

Delmore Fast Track Application

Appendix 8: A03 (Strategic Planning) to Response to Comments Letter

From: Vineway Ltd

Date: 5 June 2026

Re: Response to Annexure 3 to Auckland Council Response – Strategic planning

1.1 Introduction

This memorandum responds to the memorandum prepared by Auckland Council’s Senior Advisor Growth and Spatial Strategy. It does not include the colour coding described in the applicant’s response to comments covering letter, and used in other response to Auckland Council, because this was not a topic in respect of which there has been a written exchange of comments between Auckland Council and the applicant.

1.2 Response to Further Information Requests / Technical Comments

Information Request / Technical Comment from Council under section 53 FTAA	Applicant Response under section 55 FTAA
Section 8.0 covering table: The proposal is contrary to the sequencing and timing outlined in the FDS and does not align with the FDS principles for growth. Further commentary at: - Paragraph 6 of memo:	<i>B&A:</i> The applicant’s response to comments relating to the sequencing of the Delmore development and the FDS is provided in Appendix 1 to the Response to Comments letter (Overarching Legal Memorandum).
Section 8.0 covering table: The development proposal and the supporting infrastructure do not suggest that this development is of regional significance, rather it is of local significance.	<i>B&A:</i> The memorandum does not identify how the author has defined the concept of significant regional benefit for the purpose of this conclusion, nor does it rely on any technical evidence to support this conclusion. The applicant’s response to comments regarding the significant benefits of the application is provided in Appendix 1 to the Response to Comments letter (Overarching Legal Memorandum). In summary, its response is that the information before the Panel demonstrates that that the Delmore project will have significant benefits for the Auckland region.
Section 8.0 covering table: Deficiencies in the application	<i>B&A:</i>

are best addressed through structure planning and plan change.	The applicant's response to comments regarding the need for a plan change and the structure plan prepared by B&A and included as part of the substantive application is provided in Appendix 1 to the Response to Comments letter (Overarching Legal Memorandum) and also addressed below. In summary, its response is that the FTAA is intended to provide an alternative route to a plan change for achieving the urbanisation of FUZ land.
Paragraphs 6-12 memo: The proposal brings forward development in this area by two decades means that the required bulk infrastructure is not prioritised, funded, or designed at a detailed level at this time. Out of sequence development increases costs, undermines a strategic and phased approach to planning, and creates inefficiencies in delivering infrastructure by diverting funding from live zoned and priority areas. Comment relates to Watercare Services Limited and Auckland Transport operated infrastructure.	<i>B&A:</i> First, it is noted that the applicant is funding extensive upgrades and additions to the transport network in order to support the Delmore development, which have not been referred to by the author of this Council memorandum. To assist the Panel, these upgrades and the related conditions are visually shown on Appendix 7: Plan Set 1 (transport upgrades) to the Response to Comments letter. Second, it is noted that the applicant has provided for on-site water and waste-water servicing which if adopted, will mean the development does not require use of Council bulk infrastructure. Third, the applicant does not agree that the infrastructure technically needed to support the development is not planned. This is addressed in Appendix 1 to the Response to Comments letter (Overarching Legal Memorandum). Fourth, this comment appears to assume that providing the Delmore development with access to bulk infrastructure ahead of the indicative date in the FDS is automatically a cost. This approach does not align with the approach to the Council's economist, who considers that a costs and benefits approach should be applied. Watercare Services Limited has made the same assumption, which has been responded to in Appendix 8: A02 (Economics) to the Response to Comments letter. As such, the response provided there also responds to this comment.
Paragraphs 13-14 memo: The site remains poorly connected to the strategic transport network and is not served by public transport. The applicant's assessment focuses primarily on internal connectivity and therefore overlooks wider network effects. Risk will remain inherently car dependent contrary to FDS principle 1.	<i>B&A:</i> The applicant does not agree with this comment. The site is connected to, or is able to connect to, the public network at multiple locations. This is visually depicted in Appendix 7: Plan Set 1 (transport upgrades) to the Response to Comments letter. These connection points have been identified with input from consultants with traffic engineering, civil engineering, and urban design expertise. In addition, buses will be able to transit through the Delmore development via the central Designation 14108/NOR6 road, and then also through each stage (via Road 1 for the Demore stage 1 area and Roads 5 and 17 through the Delmore stage 2 area). Plans have been prepared as part of the applicant's response to comments showing bus stop locations as requested by Auckland Transport meaning that once built, the Delmore development will be able to link into the

