Senior Stormwater Specialist

Agency / Department: Specialist Unit, Planning & Resource Consents Department

### Project Information

Project Name: Waimauku West

### General Support or Opposition

- Support
- Oppose
- Neutral – Further information required to assess the effects of the proposed development

### Agency/Department Response

*Having considered the s22 assessment criteria, please explain your position and provide any other relevant details.*

Please consider the following in addition to the feedback provided in the PreApp Memo for PRR00043251. It is noted this assessment should be read alongside the input from Healthy Waters.

Waimauku West development is a large residential subdivision located in a rural zoned area. Regional benefits around the supply of housing, and local economic activity from an increased population could occur. However adverse effects on the environment and character of a rural area may also arise, and should be considered as part of this proposal.

At this stage, the preliminary material provided is insufficient to clearly demonstrate the effects of the proposed stormwater management.

Under E8, the development of >5,000m<sup>2</sup> impervious area is a **discretionary activity**. This development, of a 197ha site, with a potential 1500 to 2020 lots can be authorised under this activity for stormwater discharge where effects on the environment are mitigated and managed appropriately.

The extensive impervious areas associated with the scale of this proposal, and the rural nature of the surrounding sites in a 'greenfield development' require extensive analysis for potential flood effects. It is noted that council has had to recently purchase properties upstream of this site due to flooding related matters, and would require clear demonstration that flooding risks are mitigated by the design.

The high level stormwater management plan provided follows the general principles of stormwater management, including the use of retention/detention via wetlands and with proposed infrastructure designed to accommodate 10% and 1% AEP flood events. To ascertain if the proposed infrastructure will adequately mitigate flooding risks, detailed flood modelling is required. Due to the extensive size of a greenfield development Healthy Waters will analyse and provide assessment of flooding for the site.

Due to the extensive nature of the development, an assessment on the capability of the streams that will be impacted by the altered hydrology from the proposal should have a geomorphological assessment. This will help ascertain that appropriate riparian margins to allow rivers to adapt to the altered hydrological regime based on their geomorphology.

High contaminant generating areas will be treated by raingardens, swales or proprietary treatment devices. Confirming if these are to GD01 standard, that high contaminant generating areas can be approved under assessment of AUP(OP) E9 Stormwater Quality – High Contaminant Generating Areas. If the areas of high contaminant generation are under 5,000m<sup>2</sup> this will be a permitted activity, or otherwise trigger a consent.

If the site undergoes development, it would be expected that residential lots will eventually undergo a plan change to 'residential' lots. The applicant while being in charge of the operation and maintenance of the stormwater management assets prior to this while under a private E8 discharge consent, may wish to vest the assets to council when a plan change takes place. As such it is important to design stormwater infrastructure that will be accepted for vesting, and meet the NDC requirements. The stormwater management plan sets out that it aligns with the NDC Schedule 04, this will be further assessed by Healthy Waters if the applicant undertakes this direction. If the proposed stormwater management devices are to stay private, a clear mechanism for the operation, maintenance and ownership of these devices over their lifetime is needed.

The development has been noted to be located away from natural wetlands, however diversion and/or discharge of water within 100m of a natural inland wetland will require assessment under the NES-F for hydrological effect on the wetlands. The ecological report states that hydrological effects will be mitigated in the design.

## **Assessment Criteria (Section 22 FTAA)**

Please consider the below assessment criteria in preparing your response:

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

## Referral Application Feedback Form

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

### Respondent Information

Name: Ravi Chand

Role: Project Manager – West

Agency / Department: Regulatory Engineering, Planning and Resource Consents Department

### Project Information

Project Name: 1080 State Highway 16 Reweti, Waimauku West(PRR00043580)

### General Support or Opposition

- Support
- Oppose
- Neutral

### Agency/Department Response

#### Stormwater and Wastewater Management

The Development Engineering team is relying heavily on input from HW, SW, WW specialists, and WSL to progress the stormwater and wastewater management feedback for this proposal.

#### WSL Comments:

At the pre-application stage, Watercare Services Ltd (WSL) advised the applicant's agent that the site falls outside the urban catchment limits and is within a rural zone. As such, the wastewater system is required to be privately owned and drained onsite.

This position is detailed in the WSL memo dated 26 September, prepared by Helen Shaw. WSL indicated that it is Auckland Council's responsibility to work directly with the applicant's agent on the design and implementation of a private wastewater and water supply solution.

The applicant has provided a high-level summary of a proposed private water supply system to service the development in their Infrastructure and Groundwater Memorandums. At this stage we have insufficient information to determine if the proposed water supply system is feasible to service the proposed development as there are uncertainties with the yields from the proposed bores (as confirmed by Ms. Nicola Jones, Groundwater Take and Bore specialist). At this stage therefore there are uncertainties as to whether or not the proposal can be adequately serviced in terms of water supply.

Wastewater servicing has been reviewed separately by Mr. Dylan Walton, Wastewater Specialist.

**Healthy Waters (HW) Comments:**

HW has taken a neutral stance and requested additional information to better understand the impact of the proposed development on the hydrology of the sub-catchment. This is detailed in the HW memo prepared by Hillary Johnston, which outlines the need for further information to assess potential effects.

Development Engineering will seek advice and direction from HW regarding the overall stormwater disposal strategy before moving into detailed design discussions, particularly around how the stormwater network will serve individual lots and the road network.

**Auckland Transport (AT) Comments:**

AT has adopted an opposed position to this application due to concerns with effects on the roading network from unplanned urbanisation. similar position to HW, indicating that it They have confirmed that, if accepted for referral, they will require more detailed information from the applicant's agent in order to provide constructive and informed feedback.

**Geotechnical Comments:**

A preliminary geotechnical report is required to assess ground conditions and land stability. This demonstrates that the geotechnical hazards on site can be appropriate remediated for the proposed development, however a full geotechnical report is required to confirm and should include the following:

- Soil type classification within the development area
- Groundwater levels
- Proposed remedial works (if needed) to stabilise the land

- Consideration of site suitability prior to the construction of infrastructure systems

**Power Supply**

In the absence of the solar farm, which the development was originally relying on for electricity, the project will now need to connect to the national power grid via Transpower. Due to limited time, direct consultation with Transpower has not yet occurred. This matter will need to be discussed and addressed as part of the ongoing pre-application process.

**Conclusion:**

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

## Referral Application Feedback Form

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

### Project Information

Project Name	<b>Waimauku West - Fast Track</b>
Address	<b>1060 State Highway 16, Waimauku</b>
FT application number	<b>FTAA-2511-1134</b>

### Respondent Information

Name	<b>Hester Hoogenboezem</b>
Role	<b>Senior Specialist – Groundwater Diversion and Dewatering</b>
Agency / Department	<b>Auckland Council / Department of Planning and Resource Consents, Specialist Unit</b>
Date	<b>13 January 2026</b>

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

- Support
- Oppose
- Neutral

### Agency/Department Response

**Insufficient information was provided regarding Groundwater Diversion and Dewatering, and support of the proposal cannot be provided at this stage.**

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

## **Assessment Criteria (Section 22 FTAA)**

Please consider the below assessment criteria in preparing your response:

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

## **Auckland Council assessment criteria for fast-track referrals**

Please consider the below assessment criteria in preparing your response:

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

## **Groundwater Diversion and Dewatering Response**

**I consider the following significant omissions in the reporting:**

1. The ecological memorandum titled *“Waimauku West – Fast Track Application – Preliminary Ecological Assessment”*, prepared by Viridis Environmental Consultants, dated 12 November 2025 states:

*“Earthworks, diversions and discharges within 100 m of the wetlands can be managed to ensure the hydrological function and water level range of the wetlands is not significantly impacted.”*

The reporting associated with the proposal did not include a management plan or outline any mitigation measures to address the potential effects on identified wetlands. These effects may include permanent

or temporary wetland losses resulting from the proposed dewatering and groundwater diversion activities. As such, I consider that the proposal has not been fully assessed against the requirements of **Regulation 53 Prohibited activities** and **Regulation 45C (4) Restricted discretionary activities, Urban Development** of the **National Environmental Standards for Freshwater (NES-F)**, which requires adequate consideration of the potential loss of extent or values of natural wetlands and the implementation of appropriate mitigation or offset measures.

The planning memorandum titled *“Planning Memorandum for Waimauku West”*, prepared by B&A Urban and Environmental, dated 13 November 2025 states:

*“Resource consents will likely be required for a range of reasons under the National Environmental Standards: Freshwater (NES:F), including earthworks within 10 m and 100 m of a natural inland wetland, vegetation clearance and diversion of water within 100 m of a natural inland wetland. Reclamation of some streams and wetlands with lower ecological values may be required to facilitate urban development.”*

*“More detailed work will confirm if work around wetlands triggers a prohibited activity status by way of Regulation 53 of the NES:F. Regardless, s21(7) of the Fast-track Approval Act enables the Minister to accept a referral application for an activity that is prohibited under the Resource Management Act 1991. The effects of any proposal will be assessed as part of a substantive application if successfully referred.”*

2. The effects of the proposed dewatering and groundwater diversion on neighbouring structures, infrastructure, and services were not considered or addressed in the documentation provided. **This represents a significant omission.** The proposal also does not appear to have been assessed against the **Auckland Unitary Plan (AUP(OP))** standards, specifically:
  - **E7.6.1.6 (1 to 3)** – which relate to the control of dewatering to manage land stability, settlement, and effects on adjacent properties; and
  - **E7.6.1.10 (1 to 6)** – which set out the assessment criteria for groundwater diversion, including potential adverse effects on built structures, services, and ecological features.

## **Conclusion**

Without a comprehensive assessment under these provisions, it is not possible to determine whether the proposed activity can be undertaken without resulting in significant adverse effects on the environment or neighbouring properties. Therefore, further assessment and updated reporting are required to address these critical issues before the proposal can be appropriately considered under the relevant planning and environmental frameworks.

Prepared by:

A handwritten signature in black ink, appearing to read 'H Hoogenboezem', written in a cursive style.

Hester Hoogenboezem

Date: 13 January 2026

Senior Specialist – Coastal and Water Allocation  
Team, Specialist Unit

Planning & Resource Consents

## Referral Application Feedback Form

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

### Project Information

Project Name	<b>Waimauku West - Fast Track</b>
Address	<b>1060 State Highway 16, Waimauku</b>
FT application number	<b>FTAA-2511-1134</b>

### Respondent Information

Name	<b>Marija Jukic</b>
Role	<b>Team Leader – Coastal and Water Allocation Team</b>
Agency / Department	<b>Auckland Council / Department of Planning and Resource Consents, Specialist Unit</b>
Date	<b>16 January 2026</b>

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

- Support  
 Oppose  
 Neutral

### Agency/Department Response

**Insufficient information was provided regarding the proposed Groundwater Take and bores, and support of the proposal cannot be provided at this stage.**

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

## **Assessment Criteria (Section 22 FTAA)**

Please consider the below assessment criteria in preparing your response:

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

## **Auckland Council assessment criteria for fast-track referrals**

Please consider the below assessment criteria in preparing your response:

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

## **Groundwater Take and Bore Response**

**I consider the following significant omissions in the reporting:**

The applicant has provided a groundwater memo in response to Watercare's confirmation that they will not be servicing this area in the foreseeable future with a public reticulated water supply. The groundwater memo indicates that the applicant is seeking 472,000m<sup>3</sup>/year for the proposed development, and they identified the Kaipara Sand and the Kumeu-Hobsonville Aquifers as potential groundwater sources.

However, Auckland Council mapping indicates only a small area to the west and southwest of the subject site is likely to intersect the Kaipara Sand aquifer, and the 'Kumeu-Hobsonville aquifer' is a significant distance from the subject site. The mapping indicates that the underlying aquifer likely to be targeted is the

Lower Kaipara Waitemata aquifer. The current availability of groundwater in the Lower Kaipara Waitemata aquifer is 3,299,765 m<sup>3</sup>/year. This is subject to change as there has recently been an increase in water demand in this area.

A geophysical investigation report, detailing a seismo-electric investigation carried out at the subject site, has identified the presence of three aquifers beneath the site. The aquifer of interest, the Lower Kaipara aquifer, is interpreted as comprising fractured or weathered sandstone, and existing at a depth of approximately 270mbgl.

The geotechnical investigation report states that an analysis of estimated sustainable yield for the site indicates that the site is a low to moderate yield area. The data indicates that the highest groundwater yield potential area across the site is in the south-western corner, which is the initial target for groundwater exploration. Nine drilling locations have been proposed, extending to depths ranging from 347.5 to 400.1m bgl into the Lower Kaipara Waitemata aquifer.

Sustainable water production yields for the nine proposed drilling sites have been estimated as ranging from 7.5 litres per second to 10.2 litres per second. Should bore pumping tests show these yields to be attainable, two to three bores across the site may meet the annual quantities being sought. However, the yields from this aquifer can be uncertain, differing from bore to bore, based on the underlying geology. As such, the applicant will need to undertake the proposed investigative drilling and bore pumping tests to confirm the potential yield of any production bore(s) and their viability in providing the annual quantity the applicant is seeking.

It is noted that the applicant has only provided preliminary estimates of water demands and would need to provide a more detailed assessment of daily and annual quantities that are required for the development, to ensure they are promoting efficient water use.

The applicant will need to complete a full assessment of effects in accordance with the relevant standards under Chapter E7 of the AUP(OP) and address the objectives and policies under E2.2 and 2.3 relating to the taking of groundwater.

### **Conclusion**

The assessment provided by the applicant does not currently address the relevant AUP(OP) standards or policies, and there is not sufficient information to form an opinion on whether Auckland Council can support or oppose the proposed bore(s) and groundwater take for supply to the development. It is critical that the applicant undertakes further investigation to determine the viability of abstracting groundwater from the Lower Kaipara Waitemata aquifer as the primary water supply for the proposed development

Prepared by:



Marija Jukic

Date: 16 January 2026

Team Leader – Coastal and Water Allocation  
Team, Specialist Unit

Planning & Resource Consents

## Emma Chandler

---

**From:** Philips Augustine s 9(2)(a)  
**Sent:** Thursday, 15 January 2026 10:27 am  
**To:** Samuel Holmes; Emma Chandler  
**Cc:** Adonica Giborees; Ravinesh Chand  
**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input

**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to HelpMe@itconfidence.co.nz

Hi Emma,

Reviewed the applicant provided documents (7. Attachment 7 Transport Memorandum + associated plans). No updates have been noted apart from the removal of the solar farm.

Hence, my **previous memo detailing advice and recommendations remains the same.**

[Redacted]

[Redacted]

Regards

**Philips Augustine (he/him) | Senior Traffic Engineer**  
Regulatory Engineering and Resource Consents Department  
Mobile s 9(2)(a)  
Auckland Council, [6-8 Munroe Lane, Albany](#)  
Visit our website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)

**In the Office = ✓ Rostered Day WFH = W**

Mon	Tue	Wed	Thu	Fri
✓/W	✓	✓	✓	✓/W



## Referral Application Feedback Form

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

### Respondent Information

Name: Philips Augustine

Role: Senior Traffic Engineer

Agency / Department: Regulatory Engineering and Resource Consents Department

### Project Information

Project Name: FAST-TRACK Referral: Waimauku West - FTAA-2508-1094

### General Support or Opposition

Support

Oppose

Neutral

### Agency/Department Response

A detailed assessment has been provided at the “Technical Specialist Memo- 5.0 Specialist Assessment” from pages 3-9. This covers information gaps and the additional issues raised by AC at the pre-application stage (PRR00042916) in detail.

