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**FW: Fast-track referral Horsehoe Bush Road, Dairy Flat FTAA-2605-1241**

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**From** Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>

**Date** Fri 17/07/2026 11:01 AM

**To** FTAreferalls <FTAreferalls@mfe.govt.nz>

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**From:** Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>

**Sent:** Friday, 17 July 2026 10:52 AM

**To:** Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>

**Subject:** RE: Fast-track referral Horsehoe Bush Road, Dairy Flat FTAA-2605-1241

Good morning,

No comment from ACH.

Thank you,



**Office of Hon Paul Goldsmith**

Minister for Arts, Culture and Heritage | Minister of Justice

Minister for Media and Communications | Minister for Pacific Peoples

Minister for Public Service and Digitising Government | Minister for Treaty of Waitangi Negotiations

Email [p.goldsmith@ministers.govt.nz](mailto:p.goldsmith@ministers.govt.nz) | [www.beehive.govt.nz](http://www.beehive.govt.nz)

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

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**From:** Infrastructure Portfolio <[Infrastructure.Portfolio@parliament.govt.nz](mailto:Infrastructure.Portfolio@parliament.govt.nz)>

**Sent:** Monday, 29 June 2026 1:12 pm

**To:** Nicola Willis (MIN) <[N.Willis@ministers.govt.nz](mailto:N.Willis@ministers.govt.nz)>; Nicola Grigg (MIN) <[N.Grigg@ministers.govt.nz](mailto:N.Grigg@ministers.govt.nz)>; Tama Potaka (MIN) <[T.Potaka@ministers.govt.nz](mailto:T.Potaka@ministers.govt.nz)>; Paul Goldsmith (MIN) <[P.Goldsmith@ministers.govt.nz](mailto:P.Goldsmith@ministers.govt.nz)>

**Cc:** FTAreferalls <[ftareferalls@mfe.govt.nz](mailto:ftareferalls@mfe.govt.nz)>

**Subject:** Invitation to comment on Fast-track referral application for the Horsehoe Bush Road, Dairy Flat - Residential Development project under the Fast-track Approvals Act 2024 – FTAA-2605-1241

**To:**

- Minister for Economic Growth
- Minister for the Environment
- Minister for Māori Crown Relations: Te Arawhiti
- Minister for Māori Development
- Minister of Conservation
- Minister for Arts, Culture and Heritage
- Associate Minister of Housing

**NOTE - This project lodged an application after 31 March 2026, therefore a 15-day comment period applies.**

Dear Ministers,

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

The Minister has received an application from Tuakiri Property Limited for referral of Horseshoe Bush Road, Dairy Flat - Residential Development project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2605-1241).

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

### **Invitation to comment on referral application**

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

If you wish to provide written comments, these must be received by **return email** within **15 working days** of receipt of this email, being **21 July 2026**. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

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

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

### **Process**

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

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

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

### **Important Information**

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

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

### **Project summary**

|                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Project name</b>        | Horseshoe Bush Road, Dairy Flat - Residential Development                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Applicant</b>           | Tuakiri Property Limited                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Location</b>            | Dairy Flat                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Project description</b> | <p>The project is to develop a master-planned, place-led residential development in Dairy Flat, Auckland. The project will include:</p> <ul style="list-style-type: none"> <li>a. 1,000 – 1,100 residential lots/dwellings</li> <li>b. a neighbourhood centre, including retail, commercial, and community activities (comprising an approximate Gross Floor Area of 1,200m<sup>2</sup>)</li> <li>c. infrastructure and transport elements including transport facilities, intersection upgrades and roading, and walking and cycling networks</li> <li>d. green open space network (approximately 18.5 hectares).</li> </ul> |

Kind regards,



#### Office of Hon Chris Bishop

Attorney-General | Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | MP for Hutt South

Office: 04 817 6802 | EW 6.3

Email: [c.bishop@ministers.govt.nz](mailto:c.bishop@ministers.govt.nz) Website: [<http://www.beehive.govt.nz/>][www.beehive.govt.nz](http://www.beehive.govt.nz/)

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# Hon Tama Potaka

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



Hon. Chris Bishop  
Minister for Infrastructure  
infrastructure.portfolio@parliament.govt.nz  
Parliament Buildings  
Private Bag 18041  
WELLINGTON 6160

22 JUL 2026

CORTP-8525

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the Horseshoe Bush Road, Dairy Flat – Residential Development. The proposal comprises a master-planned residential development including 1,000 to 1,100 residential lots and dwellings, a neighbourhood centre, supporting infrastructure and transport upgrades, and approximately 18.5 hectares of open space.

Auckland continues to experience housing demand and the proposal would increase housing supply in northern Auckland. There are currently 105 households on the Housing Register in the Rodney Local Board area, with the greatest demand for one-bedroom homes, and the proposal would increase housing capacity and housing choice in the area.

The site is currently zoned Rural – Mixed Rural and is not identified for future urban development under the Auckland Future Development Strategy. It sits outside the Future Urban Zone and planned growth areas, with neighbouring Future Urban land not expected to be live zoned until 2035 or later. Auckland Council has also indicated that urbanisation of rural land outside the Future Urban Zone is not anticipated. The site is not currently serviced by urban infrastructure and is located outside Watercare's serviced network. The proposal relies on private water, wastewater, stormwater and transport infrastructure, with potential future connections to public networks if capacity becomes available. Nearby wastewater infrastructure is already constrained, and consideration will need to be given to future infrastructure provision, network integration and growth funding arrangements should the project proceed.

The site has limited access to public transport, with future residents requiring travel to Silverdale to access bus services. Wider transport constraints already exist across the Hibiscus Coast corridor and State Highway 1, and other strategic public transport improvements remain unfunded. The application also identifies flood hazards, overland flow paths and areas of medium landslide susceptibility. These can be further considered through the detailed assessment process.

From the perspective of the Housing Portfolio, the proposal would increase housing supply in northern Auckland. It raises planning, infrastructure, transport and natural hazard considerations that warrant further consideration through the detailed assessment process. I have no objection to this application being referred to the next stage of the fast-track process. Thank you again for the opportunity to comment.

Mauriora,

Hon Tama Potaka  
**Associate Minister of Housing**



27 July 2026

Hon Chris Bishop  
Minister for Infrastructure  
Parliament Buildings  
Wellington

REQ-0035811

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the following referral applications:

Out of Scope

- Horseshoe Bush Road, Dairy Flat, FTAA-2605-1241

Out of Scope

I am providing comment in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided in their referral applications.

Out of Scope

Out of Scope

### **Horseshoe Bush Road, Dairy Flat, FTAA-2605-1241**

This application is for the Horseshoe Bush Road development in Dairy Flat, Auckland. The proposal covers approximately 82.7 hectares and would enable a residential village development comprising approximately 1,000–1,100 residential units, a small village centre, around 18.5 hectares of open space, and associated infrastructure including roading, stream works, and water, wastewater and stormwater services.

Based on the economic assessment provided by the applicant, the proposal is expected to generate substantial economic activity over an approximately 10-year development period. The project is estimated to have approximately \$879 million in direct expenditure (excluding land), generate around \$464 million in GDP for the Auckland region, and support employment of 4,465 FTE years, including around 781 FTEs during the peak development year. Of the total, 1,695 FTE years are from direct employment, and the remaining 2,770 FTE years result from indirect and induced activity.

The assessment identifies wider benefits from the proposal, including increased housing supply and residential capacity, greater housing choice, improved housing affordability through increased supply and competition, and more efficient use of existing and planned infrastructure.

In the short to medium term, the primary benefits of the proposal are the significant capital expenditure, GDP and employment generated through development and construction activity. Given the scale of the estimated impacts, the proposal is likely to deliver significant regional economic benefits for Auckland. Over the longer term, the primary benefits are increased housing supply, residential capacity and housing affordability. This proposal may be considered under section 22(2)(a)(iii) of the Act, to the extent that it would increase housing supply, address housing needs and contribute to a well-functioning urban environment.

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**

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



20 July 2026

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

Tēnā koe Minister Bishop,

**Invitation to comment on the Horseshoe Bush Road, Dairy Flat - Residential Development Project under the Fast-track Approvals Act 2024**

Thank you for the invitation to comment on the **Horseshoe Bush Road, Dairy Flat - Residential Development** Project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report prepared by the Ministry for the Environment.

Nāku noa, nā

A handwritten signature in blue ink, reading 'Tama Potaka'.

**Hon Tama Potaka**

Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori  
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

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

|              |                                                                            |
|--------------|----------------------------------------------------------------------------|
| Project name | Horseshoe Bush Road, Dairy Flat – Residential Development (FTAA-2605-1241) |
|--------------|----------------------------------------------------------------------------|

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. |                                                        |             |   |
| Organisation name (if relevant)                                                                            | Auckland Council                                       |             |   |
| *First name                                                                                                | Tracey                                                 |             |   |
| *Last name                                                                                                 | Grant                                                  |             |   |
| Postal address                                                                                             | Private Bag 92300, Victoria Street West, Auckland 1142 |             |   |
| *Contact phone number                                                                                      | s 9(2)(a)                                              | Alternative | - |
| *Email                                                                                                     | s 9(2)(a)                                              |             |   |

| 2. Please provide your comments on this application                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Overview</b></p> <p>Thank you for the opportunity to provide comments on the referral application for the (FTAA-2605-1241) by Tuakiri Property Limited (Tuakiri Dairy Flat Project). We provide feedback below from the various relevant departments of Auckland Council, Council-Controlled Organisations (CCOs), the Rodney Local Board and Houkura – Independent Māori Statutory Board.</p> <p>1. This Planning Memorandum (<b>Memorandum</b>) sets out Auckland Council's (<b>the Council</b>) regulatory planning assessment and comments on the Referral application for the 'Horseshoe Bush Road, Dairy Flat – Residential Development Project' (<b>the Application</b>) lodged by Tuakiri Property Limited (<b>the Applicant</b>) under the Fast-track Approvals Act 2024 (<b>FTAA</b>). This Memorandum is provided in response to the invitation to comment issued by the Minister under section 17(1) of the FTAA and has taken into account the criteria that inform the Minister's decision-making progress on referral applications at section 22.</p> <p>2. This Memorandum presents the Council's response in its capacity as the relevant local authority and reflects the regulatory planning assessment of the Council officers responsible for administering the resource management functions of the Council. It is intended to assist the Minister / EPA in their consideration of the Application and should not be interpreted as</p> |

representing the views of Auckland Council's governing body or other non-regulatory parts of the organisation.