	public bus network. Separate cycle infrastructure is also provided via the central Designation 14108/NOR6 road within the Delmore stage 1 area and Roads 5 and 17 through the Delmore stage 2 area. The reasons why this is considered by the applicant to be the appropriate level of separate cycle infrastructure is addressed in Appendix 8: A22 (Auckland Transport) to the Response to Comments letter at Point 7 within Table 1.
Paragraph 15-16: Applicant's argument that more housing is better does not consider the trade-offs of enabling development in this area head of bulk infrastructure.	<i>B&A:</i> This is understood to essentially be another expression of the comment that the Delmore development is out of sequence. This issue is responded to in Appendix 1 to the Response to Comments letter (Overarching Legal Memorandum). The economic benefits arising from the Delmore development, notwithstanding it seeing the site developed ahead of the current indicative release date in the FDS are addressed in Appendix 15 to the AEE and then in Appendix 8: A02 (Economics) to the Response to Comments letter, and in the economics peer review attached to that Appendix.
Paragraph 17: Little consideration of how the development will integrate with areas of FUZ to south and southeast. Raises concern about urban form density and scale and that future rezoning options locked in by current development.	<i>B&A:</i> Opportunities for integration of the site with land to the south and south-east have been considered (as well as land to the east) in terms of both transport and land-use. Transport integration with this land is heavily influenced and constrained by the topography and watercourses which pass through the wider Upper Orewa FUZ land. By its nature, this restricts opportunities for north-south connectivity. In addition to the NOR6 arterial road, which is proposed to act as the key link connecting areas in Upper Orewa (with the Wainui FUZ south of the Orewa River), the application has provided for additional vehicular / pedestrian crossing points of the tributary to the Orewa River (stream 38) to enable direct transport connections to neighbouring sites through to Russell Road. This is identified in Figure 11 of the Urban Design Assessment. Additional connections are also enabled, via the Ara Hills development, to the south-east via the Grand Drive extension and Tamaota Terrace. Road 3 has also been widened to enable public transport movement through the site to Russell Road and beyond should Auckland Transport wish to utilise this as a route in the future. A plan which shows all connections to the adjacent sites is included at Appendix 7: Plan Set 2 (Connections) to the Response to Comments letter. Potential land-uses within the Upper Orewa area were discussed within Section 3.1 of the Concept Structure Plan submitted with the application. From the outset, it is important to recognise that 34% of the Upper Orewa FUZ sits within the consented Ara Hills Development area (which combines both residential and commercial

	uses), whilst the Delmore application site consists of a further 42% of the total FUZ area. Additionally, approximately 13ha (5%) is already identified as Significant Ecological Areas, whilst a further 6.5ha (2.5%) falls within the balance of the NOR6 designation area. This leaves approximately 43ha (gross) / 28ha (net) of FUZ land available for development – much of it on steeply sloping or south-facing land. This land is concentrated along both sides of Russell Road and towards the motorway corridor. Consistent with the conclusions noted in the Concept Structure Plan, the most appropriate land-uses within this area (and the application site itself) are residential, owing to the underlying topography and other natural constraints. The application itself does not lock in the density or scale of any future residential development on neighbouring land, rather this will be dictated by market preferences at the time of development in conjunction with the feasibility of land development on any given parcel. That being said, based on the nature of development proposed at Delmore, as well as how development has occurred at Ara Hills to date, it is reasonable to assume that future development will adopt a similar approach of concentrating denser residential development on more easily developable land and leaving the balance in some form of open space (whether vested or privately held). In terms of non-residential land-uses, the underlying topography of the Upper Orewa FUZ area is not suitable for industrial uses which are characterised by large building footprints and generally require large, flat sites to function efficiently. It is not possible to deliver such conditions in this location. In addition, an economic assessment was undertaken to determine the likely demand for centre-based uses, and it was concluded that there was sufficient space already consented / provided for within the Ara Hills centre, just east of the application site. The area would also be served by the emerging Milldale Local Centre where applications for the first retail developments have already been lodged with Auckland Council.
Paragraph 18: Applicant comments FDS contemplates 280 dwelling per annum in the north is wrong. Argument that more capacity is needed in the Hibiscus Coast is a localised issue, does not represent regionally significant development.	B&A: The statement regarding 280 dwellings to the north relates to the Ara Hills development which is north/north-east/east of the Delmore development, which has approximately 280 dwellings remaining to be built under its current resource consent. The author of this memorandum has not provided any technical assessment in support of the comment that the housing provided by the Delmore development does not represent regionally significant development. This is based on correct interpretation of what comprises a significant regional benefit for the purposes of the FTAA as discussed in Appendix 1 to the Response to Comments letter (Overarching Legal Memorandum), and the economics assessments