## **Assessment Criteria (Section 22 FTAA)**

In brief, the applicant failed to provide any significant additional information or assessment to address any regional or national benefits details, whether the project delivery maintain the efficiency (time and cost wise), whether proposal supports existing regionally/nationally significant infrastructure, if a well-functioning urban environment be able to maintained even though the proposal supplies more housing facilities to the public and the issues raised by AC at the pre-application stage (PRR00042916). The applicant intended to provide all additional details as part of the comprehensive plan to back up the substantive application.

Hence, a decision to accept Waimauku West can't be made at this time. If the application has been accepted by the decision makers, a full set of Integrated Transportation Assessment, including the potential effects, mitigation, and conditions, to be submitted to assess transport effects under the Fast-Track Approvals Act 2024. This will guide us in further assessment.

**Technical Specialist Memo - Traffic Engineering- Philips Augustine- Auckland Council Senior Traffic Engineer**

To: Emma Chandler – Lead Planner—AC & Adonica Giborees/ Fennel Mason – PPL- AC

From: Philips Augustine- Senior Traffic Engineer- AC

Qualifications & Relevant Experience: I hold the qualifications of a Bachelor of Engineering in Civil, a Master of Engineering Studies in Transportation, and have 9 years of experience in traffic engineering. I am a full member of Engineering New Zealand & Institution of Engineers (India). I have prepared expert evidence and technical assessments for resource consent applications and fast-track applications and have appeared as an expert witness before consent authorities and hearings on multiple occasions.

Preparation in Accordance with the Code of Conduct: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date: 26-09-2025

**1.0 APPLICATION DESCRIPTION**

**Application and property details**

Fast-Track project name: Waimauku West

Fast-Track application number: FTAA-2508-1094 & PRR00043251

Site address: 1080 State Highway 16, Reweti, Auckland 0883

**2.0 Executive Summary / Principal Issues**

Consent is being sought to construct approximately 1,500-2,000 residential lots across a range of densities, a small neighbourhood centre, a light industrial employment zone, and a solar farm at 1080 State Highway 16 (SH16), Waimauku. The site is zoned as Rural – Rural Production zone as per the Auckland Unitary Plan – Operative in Part AUP (OP). Overall, the status of the application is considered to be a Restricted Discretionary Activity, and AC has the provision to assess the safety issues/ triggers related to traffic matters.

At this stage, the applicant failed to provide any significant additional information or assessment to address the issues raised by AC at the pre-application stage (PRR00042916) and is meant to validate all additional details as part of the comprehensive plan to back up the substantive application. As part of the pre-lodgment procedure, I offered a few comments, and my recommendations haven't changed.

From AC- TE point of view, the applicant had failed to provide any specific information to complete the assessment as identified in the previous stage. Hence, a decision to accept Waimauku West can't be made at this time. If the application has been accepted by the decision makers, a full set of Integrated Transportation Assessment, including the potential effects, mitigation, and conditions, to be submitted to assess transport effects under the Fast-Track Approvals Act 2024.

### 3.0 Documents Reviewed

- 1. Attachment 1 Planning Memorandum- Prepared by Barker & Associates (“B&A”), Dated:18-08-2025
- 4. Attachment 4 Consultation Record- Prepared by B&A
- 5. Attachment 5 Urban Design Statement- Prepared by B&A, Dated:14-08-2025
- 7. Attachment 7 Transport Memorandum- Prepared by CKL, Dated: 15-08-2025
- 11. Attachment 11 Infrastructure Memorandum- Prepared by Crang Civil, Dated:18-08-2025;

### 4.0 Additional Reasons for Consent Not Included in AEE

- The applicant provided only limited information. Hence, I am unable to determine if any other reason for consent is to be included as a part of this specific consent.  
These remain as outstanding matters and are to be reviewed after providing a full ITA, on the basis of application acceptance.

### 5.0 Specialist Assessment

#### 1. Pedestrian safety & Active mode path

As per PC79DV\_E27.6.6, a 1.8m wide primary pedestrian access (PPA) to be provided for development serves 20 or more parking spaces or dwellings or “1.8m/ 1.4m” PPA “adjacent to/ separate to” vehicle access to be provided for development serves 4-19 parking spaces or dwellings. A maximum gradient of 1:12 is to be maintained if the PPA is not adjacent to vehicle access.

As per AUP\_E27.3 (14), larger developments similar to the subject consent need to provide high cycling and walking facilities (active modes).

Through the pre-app held on 31 July 2025- PRR00042916, further details regarding the road gradient, plan differentiating the PPA gradient, any specific locations with high friction treatments, active mode connectivity on SH16 and connectivity towards the Waimauku Central and Waimauku Station road, PPA with PCD79DV width specifications are requested. However, no specific information is provided. Through “7. Attachment 7 Transport Memorandum”, the applicant mentioned the potential possibility of active mode connection through SH16, between the site and Waimauku Access Road, and through “1. Attachment 1 Planning Memorandum”, the applicant mentioned the potential possibility of active mode connection through 93 Waimauku Station Road. However, no specific details are provided yet. The proposed design consists of 1,500-2,000 residential lots, with school facilities and multiple pedestrian connections. These large-scale design elements need to be assessed further to ensure safety is achieved, and I am not in a position to support the design effects unless the applicant provides more information through a full Integrated Transportation Assessment (ITA)

**2. Speed management measures, speed limit and Visibility assessment.**

As per PC79DV\_E27.6.4.3, speed management is to be provided not more than 10m from the site boundary with the legal road, and not more than 30m spacing between speed management measures. Through the pre-app held on 31 July 2025- PRR00042916, speed management treatments at public roads/ JOALS, speed limit with NZ Transport Agency Waka Kotahi, and visibility assessment for all intersections are requested. However, no specific information is provided yet. In reference to “5. Attachment 5 Urban Design Statement”, wider design has been reviewed (based on provided level data), and noted the multiple major intersections, including SH16 and public roads/ Joal. No specific details to assess the effects of speed management and visibility are provided. This will trigger high safety concerns for users, and I am not in a position to support the design effects unless the applicant provides more information through a full Integrated Transportation Assessment (ITA)

**3. Lighting design**

As per PC79DV\_ AUP\_ E27.6.3.7 and PC79DV\_ E24, lighting is to be provided for development with 10 or more parking spaces, four or more dwellings accessible from a primary pedestrian access, which is not adjacent to a vehicle access, 10 or more dwellings. Through the pre-app held on 31 July 2025- PRR00042916, further details regarding the lighting plan are requested. However, no specific information is provided yet. This is considered a high safety trigger for users and will end up in ongoing maintenance if not designed well. I am not in a position to support the design effects unless the applicant provides more information through a full Integrated Transportation Assessment (ITA).

**4. Vehicle crossing (VC) and vehicle access (VA)**

As per AUP\_ Table E27.6.4.3.2(T151), 5.5m to 6.0m wide VC to be provided for sites serving 10 or more parking spaces. VA to be maintained with a minimum 5.5m width, and the formed width is permitted to be narrowed to 2.75m if there are clear sight lines along the entire access and passing bays at 50m intervals are provided. Through the pre-app held on 31 July 2025- PRR00042916, further details regarding the future use and access of the light industrial area, if the safety is achieved on site- as the industrial/ residential vehicle access is shared, if the proposed 2 VC with the SH16 are at the ideal location- Safety assessment, any alternative options for the S16 VC, if any passing bay is required at any JOAL corridor, any non-compliance of VC gradient and visibility splay- at intersections are requested. However, no specific information is provided yet.

Additionally, the applicant proposed separate vehicle access at the northwestern corner for the education facility.

Considering the western VC with SH16 is shared with industrial and residential, we need to assess the rate of safety being achieved on site. We can expect a high number of heavy vehicles utilising this VC/VA to reach the industrial and solar farm site (pre & post-construction). With the current minimum information, I cannot assess if the intersection/crossroads/ private access has been designed with enough sight visibility.

The proposed education facility supports the development of the community; however, the location of the vehicle crossing needs to be assessed further. The current location consists of limited site visibility issue due to existing hedges and a curvy corridor, adjacent to a railway crossing- which triggers the queuing effect at peak time, no overtaking yellow line has been marked to highlight the site's existing safety issues.

Considering the scale of the proposal, this needs to be reviewed as critical, and I am not in a position to support the design effects unless the applicant provides more information through a full Integrated Transportation Assessment (ITA).

#### **5. Trip generation**

As per AUP\_ E27.6.1, new developments with >100 dwellings are considered as a restricted discretionary activity.

Through the pre-app held on 31 July 2025- PRR00042916, updated traffic data, traffic modelling, LOS effects and draft conditions are requested. However, no specific information is provided yet.

The proposal roughly generates 1500 to 2000 vehicles per hour; hence, internal site networks as well as wider networks (including multiple major intersections) can be affected/ congested easily. This has also been highlighted by other traffic experts as well. The applicant hadn't discussed if the current network capacity be able to manage the trip generation for the site, and the applicant is dependent on the announced projects by WK-NZTA and AT (Supporting Growth Alliance), including SH16 Northwest Alternative State Highway, Te Ara Hauāuru – Northwest Busway, Rapid Transit Corridor including Huapai and Kumeū Stations, SH16 Main Road Upgrade, Waimauku to Brigham Creek Safety Improvements, etc. The applicant provided indications of the project timings, which need further confirmation from the associated bodies. If the announced projects are implemented, most likely, the trip generation from the site will be supported; however, the applicant fails to discuss any upgrades on the most adjacent network corridors that connect to the announced projects. Currently, no traffic modelling (with updated traffic data) that determines the LOS or any draft conditions are provided by the applicant, and I am not in a position to support the design effects unless the applicant provides more information through a full Integrated Transportation Assessment (ITA).

#### **6. Rubbish collection and loading bay**

As per AUP\_Table E27.6.2.7, residential activities in the rural zone with 5,000m<sup>2</sup> to 20,000m<sup>2</sup>/ 20,000m<sup>2</sup> to 90,000m<sup>2</sup> GFA require 1/2 loading bay and >90,000m<sup>2</sup> require 3+1 per additional 40,000m<sup>2</sup>. As per AUP\_E27.6.3.6(3) and E27.6.4.4., the gradient for the manoeuvring area and access must not exceed 1 in 8.

Through the pre-app held on 31 July 2025- PRR00042916, confirmation of private/ public rubbish collection arrangement, vehicle tracking supporting the bin trucks, loading bay arrangement, D-area/ turntable area at road end are requested. However, no specific information is provided yet.

Public bins at JOALS are courtesy calls, and the same needs to be arranged with AC Waste Management. Vehicle tracking needs to be demonstrated without any overlap with any other design elements and

minimal turns (especially at the end of the road/ JOAL). Future residents need to be aware of the bin collection arrangement (especially if it's a public arrangement: bin collection point at JOALS). The truck movement needs to be reviewed with the gradient of access to ensure safe movement can be maintained.

Parking of heavy vehicles will block the vehicle crossing of the adjacent lot. Right to establish and maintain driveway- schedule 5, section 2c- ROW to be always kept clear. Considering the high rate of development, recommendations are to consider at least the JOALS with high dwelling counts and long vehicle access length for the provision of a loading bay.

As per the draft design, multiple locations (dead ends of public roads and JOALS) are noted with limited space for heavy vehicles to maneuver; hence, requested to provide a safe D-area/ turntable area. However, no details are provided, and I am not in a position to support the design effects unless the applicant provides more information through a full Integrated Transportation Assessment (ITA).

**7. Parking space details, vehicle tracking and Pickup- Dropoff facility (PUDO)**

Noted, no minimum parking spaces are required as per the Unitary Plan (NPS-UD). As per Designation Schedule - Minister of Education, 2 car parking spaces per new classroom or equivalent to be provided for schools, and 1 car parking space per 10 children + 1 per each FTE to be provided for preschools.

Through the pre-app held on 31 July 2025- PRR00042916, visitor parking details, any non-compliance with parking dimensions/ gradient, gate facilities, any 2° parking space between the garage door and the PA, Pickup/Dropoff facilities for educational facilities are requested. However, no specific information is provided yet.

Current documents haven't provided much information to check if there was any non-compliance with the parking arrangements, which are not mentioned in AEE. As no lighting designs, vehicle tracking and gradient information are provided, it will be difficult to review the design consisting of design clashes. If space is provided between the garage door and the PA (public footpath), this can be used for a potential 2° car parking space. A minimum 5.0m or recommended 5.4m spacing is required in this scenario to avoid any PA overlap and to improve inter-reaction / inter-visibility. Apart from that, requested to confirm if any gate facilities are proposed that create a queuing effect on the road or block the PA. Both will force pedestrians to use the live lane and expose them to an unsafe environment.

As multiple safety issues have been noted in the past years, an on-site PUDO service must be provided for educational facilities. As per E27, no limits for parking provision. However, activities like school, church etc. consist of high safety risk, where more kids (vulnerable users), senior citizens are involved. We need to make sure, a safe environment for the users. Specifically, we consider kids' safety at peak.

Hence, the above discussions are not to provide more parking but to provide safety for the children (parents picking and dropping their kids on site) and consider these issues to be more than minor.

However, no details are provided, and I am not in a position to support the design effects unless the applicant provides more information through a full Integrated Transportation Assessment (ITA).

In brief, the applicant noted all the previous discussion as per the pre-app held on 31 July 2025-PRR00042916 (pre-lodgment process) and intended to confirm as part of the detailed design to support a substantive application. I have provided comments as part of the pre-lodgment process and have no changes to my advice.

**6.0 Section 67 Information Gap**

**At the time of writing this Memo, I have identified the following information gaps:**

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
1. A full set of Integrated Transportation Assessment (ITA) covering the internal and wider effects and specific items outlined in section 5.0 of this specialist response	No specific information is provided at this stage. Noted, this is a referral application only. However, without receiving sufficient information, I'm not able to comment on anything further.	Cannot accurately assess the outcome of any traffic-related elements at this stage. Needs to be reviewed by AC upon receipt of the updated documents.	High.

## 7.0 Recommendation

From AC- TE point of view, the applicant had failed to provide any specific information to complete the assessment as identified in the previous stage. Hence, a decision to accept Waimauku West can't be made at this time.

If the application has been accepted by the decision makers, a full set of Integrated Transportation Assessment, including the potential effects, mitigation, and conditions, to be submitted to assess transport effects under the Fast-Track Approvals Act 2024.

## 8.0 Proposed Conditions

No conditions are provided by the applicant at this stage. However, request to provide any required conditions upfront for peer review on the basis of application acceptance.

## 9.0 Supporting Documents

NIL.

## Emma Chandler

---

**From:** Dylan Walton s 9(2)(a)  
**Sent:** Wednesday, 14 January 2026 10:51 am  
**To:** Emma Chandler  
**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input

**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to [HelpMe@itconfidence.co.nz](mailto:HelpMe@itconfidence.co.nz)

Hi Emma, I have reviewed the latest documentation and there is no change with respect to wastewater. There fore my previous comments stand.

Dylan

## Referral Application Feedback Form

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

### Respondent Information

Name: Dylan Walton

Role: Senior Wastewater Specialist (GWE Consulting)

Agency / Department: SWWITA

### Project Information

Project Name: Waimauku West FTAA-2508-1094 (PRR00043251)

### General Support or Opposition

Support

Oppose

Neutral

My answer is neutral

### Agency/Department Response

Having considered the s22 assessment criteria, please explain your position and provide any other relevant details.

I can only comment from a wastewater perspective. There is simply not enough wastewater information provided in the application for me to develop a position on whether the project will result in a significant regional or national benefit. It seems it will have benefits from a number of other perspectives (namely, increasing housing in the Auckland region), but I am neutral on whether the full benefits (or any) of this can be realised as wastewater treatment and disposal has not been described to the necessary depth in the application documents. In other words, it is not clear how wastewater handling will take place and what the effects of this will be. It could be that the impacts of the wastewater treatment and discharge outweigh the benefits of the scale of the development, or it may be that wastewater handling can be undertaken in an

appropriate and sustainable manner (and in accordance with relevant legislation), but there is currently no way to tell due to the lack of information.