3. Council encourages pre-application engagement with the applicant team on this proposal, and we look forward to working with the Applicant's team as part of a Substantive pre-application engagement process if the Minister is minded to accept the Referral application.
4. In providing these comments, Auckland Council has sought to confine its input to matters relevant to the Minister's referral decision under sections 21 and 22 of the FTAA, consistent with the invitation letter and section 17(3)(b) of the FTAA.
5. In summary, the Application represents a substantial urbanisation of rurally zoned land. The subject land is not recognised in any national or regional planning document as an area for urban growth. Because the land is not anticipated for urbanisation, it has not been factored into the planned delivery of any infrastructure by the main infrastructure providers. The application also raises unresolved concerns regarding natural hazards and open space provision. Overall, the Council **does not support** the project proceeding to a substantive application through the fast-track consenting process.

#### Section 17(3) questions

6. In the invitation letter, it has been requested that the Council provide input on two questions pertaining to s17(3) of the FTAA. We respond below:

**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.**

7. We are not aware of any applications that have been lodged with the Council that would represent a competing project if a substantive application for the project were lodged.
8. The Council notes that the application specifically excludes any necessary approvals for the taking or allocation of groundwater. Council has therefore not considered any water take applications/consents within the catchment as competing applications. Council does consider the availability of water supply within this catchment as a relevant matter for consideration, and this is discussed further below.

**In relation to projects seeking approval of a resource consent under section 42(4)(a) of the FTAA, 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.**

9. The Council is not aware of any existing resource consents where sections 124C(1)(c) or 165ZI of the RMA could apply.

**Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the FTAA).**

10. Based on the information provided, the Council has not identified any activity that clearly constitutes an ineligible activity under section 5 of the FTAA.

**Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of the FTAA).**

11. The Application is not considered to be inconsistent with section 21(5)(a) of the FTAA.
12. We note that urban residential development of the site is not anticipated under the operative Rural – Mixed Rural Zone provisions and would ordinarily require rezoning through a plan change. Whether it would be more appropriate for these matters to be dealt with under the standard RMA process (including any rezoning) is a relevant consideration for the Minister. Given the land is not identified for future urbanisation, the Council considers it to be more appropriate to deal with these matters under the RMA Schedule 1 process - section s21(5)(b) of the FTAA.
13. From a preliminary assessment, the proposal is not considered to have significant adverse effects on the environment that could not be appropriately assessed and managed through the substantive application process. However, the application lacks information regarding natural inland wetlands, water supply and esplanade requirements and more information is required on these matters to determine a level of effect in accordance with section 21(5)(c) of the FTAA.
14. The applicant has declared they do not have any relevant compliance history under any Acts relating to this application- 21(5)(d) of the FTAA.
15. With regard to s21(5)(e) of the FTAA, the Application area is not within the Council's Treaty Settlement alert layer.
16. With regard to s21(5)(f) of the FTAA, the application confirms the likely need for the removal of natural inland wetlands which is a prohibited activity under Clause 53 of the National Environmental Standards for Freshwater 2020 (NES-F). Should the application confirm this is the case, Council considers the Application will not meet the requirements of s21(5)(f) and the referral should be declined.
17. With regard to s21(5)(g) of the FTAA – no other competing applications were identified.
18. With regard to s21(5)(h) of the FTAA, Council is not aware of any existing resource consents of the kind referred to in section 30(3)(a) of the RMA.

Having regard to the above, Council considers there to be clear reasons for decline of the referral with respect to the inconsistency with the zoning provisions which is more appropriately dealt with under the RMA through a Plan Change (section 21(5)(b)).

## Section 22

Auckland Council considers there are matters relevant to the Minister's assessment under section 22 of the FTAA.

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

19. Auckland Council is not satisfied that this has been demonstrated.
20. Auckland Council's appointed Economist has reviewed the EIA (refer Attachment A) and notes that these figures measure economic activity and impact rather than economic benefit. Council's Economist notes no counterfactual has been established (e.g. whether this housing would otherwise be delivered elsewhere in the region), and the cost of servicing a location outside the areas identified for growth has not been quantified.
21. Council's Economist also notes that Auckland's latest Housing and Business Development Capacity Assessment demonstrates that plan-enabled, infrastructure-ready, feasible housing capacity is, in aggregate, already sufficient under the National Policy Statement on Urban Development, which further weakens the case that this out-of-sequence supply is needed to meet significant regional demand.
22. The Council's Policy team notes that, in absolute terms, the scale of housing proposed is small when set against regional supply: Council's Monthly Housing Update recorded 1,683 dwellings consented in April 2026 alone, and 16,687 dwellings consented across the region in the year to April 2026. The 1,000–1,100 dwellings proposed here, delivered over an estimated 15–20 year timeframe, represents a negligible contribution to the region's housing supply by comparison.
23. Taken together, whether the Application delivers “significant regional or national benefits” for the purposes of section 22(1)(a) is a matter of judgement for the Minister. Council's position on this matter, as evidenced by the specialist input, indicates the Application's benefits have not been clearly demonstrated to be ‘significant’ at a regional or national scale.

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

24. Referral may facilitate the consenting of the project in a more timely and cost-effective way than the standard RMA pathway. Urban development of the site is not enabled under the operative Rural – Mixed Rural Zone provisions and would ordinarily require rezoning through a plan change. By avoiding that step and consolidating the required approvals into a single process, referral may offer time and cost efficiencies relative to pursuing rezoning followed by resource consents under the standard process.

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

25. Council has no comment in this regard.

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

26. The project has not been specifically identified as a priority project in any government or sector plan or strategy, nor on a government infrastructure priority list.
27. The subject land is not recognised in any national or regional planning document as an area for urban growth. The proposal is not in line with the urban growth strategy outlined in the Auckland Council's Regional Policy Statement (**RPS**) and it is not identified in Councils Future Development Strategy 2023-2053 (**FDS**) which has identified 30 years of future urban zone land for future urban development. The subject land being outside of the area covered by the FDS also means it has not been factored into planned delivery of infrastructure by the main infrastructure providers.

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

28. No regionally or nationally significant infrastructure is proposed.
29. Auckland Transport's nearby designations 1490 and 1497 (protecting land for future arterial roads) and the NZ Transport Agency's Notice of Requirement 1 for a rapid transit corridor in Dairy Flat have uncertain timing and funding, and the assessments underpinning those designations did not anticipate urban development of land outside the rural urban boundary.
30. Watercare has confirmed there is no current or planned public water or wastewater servicing to the subject site, and any provision of public servicing would first require a Council policy assessment, which has not occurred.

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

31. The project would increase housing supply, providing approximately 1000-1100 residential lots. However, the quantum of dwellings proposed is not significant at a regional, or sub-regional scale.
32. The Council does not consider it contributes to a well-functioning urban environment. The site is rurally zoned, disconnected from existing centres, and lacks the transport infrastructure to support this scale of development. Auckland Transport notes that current public transport services in the area are very limited and that no material improvements are planned, given that neighbouring Future Urban Zoned land is not anticipated to urbanise until at least 2030. Future residents would be highly reliant on private vehicles therefore the application would not contribute to a 'well-functioning urban environment'.

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

33. As noted above, the Council's Economist considers that, while the project would generate economic benefits, it is unclear whether those benefits are significant at a regional or national scale.

***Will the project deliver new or support primary industries (e.g. aquaculture)?***

34. The project will not deliver new or directly support primary industries.

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

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

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

36. The project is not considered to materially support climate change mitigation. The application site is greenfield, rurally zoned and with limited public transport options, and Auckland Council considers it is not, at this time, consistent with Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan.

***Will the project support climate change adaptation, reduce risk arising from natural hazards or support recovery from natural hazard events?***

37. The project is not considered to deliver climate change adaptation, natural hazard risk reduction, or recovery benefits.

38. Auckland Transport and the Rodney Local Board have raised concerns with regard to flood hazards affecting the application site and surrounding roads. While the application considers flood hazards can be appropriately managed on site, the project's own hazard risks and are matters for the substantive effects assessment rather than benefits delivered under this criterion.

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

39. The project is not directed at addressing existing significant environmental issues.

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

40. The project is considered not consistent with all of the relevant local and regional planning documents, including the Auckland Unitary Plan (**AUP**), or the National Policy Statement – Highly Productive Land (**NPS-HPL**).

41. The site is zoned Rural – Mixed Rural Zone under the AUP. The purpose of this zone is primarily to provide for rural production activities and to protect rural character and amenity values. The project proposes urban-type residential development and subdivision which is entirely inconsistent with the intent, objectives and policies of the Rural – Mixed Rural Zone.

42. The application site includes land classified as Land Use Capability (LUC) 3. Under the NPS-HPL, land is classified as highly productive if it is rurally zoned and features a LUC of 1, 2 or 3, therefore the subject site is considered highly productive land. The Application is inconsistent with clauses 3.8 and 3.9 of the NPS-HPL as it included subdivision and inappropriate use of highly productive land for urban residential activities. It is noted the Application considers the subject site to meet the exception under clause 3.5(7)(b)(iii), however the land is not currently subject to a resource consent application for subdivision, use or development on LUC 3 land.
43. The FDS is Auckland Council's spatial strategy for accommodating growth, and it sequences the timing of future urban areas in coordination with infrastructure. The application site is not included within the FDS meaning the area is not identified for urbanisation and has not been factored into planned delivery of infrastructure by the main infrastructure providers.

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

44. Drawing reference to the comments attached to this Memorandum, there are several relevant additional matters to consider alongside the above.

Water Supply

45. Watercare Services Limited (**Watercare**) have confirmed, in accordance with Watercare's Growth Servicing Policy 2026, that they do not provide water or wastewater connections to rurally zoned land unless Council determines public servicing should proceed. Please refer to Attachment F for Watercare's full comments.
46. The Application documents refer to water supply being obtained through a range of private, public and hybrid servicing options. As there is no current plan for public water supply in this area, public and hybrid servicing is unlikely to be a feasible option.
47. The Council notes that a separate groundwater take resource consent application has been recently lodged with Council to service this application. The resource consent application is seeking a maximum of 217,175m<sup>3</sup>/year groundwater take within the Rangitooopuni aquifer.
48. The Council raises concern of the potential competing applications for water use in this catchment. In particular:
- Auckland Surf Park Community – Stage 2 is currently progressing through the FTAA substantive application process. The Stage 2 application includes a groundwater take for water supply within the Rangitooopuni aquifer,
  - We are aware of another Fast Track referral application which also potentially relies on groundwater in this catchment. Due to confidentiality clauses, it is not listed here but can be provided to EPA on request,
49. This Application alone requires a large proportion of the modelled remaining groundwater in the Rangitooopuni catchment. When considered in combination with the Surf Park Stage 2 application, the groundwater in this catchment may be over allocated.

