

# Fast-track Approvals Act 2024 - Delmore Substantive Application Technical Addendum

FTAA-2502-1015 / BUN60444768

1.0	<b>Technical Specialist -</b> Ian Kloppers, Head of Infrastructure Investment and Phasing	
From:		Infrastructure Investment & Phasing Dept, Auckland Urban development Office
Date:		18/7/25
	'	

### 2.0 Executive Summary / Principal Issues

Vineway Ltd (**the Applicant**) has not responded to the Infrastructure Financing and Funding issues raised in the 25/6/2025 memo from Brigid Duffield and Ian Kloppers. Therefore, the evidence, questions, and issues raised in the memo still stand.

## 3.0 Specialist Assessment - Previous Memo / Comments Overview

#### Key Headings - Summary of 25/06 Issues identified

- Infrastructure requirements
- Infrastructure financing solution for this Application
- New funding and financing tools
- Recommendations
- Proposed conditions

#### 4.0 Specialist Assessment - Material Reviewed

## Review of 07/07 Updates from the Applicant

The following documents have been reviewed in preparation of this memo:

- Memorandum of counsel for the Applicant particularly pages 16 17, 21 22
- Appendix 53.1 Updated Economic Report
- Appendix 53.2 UE Response to AC Economics
- Updated AEE

## 5.0 Specialist Assessment - Addendum - Outstanding Issues / Information Gaps

At the time of writing this Memo, and having reviewed the 7 July updates from the Applicant, I have identified the following outstanding and information gaps:



#### **Outstanding Issues**

Issues raised in the memo issued on 25/06 by Ian Kloppers and Brigid Duffield have not been resolved by the Applicant's further information.

#### **Outstanding Information Gaps are as follows:**

- 1. The Delmore Application represents an urban development proposal that was not anticipated at this time by any of Auckland Council's, Watercare's and Auckland Transport's strategic planning documents, infrastructure programming, and funding plans and policies.
- 2. We reiterate that there is a significant funding and financing gap to service this development with the infrastructure needed to enable it as required by the NPS-UD and the AUP RPS.
- 3. Not only does the proposed development require infrastructure to service the development itself, but there are also cumulative infrastructure implications that extend well beyond the applicant site. These have not been sufficiently addressed.
- 4. The proposed development, if approved, runs significant implementation risks and cost implications in that any development that is achieved may cause adverse effects on the environment and on existing network infrastructure.
- 5. The Applicant states that many infrastructure upgrades, such as parts of roads, will be undertaken as part of nearby developments. This needs to be more accurately set out. Plus, an understanding of the cumulative infrastructure effects of all the nearby developments and this development has not been demonstrated in this Application.
- 6. The Applicant's response has not addressed OPEX implications of the development and who will pay for the on-going maintenance of the development's infrastructure over time. Again, these costs have not been built into any of the council's or infrastructure providers' financial plans and budgets for the next 30 years.
- 7. Infrastructure programming and funding by the council and network infrastructure providers is based on the amount of urban live-zoned areas within the Auckland Unitary Plan. It is inefficient to have to reprioritise budgets and programming to service out-of-sequence developments. There are not infinite funds and so applications like this mean that planned upgrades and the extension of infrastructure into the areas already zoned for urban development (including intensifying brownfield areas) may have allocated funding reduced or diverted from them.
- 8. In order to confidently process this Application, it is necessary to understand the costs, timing and who is responsible for delivery of the requisite infrastructure components now. The necessary information has not been provided and it is not prudent to leave the determination of infrastructure details, especially for such a large proposal, until a later stage.

Please refer to tables under paragraphs 2.5 and 2.7 in the 25/6/25 memo.

## **6.0** Proposed Conditions

The conditions proposed in the 25/6/25 memo from Ian Kloppers and Brigid Duffield still stand:

If the Application is granted, conditions should be imposed requiring certainty of infrastructure financing and funding before the Development proceeds. These conditions should ensure that the Development demonstrates how infrastructure will be paid for and confirms that required



infrastructure provision will not displace planned investment in other areas of Auckland. Consideration could be given to conditions or covenants such as requiring private funding and private operational responsibility for infrastructure, and / or deferring development stages until infrastructure is funded and delivered.

## 7.0 Recommendation

The recommendations in the 25/6/25 memo from Ian Kloppers and Brigid Duffield still stand.