### **Assessment Criteria (Section 22 FTAA)**

Please consider the below assessment criteria in preparing your response:

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

## **Technical Memorandum - Wastewater** **1060 State Highway 16, Waimauku West**

**High level review of referral application documents for Fast Track Application**  
Auckland Council

**TO:** Adonica Giborees, Auckland Council  
**FROM:** Dylan Walton, GWE Consulting Ltd

**REF:** FTAA-2508-1094  
**DATE:** 25 September 2025

---

This memorandum provides a high level assessment of wastewater discharge associated with a proposed new community comprising 1,500 to 2,020 dwellings. The applicant's name is Halberd Holdings Ltd. I have reviewed the documents provided to Auckland Council and the following are my comments:

- Nearly all information about wastewater treatment and disposal is provided in Section 4 of the Technical Memo titled "Civil Engineering Infrastructure Summary Memo" (by Crang Cibvil, dated August 18 2025), and given as Attachment 11 in the application documents.
- The applicant has confirmed that Watercare's position at this time is that there is no capacity in the public network to service the development.
- Wastewater treatment must therefore take place at the site (the northwest corner of the site has been mooted) and disposal must be either to land or surface water.
- If wastewater treatment and disposal were to take place to land on-site, then a very large area will need to allocated be needed for disposal – likely dozens of hectares. This likely areal requirement has not been shown as being available on the Masterplan (given as Figure 2 in the Memorandum titled "Planning Memorandum for Waimauku West" by Barker and Associates, dated 18 August 2025).
- If disposal is to land then the soakage characteristics and proximity to key features like streams, groundwater, bores, wetlands etc will need to be considered, as will public health risks.
- Wherever treated wastewater is discharged then a comprehensive AEE will be required eg ecological studies, public health, a Best Practicable Option study etc. These can be time consuming and costly.
- Regarding the previous two points, the objectives and policies of all relevant regulation will also need to be addressed eg The Auckland Unitary Plan, The National Policy Statement for Freshwater Management, The National Environmental Standards for Freshwater, the Resource Management Act (or replacement) etc.
- I note that the proposed national wastewater environmental performance standards are in circulation, though not yet finalised. These provide limits for contaminants when

discharging to water, and are not currently operable. But they may be by the time application is made, and the applicant is advised to monitor the status of the standards.

- No information about the level of treatment to be provided, nor the final discharge location have been provided at this stage. Consequently, an assessment of the effects of the discharge has not been provided by the applicant. I cannot therefore provide any assessment (even at a very high level) at this stage of the impact of any discharge.

## **LIMITATIONS**

### **General:**

This report has been prepared for the sole benefit of **Auckland Council** as our Client, and their appointed representatives, according to their instructions, for the specific objectives described herein. This report is qualified in its entirety and should be considered in the light of our Terms of Engagement with the Client and the following:

- a. Data or opinions contained within the report may not be used in other contexts or for any other purpose without our prior review and written agreement. Any reliance will be at the parties' sole risk.
- b. No responsibility is assumed for inaccuracies in reporting by the information providers. In no event, regardless of whether GWE's consent has been provided, does GWE accept any liability, whether directly or indirectly, for any liability or loss suffered or incurred by any third party to whom this report is disclosed placing any reliance on this report, in part or in full.
- c. GWE has relied on information provided by the Client and by third parties to produce this document and arrive at its conclusions. GWE has not verified information provided (unless specifically noted otherwise) and we assume no responsibility and make no representations with respect to the adequacy, accuracy, or completeness of such information.

### **Prepared by:**



Dylan Walton  
Senio Wastewater Engineer

## Emma Chandler

---

**From:** Dani Guinto s 9(2)(a)  
**Sent:** Monday, 12 January 2026 4:44 pm  
**To:** Emma Chandler  
**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input

**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to HelpMe@itconfidence.co.nz

Hi Emma,

Thanks for your message. My original comments on this application still stands as I have not made any assessment of the solar farm component of the project that is now being removed.

Regards,

Dani

**Dani Guinto, PhD [he/him] | Senior Land & Soil Scientist | Mātanga Pūtaiao Matua – Whenua me te Oneone**

Air, Land & Biodiversity

Environmental Evaluation & Monitoring Unit | Te Wāhanga mō te Arotake me te Aroturuki i te Taiao

Auckland Council | Te Kaunihera o Tāmaki Makaurau

Level 18, 135 Albert Street, Auckland 1010

s 9(2)(a) s 9(2)(a)

## Referral Application Feedback Form

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

### Respondent Information

Name: Dani Guinto

Role: Senior Land and Soil Scientist

Agency / Department: Environmental Evaluation and Monitoring Unit, Auckland Council

### Project Information

Project Name: Waimauku West

### General Support or Opposition

- Support
- Oppose X
- Neutral

### Agency/Department Response

Having considered the s22 assessment criteria, please explain your position and provide any other relevant details.

Please see commentary below. While the proposed residential development addresses New Zealand's housing crisis, it will contribute to the loss of a significant area of highly productive land in Auckland that the National Policy Statement for Highly Productive Land (NPS-HPL) 2022 (amended 2024) aims to protect from non-primary production uses to ensure primary production in the country continues now and in the future. Loss of highly productive land is generally irreversible. As land is lost to urbanisation and other non-farming activities, our ability to produce food and protect agri-environmental resources not only becomes limited but we will also lose other essential ecosystem services provided by soils. The more evident impacts will be on food and biomass provision (food security), water regulation, biodiversity and the reduction of carbon sequestration. This calls for limiting residential development to non-highly productive land areas to fulfill the intent of the NPS-HPL.

## **Assessment Criteria (Section 22 FTAA)**

Please consider the below assessment criteria in preparing your response:

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

## **Comments on proposed residential subdivision development at 1080 State Highway 16, Waimauku**

### **Background**

A request has been made to provide a high-level commentary on a premium resource consent application [FTAA-2508-1094 (PRR00043251)] for a proposed residential subdivision development at 1080 State Highway 16, Waimauku by Halberd Holdings Limited (HHL) which engaged Barker & Associates (B&A) to provide planning services for the master planning, consenting and design of Waimauku West. Waimauku West is located approximately 31.5 km north-west of Auckland CBD and 4 km west of Huapai. Waimauku West is a proposed new residential community that will form an extension of the existing Waimauku settlement (Barker and Associates Ltd., 2025). The online New Zealand Land Resource Inventory (NZLRI) land use capability (LUC) classification maps have classified the site as containing a significant area of LUC class 3 land which is considered highly productive land (HPL) so that the proposed development site is subject to the National Policy Statement for Highly Productive Land (NPS-HPL).

### **NZLRI LUC map and the Environment Court's Blue Grass decision**

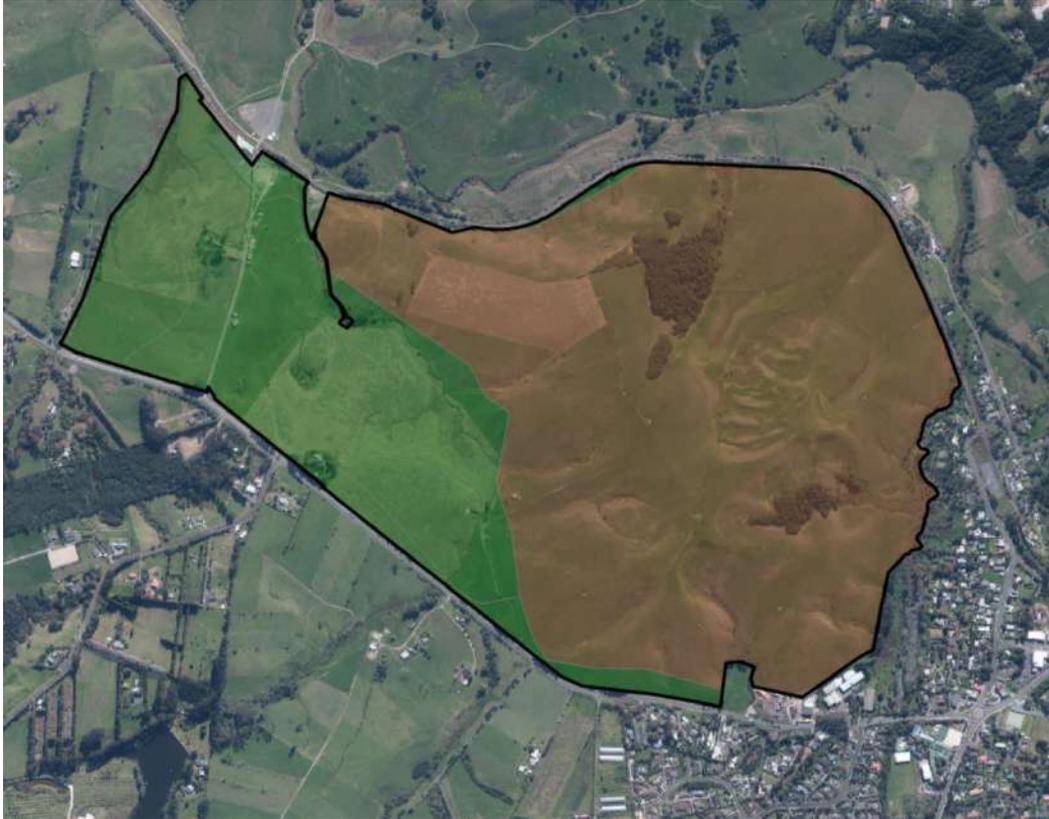
Figure 1 shows the LUC classification of the project site according to the NZLRI. According to the recent Environment Court's decision on Blue Grass Limited vs Dunedin City Council ([2024] NZEnvC 083), during the interim period when the NPS-HPL came into effect and updated mapping of HPL has not yet been completed by regional and unitary councils, the NZLRI LUC map remains as the definitive map that defines HPL (LUC classes 1 to 3) at a given site and site-specific mapping cannot be used to modify those classifications. If the Blue Grass decision is used and the one that prevails as the method for mapping the extent of HPL in the proposed project site, some 62 ha of LUC land needs to be protected from inappropriate land use such as a residential subdivision so that this remains to be available for primary production use now and in the future. This means that the larger area of about 134 ha on the eastern part of the property that contains non-HPL (LUC4) is available for residential subdivision development.

### **Site-specific soil/LUC mapping**

Despite the above, Hanmore Land Management Ltd was engaged by the developer/applicant to do a site-specific soil/LUC mapping of the proposed project site. Hanmore (2025) has shown that the total area of HPL is much smaller than the NZLRI LUC map amounting to only 19.5 ha consisting of 0.4 ha of 3e3, 12.1 ha of 3e5, 0.3 ha of 3w1 and 6.7 ha of 3s4 (Figure 2).

### **Indicative uses of HPL areas in the Master Plan**

Areas of HPL from Figure 2 have been numbered from 1 to 10 and their indicative uses based on the Master Plan are shown in Table 1. In my opinion, the Master Plan should take these areas into account to avoid these areas, particularly the larger polygons like Nos. 2, 3, 4, 6 and 7, for residential development use. As it currently stands in the Master Plan, these HPL areas are planned for light industrial area, wastewater treatment plant, school, and neighbourhood centres, respectively. There should be some flexibility in the Master Plan to avoid inappropriate use and subdivision of HPL in accordance with the NPS-HPL.



**Figure 1.** LUC classification according to the NZLRI (Original map scale 1:50,000). Green is 3e5 (62 ha) and brown is 4e9 (135 ha) (From Hanmore, 2025). LUC 3e5 is considered HPL.



**Figure 2.** HPL areas (LUC 3) labelled 1 to 10 from west to east of the proposed project site based on Hanmore's site-specific HPL map (2025). (Reported scale 1:7,000 on A3 paper).

**Table 1.** HPL area numbers from Figure 2 and their corresponding indicative use in the Master Plan.

HPL Area No.	Indicative use in Master Plan
1	Potential on-site wastewater treatment plant
2	Light industrial area
3	Potential on-site wastewater treatment plant
4	Potential school location
5	Riparian enhancement and on-site stormwater management
6	Neighbourhood centre
7	Neighbourhood centre
8	Riparian enhancement and on-site stormwater management
9	Riparian enhancement and on-site stormwater management
10	Neighbourhood centre

### References

Barker and Associates Ltd. 2025. Planning memorandum, 18 August 2025

Hanmore, I. 2025. Soil and Resource Report for 1080 State Highway 16, Waimauku. Hanmore Land Management, Whangarei, 28 February 2025.

Ministry for the Environment and Ministry for Primary Industries. 2022. National policy statement for highly productive land 2022 (amended August 2024).

<https://environment.govt.nz/publications/national-policy-statement-for-highly-productive-land-2022-amended-august-2024/>

**Prepared by:** Dani Guinto, Environmental Evaluation and Monitoring Unit (EEMU), Auckland Council, September 2025

**Time spent:** 2.5 hours

## Referral Application Feedback Form

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

### Respondent Information

Name: Naz Tavasoli

Role: Freshwater Specialist

Agency / Department: Earthworks, Streamworks & Trees Team – Resource Consents

### Project Information

Project Name: **Waimauku West**

### General Support or Opposition

- Support
- Oppose
- Neutral

### Agency/Department Response

I, Naz Tavasoli, Freshwater Specialist from the Earthworks, Streamworks & Trees Team, have reviewed relevant document provided in support of the proposed development submitted as part of the Fast-Track application (Waimauku West - FTAA-2508-1094 (PRR00043251)).

I acknowledge that the information provided is not a full substantive application, however, I have concerns surrounding whether the project will address significant environmental issues. This is regarding the lack of wetland delineation data and descriptions of the activities provided which may impact wetlands and associated assessment of effects.

I note that with careful planning, it is possible to develop around the wetlands and avoid or minimise ecological impacts. However, significantly more detail is required and must be addressed in the full application if the referral application is accepted.

## Aquatic Ecology Response

The applicant has identified wetlands and streams on the site, noting that most are degraded, with some higher-quality habitats in the east and northeast. Proposed activities include earthworks and discharges within 100 m of wetlands, with an intent to maintain hydrological function and mitigate indirect effects such as sedimentation through best-practice controls. If impacts are unavoidable, the NES-FW effects management hierarchy is proposed. The draft master plan incorporates key ecological features, with detailed mitigation to be addressed at later consent stages.

However, the application lacks critical information needed for a robust assessment of freshwater effects. No detailed description of potential activities (e.g., earthwork proposed within the wetland or adjacent to wetland), impact assessment, or management plan has been provided for site freshwater features.

- **Activity details:** No clear description of proposed earthworks or other activities within or adjacent to wetlands and streams has been provided.
- **Impact assessment:** No comprehensive assessment of potential effects on freshwater features has been undertaken.
- **Effects management plan:** No effects management plan demonstrating how the NES-FW effects management hierarchy will be applied has been submitted.
- **Regulatory compliance:** The potential for non-compliance with the NES-FW exists. For example, wetland reclamation or drainage associated with new or upgraded crossings may constitute a prohibited activity under Regulation 53, and Regulation 45C does not apply as the site is not zoned Urban. The applicant must demonstrate how proposed works avoid triggering prohibited activity status.
- **Ecological data:** Supporting data such as vegetation plots, soil and hydrology analyses, and SEV assessments are not provided.
- **Master plan limitations:** Streams are not shown, and the required 10 m riparian zone, 10m m and 100 m wetland setback/offset areas are not indicated. The extent of proposed earthworks is also not specified, preventing assessment of potential impacts.
- **Sediment and erosion control plan:** While best-practice guidelines are referenced, no plan is included to demonstrate how earthworks will be managed within or near freshwater features.
- **Road crossings:** A proposed road crossing through a wetland lacks details on design (e.g., bridge, culvert, or reclamation) or the potential area of wetland affected.
- **Reclamation / loss of extent and value:** No detailed information is provided regarding potential reclamation, including location, area, ecological value, or application of the effects management hierarchy. Loss of stream and wetland extent or ecological value has not been addressed.
- **Western wetland network:** A large wetland network on the western side of the site, encompassing countryside living areas, light industrial zones, and the WWTP, lacks detail on proposed activities, potential effects, and management measures.