50. The Council considers that, should the Project proceed to Substantive stage, the issue of water supply and competing applications for the limited groundwater resource in this catchment, should be considered further.

Other matters

51. Auckland Transport opposes the application being referred and considers that the proposal will not result in significant regional or national benefits, will not contribute to a “well-functioning urban environment”, and will not deliver any new regionally or nationally significant infrastructure. Should the application be referred under the FTAA, Auckland Transport request that an Integrated Transport Assessment be provided and concerns related to flood hazards and stormwater management be appropriately addressed. Please refer to Attachment E for Auckland Transport’s full comments.
52. Council’s Healthy Waters and Flood Resilience department (**Healthy Waters**) are neutral on referral of the Application. Healthy Waters have highlighted the Regionwide Network Discharge Consent is unable to be utilised for rurally zoned land, therefore private stormwater discharge and diversion consents will be required. Healthy Waters also raise concerns with the stormwater management approach, including the potential for insufficient retention volume of wetlands and potential for increased erosion risk and stream bank stability issues. Lastly, Healthy Waters seek further information regarding the operation and maintenance of stormwater infrastructure proposed to be vested. Please refer to Attachment G for Healthy Waters’ full comments.
53. Auckland Council’s Parks and Community Facilities (Parks) oppose the referral of the proposal. Parks key concerns are the lack of open space provision and gaps in information regarding esplanade areas (in accordance with s229(a)(v) of the RMA) and associated management of natural hazards. Please refer to Attachment H for Park’s full comments.
54. Overall, whilst Council recognises there will be benefits associated with the development, including provision of housing and employment opportunities, it has not been established and demonstrated, to a sufficiently robust degree, that the Application will have significant regional or national benefits. Additionally, the application is inconsistent with the relevant regional planning documents. Overall, Auckland Council **opposes** the Application proceeding to a substantive application through the fast-track consenting process
55. Finally, the attached 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 encourage pre-application consultation be completed with Council prior to a substantive application being made.

### **Auckland Council accompanying feedback**

The following attachments are provided to inform the Section 22 decision-making process:

- Economic Comments – Attachment A
- Local Board Comments – Attachment B
- Houkura Comments – Attachment C
- Policy Comments – Attachment D
- Auckland Transport Comments – Attachment E
- Watercare Comments – Attachment F
- Healthy Waters Comments – Attachment G
- Auckland Parks Comments – Attachment H

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

### **Comments prepared by:**



Cameron Sunde  
Consultant Planner (Alt Environmental Limited)  
For Resource Consents  
Date: 21 July 2026

### **Reviewed by**



Tracey Grant  
Principal Project Lead  
Planning & Resource Consents  
Dated: 21 July 2026

## **Attachment A – Economic Comments**

## 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 & FTAA number | Tuakiri Fast Track – FTAA-2605-1241 |
|----------------------------|-------------------------------------|

### Respondent Information

|                     |                      |
|---------------------|----------------------|
| Name                | Shane Martin         |
| Role                | Consulting Economist |
| Agency / Department | Auckland Council     |
| Date                | 13 July 2026         |

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

- ☐ Support  
☐ Oppose  
☒ Neutral

### Agency/Department Response

This is primarily a review of the Economic Impact Assessment (EIA) for Horseshoe Bush Road Fast-Track Project Fast-Track Referral Application prepared in accordance with the Fast-track Approvals Act 2024 (FTAA). The EIA (“report”) was prepared by Property Economics for Tuakiri Property Limited and is dated May 2026.

#### Context

Section 22(1)(a) of the FTAA states that “the criteria for accepting a referring application are that the project is an infrastructure or development project that would have significant regional or national benefits...”

I take “regional” to have the same definition as in Section 5(1) of the Local Government Act 2002 (LGA) as it is not explicitly defined in the FTAA. That is, “the region of a regional council and includes the district of a territorial authority, if the territorial authority is a unitary authority.” This definition is consistent with that in Section 2(1) of the Resource Management Act 1991 (RMA).

Section 22(2)(a)(iv) of the FTAA states that “the Minister may consider whether the project will deliver significant economic benefits.”

I take “significant” to have the same definition as in Section 5(1) of the LGA as it is not explicitly defined in the FTAA nor the RMA. That is, “the issue, proposal, decision, or other matter has a high degree of significance.” “Significance” is defined, in the same section of the

LGA, as “the degree of importance of the issue, proposal, decision, or matter, as assessed by the local authority, in terms of its likely impact on, and likely consequences for, the current and future social, economic, environmental, or cultural well-being of the district or regions; any persons who are likely to be particularly affected by, or interested in, the issue, proposal, decision, or matter; the capacity of the local authority to perform its role, and the financial and other costs of doing so.”

In the context of economics, we must determine whether the project will deliver significant economic benefits regionally or nationally, considering the above definitions of “significant” and “regional”.

Economic benefits are not the same as economic impacts. This is a point well made in economic literature<sup>1,2,3</sup> and is not an insignificant point given the wording of the legislation.

The FTAA specifically allows the Minister to consider whether the project will deliver significant economic *benefits* which is not the same as whether the project has significant economic *impacts*. While this may seem trivial, within the field of economics, it is important.

This distinction is likely to be important given that this project is proposed outside of the defined Future Urban Area on land that is zoned Rural – Mixed Use and the site is not contiguous with any already developed sites (though it is near some live-zoned Business – Light Industry land). This means that it is not consistent with the Auckland Unitary Plan, Auckland’s Future Development Strategy, or the Future Urban Land Supply Strategy. Because of this, the analysis needs to clearly show that the project would deliver economic benefit despite being on land that has not been identified for development.

Section 22(2)(a)(iii) of the FTAA states that “the Minister may consider whether the project will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020<sup>4</sup>)”. While Policy 1 is not exclusively the realm of economics, it is clear that at least part of Policy 1 is. I would expect this to be discussed in the report.

### **Project Specifics**

The project covers nearly 80 hectares of land with a proposed yield of 1,000 – 1,100 dwellings and 18.5 hectares of open space in a master-planned development just to the west of the town of Dairy Flat. It is on the opposite side of Horseshoe Bush Rd from the Redvale Landfill and lies between Kahikatea Flat Rd, Horseshoe Bush Rd, and Dairy Flat Hwy.

### **Review of Section 5 of the EIA -- TOTAL ECONOMIC ACTIVITY FROM DEVELOPMENT**

Section 5 is where the economic analysis begins in the report. It estimates that the proposed development would generate approximately \$465 million of gross domestic product (GDP) and 4,465 FTE-years<sup>5</sup> of employment over 10 years.

These are measures that are relevant to a Section 32 assessment under the Resource Management Act 1991 – specifically Section 32(2) – that indicates an assessment must “identify and assess the benefits and costs of the environmental, economic, social, and

<sup>1</sup> <https://doi.org/10.3138/cjpe.3.004>

<sup>2</sup> <https://doi.org/10.1080/14615517.2020.1767954>

<sup>3</sup> <https://doi.org/10.1108/14777830710725867>

<sup>4</sup> Generally referred to as the NPS-UD

<sup>5</sup> That is, 4,465 full-time equivalent years of employment. For example, 4,465 full-time jobs for 1 year. Or 446.5 full-time jobs per year, over ten years.

cultural effects that are anticipated from the implementation of the provisions, including the opportunities for economic growth that are anticipated to be provided or reduced; and employment that are anticipated to be provided or reduced.” However, I note that even for a Section 32 report, providing this information is necessary but not necessarily sufficient to demonstrate the benefits and costs as Section 32(2)(b) specifically states that “if practicable, quantify the benefits and costs referred to [above].”

I argue that simply showing the GDP and jobs impact of a project is not sufficient under the RMA for a Section 32 report. However, notwithstanding that, this assessment is provided for a referral application under the FTAA which makes clear, as noted previously, “the Minister may consider whether the project will deliver significant economic benefits.” GDP and jobs are impacts and potentially indicative of benefits generated, but are not benefits per se.

To estimate benefits, a clear counterfactual (e.g., development being delayed, taking place elsewhere, etc.) should be defined then compared to this proposal.

#### **Review of Section 6 of the EIA -- RESIDENTIAL MARKET OVERVIEW**

This section makes the argument that housing, in general, is unaffordable in Auckland. This is true, though less so than it was ten years ago. A key point made in this section is that the NPS-UD seeks to promote competitive land and housing markets through enabling a sufficient supply of land and development capacity.

The latest Housing and Business Development Capacity Assessment (HBA) from Auckland<sup>6</sup> demonstrates that, in aggregate, the plan-enabled, infrastructure-ready, feasible, and reasonably expected to be realized housing capacity is sufficient, in aggregate, under the measurements required by the NPS-UD.

#### **Review of Section 7 of the EIA -- OTHER QUALITATIVE ECONOMIC BENEFITS**

This section provides the most compelling assessment of economic benefits though they are qualitative rather than quantitative.

In general, this section on non-monetised benefits (and costs) is well-reasoned if incomplete. While many potential benefits were identified, there are no-doubt potential costs that have been overlooked.

#### **Gaps in the analysis**

All the future urban land to the east is part of the Silverdale West Dairy Flat Industrial Area Structure Plan and all the land is anticipated to be zoned for Light Industry or Heavy Industry. There is future urban zoned land approximately 1km to the north of the site (Wainui East) which has been identified by the 2023 Future Development Strategy and the Spatial Land Use Strategy (Dairy Flat and Silverdale Future Urban Zones)<sup>7</sup> as being phased in 2050+. The nearest existing residential development at any scale is Milldale, approximately 4km to the north. This means that any infrastructure (outside the development, but used by the development) such as roads, public transport, libraries, etc. will not be accessible and will potentially not have the capacity to accommodate this unplanned growth.

<sup>6</sup> [https://www.knowledgeauckland.org.nz/media/ejmbrasm/auckland-council-hba-oct-2023\\_final\\_print-part-1.pdf](https://www.knowledgeauckland.org.nz/media/ejmbrasm/auckland-council-hba-oct-2023_final_print-part-1.pdf)

<sup>7</sup> <https://www.aucklandcouncil.govt.nz/content/dam/ac/docs/plans/structure/spatial-land-use-strategy-dairy-flat-silverdale-future-urban-zones.pdf>

This is the largest gap in the analysis and is specifically relevant to the FTAA and its characterisation of economic benefits. Given the location of the development outside areas identified for future growth, it is likely that any infrastructure provision will be less efficient than it would be otherwise – that is, there will be a cost which has not been quantified in the economic analysis. Without this, I am unable to determine if the project will generate net economic benefits and why I am neutral on whether this project proceeds through the fast-track process.

## **Attachment B –Local Board comments**

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

## **Project Name**

**Tuakiri Dairy Flat Project**

## **Location**

24, 42, 46, 48, 82, 100 Horseshoe Bush Road, Dairy Flat  
Lot 3 DP 130668, Horseshoe Bush Road, Dairy Flat  
Lot 1 DP 130668, Horseshoe Bush Road, Dairy Flat  
61, 77 Kahikatea Flat Road, Dairy Flat

Together referred to as “the site”.

## **Date**

7 July 2026

## **Prepared by**

Rodney Local Board

## **1. Context – About Fast-track Applications**

The Rodney Local Board understands that the Fast-track Approvals Act 2024 provides a streamlined consenting process for projects considered to have significant regional or national benefit. The Board also understands that Local Boards do not have a formal decision-making role on matters such as community impact, transport, open space, mana whenua engagement and infrastructure alignment.

The Board provides this feedback in that context.

Given the limited opportunity for wider public participation through the fast-track process, the Board considers it especially important that local impacts are carefully considered by the Expert Panel before any decision is made.

## 2. Local Board Feedback

### Overall position

The Rodney Local Board **does not support the Tuakiri Dairy Flat Project being approved in its current form.**

The Board acknowledges the need for additional housing across Auckland and recognises that well-planned growth can provide community benefit when it is properly sequenced, serviced and integrated with infrastructure. However, the Board has serious concerns that this proposal represents a substantial urban development on rural land, ahead of the necessary strategic planning, infrastructure provision and community engagement.

The proposal is for approximately **1,000-1,100 residential lots or dwellings** across approximately **77.9 hectares** of land currently zoned **Rural -Mixed Rural Zone**. It also includes a neighbourhood centre, commercial activity, community activity, roading, walking and cycling networks, onsite servicing and approximately **18.6 hectares of open space, ecological restoration and stormwater management areas.**

The scale of the proposal means it should not be treated as a simple subdivision or isolated development. It would create a significant new settlement pattern in Dairy Flat and would have long-term effects on transport, infrastructure, rural character, highly productive land, natural hazards, community facilities and council servicing obligations.

The Board's concerns are set out below.

### 2.1 Strategic planning and growth sequencing

The Board is concerned that the project would enable large-scale urbanisation of rural land through the fast-track process, rather than through Auckland planning, plan change, infrastructure planning and public engagement processes.

The site is currently zoned **Rural – Mixed Rural Zone**. A proposal of this scale is not a minor rural-residential development. It would introduce an urban form and density that is significantly different from the existing planning framework for the area.

The Board is concerned that approving this project through fast-track would risk setting a precedent for ad hoc urbanisation in Rodney, particularly in areas where infrastructure, roads, public transport, community facilities and hazard planning have not yet been resolved.

Rodney has already experienced the effects of growth occurring ahead of infrastructure. The Board does not consider it appropriate for a development of this scale to proceed unless it is clearly aligned with Auckland's wider growth strategy and infrastructure sequencing.

## 2.2 Infrastructure and servicing

The Board has significant concerns about the lack of existing public water and wastewater infrastructure to service a development of this scale.

The application summary refers to **onsite servicing for water, wastewater and stormwater**. However, a development of 1,000-1,100 dwellings, together with a neighbourhood centre and commercial/community activities, requires a very high level of certainty around long-term servicing.

The Board does not consider that general references to onsite servicing are sufficient.

The Expert Panel should require clear and independently reviewed evidence on:

- potable water supply;
- wastewater treatment and disposal;
- stormwater detention, treatment and discharge;
- long-term ownership, operation and maintenance of any private or onsite infrastructure;
- failure risk, monitoring and compliance;
- effects on downstream environments and neighbouring properties;
- whether Auckland Council, Watercare, Auckland Transport or the local community could inherit future costs or risks.

The Board is particularly concerned that infrastructure presented as a private or onsite solution at the consenting stage may later become a public problem if systems fail, are poorly maintained, or prove inadequate over time.

## 2.3 Transport and road safety

The Board considers transport to be one of the most significant unresolved issues.

Horseshoe Bush Road and Kahikatea Flat Road are rural roads. A development of 1,000–1,100 dwellings would generate a substantial increase in daily vehicle movements, including private vehicles, service vehicles, construction traffic and commercial traffic associated with the neighbourhood centre.

The Board is concerned about:

- the capacity and safety of the surrounding rural road network;
- intersection safety and required upgrades;
- construction traffic impacts over the proposed eight stages;
- the absence of frequent public transport to support this scale of housing;
- the risk of car-dependent development;
- safe walking and cycling connections beyond the site;
- school travel impacts;
- cumulative effects with other growth and development pressures in the wider Dairy Flat, Silverdale, Wainui and Rodney area.

The Board does not consider that internal walking and cycling networks are enough. The development must be safely and practically connected to the wider transport network, including public transport, schools, employment areas, services and community facilities.

Without this, the proposal risks creating another car-dependent settlement that places further pressure on already constrained rural and peri-urban roads.

## **2.4 Highly productive land and rural land use**

The Board notes that the site includes **highly productive land**.

Rodney contains a significant proportion of Auckland's rural land and productive land resource. The Board is concerned about the ongoing loss of rural land to urban development, particularly where that development is not clearly sequenced or supported by infrastructure.

The proposal would permanently remove a large area of rural land from productive use. The Board considers that this loss should not be treated lightly, particularly where the project is being advanced outside the normal plan change process.

The Board asks the Expert Panel to carefully consider whether the claimed benefits of the project outweigh the long-term loss of rural and productive land.

## **2.5 Natural hazards, stormwater and flooding**

The Board has serious concerns about natural hazards, stormwater and downstream flooding effects.

The application material identifies stormwater management and ecological open space as part of the proposal. However, the Board considers that the scale of earthworks, impervious surfaces, roads, roofs and urban development across the site has the potential to significantly alter stormwater flows.

Rodney communities have direct experience of the consequences of underestimating stormwater and flood risk. The Board therefore considers that any assessment must be conservative, independently reviewed and based on current best practice modelling.

The Expert Panel should require clear evidence on:

- flood risk across the site and downstream catchments;
- changes to runoff volumes and peak flows;
- cumulative downstream effects;
- climate change assumptions;
- overland flow paths;
- long-term maintenance of stormwater devices;
- the risk of stormwater infrastructure failure;
- effects on neighbouring rural properties and receiving environments.

The Board does not support approval unless stormwater and natural hazard risks are fully understood and there is certainty that the development will not increase flood risk on or off the site.

## **2.6 Open space, ecology and community benefit**

The Board acknowledges that the applicant has identified approximately **18.6 hectares of open space**, including ecological restoration, revegetation, mitigation planting, stormwater management areas and public open spaces.

The Board supports genuine ecological restoration and well-designed public open space. However, the Board cautions against treating stormwater management areas, mitigation planting and constrained land as equivalent to high-quality, usable public open space.

For a development of 1,000-1,100 dwellings, the Board considers that open space must be:

- usable, safe and accessible;
- connected to walking and cycling routes;
- designed for a range of ages and abilities;
- maintained to an agreed standard;
- clearly distinguished from stormwater infrastructure;
- provided early enough to serve residents as stages are developed.

The Board also seeks clarity on whether any open space is proposed to vest in Auckland Council, and if so, what the long-term maintenance and renewal costs would be.

## **2.7 Community infrastructure and social impact**

The Board is concerned that the proposal may create demand for community infrastructure before the wider area is ready to support that growth.

A development of this scale will generate demand for schools, early childhood education, parks, community facilities, libraries, recreation spaces, public transport, health services and local employment. The application summary refers to a neighbourhood centre and some community activity, but the Board does not consider this sufficient to address the wider social infrastructure demands created by 1,000-1,100 dwellings.

The Expert Panel should require a clear assessment of community infrastructure demand and how that demand will be met, funded and delivered.

## **2.8 Mana whenua engagement**

The Board expects meaningful engagement with mana whenua to be undertaken and clearly documented.

Given the scale of the proposal and the potential effects on land, water, ecology, stormwater, cultural values and future urban form, mana whenua input should be sought early and incorporated into the project design, not treated as a late-stage consent requirement.

The Board asks the Expert Panel to ensure that mana whenua views are given appropriate weight in considering whether the project should proceed and under what conditions.

## 2.9 Cumulative effects

The Board is concerned that the proposal should not be assessed in isolation.

Rodney is experiencing significant pressure from multiple growth proposals, including fast-track and private development applications. Individually, each proposal may claim to provide housing benefit. Collectively, they can create major cumulative impacts on transport networks, infrastructure, rural character, natural systems, community facilities and council budgets.

The Board asks the Expert Panel to consider the cumulative effects of this proposal alongside wider growth pressures in Dairy Flat, Silverdale, Wainui and the wider Rodney area.

## 2.10 Matters the Board considers must be resolved before any approval

If the Expert Panel is minded to consider approval, the Board asks that no approval be granted unless the following matters are fully resolved:

1. Confirmation that the proposal is consistent with Auckland's growth strategy and infrastructure sequencing.
2. Independent review of water, wastewater and stormwater servicing.
3. Independent review of flood modelling, natural hazard assessment and downstream effects.
4. Confirmation of transport upgrades required to safely support the development.
5. Clear staging conditions linking development to infrastructure delivery.
6. Assessment of the loss of highly productive land.
7. Confirmation of long-term ownership, maintenance and funding responsibilities for open space, stormwater and any onsite servicing systems.
8. Assessment of community infrastructure demand.
9. Evidence of meaningful mana whenua engagement.
10. Clear assessment of cumulative effects with other growth proposals in the wider area.

## 3. Conclusion

The Rodney Local Board does **not support approval of the Tuakiri Dairy Flat Project in its current form.**

The Board considers that the proposal would enable large-scale urbanisation of rural land through a fast-track process, without sufficient certainty around infrastructure, transport, natural hazards, stormwater, community infrastructure, highly productive land and long-term public costs.

The Board acknowledges the need for additional housing, but considers that housing growth must be well planned, properly serviced, appropriately sequenced and supported by infrastructure. Growth that occurs ahead of infrastructure creates long-term consequences for existing communities, future residents and Auckland Council.

The Board asks the Expert Panel to give significant weight to local impacts and to decline the application unless the matters identified above are fully resolved.