Additionally, a further key concern is potential non-compliance with the National Environmental Standards for Freshwater (NES-FW), wetland reclamation or drainage associated with new or upgraded crossings may be a prohibited activity under Regulation 53, and Regulation 45C does not apply because the site is not zoned Urban. As prohibited activities cannot be considered, the applicant must

demonstrate how any proposed works, particularly reclamation or drainage, will avoid triggering prohibited activity status.

Overall, the ecological assessment lacks sufficient detail to determine potential effects or confirm consent requirements under the NES-FW and the Auckland Unitary Plan (AUP) Chapter E3 provisions. To enable a full and accurate evaluation of potential adverse effects and compliance obligations, the applicant must:

- Confirm detailed activities proposed within and adjacent to natural inland wetlands and streams.
- Provide a comprehensive impact assessment of the proposed activities.
- Submit a detailed impact management plan that follows the effects management hierarchy.
- Provide relevant regulatory assessment in relation to NES-FW and AUP Chapter E3.

### Examples of information gaps

The following significant information is lacking and is required to complete a robust assessment of freshwater effects:

- A general wetland delineation is described, but no supporting data to peer review and confirm wetland extent —such as vegetation plots and their locations, or soil and hydrology analyses— has been provided.
- The master plan does not show streams or indicate the required 10 m and 100 m wetland setback/offset areas.
- The extent of proposed earthworks is not provided, preventing assessment of potential impacts on natural inland wetlands and streams. Although best-practice guidelines are referenced, no sediment and erosion control plan is included to demonstrate how earthworks within or near these features will be managed.
- Where direct discharges to streams or wetlands may occur, no information is provided on treatment or control measures.
- The master plan shows a road crossing through a wetland, but provide no details on the design (e.g., bridge, culvert, or reclamation) or the potential area of wetland and stream that may be affected (see photo below).



- There is no detailed information regarding potential reclamation (location, area X<sup>2</sup>, potential value of the stream or wetland), and no ecological data (e.g., SEV) or effects management

hierarchy and regulatory assessment have been provided or discussed. The ecology report loss of both the extent and ecological value of the stream and wetland has not been addressed.

- A large wetland network is located on the western side of the site, encompassing countryside living areas, light industrial zones, and the WWTP. However, no details are provided on the proposed activities or structures within this area, their potential effects, or how impacts will be managed (see photo below).



Without this information, residual adverse effects cannot be fully assessed, and regulatory requirements cannot be confirmed.

## Proposed Solar Farm

The proposed solar farm to the north of the site has only been assessed via a preliminary desktop study. No ecological features, values, or potential impacts have been formally assessed. No freshwater features have been identified or mapped, and no effects management plan has been provided. There is no information on the nature or location of activities within or adjacent to the solar farm footprint, or how potential effects on wetlands and streams will be addressed.

Without this information, it is not possible to fully assess potential residual adverse effects on natural inland wetlands and streams or to confirm compliance with regulatory requirements. A comprehensive ecological assessment and detailed effects management plan must be provided, including:

- Detailed description of proposed activities within and adjacent to freshwater features.
- Comprehensive impact assessment of these activities.
- Detailed effects management plan following the NES-FW effects management hierarchy.
- Regulatory assessment against NES-FW and AUP Chapter E3 requirements.

Overall, the referral application lacks sufficient information and demonstrates a significant deficiency in detail regarding freshwater features in relation to the proposed development. A significant amount of additional work and reporting is required by the applicant.

## Emma Chandler

---

**From:** Luke Stanley s 9(2)(a)  
**Sent:** Monday, 15 December 2025 4:53 pm  
**To:** Emma Chandler  
**Cc:** Adonica Giborees  
**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input

**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to [HelpMe@itconfidence.co.nz](mailto:HelpMe@itconfidence.co.nz)

Hi Emma,

The only changes noted in the plans and ecological memo relate to the removal of the solar farm. My previous advice and recommendations remain the same.

Ngā mihi | Kind regards

**Luke Stanley | Ecology Specialist**

**Ecological Advice, Environmental Services**

Auckland Council | Te Kauniwhera o Tāmaki Makaurau

Level 19, Auckland House, 135 Albert Street, Auckland

[aucklandcouncil.govt.nz](http://aucklandcouncil.govt.nz)

## Referral Application Feedback Form

### Respondent Information

Name: Luke Stanley

Role: Ecologist

Department: Ecological Advice

### Project Information

Project Name: Waimauku West

FTAA-2508-1094 (PRR00043251)

### General Support or Opposition

- Support  
 Oppose  
 Neutral

My opinion remains neutral at this time as I do not have sufficient information to assess the effects.

### Documents Reviewed

- Waimauku West Fast Track Referral Application Covering Letter prepared by B&A, dated 17/08/2025
- Referral Application Form, prepared by B&A, undated.
- Preliminary Ecological Assessment, prepared by Viridis, dated 29/07/2025. [EcIA]
- Urban Design Statement, prepared by B&A, dated 14/08/2025.
- Planning Memorandum, prepared by B&A, dated 18/08/2025.

### Agency/Department Response

#### Existing Environment

The site is outside the rural urban boundary (RUB), contains Significant Ecological Areas (SEAs), wetlands and streams. Provided fauna and flora assessments appear to be taken from desktop assessments and site visits, without qualitative and quantitative survey work undertaken.

Proposed SEA, riparian and wetland buffer planting is generally in line with at least minimum expected outcomes in an area where urbanisation is occurring.

### Potential Effects

#### Fauna and Flora

No qualitative and quantitative survey work appears to have been undertaken on flora and fauna. As the site is outside the RUB, development has not been anticipated in the Auckland Unitary Plan in this area. An appropriate level of fauna and flora survey is recommended to be undertaken to identify what is there and how it will respond positively where development is proposed. For example, it has been acknowledged that the Australian bittern (nationally critical) has been observed at nearby sites. Long tailed bats have also been recorded within 10km of the site and habitat exists for them onsite. Both species could be affected by the proposed development. Effects on fauna are not just limited to construction, and effects of urbanisation should be considered, including effects of pets, light and noise. It should be demonstrated how the proposed development is responding to the values identified on the site and managing the effects of development, especially in reference to the objectives and policies and subparts of relevant statutory documents including , but not limited to:

- The National Policy Statement for Indigenous Biodiversity (NPSIB) 2.1(1)(a), 2.2, 3.16(1)(2), 3.20, 3.21), 3.22.
- The National Policy Statement for Fresh Water (NPSFM) 2.1, 2.2 (P3,5,6,7,13).
- Auckland Unitary Plan (AUP) E15.2(1,2), E5.3(1,2)

Fauna and flora surveys cannot be undertaken as a condition of consent and information should be provided at the application stage.

It has been acknowledged that if relocation of lizards is required then a Wildlife Act Authority (permit) will be required.

#### Streams

Streams onsite are proposed to have 10m riparian margin planting and covenanting undertaken, except some areas (e.g. crossings). I am supportive of the riparian planting. Consideration of the increased runoff and the likely resultant geomorphological changes from new impervious surfaces should be provided, to which I defer to the appropriate specialist(s). Increasing the riparian margin buffers is one way for this to be managed, to allow for channel movement over time and erosion. Any reduction in riparian margins through roads or other development should be managed through the effects management hierarchy.

#### Wetlands

Consent: Waimauku West, FTAA-2508-1094 (PRR00043251)  
Address: 1060 State Highway 16, Waimauku

The Illustrative Master Plan in the Urban Design Statement shows potential reclamation of wetlands for roads and potentially for residential sites. This would be a prohibited activity under Rule 53 of the National Environmental Standards for Freshwater (NESFW) and would likely trigger Rule 54 as a non-complying activity for vegetation clearance. The proposal includes planting and covenanting of buffers for wetlands (EclA, p6) which I am supportive of, but this excludes some areas (e.g. crossings). Any areas within 10m of a wetland which will be permanently affected should have suitable justification, be quantified and managed through the effects management hierarchy. Consideration and robust justification of the provision of an effective buffer width to the wetlands should be undertaken and provided for review, especially for wetland values and potential effects and management of urbanisation on indigenous fauna.

### SEAs

The application includes covenanting SEA areas and vegetation meeting SEA criteria which I am supportive of. Clarification of areas (including any wetlands) that meet SEA criteria should be provided. The EclA has only identified indigenous vegetation as potential SEA. However, indigenous dominated wetland would also meet SEA factor criteria as significant, irrespective of size. The EclA has not demonstrated which factors the indigenous vegetation has met, therefore I am unable to agree with the potential significance.

As some of the SEAs onsite are isolated and relatively small, providing additional buffer planting should be considered to mitigate the potential effects of development, to reduce/prevent edge effects, provide resilience to the forest ecosystem, and restore and enhance these areas as per 3.21 of the NPSIB, E15 and D9 of the AUP. Effects of urbanisation including disturbances such as lighting, pets and noise should be considered.

### Potential triggers not identified in the application documents

- Depending on final layout, under the National Environmental Standards for Freshwater, Rule 54 could be triggered for vegetation clearance within, or within a 10 m setback from, a natural inland wetland as a Non-complying activity
- Depending on final layout, and vegetation proposed to be removed, under the Auckland Unitary Plan,
  - Rule E15.4.1(A17) could be triggered for vegetation alteration or removal within 10m of rural streams in the Rural – Rural Production Zone and Rural – Mixed Rural Zone, as a restricted discretionary activity
  - Rule E15.4.1(A18) could be triggered for vegetation alteration or removal within 20m of a natural wetland, in the bed of a river or stream (permanent or intermittent), or lake as a restricted discretionary activity.
  - Rule E15.4.2(A43) could be triggered for any vegetation alteration or removal not otherwise provided for as a discretionary activity.

## Recommendations

- Qualitative and quantitative fauna and flora assessments be undertaken prior to application being lodged, and demonstration of how impacts from construction through to developed stages will be managed through the effects management hierarchy.
- Fauna, planting and covenant management plans be provided at the application stage for adequate review. Inclusion of who will be responsible for planting and covenant management and how this will be implemented effectively is recommended.
- Identification and delineation of all wetlands and streams onsite be undertaken, effects identified and managed through the effects management hierarchy. (Note to planner: this is likely to be addressed by the Earth Streams and Trees team).
- SEAs, streams and wetlands are buffered with appropriate planting and covenanting.
- Demonstration be provided of how ecosystem services and biological diversity values are maintained and enhanced

**Memo prepared by:**



**Luke Stanley | Ecologist**  
**Ecological Advice Team | Environmental Services**  
**Date: 29/09/2025**

## **Assessment Criteria (Section 22 FTAA)**

Please consider the below assessment criteria in preparing your response:

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

## Emma Chandler

---

**From:** Andreas Lilley s 9(2)(a)  
**Sent:** Wednesday, 14 January 2026 11:56 am  
**To:** Emma Chandler  
**Cc:** Adonica Giborees  
**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input  
**Attachments:** PRR00043251 - Parks Memo FT Referral Final release.pdf  
  
**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to [HelpMe@itconfidence.co.nz](mailto:HelpMe@itconfidence.co.nz)

Hello Emma

I have reviewed the application information and cross referenced with the previous application materials and our Parks Planning memo dated 26/09/2025 which was released for the withdrawn FTAA referral PRR00043251. I note the following in regard to the relevant application materials provided for this new application PRR00043580:

- **Planning Memorandum – Barker & Associates.**  
The previous version we assessed dated 18 August 2025 has been updated as of 13/11/2025, but contains no new information regarding open space matters.
- **Urban Design Statement – Waimauku Masterplan, Barker & Associates**  
The previous version we assessed dated 14 August 2025 has been updated as of 12/11/2025, but contains no new information regarding open space matters. The proposed open space provision is still light on detail, with the illustrative masterplan continuing to indicate two potential neighbourhood park locations as per the withdrawn application. The proposed connectivity masterplan for the site remains as per the previous version which we had assessed.
- **Preliminary Stormwater Management plan – GHD**  
The previous version we assessed dated 18 August 2025 has been updated as of 12/11/2025, but contains no new information regarding open space matters.
- **Preliminary Ecological Assessment – Viridis**  
The previous version we assessed dated 29 July 2025 has been updated as of 12/11/2025, but contains no new information regarding open space matters.
- **Landscape Memorandum, Bridget Gilbert Landscape Architecture.**  
This assessment dated 28 May 2025 has not been updated since our last review.
- **Civil Engineering Infrastructure Summary Memo, Crang Civil**  
The previous version we assessed dated 18 August 2025 has been updated as of 12/11/2025, but contains no new information regarding open space matters.
- **Waimauku West Consultation Record – Barker & Associates**  
No change to this document and no new information regarding open space matters.

Therefore, our Parks Planning feedback memo dated 26/09/2025 that was provided for the previous PRR00043251 is still valid and would be sufficient at this stage for this relodged PRR00043580. Our previous advice remains valid until we have further information to assess at the substantive stage. Hester has reviewed my summary and confirms my advice can be provided to you.

If you have any questions in the meantime, please let me know or [parksconsent@aklc.govt.nz](mailto:parksconsent@aklc.govt.nz).

Kind regards  
Andreas

**Andreas Lilley**

Parks Planning Consultant to Auckland Council

s 9(2)(a)

[mckenzielilley.co.nz](http://mckenzielilley.co.nz)



**MCKENZIE LILLEY PLANNING**

**26 September 2025**

## **Referral Application Feedback Form**

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

### **Respondent Information**

Name: Andreas Lilley

Role: Consultant Parks Planner

Agency / Department: Parks & Community Facilities

### **Project Information**

Project Name: Waimauku West - FTAA-2508-1094

### **General Support or Opposition**

Support

Oppose

Neutral

### **Agency/Department Response**

Having considered the s22 assessment criteria, please explain your position and provide any other relevant details.

### **Referral Application Information Reviewed**

- Planning Memorandum – Barker & Associates, 18 August 2025
- Urban Design Statement – Waimauku Masterplan, Barker & Associates, 14 August 2025
- Preliminary Stormwater Management plan – GHD, 18 August 2025
- Preliminary Ecological Assessment – Viridis, 29 July 2025
- Landscape Memorandum, Bridget Gilbert Landscape Architecture, 28 May 2025
- Civil Engineering Infrastructure Summary Memo, Crang Civil, 18 August 2025
- Waimauku West Consultation Record – Barker & Associates

## Assessment Criteria (Section 22 FTAA)

Please consider the assessment criteria below in preparing your response:

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

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

- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?  
*Yes. The provision of two neighbourhood parks would be consistent with the Manaaki Tamaki Makaurau: Auckland open space, sport and recreation strategy (May 2025).*
- Are there any other relevant matters to consider?  
*Yes. Further comments are provided below from Parks and Community Facilities.*



Figure 1: Waimauku West Master Plan layout provided by Barker & Associates

Thank-you for your request for specialist input from the Parks Planning team representing the wider Parks & Community Facilities Department for this referral application under the Fast-track Approvals Act 2024 (FTAA). The following comments are provided at a high-level only and reflect the limited detail supplied in the referral request in relation to public open space matters. Where still relevant, feedback has largely been drawn from the previous Parks Planning pre-application guidance provided for PRR00042916 in July 2025. It is anticipated that if the application is accepted for referral under the FTAA that more detail will have to be provided for substantive assessment.

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

- Allan Christensen, Manager - Land Advisory Services – Land and Property Advisory – Property

- Rahman Bashir, Principal Property Provision Specialist, Land and Property Advisory - Property
- Matt Woodside, Parks & Places Specialist, Special Operations – Parks & Community Facilities

### **Open Space Provision**

- The provision of public open space is guided by the Manaaki Tamaki Makaurau: Auckland open space, sport and recreation strategy (May 2025). Please refer to this strategy for further guidance on the provision of open space outcomes within the masterplan area.
- The council has not anticipated that the site will be developed, and no development contributions have been collected to fund open space on the site and no capital or operational funding has been forecast to be spent in this location.
- The masterplan concept provided for the referral process indicates extensive areas of open space throughout the development alongside riparian margins and natural wetlands but is otherwise silent on the wider open space provision strategy for the development. For instance, no information is provided on what land is proposed to be provided for stormwater drainage, which is to be wetland, and which is to be public open space as neighbourhood parks. Given the lack of intent in the documents on the open space areas, to vest or otherwise, and on any expected land to acquire, and the actual land areas or quantum proposed, providing detailed comment is difficult at this stage.
- Any land used primarily for stormwater management purposes would not be acquired by council for neighbourhood park purposes. Vesting of such land would be for Healthy Waters to confirm.
- The integration of green infrastructure land and recreational areas using landscaping, path networks, and terrain is supported by the policy documents, particularly the Manaaki Tamaki Makaurau: Auckland open space, sport and recreation strategy (May 2025). Exploring opportunities to consider how this land can incorporate informal recreation opportunities is encouraged. The leveraging of pedestrian movement patterns through the extensive green corridors between the formal neighbourhood parks is encouraged and is indicated at a high level on the connectivity concept plan which is supported.
- However, drainage reserves are not appropriate mechanisms to meet formal neighbourhood park provision to enable public recreation and community infrastructure. Drainage reserves will not be appropriate for this purpose or consistent with the variety of community uses that should locate on it or any leasing requirements for future community facilities and infrastructure.



**2.6 Connectivity**

A central "Primary Collector Road" is proposed to run through the spine of the development and provide vehicular connection points to SH16. This route would be designed to support public transport routes to and from the site and provides a link to several key destinations within the site. The Masterplan also provides for two "Secondary Collector Roads" which may accommodate greater levels of vehicle movements and could benefit from segregated cycling provision. In addition to these key roads identified, there are several important off-road pedestrian and cycling connections proposed through the site along riparian corridors and to provide access to the existing Waimauku Village. These routes generally converge in the proposed location of the neighbourhood centre, located centrally within the site.

Figure 2: Neighbourhood park provision layout provided by Barker & Associates

- The assessment undertaken by council’s specialist indicates the requirement for **two** neighbourhood parks within the masterplan area based on radial proxies applied to the proposed densities (noting the residential densities provided do not all neatly align with the AUP zoning). The masterplan shown above indicates two neighbourhood parks which is supported; however, the specific location of these parks requires further consideration in the context of legibility and accessibility. If substantial areas are proposed as drainage reserves providing connectivity corridors within these alternative green assets, the opportunity is presented to provide more deliberate interfaces with neighbourhood parks.
- Acquisition of neighbourhood parks by council will be subject to local board approval. No specific comments are available currently on community infrastructure provision such as playgrounds and sports fields to supplement the existing recreation assets within the existing Waimauku township and wider north-west locality. This requires specific modelling and investigation to establish the appropriate service provision to ensure the community envisaged by this development is provided with the necessary amenity envisaged for this scale of development.
- It is noted that under s239 of the RMA any reserve land to be vested in Council will need to be free from encumbrances, of which any covenant or protection mechanism over an SEA area would be. It is considered that covenanted areas stay within private ownership.
- In regard to the provision of neighbourhood parks in a proposal lodged for approval under the Fast Track consenting process, should clarify the extent of any flood plains, area and delineation of proposed neighbourhood parks to fulfil its purpose.

## Greenways

- The Rodney West Local Paths (Greenways) Plan (June 2019) identifies an Express Path – Open Space running parallel with the northern side of the North Auckland Rail Line which adjoins the site. This aspirational greenway connection provides an important link with the Waimauku township to the south-east. The masterplan indicates a network of pedestrian / cycling links throughout the development which is supported but careful consideration should be given to how internal networks can provide logical connections to the greenways route.
- A greenway that can be easily accessed by this community would be beneficial, without the barrier of having to cross the railway lines for access.

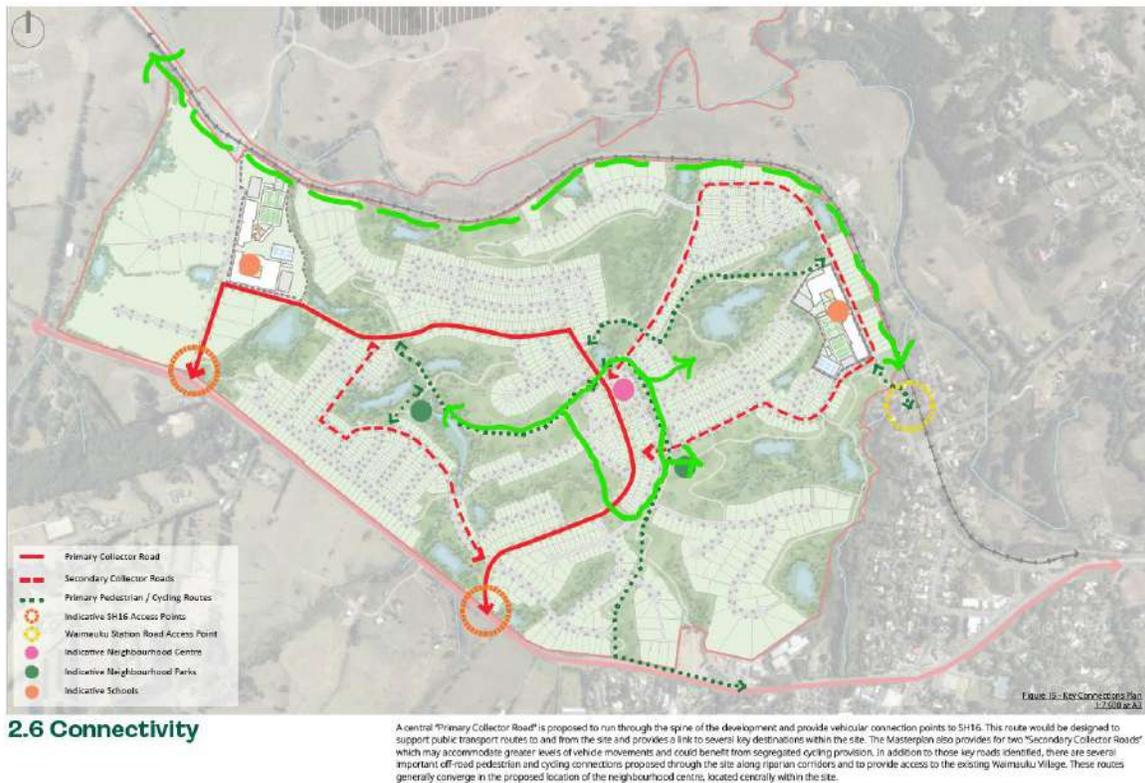


Figure 3: Connectivity layout provided by Barker & Associates with additional mark-up in green

- Integrating public connectivity opportunities is encouraged throughout the development via shared pathways adjoining road networks or within riparian margins / esplanade reserves.

## Esplanade Reserve Provision

- Vesting of a full 20 metre esplanade reserve width would be expected with the application where streams qualify under s230 RMA that must be supported by survey information to demonstrate the stream width.
- Land beyond the 20 metres width for vesting as esplanade reserve is unlikely to be supported.

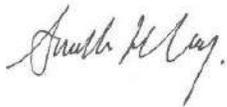
**Street Landscaping**

- No detail is provided on typical road cross sections and street landscaping. Landscape concept plans will be required to ensure intended outcomes are achieved where the width of the road reserve berms is sufficient to accommodate street trees and required infrastructure.

Please note that the above is initial advice only and is based on the limited plans and information presented at this FTAA referral stage. The above is not a final specialist memo, **and does not constitute written approval.**

If you have any queries or questions relating to the above request, please do not hesitate to contact me on s 9(2)(a) or the Parks Planning Team [parkscsent@aucklandcouncil.govt.nz](mailto:parkscsent@aucklandcouncil.govt.nz)

Kind regards,



Assessment prepared by: Andreas Lilley  
Consultant Parks Planner  
Parks Planning Team  
Parks and Community Facilities  
Auckland Council



Parks Agency Lead Release: Hester Gerber  
Manager Parks Planning  
Parks and Community Facilities

## Emma Chandler

---

**From:** Oliver May s 9(2)(a)  
**Sent:** Monday, 15 December 2025 4:45 pm  
**To:** Adonica Giborees; Emma Chandler; Urban Design; Samuel Holmes; Development Planning West (AT); Mark Iszard; Matthew Richards (AT); Debbie Philp; Anna Jennings; SLawton (Shane); Parks Consent; Land Advisors; Allan Christensen; Karen Foster; Ian Kloppers; Laura Scaife; Sian Farrell; Unitary Plan; Claire Gray; David Hawkey; CANconsents; SWWWITA; ESandTSpecialistUnit; Heritage Consents; Henderson Subdivision; Ecological Advice; James Stewart; s 9(2)(a)  
**Cc:** RC Consultants; Philips Augustine; Tessa Craig; Hillary Johnston; Mereene Mathew; Hester Gerber; Ben Willis; Eva Zombori; Martin Meyer; Annika Swanberg; ATaylor (Amber) 1; Duffy Visser; Dylan Walton; Naz Tavasoli; Hester Hoogenboezem; Matt Riley; Ravinesh Chand; Nicholas Simpson; Andreas Lilley; Andrew Kalbarczyk; Matt Byrne; Luke Stanley; Dani Guinto  
**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input  
**Categories:** Waimauku FTAA - Referral 2

You don't often get email from s 9(2)(a) [Learn why this is important](#)

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to [HelpMe@itconfidence.co.nz](mailto:HelpMe@itconfidence.co.nz)

Kia ora Adonica

Regarding the potential landscape and visual effects, it is my understanding that “Attachment 5 Urban Design Statement” and “Attachment 14 Landscaping Memorandum” have not been updated since the since the previous submission. In this instance, my previous advice and recommendations remain the same.

Ngā mihi nui

**Oliver May** | Landscape Planner | Associate Principal | NZILA Registered Landscape Architect

E: s 9(2)(a) | LEVEL 3 | 82 WYNDHAM STREET | AUCKLAND 1010 | NEW ZEALAND

---

**BOFFA  
MISKELL**

**VISIT OUR >** [Website](#) | [LinkedIn](#) | [Facebook](#) | [Instagram](#)

WHANGĀREI | AUCKLAND | HAMILTON | TAURANGA | WELLINGTON | NELSON |  
CHRISTCHURCH | QUEENSTOWN | DUNEDIN

Boffa Miskell is proudly a Toitū net carbonzero® certified consultancy, [learn more>](#)

---

24 September 2025

Dear Adonica Giborees

Thank you for the opportunity to review the pre-application proposal for the Waimauku West masterplan comprising:

Stage 1 – 1500-2020 dwellings, neighbourhood centre, public open space and stormwater management, light industrial area, and associated infrastructure.

Stage 2 – Solar farm.

Further to the information provided on 17 September, please find below my comments regarding landscape character, visual amenity and natural character effects for inclusion in the pre-application meeting minutes:

- In 2.2 the memo it is stated that the *“absence of ‘landscape’ or ‘viewshaft’ overlays along with the close proximity to an established settlement and transport links, make this area well suited to urban development from a landscape perspective”*. Potentially this criteria would apply to a large area of rural productive land in Auckland and would need to be more specific to why this site in particular is suitable to be urbanised.
- Further details is required on how the landscape design will work with the management of urban runoff and the flooding overlays
- Further detail is required for the proposed controls and requirements of the proposed buffer planting to the northern and western boundaries of the site and SH16 and the proposed light industrial area to the west.
- Will the landscape effects assessment also assess the potential effects related to the proposed Stage 2 solar farm?

---

## Referral Application Feedback Form

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

### Respondent Information

Name: Oliver May

Role: Landscape Architect / Landscape Planner peer review

Agency / Department: Landscape

### Project Information

Project Name: FAST-TRACK Referral: Waimauku West - FTAA-2508-1094 (PRR00043251)

### General Support or Opposition

- Support
- Oppose
- Neutral

### Agency/Department Response

Having considered the s22 assessment criteria, please explain your position and provide any other relevant details.

I have considered the proposal from a landscape perspective against the S22 assessment criteria as it relates to my area of expertise. I believe that fast-tracking the project will deliver the a development in a less time and presumably for less cost. The project will provide “housing” and “renewable energy production” which are key sectors to increase housing supply and will reduce green house gas emissions.

The project is however inconsistent with current Auckland Council residential and strategic infrastructure strategies to support urbanisation within this area. The potential effects relating to landscape character, visual amenity and natural character will not be able to be fully understood at this stage.

### Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

Does the project have significant regional or national benefits?

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

**Urban Design Specialist Advice for:** INSERT ADDRESS  
**Pre App Number:** INSERT CONSENT NUMBER



---

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

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

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

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

Will the project deliver significant economic benefits?

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

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

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

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

Will the project address significant environmental issues?

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

Are there any other relevant matters to consider?

Should you wish to discuss anything further regarding the above, please do not hesitate to contact me.

Yours sincerely,

Oliver May  
Associate Principal, Landscape Architect  
09 359 5230

## Emma Chandler

---

**From:** Matt Riley s 9(2)(a)  
**Sent:** Monday, 15 December 2025 7:17 pm  
**To:** Oliver May; Adonica Giborees; Emma Chandler  
**Cc:** Urban Design  
**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input

**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to [HelpMe@itconfidence.co.nz](mailto:HelpMe@itconfidence.co.nz)

Kia ora Adonica and Emma

As you have referred to, it appears other than the removal of the solar farm, the application is the same – and the urban design statement is the same other than amendments to mapping now removing the solar farm. I think my previous reporting/comments can be substituted in without any amendment. Happy to discuss.

Matt

**Matt Riley** | Urban Designer | Senior Principal

s 9(2)(a)  
ZEALAND | LEVEL 3 | 82 WYNDHAM STREET | AUCKLAND 1010 | NEW

---

**BOFFA  
MISKELL**

VISIT OUR > [Website](#) | [LinkedIn](#) | [Facebook](#) | [Instagram](#)

WHANGĀREI | AUCKLAND | HAMILTON | TAURANGA | WELLINGTON | NELSON |

CHRISTCHURCH | QUEENSTOWN | DUNEDIN

Boffa Miskell is proudly a Toitū net carbonzero® certified consultancy, [learn more>](#)

## Referral Application Feedback Form

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

### Respondent Information

Name: Matthew Riley

Role: Consultant urban designer to Auckland Council

Agency / Department: Auckland Council

### Project Information

Project Name: Waimauku West - FTAA-2508-1094 (PRR00043251)

### General Support or Opposition

- Support
- Oppose
- Neutral

### Agency/Department Response

From an urban form and amenity sense, the masterplan layout responds positively to site topography and features, including streams, wetlands and areas of significant vegetation.

The general arrangement of land uses and densities is well considered, with clusters of medium density residential lots amongst standard residential lots.

The masterplan retains a generous amount of open space which will become a key amenity feature of the new neighbourhood.

The road and lot layout results in groupings of housings which lend themselves to developing as identifiable neighbourhoods within the overall site. This is a positive feature and will contribute to sense of place.

The road network has a level of connectivity that is appropriate to the planned urban form and site characteristics, with roads well placed to respond to topography and slope.