## 4. Contact for Further Information

Name: Guy Wishart

Role: Chair: Rodney Local board

Email: s 9(2)(b)(ii)

## **Attachment C – Houkura Comments**

**From:** [Caleb Hamilton](#)  
**To:** [Tracey Grant](#)  
**Cc:** [Dean Williams](#); [Taff Wikaira](#)  
**Subject:** RE: FAST TRACK REFERRAL - Tuakiri Dairy Flat Project  
**Date:** Tuesday, 7 July 2026 8:56:27 am  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)

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Mōrena Tracey,

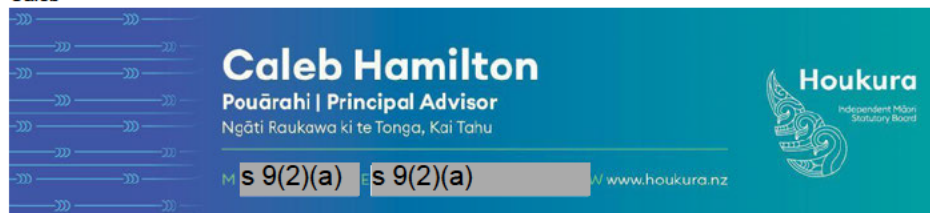
The Houkura Secretariat has read through the documentation provided, outlining this project below and engagement to date.

At this stage of the process, the applicant has contacted all mana whenua listed below, though only Ngāti Manuhiri has replied to date.

Based on the information provided, the Houkura Secretariat would indicate to Council that this applicant could proceed to the next stage of the FTAA process, so long as the applicant provides resourcing and support for Ngāti Manuhiri to collaborate with Te Kawerau ā Maki to produce a CVA, and for further engagement to take place with other mana whenua.

Also, as this site sits within Ngāti Rango and te Taoū, Ngāti Whātua ki Kaipara should be engaged on this as well.

Ngā mihi,  
Caleb



## **Attachment D – Auckland Council Policy Comments**

## 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 & FTAA number | Tuakiri Fast Track – FTAA number to be confirmed<br><input type="checkbox"/> <a href="#">Horseshoe Bush Road Pine Valley 0794,100 - PRR00044382</a> |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|

### Respondent Information

|                     |                                |
|---------------------|--------------------------------|
| Name                | Alison Pye                     |
| Role                | Senior Policy Planner          |
| Agency / Department | Planning and Resource Consents |
| Date                | 7 July 2026                    |

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

☐ Support   ☒ Oppose   ☐ Neutral

### Department Response

#### Regionally significant

The scale and timeframes for the proposal are not considered to be 'regionally significant'. If Council infrastructure is relied on – it should be noted that it is not scheduled to be delivered until 2050. It is reasonable then to assume a 15-20 year timeframe for the proposed 1,100 houses. This does not deliver what is provided in Auckland in a single month. Data from the Auckland Monthly Housing Update identifies that 1683 dwellings were consented in April 2026 alone and that in the year ending April 2026, 16,687 dwellings were consented in the region.

#### Inconsistent with regional planning documents

The subject land is not recognised in any national or regional planning document as an area for urban growth. The proposal is not in line with the urban growth strategy outlined in the Auckland Council's Regional Policy Statement – being rural land outside the Rural Urban Boundary, and it is not identified in Councils Future Development Strategy 2023-2053 which has identified 30 years of future urban zone land for future urban development.

The subject land being outside of the area covered by the FDS also means it has not been factored into planned delivery of infrastructure by the main infrastructure providers. They have only considered and planned for servicing of council's FUZ zoned land.

#### Inconsistent with national planning documents

The proposed urbanisation of rural zoned land with LUC3 soil is in conflict with the National Policy Statement – Highly Productive Land.

The subject site meets the definition of highly productive land set out under 3.5.7 NPS-HPL, - it is land with a rural zone and LUC3 soil (satisfying 3.5.7(a)(i) and (ii); and it has not been identified for urban development, is not the subject of an approved plan change for rezoning, and does not have resource consent for non-rural activity (satisfying 3.5.7(b)(i, ii and iii).

Objectives and policies (part 2 of the NPS-HPL) direct avoidance of urbanisation of highly productive land. Measures to give effect to the objectives and policies are set out in part 3 'Implementation'. The proposal is considered to be inconsistent with part 2 and part 3 (in particular 3.6, 3.7, 3.9 and is not considered to qualify for any of the exemptions listed in part 3.10

*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**? **No**
- 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? **No**
- Will the project deliver new or support existing regionally/nationally significant infrastructure? **No**
- Will the project increase housing supply or contribute to a well-functioning urban environment? **No**
- 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)? **No**
- 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?

## **Attachment E – Auckland Transport Comments**

## 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 & FTAA number | Tuakiri Fast Track – FTAA-2605-1241 - PRR00044382 |
|----------------------------|---------------------------------------------------|

### Respondent Information

|                     |                               |
|---------------------|-------------------------------|
| Name                | Liam Burkhardt                |
| Role                | Principal Development Planner |
| Agency / Department | Auckland Transport            |
| Date                | 13 July 2026                  |

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

- ☐ Support  
☒ Oppose  
☐ Neutral

### Agency/Department Response

#### Overview

1. The Minister for Infrastructure ('the Minister') has asked Auckland Council to provide written comments on an application to refer Tuariki Dairy Flat ('the project' or 'the proposal') under the Fast-track Approvals Act 2024 ('the Act') to the fast-track process.
2. Auckland Council has asked Auckland Transport to provide comments on the project, which will form part of Auckland Council's response to the Minister.
3. Auckland Transport does not support the project's referral to the fast-track process and considers that it will not result in significant regional/national benefits, contribute to a "well-functioning urban environment", or deliver any new regionally/nationally significant infrastructure.

#### Project description

4. The project involves the subdivision and development of a large site across approximately 77.9 ha, located between Horseshoe Bush Road and Kahikatea Flat Road in Dairy Flat, Auckland.
5. The project is proposed to be delivered over 8 stages, which includes 1,000 – 1,100 residential lots/dwellings and a neighbourhood centre with a gross floor area of approximately 1,200m<sup>2</sup>;
6. The project includes transport infrastructure, an open space network and on-site water, wastewater and stormwater servicing.

7. The proposal is located within the Rural - Mixed Rural Zone in the Auckland Unitary Plan ('AUP').

**Lack of integration between land use and transport infrastructure/services**

8. The project involves significant residential and commercial development of land that was not anticipated for urban development, given that the site is zoned Rural - Mixed Rural Zone and sits outside of the Rural Urban Boundary ('RUB').
9. Auckland Transport's nearby designations 1490 and 1497 protect land for future arterial roads. The New Zealand Transport Agency has also lodged Notice of Requirement 1 ('NOR 1') for a rapid transit corridor in Dairy Flat. However, the timing and funding for constructing these designated arterial routes and the NOR 1 rapid transit corridor have not yet been confirmed. Therefore, any development of the project site would be occurring prior to the construction of the necessary bulk transport infrastructure and may undermine the sequencing of transport investment.
10. Further, arterial routes 1490 and 1497 were designated to support the future development of land that is either live zoned or zoned as Future Urban. The assessment prepared to support these designations did not anticipate significant urban development of land that sits outside the RUB. Therefore, large-scale urban development of land that sits outside the RUB has the potential to undermine the safe and efficient operation of the future bulk transport network, such as the arterial routes protected by designations 1490 and 1497.
11. Current public transport services in the area are very limited, so future residents will be reliant on the private vehicle for travel. There are no significant improvements planned to public transport in the area, given that the Future Urban zoned land to the east of the project site is not anticipated to urbanise until 2030 at the very earliest, according to Auckland Council's Future Development Strategy ('FDS').
12. Given that the project does not align with the provision of bulk transport infrastructure and services, was not anticipated as part of the assessment to support the designations of future arterial routes, and is poorly served by public transport, Auckland Transport considers that the project will not result in significant regional/national benefits and does not contribute to a "well-functioning urban environment". Additionally, the applicant is not proposing any new regionally/nationally significant infrastructure to support the project. As such, the project should not be referred to the fast-track process.

**Transport matters for the applicant to address**

13. The comments below do not relate to the assessment criteria under section 22 of the Act. However, should the project be referred to the fast-track process, Auckland Transport requests the following information is provided as part of the substantive application.
14. The applicant should provide an integrated transport assessment ('ITA') as part of the substantive application. The ITA should assess, but is not limited to, the following matters:
  - a. Estimation of trip generation/distribution
  - b. Associated modelling of surrounding intersections that accounts for cumulative development associated with planned growth, including:
    - i. Kahikatea Flat Road / Dairy Flat Highway
    - ii. Horseshoe Bush Road / Dairy Flat Highway
    - iii. New access points on Kahikatea Flat Road and Horseshoe Bush Road.

- c. Vehicle tracking drawings and visibility assessments for all intersections and vehicle crossings.
  - d. Discussion about construction-related effects on the transport network.
15. Auckland Transport considers that both Kahikatea Flat Road and Horseshoe Bush Road would function as key roads, providing access between the project site and Dairy Flat Highway. Auckland Transport expects that both these roads would, at a minimum, need to be upgraded to an urban collector standard, including the upgrade of the existing one-way bridge on Horseshoe Bush Road. The intersections of these roads with Dairy Flat Highway would also need to be upgraded. Draft designs for these road and intersection upgrades should be provided.
16. In addition to draft designs for upgrades of external roads and intersections, Auckland Transport would like to see draft designs for an internal road network and expects that provision is made for internal collector roads to provide connectivity throughout the site.

**Stormwater management concerns and matters for the applicant to address**

17. The comments below do not relate to the assessment criteria under section 22 of the Act. However, should the project be referred to the fast-track process, Auckland Transport requests the following information is provided as part of the substantive application.
18. The stormwater management system is proposed to comprise of constructed stormwater treatment wetlands. However, the applicant also states that where retention cannot be achieved within the wetlands, distributed-at-source control measures or supplementary devices would be used to make up this shortfall. Auckland Transport is concerned that supplementary devices may be distributed within the road reserve to meet required stormwater retention requirements, and this is generally not supported.
19. The project site sits within a catchment that discharges to a stream with many sub-catchments. This presents hazards to existing roads managed by Auckland Transport. The applicant proposes to provide attenuation to limit peak flows to pre-development levels within the site, suggesting that this will avoid adverse effects. However, Auckland Transport notes that providing peak flow attenuation doesn't consider the potential impacts of the increased runoff volumes due to development of the site, nor the potential for affecting the timings at which peak flows may coincide from other catchments.
20. Existing roads in the vicinity of the project site are currently subject to highly hazardous flooding during extreme rainfall events. In their present form, new residents cannot rely on these roads to be serviceable or safe during extreme rainfall events.
21. Should the project be referred to the fast-track process, a stormwater management report should be provided that addresses, but is not limited to, the following matters:
- a. Feasibility assessment of proposed wetlands achieving stormwater retention requirements, including confirmation of the form, number and layout of any supplementary devices (if any).
  - b. Hydrological and hydraulic modelling, demonstrating that the proposed flood management system adequately mitigates the effects associated with the project.
  - c. Discussion about how residents will be provided with safe access during extreme rainfall events, given that existing roads are already subject to highly hazardous flooding events.