A neighbourhood centre is well positioned in a central location and on a main road where it will be both conveniently accessible and legible. The centre is at a high point in the site so will benefit from good views out over the wider area.

The stream at the western end of the site is a natural feature at a low point in the land which has the potential to form a logical boundary between urban and rural areas.

The use of Countryside Living Lots as a tool to transition density down at the western end of the site is supported, as is the use of Large Lot Residential on sloping land to the east, where it forms a backdrop to the existing township.

The potential to achieve a link back into the existing township at the north-eastern end of the proposal is considered important.

Parts of the Modified Ridgeline Protection overlay form a visual backdrop to the existing urban area of Waimauku. This area is primarily shown as open space, SEA and Large Lot Residential, with Standard Residential lots on the periphery. It would be desirable to understand the extent to which this housing would be seen behind Waimauku, with visual simulations recommended, to inform whether additional management tools are needed, such as a bespoke landscaping/planting requirement on lots.

The Urban Design Statement identifies Design Principles to address and work in with site slope, including slope adaptive housing. This includes the use of split level houses to minimise cut and fill. This is strongly supported. Given the sloping nature of the site, such design approaches to minimise the need for retaining walls, including by moving away from a contemporary development approach of completed levelled residential lots, is supported.

Ms Gilbert's landscape memo identifies at her paragraph 3.1, a number of matters which will be necessary for her support of the proposal. I agree with all her identified matters.

Overall, I consider the proposal can be accommodated in a manner that responds appropriately to site characteristics and achieves positive urban design outcomes, subject to the provision of additional identified information.

Visual simulations are needed to understand views back to the development from key public viewing points, including from the township and from State Highway 16. These are needed to understand the extent to which the proposed development form is an appropriate response to the environment.

It is understood that a high point of the hill within the site is proposed to be reduced by approximately 10m – 11m. A visual simulation would be desirable showing the effect of this reduction from the township and SH16, as to whether and the extent to which it adversely affects perception and understanding of this landscape feature.

Detailed information on retaining walls is needed, in order to understand the extent to which will/will not form a significant part of the viewing environment.

Plans for indicated off-road pedestrian / cyclist links will be needed, in order to understand the quality these routes offer as an amenity feature to the development.

Those matters identified in Ms Bridget Gilbert's Landscape memo at paragraph 3.1 will need to be incorporated and supplied by way of information to demonstrate supportable urban design effects.

I support the application on the basis of the information currently supplied.

## Emma Chandler

---

**From:** Matt Byrne s 9(2)(a)  
**Sent:** Wednesday, 17 December 2025 12:11 pm  
**To:** Adonica Giborees; Emma Chandler  
**Subject:** Re: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input

**Categories:** Waimauku FTAA - Referral 2

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to HelpMe@itconfidence.co.nz

Thanks, Adonica

The "new" Infrastructure Memorandum you added to the OneDrive folder is actually the old one from August that includes reference to the Solar Farm. However, based on a review of the two reports "side by side", there's no change to the very high-level earthworks proposal. Further, based on Emma's initial email, I doubt they've updated the plans at all as the original report didn't contain any earthworks or erosion and sediment control plans for the Solar Farm anyway.

@Emma Chandler, based on the above and on the latest information provided for the Waimauku West FTAA Referral, I can confirm that I have no additional information to add to the initial feedback I provided for this project on 24 September 2025.

Please do not hesitate to get in touch if you have any questions or comments.

Nga mihi,

### Matthew Byrne

Earthworks, Streamworks & Sediment Management Consultant

Earth, Streams & Trees - Specialist Unit

M: s 9(2)(a)

Auckland Council, 135 Albert Street, Auckland

Visit our website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)

## Referral Application Feedback Form

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

### Respondent Information

Name: Matthew Byrne

Role: Earthworks, Erosion and Sediment Control Specialist

Agency / Department: Earthworks, Streamworks & Trees Team – Resource Consents

### Project Information

Project Name: Waimauku West - FTAA-2508-1094

### General Support or Opposition

- Support
- Oppose
- Neutral

### Earthworks & Erosion and Sediment Control Response

The referral application does not contain sufficient information to complete a detailed assessment of the project's potential earthworks and erosion and sediment control related effects. However, the **Civil Engineering Infrastructure Summary Memo**, by Crang Civil, dated 18 August, 2025 effectively concludes that the earthworks required to complete the indicative development are technically feasible, and I concur with that conclusion.

Completing the earthworks will require the preparation and implementation of an erosion and sediment control plan (ESCP) in accordance with Auckland Council guideline document number 5, '*Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region*', June 2016, Incorporating Amendment 3 (GD05), and from an earthworks and erosion and sediment control point of view, I see no reasons why the development cannot proceed.

I have considered the individual assessment criteria contained in Section 22 of the FTAA when completing this memorandum, however, the criteria are largely planning related and there are no criteria that relate specifically to earthworks and/or erosion and sediment control matters. As such, I confirm that there are no technical reasons why the indicative development cannot proceed to the substantive application stage.

Matthew Byrne  
Specialist Advisor – Earth, Streams & Trees Team  
Resource Consents, Auckland Council

24 September 2025

## **Assessment Criteria (Section 22 FTAA)**

Please consider the below assessment criteria in preparing your response:

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

## Emma Chandler

---

**From:** Duffy Visser s 9(2)(a)  
**Sent:** Monday, 15 December 2025 3:54 pm  
**To:** Emma Chandler  
**Cc:** Andrew Kalbarczyk  
**Subject:** RE: PRR00043580, Waimauku West FTAA Referral - Request for Specialist Input  
**Attachments:** FW: FOLLOW UP: FAST-TRACK Referral: Waimauku West - FTAA-2508-1094 (PRR00043251)  
**Categories:** Waimauku FTAA - Referral 2

You don't often get email from s 9(2)(a) . [Learn why this is important](#)

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you wish to get this email verified, forward as an attachment to HelpMe@itconfidence.co.nz

Hi Emma

With regards to soil contamination:

As I understand, the change in the application is limited to the removal of the 50MW solar farm from the proposal and all other elements remain largely the same as originally submitted.

That will not change any of the comments from Andrew Kalbarczyk or myself.

Regards  
Duffy

Duffy Visser:  
Specialist  
Contamination, Air & Noise | Specialist Input | Planning and Resource Consents  
Phone s 9(2)(a)  
Auckland Council  
Level 6, Te Wharau o Tāmaki Auckland House, 135 Albert Street, Auckland

## Referral Application Feedback Form

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

### Respondent Information

Name: Andrew Kalbarczyk

Role: Senior Specialist – Contaminated Land, Specialist Input

Agency / Department: Policy & Resource Consents Department

### Project Information

Project Name: \*PREMIUM, FTAA REFERRAL PROJECT\* - PRR00042916, 1080 State Highway 16, Reweti

### General Support or Opposition

- Support
- Oppose
- Neutral

### Agency/Department Response

I have undertaken a review of this Referral Application in the context of the *National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health* (NES:CS).

I have now reviewed a Preliminary Site Investigation report, submitted in support of the above Referral Application. The report was titled *Preliminary Site Investigation: 1080 State Highway 16, Waimauku*, Version 3.0, dated 12 August 2025, and prepared by SLR Consulting New Zealand Limited (further referred to as 'the PSI report').

Based on the information provided within the above report, a number of isolated, potentially-contaminating activities, included on the Ministry for the Environment (MfE) Hazardous Activities and Industries List (HAIL) have been identified to have more-likely-than-not taken place within the subject site. On this basis, the provisions of the *National Environmental*

*Standards for Assessing and Managing Contaminants in Soil to Protect Human Health (NES:CS)* will apply to the proposed resource consent application and a consent under the NES:CS will likely be required.

As per the conclusion within the PSI report, it is unlikely that either the former or current HAIL activities within the subject site will have impacted the soil to an extent which would preclude the proposed future residential, commercial, and light-industrial development of the site.

In accordance with the recommendation made in the PSI report, a Detailed Site Investigation of the subject site must be undertaken in support of the resource consent application for the proposed land development in order to assess the current soil contamination status, identify any risks posed to human health and the environment, and determine any remediation requirements.

Depending on the level of contamination within the soil and groundwater on site, a contaminant discharge consent under Chapter E30 of the AUP(OP) may also be required.

I concur with the conclusions drawn within the PSI report.

### **Assessment Criteria (Section 22 FTAA)**

Please consider the below assessment criteria in preparing your response:

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

# Hon James Meager

Minister for the South Island  
Minister for Hunting and Fishing  
Minister for Youth  
Associate Minister of Transport



26 JAN 2026

JMITC-30

Hon Chris Bishop  
Minister for Infrastructure

**By email:** [infrastructure.portfolio@parliament.govt.nz](mailto:infrastructure.portfolio@parliament.govt.nz)

Dear Chris,

Thank you for your invitation to comment on the resubmitted referral application for Waimauku West [FTAA-2511-1134] under the Fast-track Approvals Act 2024. You have invited me to comment in my capacity as Associate Minister of Transport.

I support the Waimauku West application being referred to the Fast-track process, especially as it provisions housing where transport connections are planned (NZTA's North West programme). This application is for a new residential community that will form an extension to the existing Waimauku settlement, providing approximately 1500 – 2000 dwellings.

I have not considered the impact of this proposal on the local transport network. However, I am pleased to see that the applicant is working with Auckland Council, Auckland Transport, and NZTA to ensure these matters are properly considered, and note that those organisations have also been invited to comment on this application.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'James Meager', written over a large, stylized blue scribble.

**Hon James Meager**  
Minister for the South Island  
Minister for Hunting and Fishing  
Minister for Youth  
Associate Minister of Transport

# Hon Tama Potaka

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



30 JAN 2026

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

Tēnā koe Hon. Bishop

Thank you for the invitation to comment on the fast-track consent application to establish an urban development across approximately 196 hectares of rural land at 1080 State Highway 16, west of Waimauku. The proposal includes a residential development of approximately 1,500–2,020 dwellings across a range of densities, a neighbourhood centre, a light industrial area of around 8.2 hectares, and two indicative school sites.

There is clear housing need in Auckland, with nearly 7,000 people currently on the social housing register, including 216 in the Kaipātiki Local Board area. Additional market supply of this scale would help contribute to addressing that wider housing need.

It is possible that Auckland Council and Watercare will raise matters relating to the site's rural zoning, the presence of highly productive land, and the absence of existing three-waters infrastructure. These considerations — including servicing, wastewater solutions, and the timing of broader infrastructure upgrades identified in the Future Development Strategy — can be examined at the detailed consenting stage.

Should the project advance, I would expect both Auckland Council and Watercare to engage through the expert panel process, ensuring any planning and servicing issues receive full assessment. The proposal also includes a neighbourhood centre and school sites, which can be further discussed with the Ministry of Education at the next stage.

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

Mauriora,

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

Hon Tama Potaka  
**Associate Minister of Housing**

# Hon Tama Potaka

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



30 JAN 2026

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

Tēnā koe Hon. Bishop

Thank you for the invitation to comment on the fast-track consent application to establish a retirement village at 82 Hobsonville Road in West Harbour.

There is growing demand for retirement accommodation both locally and nationally, and this is only expected to increase over the coming years. It is important that we provide for our growing older population by ensuring there are a range of housing choices. This project would contribute meaningfully to meeting that need and would help relieve wider housing pressures.

The project site benefits from strong proximity to a wide range of services, including Westgate Metropolitan Centre and the Hobsonville Local Centre. Existing public transport options already connect the area to key destinations and planned rapid transit improvements are expected to further strengthen accessibility over the medium term.

It is likely that Council and Watercare will raise matters relating to planning and infrastructure, including the timing of bulk infrastructure upgrades and current water constraints, as well as considerations related to zoning designations and flood-prone areas. These matters can be examined and addressed through the detailed consenting stage, consistent with the approach taken for similar proposals.

From a Housing Portfolio perspective, I note that this project will assist in addressing retirement village supply pressures. As with any development, factors associated with planning, infrastructure, and servicing would need to be carefully considered at subsequent stages. However, I am confident that these matters can be examined in the usual way through the detailed consenting process.

On these bases, I support this application progressing to the detailed consenting stage.

Mauriora,

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

Hon Tama Potaka  
**Associate Minister of Housing**

# Hon Tama Potaka

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



30 JAN 2026

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

Tēnā koe Hon. Bishop

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

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

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

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

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

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

Mauriora,

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

Hon Tama Potaka  
**Associate Minister of Housing**

# Hon Tama Potaka

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



30 JAN 2026

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

Tēnā koe Hon. Bishop

Thank you for the invitation to comment on the fast-track consent application for development at 120 Tongue Farm Road, Matakana of a master-planned retirement community providing 208 independent living units, a 30-bed care facility, and a range of communal and recreational amenities, including a clubhouse, café/restaurant, health spa, art centre, workshop, and open space network.

I understand that demand for retirement accommodation in Rodney is significant, with population growth among older age groups a key driver. It is important that we provide for our growing older population by ensuring there are a range of housing choices. Demand for care beds is also expected to exceed supply within five years. Provision of these retirement units and care beds would help to address these shortages. As with any additional supply, this would also have positive flow-through effects on the wider housing market.

The site has proximity to amenities in Matakana town centre. There is no direct public transport connection, although bus route 997 operates from Matakana township to Warkworth.

It is likely that Council and Watercare will raise concerns with this application from a planning and infrastructure perspective. The site is currently zoned Rural Coastal Zone and General Coastal Marine Zone and is constrained by some planning overlays. These would be examined at the detailed consenting stage.

On these bases, I support this application proceeding to the detailed consenting stage.