## **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?

## **Attachment F – Watercare Comments**

13 July 2026

Tracey Grant  
Principal Project Lead, Auckland Council  
s 9(2)(a)

Dear Tracey

***Re: Application for referral of the Tuakiri Dairy Flat Project under the Fast-Track Approvals Act 2024***

## Introduction

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Tuakiri Dairy Flat Project Fast-track referral application (**Application**), made under section 13 of the Fast-track Approvals Act 2024 (**Act**).
2. Tuakiri Property Limited (**Applicant**) proposes to subdivide and construct a residential village development (the **Project**) over approximately 77.9 hectares of land including the following sites, collectively referred to hereafter as the Project Area:
  - 24 Horseshoe Bush Road, Dairy Flat
  - 42 Horseshoe Bush Road, Dairy Flat
  - 46 Horseshoe Bush Road, Dairy Flat
  - 48 Horseshoe Bush Road, Dairy Flat
  - Lot 3 DP 130668, Horseshoe Bush Road, Dairy Flat
  - Lot 1 DP 130668, Horseshoe Bush Road, Dairy Flat
  - 100 Horseshoe Bush Road, Dairy Flat
  - 82 Horseshoe Bush Road, Dairy Flat
  - 61 Kahikatea Flat Road, Dairy Flat
  - 77 Kahikatea Flat Road, Dairy Flat.
3. The Project includes:
  - approximately 1,100 – 1,200 residential units;
  - a village centre;
  - approximately 18.6 hectares of open space;
  - private wastewater servicing through an on-site reticulation and treatment system;
  - a number of potential water supply options, including a private bore-fed supply, a connection to Watercare's public water supply network via the Orewa 2 Watermain, or a hybrid approach involving private bore supply with a public top-up from Orewa 2 Watermain.
4. The zoning of the Project Area is Mixed Rural Zone under the Auckland Unitary Plan – Operative in Part (**AUP-OP**).
5. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
  - Referral Application Planning Report Final, dated 2 June 2026

- Appendix A – Masterplan Document, date 29 May 2026
- Appendix B – Project Map
- Appendix E – Infrastructure and Stormwater - Maven
- Appendix F – Drinking Water Assessment – GWE
- Appendix G - Wastewater Assessment - GWE

6. Any amendment to the Application will require further review from Watercare.
7. This advice is valid as at the date of this letter. All servicing advice is based on the best available information at the time and may change if updated network modelling or programme and/or funding reviews indicate materially different outcomes. Any infrastructure delivery dates provided in this letter are forecast dates only and are subject to change.

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

8. 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.
9. Watercare is required to manage its operations efficiently, with a focus on minimising overall costs while maintaining long-term asset integrity. These obligations are subject to economic regulation under the Watercare Charter, with oversight provided by the Commerce Commission as the appointed Crown monitor. Watercare must also give effect to the relevant aspects of Auckland Council’s Long-term Plan and act consistently with other council plans and strategies, including the Auckland Plan 2050 and the Future Development Strategy (**FDS**).
10. Through its annual Statement of Intent responding to the council’s Letter of Expectation, Watercare commits to contributing to Auckland Plan 2050 outcomes. This includes working collaboratively with the wider council group to support areas of growth identified by the council, acting consistently with the FDS for major infrastructure development for future urban areas and ensuring alignment of infrastructure projects with other utilities. Watercare also commits to fully recovering growth-related costs so that growth pays for growth.

### **Watercare’s comments**

11. Watercare has considered the Project against the assessment criteria set out in section 22 of the Fast-track Approvals Act 2024 and provides the following comments.

#### Watercare Growth Servicing Policy

16. Watercare’s Growth Servicing Policy 2026<sup>1</sup> sets out Watercare’s approach to servicing growth. The policy recognises Rural or equivalent zoned land as a distinct servicing category located outside of Watercare’s area of service. It also recognises that development may be proposed through Fast Track or Resource Consent processes, in which case Auckland Council will undertake a policy assessment considering consistency with its plans and strategies and wider infrastructure requirements needed

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<sup>1</sup> [Watercare Growth Servicing Policy 2026](#)

to support a thriving community. Watercare will follow Council's lead on strategic consistency and provision of public infrastructure servicing for such proposals.

17. In line with this policy, Watercare does not provide water or wastewater connections to rural land unless Auckland Council has determined through its policy assessment that provision of public servicing should proceed. As of the date of this letter, no policy assessment for servicing the Project has been provided by Auckland Council.
18. Notwithstanding this policy position, the below comments are provided in relation to the Applicants proposed servicing options.

#### Water Supply

12. While the Applicant is proposing private water supply servicing, the Application also identifies potential water supply options that would involve reliance on Watercare's public water supply network. Watercare's position on these options is set out below.
13. The proposed water supply servicing options include:
  1. a fully private bore-fed supply,
  2. Public servicing by connection to Watercare's public water supply network via the Orewa 2 Watermain, and
  3. a hybrid option involving a private bore supply with a public top-up connection from the Orewa 2 Watermain.
14. Regarding option 2, there are no current plans for the Orewa 2 Watermain to supply development areas west of State Highway 1, with future development in this area expected to be supplied by the future Orewa 3 watermain which is currently anticipated to be delivered by 2038+.
15. Regarding option 3, Watercare does not support a hybrid private and public water supply arrangement as Watercare would have no control over the source or quality of water supplied, creating challenges in meeting its drinking water regulatory and reporting obligations. Such arrangements may also introduce operational and water quality management issues associated with integrating public and private supply systems.
16. Re option 1, Watercare defers to Auckland Council for comments on the proposed fully private water supply servicing for the Project including design, governance and environmental performance. Additionally, any private water supply would be subject to regulation by Taumata Arowai.

#### Wastewater

17. The Applicant proposes a private wastewater servicing solution comprising an on-site reticulation network and centralised on-site wastewater treatment plant, with treated effluent discharged to land and/or a receiving stream, subject to detailed design and consenting requirements.
18. Watercare defers to Auckland Council for comments on the proposed private wastewater servicing for the Project including design, governance and environmental performance.

## Conclusion

1. Watercare does not provide water supply or wastewater connections to rural land unless Auckland Council has determined through its policy assessment that provision of public servicing should proceed. As of the date of this letter, no policy assessment for servicing the Project has been provided by Auckland Council.
19. Watercare remains available to discuss this matter further and to continue engagement with Auckland Council and the Applicant as the Project progresses.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Amber Taylor', enclosed in a light blue rectangular box.

Amber Taylor  
**Development Planning team Leader – Major Developments**  
Watercare Services Limited

Address for correspondence:  
Chloe Jacobs  
Development Planner  
Phone: s 9(2)(a)  
Email: fasttrack@water.co.nz

## **Attachment G – Healthy Waters Comments**

## 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 & FTAA number | Tuakiri Fast Track – FTAA-2605-1241 |
|----------------------------|-------------------------------------|

### Respondent Information

|                     |                  |
|---------------------|------------------|
| Name                | Hillary Johnston |
| Role                | Fast-Track Lead  |
| Agency / Department | Healthy Waters   |
| Date                | 20 July 2026     |

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

- ☐ Support  
☐ Oppose  
☒ Neutral

### Agency/Department Response

Healthy Waters & Flood Resilience (HWFR) has reviewed the referral application for the proposed residential development located within parcels of land between Horseshoe Bush Road and Kahikatea Flat Road, Dairy Flat. We understand that the proposed project includes approximately 1,100 - 1,200 residential units, a village centre, approximately 18.5 hectares of open space, and associated infrastructure and servicing.

#### Authorisation

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.

The proposed development is located within the *Rural – Mixed Rural* zone and therefore will not be able to be authorised under the RWNDC.

A private diversion and discharge consent will be required to authorise the diversion and discharge of stormwater from the proposed development. This has been acknowledged within the application documents.

HWFR remains available to work closely with the Applicant's team and Council's regulatory stormwater specialists in respect of any private diversion and discharge consent that may be required.

### **Natural Hazards**

The application acknowledges that the site contains existing flooding, floodplains, flood prone areas, and overland flow paths. The Infrastructure Report indicates that development will be designed to maintain existing overland flow paths, manage flood risk through attenuation of post-development flows to pre-development levels, and avoid increasing flood risk both on-site and downstream. However, no detailed flood modelling or flood hazard assessment has been provided to demonstrate how these outcomes will be achieved.

Should the application proceed, a comprehensive flood assessment should be provided to confirm the extent of existing and post-development flood hazards and demonstrate that the development can be undertaken without increasing flood risk within the site or to upstream and downstream properties. This should include consideration of floodplain storage, overland flow path conveyance, finished floor levels, access and egress during flood events, and the effects of any filling within flood-prone areas.

### **Stormwater Management**

The preliminary information indicates that wetlands are proposed as the primary stormwater management device for water quality treatment, hydrology mitigation, and attenuation. While this is acknowledged, wetlands are generally not considered to provide a sufficient level of retention to meet Auckland Council hydrology mitigation requirements.

While peak flow attenuation is proposed, the increased runoff volume from the development could significantly increase erosion risk and affect stream bank stability if appropriate mitigation measures are not included.

Further consideration should therefore be given to alternative or supplementary stormwater treatment measures to achieve appropriate hydrology mitigation outcomes. This may include a treatment train approach or other devices capable of meeting relevant hydrology mitigation performance standards.

Additional detail on the proposed stormwater management approach, including device selection, performance, and footprint, should be provided if the application is to proceed.

### **Asset Ownership**

The information provided indicates that approximately 18.5ha of Open Space is proposed which will include a constructed wetland system that will provide primary and secondary conveyance, flood risk management, and water quality treatment. This constructed wetland system is proposed to be vested to Council.

Auckland Councils *Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy* which was adopted by Council in May 2025 sets out the how Council will consider the provision of open space including for stormwater management purposes. The strategy also seeks to support the vesting of stream corridors or natural wetlands where the function sits best in public ownership. This is to avoid vesting of land that would result in an ongoing financial maintenance burden to Council without a clear and tangible public benefit. If the project were to progress, the extent and location of any land proposed for vesting for stormwater management purposes should be accompanied by evidence and clear rationale linked to *Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy* that the land delivers essential stormwater function as well as wider public benefit.

The application outlines that SMAF hydrology mitigation, water quality treatment, and flood management will be achieved by the constructed wetland system. If the project were to progress, HWFR seek further input on proposed stormwater management so that, if necessary, there is opportunity to comment on the operation and maintenance requirements of any public stormwater system.