Mauriora,

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

Hon Tama Potaka  
**Associate Minister of Housing**

# Hon Nicola Willis

Minister of Finance  
Minister for Economic Growth  
Minister for Social Investment



20 JAN 2026

Hon Chris Bishop  
Minister for Infrastructure  
Parliament Buildings  
Wellington

REQ-0025854

Dear Chris

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

- Out of Scope [Redacted]
- [Redacted]
- [Redacted]
- Waimauku West, FTAA 2511-1134
- Out of Scope [Redacted]
- [Redacted]

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

Out of Scope [Redacted]

Out of Scope



***Waimauku West – FTAA 2511-1134***

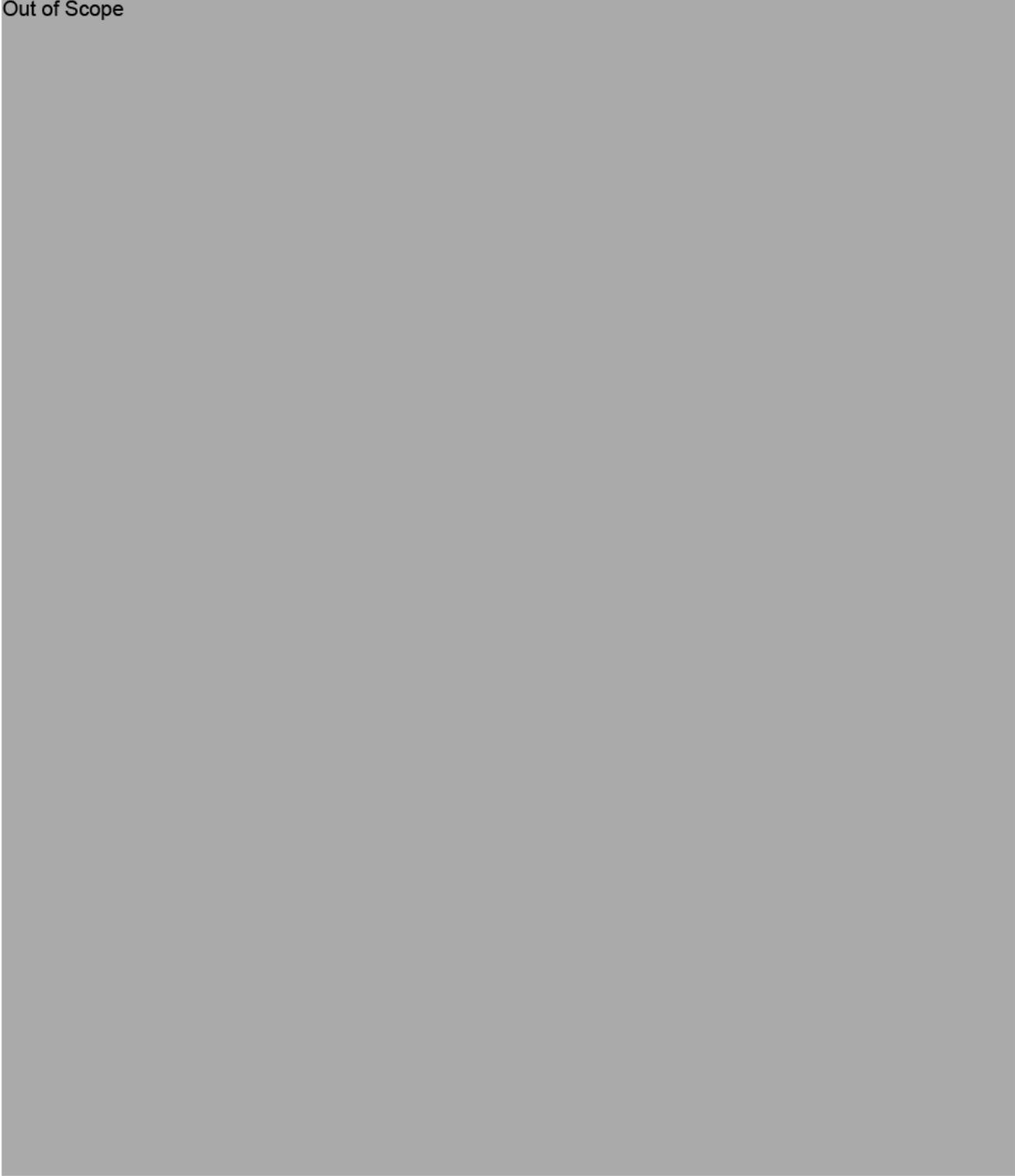
The proposed application is to develop a large tract of land in Waimauku in northwest Auckland over a 15-year development period. The proposal includes the development of an estimated 1,500 to 2,020 residential lots, approximately eight hectares of light industrial land, and a small neighbourhood centre. The application has been re-submitted; its initial submission included a solar farm. The updated proposal provides comparable economic benefits as listed below.

According to the economic assessment provided by the applicant, the expected economic benefits in the Auckland region include a one-time boost in GDP of approximately \$650 million, of which \$176 million is direct and \$474 million is indirect. The proposal also provides full-time equivalent employment for 305 people for 15 years, of which 93 roles are direct and 212 are

indirect. Once operational, the proposal's non-residential areas could provide ongoing full-time employment and associated economic activity.

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

Out of Scope



Out of Scope

Yours sincerely

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

Hon Nicola Willis  
**Minister for Economic Growth**

# Hon Shane Jones

---

Minister for Oceans and Fisheries  
Minister for Regional Development  
Minister for Resources  
Associate Minister of Finance  
Associate Minister for Energy



17 December 2025

Hon Chris Bishop  
Minister for Infrastructure  
Parliament Buildings  
Wellington

## **Fast-track Approvals Act 2024 – Waimauku West referral application (FTAA-2511-1134)**

Dear Chris

Thank you for the opportunity to comment on this referral application under the Fast-track Approvals Act 2024 (FTAA 2024).

I have considered the application and its alignment with the priorities of my Regional Development portfolio. My comments are attached as Annex One.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'S. Jones'.

Hon Shane Jones  
**Minister for Regional Development**

## **Annex One – Regional Development comments**

---

### **Project overview**

1. The Waimauku West application proposes to construct and establish an urban development across approximately 196 hectares of rural land located at Waimauku, within the Auckland Region, with an estimated 15-year construction period.
2. The project proposes to develop 1,500-2,020 dwellings, a neighbourhood centre, a light industrial area, school sites, and supporting infrastructure (such as stormwater systems and water supply). The applicant originally sought consent for a solar farm as part of the project, but this component has now been removed from the application process.
3. Analysis provided in the application indicates that, over a 15-year construction period, the development could have the following regional impacts:
  - a. Contribution to the regional economy's gross domestic product (GDP) of nearly \$650 million.
  - b. Full-time employment for approximately 305 people for 15 years.
  - c. Additional household incomes of \$385 million.
4. Once operational, the proposal's non-residential components could sustain full-time employment for 284 people, contribute annual GDP of \$57 million and approximately \$24 million paid in annual wages.
5. The economic assessment also noted that the proposed development will generate a significant increase in the housing supply by providing a variety of dwellings, land market competition and fostering a well-functioning urban environment. Wider economic and social benefits also noted include improved local retail and social provision, the highest and best land use and investment signal effects.

### **Regional Development comments**

6. If realised, the expected outcomes from the project's construction will provide benefit for the Auckland region and any communities and businesses from the neighbouring Northland region that can connect with the development. The resulting assets will offer some ongoing employment and economic value.
7. It is not clear how the assessment came to the conclusion that the proposal will enable the land to be put to its highest and best use. There may be other economic opportunities not realised as a result of this development, although that is not set out in the application.
8. You may wish to suggest the applicant provide further information on how the proposed development and its resulting dwellings will impact on local resource availability, and how this might impact on existing communities and businesses.

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

Project name	Waimauku West
--------------	---------------

Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

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

1. Contact Details		
Please ensure that you have authority to comment on the application on behalf of those named on this form.		
<b>Organisation name</b>	Department of Conservation	
<b>*First name</b>	David	
<b>*Last name</b>	Greaves	
<b>Postal address</b>		
<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>
<b>*Email</b>	<a href="mailto:Fast-track@doc.govt.nz">Fast-track@doc.govt.nz</a> ; s 9(2)(a)	

2. Please provide your comments on this application
Comments follow overleaf.

**Manager's signoff**



Jenni Fitzgerald

16<sup>th</sup> of December 2025

## Director-General of Conservation s17 comments

<b>Project name</b>	Waimauku West
<b>Applicant name</b>	Halberd Holdings Limited
<b>Application number</b>	FTAA-2511-1134
<b>Project summary details</b>	<p>The Applicant has provided a brief description of the Proposal as follows:</p> <p><i>Waimauku West is a proposed new residential community that will form an extension of the existing Waimauku Settlement. The Waimauku West masterplan has five key components:</i></p> <ul style="list-style-type: none"> <li><i>5) Approximately 1,500 – 2,020 dwellings ranging in density from Large Lot Residential (approximately 50-120 dwellings), Standard Residential (approximately 1,100-1,400 dwellings) to Medium Density Residential (approximately 350-500 dwellings);</i></li> <li><i>5) A neighbourhood centre to provide for residents day to day needs;</i></li> <li><i>5) A green network incorporating existing ecological areas and features, stormwater management and public open spaces;</i></li> <li><i>5) A light industrial area to the west surrounded by Countryside Living (approximately 5 dwellings); and</i></li> <li><i>5) Associated Infrastructure.</i></li> </ul> <p>The Applicant identifies that a Wildlife Approval is required under the Wildlife Act 1953 for the relocation of lizards.</p> <p>The Site is not within or adjacent to Public Conservation Land.</p>

#### 4 GENERAL COMMENT

- 1.1 As the project includes an approval under a specified Act for which DOC is the administering agency, the applicant was required to undertake pre-lodgement consultation in accordance with section 11 of the FTAA.
- 1.2 In relation to this application, the applicant took steps to consult with DOC prior to lodging their application for referral. Consultation was initiated on the 3<sup>rd</sup> of June 2025 and DOC provided information to the applicant on the 16<sup>th</sup> of July 2025. In summary, DOC recommended engagement when further information is known about the presence or absence of wildlife and how that would be managed. A previous referral application was lodged on the 9<sup>th</sup> of September 2025 (reference FTAA-2508-1094), with DOC providing comment on the 1<sup>st</sup> of

October 2025. This application differs from FTAA-2508-1094 as it is no longer seeking approval for a solar farm associated with the development.

- 1.3 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, it considers it likely that with the appropriate design and conditions, effects can be managed to appropriate levels.

1.4 DOC is not aware of any other reason the project should not be referred.

#### **4 MINISTER'S DECISION ON REFERRAL APPLICATION**

2.1 Sections 21 and 22 of the FTAA set out matters to be considered in determining whether a referral application should be accepted.

2.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.

2.3 For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should consider.

2.4 Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

<b>Section</b>	<b>Criteria</b>	<b>Comments</b>
21(3)(b)	<i>Does the project involve an ineligible activity</i>	<i>The meaning of ineligible activity is set out in s5 of the FTAA – DOC has considered s5(1)(f), (h), (i), (j) and (k) and has not identified any aspect of the project that would meet the definition.</i>
21(3)(c)	<i>Is there adequate information to inform a decision</i>	<i>No detailed ecological information has been provided. If the referral to the fast-track process is granted and the applicant proceeds with the substantive application process, then detailed ecological surveys (including lizard, bird, bat and wetland surveys) would need to be undertaken. These surveys would confirm which species, if any, are found on the site. A Wildlife Act Approval should then be applied for to protect wildlife present at the site that are likely to be impacted by the project. Based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the Proposal, and our experience of what kind of design changes and conditions could be implemented, we are confident that once more detailed information is available, it would be possible to achieve a Proposal with conditions that has acceptable outcomes. DOC therefore considers the information adequate in terms of a referral decision.</i>
21(4)	<i>Are there any other reasons not specified</i>	<i>DOC has not identified any other reasons why the project should not be referred.</i>
21(5)(a)	<i>Is the project inconsistent with:</i> <ul style="list-style-type: none"> <li>• <i>a Treaty settlement;</i></li> <li>• <i>Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019;</i></li> <li>• <i>Marine and Coastal Area (Takutai Moana) Act 2011.</i></li> </ul>	<i>DOC has not identified any inconsistency with any relevant settlement or other obligation. Treaty Settlements that apply are:</i> <ul style="list-style-type: none"> <li>• <i>Te Kawerau ā Maki Claims Settlement Act 2015</i></li> <li>• <i>Ngāti Whātua o Kaipara Claims Settlement Act 2013</i></li> <li>• <i>Ngāti Tamaoho Claims Settlement Act 2018</i></li> <li>• <i>Tāmaki Makaurau Collective Redress Act 2014</i></li> </ul>

21(5)(b)	<i>Would it be more appropriate to deal with the proposed approvals under another Act(s)</i>	<i>DOC has not identified any reason why the conservation approval identified should not be dealt with under the FTAA.</i>
21(5)(c)	<i>Would the project have significant adverse effects on the environment</i>	<p>Comprehensive surveys or investigations of ecological features, including habitat of fauna have not been provided by the applicant. As such DOC considers there is the potential for the project to have significant adverse effects given values known/anticipated to be present. Based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the Proposal, and our experience of what kind of design changes and conditions could be implemented, we are confident that once more detailed information is available, it would be possible to achieve a Proposal with conditions that have acceptable outcomes.</p> <p>Overall, however, based on the high-level information available, DOC considers adverse effects of the project may be able to be addressed through the design phase and with the imposition of appropriate conditions</p>
21(5)(d)	<i>Does the applicant(s) have a poor compliance history under a specified Act</i>	<i>DOC has not identified any issues with the applicant's compliance history under the Wildlife Act 1953.</i>
21(5)(g)	<i>Would a substantive application have any competing applications</i>	<i>No competing applications relating to wildlife approvals have been identified.</i>

a.1.1 Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

<b>Section</b>	<b>Criteria</b>	<b>Comments</b>
22(1)(b)(i)	<i>Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?</i>	DOC notes that a Wildlife Act approval of this nature would typically take three-four months to process, which is not significantly longer than the FTAA process is expected to be. However, there may be benefits for the applicant in terms of consideration being combined with RMA approvals, and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	<i>Will this project address significant environmental issues?</i>	No.
22(2)(a)(x)	<i>Is the project consistent with local or regional planning document, including spatial strategies?</i>	Relevant local or regional documents include the Auckland Conservation Management Strategy 2014 – DOC has not identified any inconsistency with this document. However, in preparing their substantive application, the applicant should give consideration to the objectives of the CMS, including having healthy ecosystems and well conserved historic and cultural heritage. The CMS recognises that Auckland faces significant biodiversity challenges due to urbanisation and environmental degradation.  DOC notes that relevant iwi authorities have produced planning documents that should also be considered.
22(b)	<i>Any other matters the Minister may consider as relevant?</i>	Nil.

## 4 OTHER CONSIDERATIONS

- 3.1 DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. DOC has provided input to a number of fast-track projects to-date where additional conservation approvals that would have been available under the FTAA have not been included in an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the 'one stop shop' approach the FTAA was designed to deliver.
- 3.2 Given the lack of assessment undertaken at the referral stage, DOC considers it may be beneficial for the applicant to consider whether it should seek to include additional approvals that would potentially be required on a precautionary basis. To this end, DOC suggests the Minister consider whether further information should be sought from the applicant under s20 prior to making their decision to ensure all approvals in scope of the FTAA and necessary to implement the project are included.
- 3.3 In particular, DOC recommends that the Minister request further information from the applicant, clarifying whether any activities proposed in natural rivers, streams, or water meet the criteria for requiring approval under the Freshwater Fisheries Regulations, and if so, whether the applicant is also seeking these approvals under the FTAA or intends to instead obtain approval separately outside of this process. Additionally, it is noted that there appear to be several 'natural inland wetlands' on the site that are not addressed in the ecological assessment. There are regulatory implications if these are not identified as part of this referral process. Similarly, DOC recommends consideration is given to whether bats and birds should be included in the scope of wildlife, or other, approvals sought. Details of the potential approvals required were provided to the applicant as part of the preliminary consultation process.

## 4 MATTERS FOR THE MINISTER TO SPECIFY (S27)

- 4.1 DOC notes that there is no obligation on an applicant to undertake pre-lodgement consultation with administering agencies in respect of a substantive application for a referred project. Given the lack of detail in the referral application DOC considers it would be highly beneficial for the applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.
- 4.2 To this end, DOC suggests the Minister considers specifying that evidence of further engagement with DOC be submitted with the substantive application, should the decision be to accept the referral application.



Jenni Fitzgerald  
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 16<sup>th</sup> of December 2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

# KiwiRail Holdings Limited comments on a project under the Fast Track Approvals Act 2024

<b>Project name</b>	Waimauku West
---------------------	---------------

Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

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

1. Contact details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>	KiwiRail Holdings Limited		
<b>*First name</b>	Sheena		
<b>*Last name</b>	McGuire		
<b>Postal address</b>	PO Box 593		
<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>	
<b>*Email</b>	environment@kiwirail.co.nz		

2. Comments on Waimauku West application
<p>KiwiRail Holdings Limited (KiwiRail) welcomes the opportunity to provide feedback on the Waimauku West referral application. KiwiRail has an interest in the proposal and the potential effects on the North Auckland Line rail corridor which adjoins and extends through the subject site. KiwiRail currently operates freight trains through this area of the network and rail traffic is expected to increase with the proposed Marsden Point Rail Link and rail upgrade north of Whangārei.</p> <p>The Referral Application Summary details the five key components of the Waimauku West masterplan including 1500-2020 dwellings, a neighbourhood centre, a green network, a light industrial area and associated infrastructure. The masterplan site adjoins and includes part of the North Auckland Line which is owned and operated by KiwiRail.</p> <p>The referral application does not identify KiwiRail as an affected party in Section 3, nor has there been any consultation with KiwiRail to date.</p> <p>The proposed project has the potential to directly affect KiwiRail as owner/operator of the North Auckland Line rail corridor as outlined in the initial high-level assessment below:</p>

### Land ownership

Part of the masterplan development extends onto rail land (see Attachment A). The application needs to correctly identify this land as third party land and KiwiRail needs to be engaged if this land is included in the proposal. Necessary lease or land acquisition processes must be followed for use or occupation of this land.