It is understood that a private ownership entity is proposed to be established for the operation and management of the private wastewater network and potentially a private water supply network. It may also be appropriate for this entity to consider the proposed stormwater network alongside the wastewater and water servicing given the stormwater discharge consent will also need to be private. Healthy Waters remain open to further discussions with the applicant over these future arrangements.

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

### **Summary**

From a HWFR perspective, the information provided does not currently identify any stormwater related matters that would warrant recommending decline of the referral application under section 21 of the FTAA. However, it is noted that the proposed development cannot be authorised under the RWNDC due to current zoning, and a private diversion and discharge consent will be required.

If the application is to proceed, further, more detailed information will be required including confirmation of the proposed approach to address hydrology mitigation and to manage effects on the receiving environment including stream erosion and flooding, particularly in respect of upstream and downstream properties, and infrastructure.

HWFR welcomes further engagement with the Applicant's Agent should the proposal progress.

## **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?

## **Attachment H – Auckland Parks Comments**

## Parks Referral Application Feedback Form

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

### Project Information

|                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project Name & FTAA number | Tuakiri Fast Track – FTAA-2605-1241<br>(PRR00044382)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Address                    | <p>The Site is located within Dairy Flat, and comprises multiple adjoining lots situated between Horseshoe Bush Road and Kahikatea Flat Road. The addresses are:</p> <ul style="list-style-type: none"> <li>• 24 Horseshoe Bush Road, Dairy Flat</li> <li>• 42 Horseshoe Bush Road, Dairy Flat</li> <li>• 46 Horseshoe Bush Road, Dairy Flat</li> <li>• 48 Horseshoe Bush Road, Dairy Flat</li> <li>• Lot 3 DP 130668, Horseshoe Bush Road, Dairy Flat</li> <li>• Lot 1 DP 130668, Horseshoe Bush Road, Dairy Flat</li> <li>• 100 Horseshoe Bush Road, Dairy Flat</li> <li>• 82 Horseshoe Bush Road, Dairy Flat</li> <li>• 61 Kahikatea Flat Road, Dairy Flat</li> <li>• 77 Kahikatea Flat Road, Dairy Flat</li> </ul> <p>Together referred to as 'the site'</p> |

### Respondent Information

|                     |                                |
|---------------------|--------------------------------|
| Name                | Kirsty Smith                   |
| Role                | Parks planner                  |
| Agency / Department | Parks and Community Facilities |
| Date                | 8/07/2026                      |

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

- ☐ Support  
☒ Oppose  
☐ Neutral

## Agency/Department Response

*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?  
*Not from a parks perspective.*
- Would referring the project facilitate its delivery in a more timely and cost-effective way?  
*Not from a parks perspective.*
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?  
*Not from a parks perspective.*
- Has the project been identified as a priority in any government or sector plan or strategy?  
*Not from a parks perspective.*
- Will the project deliver new or support existing regionally/nationally significant infrastructure?  
*Not from a parks perspective.*
- Will the project increase housing supply or contribute to a well-functioning urban environment?  
*Not from a parks perspective.*
- Will the project deliver significant economic benefits?  
*Not in scope for Parks to advise on.*
- Will the project support primary industries (e.g., aquaculture)?  
*Not in scope for Parks to advise on.*
- Will the project support development of natural resources (e.g., minerals, petroleum)?  
*Not in scope for Parks to advise on.*
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?  
*Not in scope for Parks to advise on.*
- Will the project support climate change adaptation or recovery from natural hazard events?  
*Not from a parks perspective - no information provided to support the purpose of esplanade areas under s229(a)(v) of the RMA to address mitigation of natural hazards.*
- Will the project address significant environmental issues?  
*Not from a parks perspective.*
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?  
*Not from a parks perspective.*
- Are there any other relevant matters to consider?  
*See assessment below.*

## 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?  
*Not from a parks perspective.*
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?  
*Not from a parks perspective.*
- 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?  
*Except for the provision of connectivity and esplanade area provision, this is not in scope of Parks and Community Facilities to advise on.*
- Is there the potential for significant adverse environmental effects to occur?  
*Potentially, as esplanade area provisions may be triggered and assessment on this matter is lacking.*

### Other relevant matters

- The applicable underlying mixed rural zoning does not establish open space requirements.
- There is provision for a minimum of two open spaces within the proposal site. Only one open space has been provided which will lead to gaps in park provision.
- The current proposed location of the proposed neighbourhood park open space is not appropriate. The location is isolated from other parks infrastructure and does not show a relationship with the urban blocks.
- Recreational infrastructure is proposed along riparian margins. It is not clear what the function, maintenance and ownership look like.
- An assessment on streams within the development is required to determine whether s230 of the RMA is triggered. Details on the location, width, continuity, and functional design of any esplanade areas will be required to ensure the validity of the blue-green network.
- Further detail on how formalised open space will be appropriately staged to avoid shortfalls as population establishes is required including the wider blue green networks.
- There are opportunities to avoid fragmenting and isolating potential greenway connections through the creation of further connections within the proposal site and to surrounding community and open space infrastructure.
- No existing council reserve land is affected. Indirect effects may be caused from a lack of provision of open spaces in the proposal site.
- The application all round is very light in detail on parks and community facilities

infrastructure. A lack of planning for open space is considered a form of not providing a development that is of regional or national significance from a Parks' perspective.

For the above reasons the application is not considered of regional or national significance.

**Prepared by:**



---

Kirsty Smith  
Parks Planner - Parks Planning  
Parks and Community Facilities  
Date: 8/07/2026

**Accepted for release by:**



---

Hester Gerber  
Manager Parks Planning, Agency Lead for  
Parks and Community Facilities  
Date: 8/07/2026

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

|              |                                                           |
|--------------|-----------------------------------------------------------|
| Project name | Horseshoe Bush Road, Dairy Flat – Residential Development |
|--------------|-----------------------------------------------------------|

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. |                                                                                                                                                                              |           |             |
| Organisation name                                                                                          | Director-General of Conservation<br>Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G. |           |             |
| *First name                                                                                                | Lana                                                                                                                                                                         |           |             |
| *Last name                                                                                                 | Gooderham                                                                                                                                                                    |           |             |
| Postal address                                                                                             |                                                                                                                                                                              |           |             |
| *Contact number                                                                                            | phone                                                                                                                                                                        | s 9(2)(a) | Alternative |
| *Email                                                                                                     | <a href="mailto:Fast-track@doc.govt.nz">Fast-track@doc.govt.nz</a> ;                                                                                                         |           |             |

### 2. Please provide your comments on this application

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

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

### Manager's signoff



Linda Kirk  
Fast Track Applications Manager

15 July 2026

# Director-General of Conservation s17 comments

|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Project name</b>            | Horseshoe Bush Road, Dairy Flat – Residential Development                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Applicant name</b>          | Tuakiri Property Limited                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Application number</b>      | FTAA-2605-1241                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Project summary details</b> | <p>The project is to develop a master-planned, place-led residential development in Dairy Flat, Auckland. The project will include:</p> <ul style="list-style-type: none"> <li>• 1,000 – 1,100 residential lots/dwellings</li> <li>• a neighbourhood centre, including retail, commercial, and</li> <li>• community activities (comprising an approximate Gross Floor Area</li> <li>• of 1,200m<sup>2</sup>)</li> <li>• infrastructure and transport elements including transport facilities,</li> <li>• intersection upgrades and roading, and walking and cycling</li> <li>• networks</li> <li>• green open space network (approximately 18.5 hectares).</li> <li>• The project will require the proposed approvals:</li> <li>• Resource consents under the Resource Management Act 1991</li> <li>• Approval under the Wildlife Act 1953</li> <li>• Archaeological authority under the Heritage New</li> <li>• Zealand Pouhere taonga Act 2014.</li> </ul> <p>The proposal does not involve any development on Public Conservation Land.</p> |

## 1 Overview

### 1.1 Applicant Engagement

- 1.1.1 As the project includes an approval under a specified Act for which the Director-General of Conservation is the administering agency, the applicant was required to notify DOC and allow 20 working days to respond before lodging the referral application in accordance with section 11.
- 1.1.2 In relation to this application, DOC has had the following engagement with the applicant:
- 1.1.3 DOC was notified of the application on 22 April 2026
- 1.1.4 the referral application was lodged on 4 June 2026;
- 1.1.5 In the period available specific feedback was provided as discussed below.

## 1.2 Wildlife Approval

- 1.2.1 The referral application states that the project will require a Wildlife approval for the capturing, handling, or relocating of protected lizards on the subject site.
- 1.2.2 It is noted that during pre-lodgement notification, the applicant specified that they may also require Wildlife approval for handling of bats. The referral application does not identify this approval as being required.
- 1.2.3 Further detail is provided in Part 3 of these comments

## 1.3 Freshwater

- 1.3.1 The referral application does not include any Freshwater Fisheries approvals. It is noted that during pre-lodgement notification, the applicant identified that complex Freshwater Fisheries approvals may be required.
- 1.3.2 Further detail is provided in Part 3 of these comments

## 1.4 Other comments

- 1.4.1 During pre-lodgement notification, it was identified that, in addition to lizards, wetland birds and long-tailed bats may have a presence at the site. In addition, there are natural inland wetlands present on the subject site. Other than Wildlife approval for lizards, no other approvals have been applied for in the referral application.
- 1.4.2 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. Not including these approvals may result in inefficiencies and increased costs.
- 1.4.3 DOC recommends that consideration should be given to as to whether additional conservation approvals are required by the proposal, and if these should be included in the substantive application.

## 2 Criteria for Minister's decision on referral application

- 2.1.1 Sections 21 and 22 of the FTAA set out matters to be considered by the Minister in determining whether a referral application should be accepted.
- 2.1.2 Comments below are targeted to provisions where DOC has specific interests or information relevant to the Minister's decision.