### Scope of application

The proposed masterplan and accompanying referral application attachments propose development of the subject site south of the North Auckland Line rail corridor. However, the application identifies land to the north of the rail corridor within the application scope. It is not clear to KiwiRail if there are future plans for the development of the land to the north of the rail corridor or whether this is to remain in rural use. Clarification on the scope of the application is important to KiwiRail as the North Auckland Line currently severs the subject site. Any development of either the northern or southern section is of interest to KiwiRail, particularly when considering access across the rail corridor.

### Level crossing safety

The proposed masterplan proposes one connection between the proposed northern and southern parts of the subject site via an existing private level crossing (reference ID 3490). It is unclear what the intended use of this crossing is. The existing crossing is a personal agreement and does not permit the crossing to be used in a public capacity. There are no permissions in place for anyone other than the Grantee to use this private level crossing. If the applicant is proposing a new public level crossing, an application for a new level crossing application is required and this would have to demonstrate an overall reduction of risk and why a grade separated alternative is not possible.

KiwiRail also identifies the Waimauku Station Road public level crossing (reference ID 390) as potentially affected by the proposal. Section 2.6 Connectivity in Attachment 5 of the referral application identifies a primary pedestrian and cycling route and an access point to the southern development from Waimauku Station Road. The proposed development is likely to result in vehicle, cyclist and pedestrian traffic increases at the Waimauku Station Road level crossing and there is currently no pedestrian access at this level crossing.

The proposed access to the southern development site has the potential to affect the safe and efficient operation of the rail line and train operations. A Level Crossing Safety Impact Assessment is required to confirm proposed usage of level crossings, assess the risk to safety, and determine what improvements are required. Based on the information provided, the current safety controls at level crossings are likely to be insufficient. KiwiRail's preferred options for private level crossing (reference ID 3490) are grade separation or the closure of the crossing and provision for alternative road access.

### Land instability and stormwater discharge

KiwiRail has undertaken an initial review of Attachment 8 Geotechnical Report of the referral application. Potential construction-related effects on the rail corridor have been identified as follows:

- Given the documented history of slips and head scarps, earthworks undertaken near slope crests could increase the likelihood of future slope instability and potential movement towards the rail corridor.
- The presence of alluvial deposits and organic soils indicates poor ground consolidation, meaning that stockpiling or surcharge loading could result in settlement or subsidence if not appropriately managed.

In considering the underlying geology and the site's history of instability, earthworks, slope modification, or stormwater works upslope of the rail corridor could adversely affect rail formation stability, track performance, and long-term maintenance requirements if not managed effectively.

KiwiRail has also undertaken an initial review of Attachment 12 Stormwater Management Plan (SMP) of the referral application. The SMP identifies a number of potential effects on the rail corridor including:

- Rail culverts downstream of the site are identified as hydraulic constraints for site runoff.
- The SMP acknowledges that increased runoff resulting from urbanisation could:
  - Exceed the capacity of existing culverts beneath the rail corridor
  - Increase flood levels upstream of the rail embankment
  - Increase scour and erosion risk around rail structures, where present.
- The SMP relies on future flood modelling and attenuation design, which has not yet been confirmed at the plan change stage.
- There is no confirmation that the capacity or resilience of rail assets has been explicitly assessed as part of the stormwater design.
- The SMP refers only to the 10% and 1% AEP flood events. However, for developments adjacent to rail infrastructure, KiwiRail would typically request assessment of additional scenarios, including the 50% AEP event, no-climate-change baseline, and future climate change scenarios equivalent to a temperature increase of 2.1°C by 2090 and 3.8°C by 2110.

KiwiRail considers that without rail-specific hydraulic assessment with consideration to climate change, there is a risk that post-development flows will result in flood and scour effects on rail infrastructure. KiwiRail also notes that any infrastructure or services located within the rail corridor will require a Deed of Grant agreement with KiwiRail.

### Building setbacks

The proposed masterplan identifies new residential lots and a new school adjoining the North Auckland Line rail corridor. KiwiRail seeks a 5m setback from the rail corridor for buildings and structures. This is to ensure buildings can be safely maintained over time without access onto or over the rail corridor. This clearance is crucial for maintaining the safety of neighbours and to protect the safe and efficient operation of the rail corridor.

### Noise attenuation

The masterplan shows a number of noise sensitive activities within proximity to the operational rail corridor. To manage the effects on the amenity of neighbours, and reverse sensitivity effects on the rail corridor, KiwiRail seeks appropriate noise attenuation for noise sensitive activities within 100m of the rail corridor.

KiwiRail does not object to the assessment of the Waimauku West application under the fast-track consent process. However, KiwiRail should be identified as a stakeholder and/or affected party when the resource consent for this project is lodged.

KiwiRail will be seeking additional details in the resource consent application which more clearly identify potential effects and how these effects will be appropriately managed, such as:

- Confirmation of intention to use rail land.
- Confirmation of scope of application, particularly the northern section which hasn't been detailed in the referral application.
- A Level Crossing Safety Impact Assessment which covers all level crossings (private and public) effected by the proposal.
- Geotechnical and Stormwater Assessments which address effects on the rail corridor and rail infrastructure.
- Details on the location of buildings and structures, and noise sensitive activities within close proximity to the operational rail corridor, and how safety and reverse sensitivity effects on the rail corridor will be managed.

KiwiRail anticipates that B&A Urban & Environmental on behalf of its client will initiate engagement with KiwiRail should the application be successful in gaining referral into the fast-track process.

KiwiRail looks forward to further engagement with the applicant and engagement with EPA processes should the application be successful.

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



Sheena McGuire  
Senior RMA Advisor  
KiwiRail Holdings Limited

Date 26/01/2026

**Attachment A – KiwiRail land parcel**

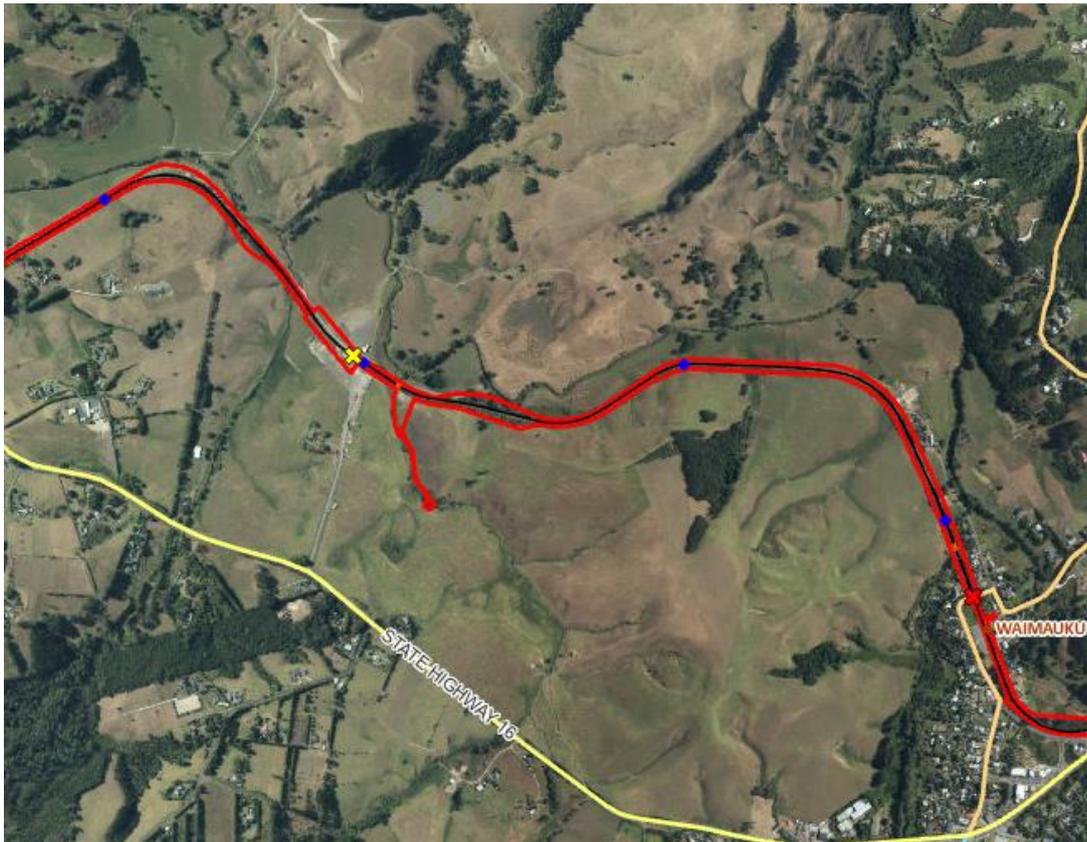


Figure 1: Extract of KiwiRail GIS showing landholdings in red. Subject land circled in yellow

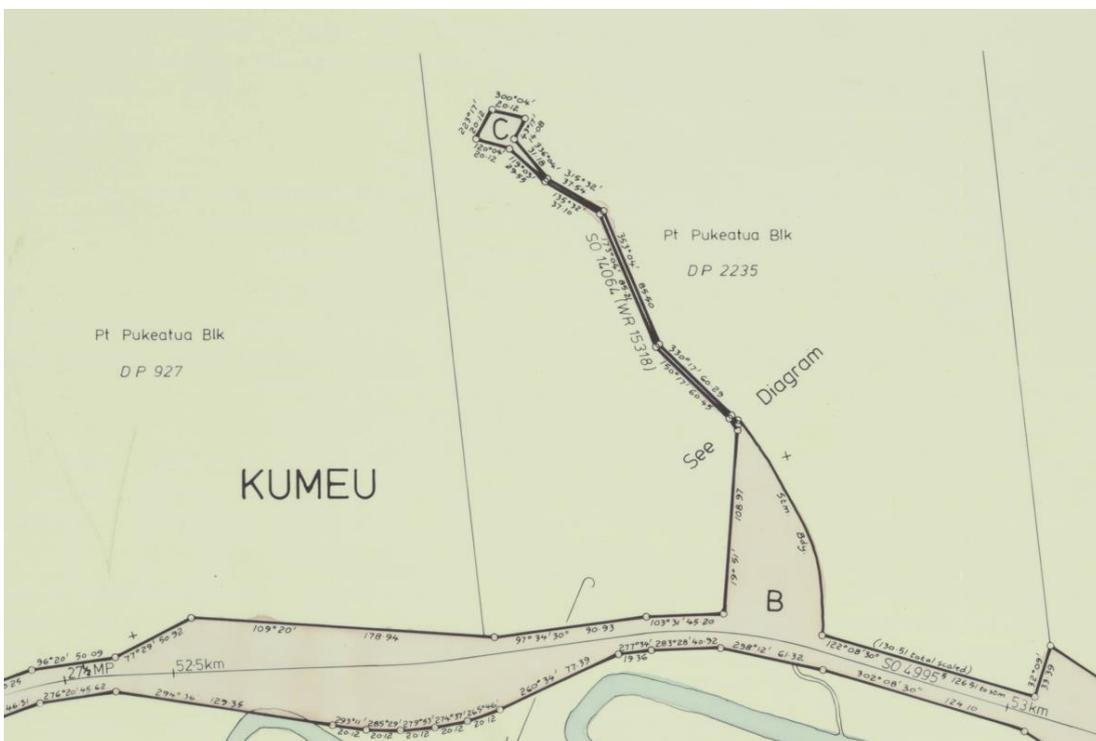


Figure 2: Extract of Historic Land Plan. Subject rail land is shown as "B" and "C" above.

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

<b>Project name</b>	Waimauku West
---------------------	---------------

Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

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

<b>1. Contact Details</b>			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>	NZ Transport Agency		
<b>*First name</b>	Nicola		
<b>*Last name</b>	Foran		
<b>Postal address</b>			
<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>	
<b>*Email</b>	environmentalplanning@nzta.govt.nz		

<b>2. Please provide your comments on this application</b>
<p>NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast track approvals process.</p> <p>NZTA has had pre-application engagement with the applicant regarding this project (prior to the removal of the solar farm from the proposal) through Auckland Council. An online meeting was held with Auckland Council, Auckland Transport, NZTA and the applicant's team on 31<sup>st</sup> July 2025. Following this meeting, minutes were circulated by Auckland Council to the applicant's consulting team that detailed the information and level of assessment NZTA would require to be able to make substantive comment on any traffic safety and operational impacts this proposal could have on the state highway network. The information provided at the time was assessed by internal NZTA subject matter experts, with key commentary being that an Integrated Transport Assessment (ITA) should be provided with the substantive application. The amended development proposal has also been assessed by the internal NZTA subject matter experts to determine if the removal of the solar farm aspect of the proposal would amend the information required should this application be referred.</p> <p>As per the matters set out on the invitation to comment, NZTA provides the following commentary:</p>

Insert Fast-track logo

1. The project proposes an upgrade to two existing vehicle crossings to form intersections to State Highway 16 as the main accesses to the wider development. NZTA would need to see a substantive application with an ITA to be able to determine the actual impacts of the proposal on the state highway network.

The development site is bordered by the Railway to the north and State Highway 16 to the south. NZTA understands that the two key intersections proposed to be off State Highway 16 would be the only vehicle accesses to the site.

Specific detail would be needed regarding the proposed two State Highway 16 intersections as well as the wider state highway network. As part of the substantive application, NZTA would expect to see a comprehensive ITA that identifies, through appropriate modelling and expert technical assessment, the impact of the anticipated vehicle generation on the safe and efficient functioning of both the proposed State Highway 16 intersections and the wider state highway network, as well as specific mitigation measures to address adverse effects on the state highway network resulting from this development. That ITA should assume that the posted speed limit on State Highway 16 will remain unchanged.

2. General comments on the referral application

This section of State Highway 16 is designated under Auckland Unitary Plan reference 6766 with NZTA as the requiring authority. The purpose of the designation is “State Highway 16”.

In its current form, State Highway 16 lacks the urban infrastructure necessary to safely and efficiently support a development of this scale. The proposed development could be supported if there is substantial investment in upgrading State Highway 16. Without these upgrades, the current high-speed, rural configuration of the highway poses significant safety, accessibility, and network capacity risks—particularly in relation to vulnerable users, multimodal connectivity, and existing congestion levels.

The Transport Memo prepared by CLL and dated 12 November 2025 has stated that the following information will be provided in an ITA if the application is accepted for referral:

- Carry out additional traffic modelling along the SH16 corridor to the east, potentially involving network modelling or intersection modelling using network modelling outputs.
- Finalising the development form, including an assessment against relevant design requirements and Unitary Plan rules.
- Finalising access locations and form, including assessment of sightlines, safety and performance, in consultation with NZTA, including assessment of whether reducing the SH16 speed limit for all or part of the development frontage is feasible or desirable.
- Investigate external safety effects.
- Production of a framework Construction Traffic Management Plan (CTMP).

NZTA consider that this information is required and in addition the following should be provided:

- Discussion as to how the proposed development will align with major infrastructure projects being undertaken by NZTA, including: State Highway 16 Brigham to Waimauku,

State Highway 16 Main Road Upgrade, Alternative State Highway, Access Road upgrade and the Northwest Rapid Transit Corridor.

NZTA is not opposed to the application being referred into the fast track approvals process, however we would want to ensure that the effects of the proposal on the state highway network are appropriately mitigated. NZTA would welcome the opportunity to provide comments on any substantive application in due course.

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

**Managers signoff**



Rory Power, Team Lead – Environmental Planning

Date: 14/01/26