### 2.2 Criteria for declining a referral application

- 2.2.1 Section 21 sets out the criteria for the Minister for declining a referral application. DOC has considered these criteria and provides comments in the table below

| Section  | Criteria                                                                                                                                                                                                                             | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 21(3)(b) | Does the project involve an ineligible activity                                                                                                                                                                                      | Based on the information available, DOC has considered the ineligibility criteria at sections 5(1)(h), (i), (j) and (k), and has not identified any aspect of the Project that would be ineligible based on those criteria.                                                                                                                                                                                                                                                                                                                                                     |
| 21(3)(c) | Is there adequate information to inform a decision                                                                                                                                                                                   | With respect to the approvals identified in the referral application for which DOC is the administering agency, DOC considers the information <b>adequate</b> in terms of a referral decision.                                                                                                                                                                                                                                                                                                                                                                                  |
| 21(4)    | Are there any other reasons to decline the application?                                                                                                                                                                              | Based on the information available, DOC has not identified any reason why the Project should be declined.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 21(5)(a) | Is the project inconsistent with: <ul style="list-style-type: none"> <li>• a Treaty settlement;</li> <li>• Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019;</li> <li>• Marine and Coastal Area (Takutai Moana) Act 2011.</li> </ul> | Based on the information available, DOC has not identified any inconsistency with any relevant Treaty settlement or other obligations. The relevant Treaty settlements are: <ul style="list-style-type: none"> <li>• Te Kawerau ā Maki Claims Settlement Act 2015</li> <li>• Ngāi Tai ki Tāmaki Claims Settlement Act 2018</li> <li>• Ngāti Manuhiri Claims Settlement Act 2012</li> <li>• Ngāti Whātua o Kaipara Claims Settlement Act 2013</li> <li>• Ngāti Pāoa Claims Settlement Act 2025 (Note: Conservation Relationship Agreement is still under negotiation)</li> </ul> |
| 21(5)(b) | Would it be more appropriate to deal with the proposed approvals under another Act(s)                                                                                                                                                | Based on the information available, DOC has not identified any reason why the Project should not be dealt with under the FTAA.                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 21(5)(c) | Would the project have significant adverse effects on the environment                                                                                                                                                                | Based on the information available, DOC considers it is likely that adverse effects of the Project can be addressed through appropriate conditions on any substantive approvals.                                                                                                                                                                                                                                                                                                                                                                                                |
| 21(5)(d) | Does the applicant(s) have a poor compliance history under a specified Act                                                                                                                                                           | DOC has not identified any issues with the applicant's compliance history.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Section  | Criteria                                                        | Comments                                                                                                                    |
|----------|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| 21(5)(g) | Would a substantive application have any competing applications | Based on the information available, DOC has not identified any competing applications in respect of conservation approvals. |

## 2.3 Criteria for accepting a referral application

- 2.3.1 Section 22 sets out the criteria for the Minister for accepting a referral application.
- 2.3.2 DOC has considered these criteria and has not identified anything where DOC has specific interests or information relevant to the Minister's decision.

## 3 Other considerations

- 3.1.1 The referral application includes a wildlife approval for the capturing, handling, or relocating of protected lizards on the subject site. During pre-lodgement notification, it was identified that, in addition to lizards, wetland birds and long-tailed bats may have a presence at the site. In addition, there are natural inland wetlands present on the subject site.
- 3.1.2 To this end, DOC considers that additional Wildlife approvals and complex Freshwater Fisheries approvals may be required than what was identified in the referral application.
- 3.1.3 DOC has provided input to a number of fast-track projects to date where additional 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.
- 3.1.4 DOC suggests that consideration should be given as to whether additional conservation approvals are required by the proposal, and whether these approvals should be included in the substantive application.

## 3.2 Conclusion

- 3.2.1 DOC is not aware of any reason the Project should not be referred.



Linda Kirk  
Fast Track Applications Manager

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

Date: 15 July 2026

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



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

Horseshoe Bush Road, Dairy Flat – Residential Development

FTAA-2605-1241

| Contact Details   |                                                                          |
|-------------------|--------------------------------------------------------------------------|
| Organisation Name | Heritage New Zealand Pouhere Taonga (HNZPT)                              |
| Contact person    | HNZPT Fast-track Team                                                    |
| Contact Number    | (04) 470 8053                                                            |
| Email             | <a href="mailto:fasttrack@heritage.org.nz">fasttrack@heritage.org.nz</a> |

### General Comments

1. Tuakiri Property Limited (Applicant) has lodged an application for referral of the Horseshoe Bush Road, Dairy Flat – Residential Development (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has not been provided with application documents that are relevant to an archaeological authority application. HNZPT comments as follows:

### Consultation and Engagement

4. A pre-lodgement notification was received from the applicant on the 22 April 2026. HNZPT responded on 21 May 2026 noting that the project area should be assessed by a suitably qualified archaeologist to determine whether there is potential for unrecorded sites to exist within the project area. This assessment should focus on an initial screening and field survey.
5. In response, the applicant stated that if the project is referred, an archaeological assessment will be completed. Dependent on the outcome of that assessment either an archaeological authority applied for, or an Accidental Discovery Protocol condition will be included the resource consent.

### Archaeological Authority Application

6. The Applicant has provided no archaeological assessment with their referral application.
7. Without an archaeological assessment, the potential for subsurface archaeological evidence is unknown. As such, HNZPT is unable to determine whether an authority is required for the project. However, HNZPT notes that within the *Planning Report for Referral under the Fast-*



*Track Approvals Act 2024* prepared for the project, it is stated that an Archaeological Authority will be sought under the Heritage New Zealand Pouhere Taonga Act 2014 as a precautionary measure.

8. The site is located in a statutory acknowledgement area for Te Kawerau ā Maki, relating to Rangitoopuni Stream and tributaries. HNZPT notes that no Cultural Impact Assessment has been provided with this application. HNZPT recommends the provision of a Cultural Impact Assessment to understand the cultural impacts of the project and how these may be mitigated.
9. HNZPT notes that tangata whenua have been notified to the project, and some consultation has occurred. Should the project be referred, appropriate consultation with tangata whenua must be provided with a substantive application.

### **Conclusion**

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

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

|                     |                                                           |
|---------------------|-----------------------------------------------------------|
| <b>Project name</b> | Horseshoe Bush Road, Dairy Flat – Residential Development |
|---------------------|-----------------------------------------------------------|

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>                                                                     | North Shore Aero Club Incorporated (North Shore Airport) |                    |  |
| <b>*First name</b>                                                                                         | John                                                     |                    |  |
| <b>*Last name</b>                                                                                          | Punshon                                                  |                    |  |
| <b>Postal address</b>                                                                                      |                                                          |                    |  |
| <b>*Contact phone number</b>                                                                               | s 9(2)(a)                                                | <b>Alternative</b> |  |
| <b>*Email</b>                                                                                              | s 9(2)(a)                                                |                    |  |

| 2. Please provide your comments on this application            |
|----------------------------------------------------------------|
| Refer to the attached letter prepared by CivilPlan Consultants |

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**



John Punshon

21 July 2026

21 July 2026

Fast-track Operations  
Ministry for the Environment  
PO Box 10362  
Wellington 6143

Attention: Max Gander-Cooper

Dear Sir,

**Subject: Comments of North Shore Aero Club Incorporated on the Referral Application for the Horseshoe Bush Road, Dairy Flat – Residential Development Project under the Fast-track Approvals Act 2024**  
**CivilPlan Project No: 2966**

On 29 June 2026, North Shore Airport received an invitation on behalf of the Minister for Infrastructure to provide comments on the referral application for the Horseshoe Bush Road, Dairy Flat – Residential Development project under the Fast-track Approvals Act 2024. North Shore Aero Club ('NSACI'), who owns and operates the North Shore Airport, has engaged CivilPlan Consultants to review the referral application and prepare comments on their behalf.

NSACI operates the North Shore Airport, North Shore Aero Club and Auckland International Pilot Academy from the airport located at Postman Road, Dairy Flat. NSACI has aspirations to expand and modernise its airport infrastructure as outlined in its Master Plan 2024, available on its website.<sup>1</sup> The sites subject to the proposed residential development are located within the western approach path of the airport's secondary runway, beyond the Rural Urban Boundary where long-term urban growth is anticipated, and therefore may give rise to reverse sensitivity effects that may undermine these aspirations.

Under the Auckland Unitary Plan, the subject sites between Horseshoe Bush Road and Kahikatea Flat Road are located within the Airport Approach Surface Overlay, as shown in Figure 1, below. The majority of the land is within the approach / take-off fan, with height limits of between 90 m and 120 m above NZVD2016 (approximately). The sites are not, however, located within the Aircraft Noise Overlay.

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<sup>1</sup> <https://www.northshoreairport.co.nz/masterplan/>

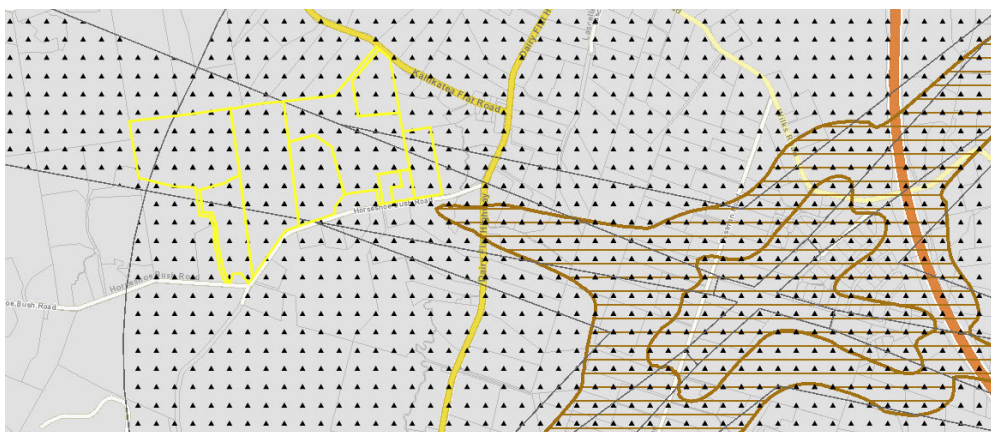


**Figure 1: Extent of the Airport Approach Surface Overlay and Aircraft Noise Overlay under the Auckland Unitary Plan in Relation to the Subject Sites**

NSACI provides the following comments:

- NSACI requests that they remain involved in the fast track process, should Minister's decision be to refer the project. In this regard, NSACI requests that the Minister specify NSACI (being the correct legal entity, rather than North Shore Airport) as a person or group from whom a panel must invite comments for the substantive application.
- The development, including all buildings, cranes, infrastructure and vegetation (including mature trees heights) must comply with the height restrictions specified in Standard D23.6.1 of the Auckland Unitary Plan. It is noted that infringement of this standard is specified to be a prohibited activity, and so NSACI expects that no deviation from this limit would be provided for. The referral application material appears to confirm that compliance with these height restrictions will be achieved, but NSACI requests that a substantive application provide detailed assessment to confirm compliance.
- Beyond this height restriction, NSACI considers that the development should incorporate, to the extent practicable, measures to safeguard operation of the airport, such as in relation to lighting, glare, reflective surfaces and bird or wildlife attraction from stormwater, wetlands, ecological areas, ponds and open space.
- NSACI would also like the applicant to consider the use of covenants to provide for reverse sensitivity protections for the operation of the airport and would welcome further discussions with the application regarding these.

NSACI thanks the Minister for the invitation to provide comments on this referral application.

Yours sincerely,  
**CivilPlan Consultants Ltd**

Aaron Grey  
Associate