	provided in Appendix 15 to the AEE and Appendix 8: A02 (Economics) to the Response to Comments letter , and in the economics peer review attached to that Appendix.
Paragraphs 19-20, 23: Structure plan does not meet AUP criteria and development without a structure plan and plan change is problematic because it bypasses process for co-ordinated, efficient, sustainable growth.	<i>B&A:</i> The applicant's response to comments about the need for a plan change and problems arising if this does not occur is provided in Appendix 15 to the AEE and then in Appendix 1 to the Response to Comments letter (Overarching Legal Memorandum). Regarding the comments specifically relating to the structure plan included with the application, the following is noted. Policy B2.2.2(3) gives reference to Appendix 1 of the AUP in the context of rezoning of FUZ land. Specifically, it enables rezoning of land following a structure planning and plan change processes "in accordance with Appendix 1". It is observed that Appendix 1 provides a series of guidelines and sets out no specific process or requirements with regards to a structure planning process within which one could be deemed to be "in accordance". Rather the guidelines set out documents and analysis that could be considered in a structure plan. However, the relevance of this is context specific to enable variation to suit varying locational and contextual attributes of a particular area. In the case of Upper Orewa, it is a relatively small area in extent (approximately 260ha). This compares with other Council-led structure plans, including: • Drury-Opāheke - 1921ha • Pukekohe-Paerata - 1300ha • Silverdale West – Diary Flat Industrial Area - 603ha Proportionately, the Upper Orewa area represents less than 14% and 20% of the land areas of Drury-Opāheke and Pukekohe-Paerata respectively. Further, of the 260ha within Upper Orewa, 90ha (34%) is already subject to an approved resource consent with development well advanced. A further 7.5% of land falls within either a Significant Ecological Areas or Designation boundaries. The Delmore application site itself comprises a further 42% of the Upper Orewa area. Combined this means that more than 80% of the FUZ land in this area has already undergone a level of detailed technical investigation, far more than that undertaken in typical Council-led structure planning processes to date. Investigation to date has included input from: • Transport planners / engineers; • Ecologists; • Landscape architects;

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- Architects;
 - Urban Designers;
 - Civil Engineers;
 - Geotechnical Engineers;
 - Stormwater Engineers;
 - Acoustic Engineers;
 - Arboriculturists;
 - Hydrologists;
 - Archaeologists; and
 - Planners.

This aligns with the matters that Section 1.4 of Appendix 1 identifies need to need to be investigated and addressed. Work to date has also included more detailed feedback from a range of relevant stakeholders, including infrastructure providers on more certain development proposals than is otherwise the case.

It is also noted that detailed transport planning for the wider sub-region has already been undertaken and advanced by the Supporting Growth Alliance (SGA) which has identified several major transport projects to support growth – including the NOR6 arterial road which passes through the application site. These projects have already been through a detailed business case process as well as a designation process so are already well advanced in terms of their planning. Watercare have also identified a number of water and wastewater projects required to support future population growth across North Auckland which have been able to be factored into the development proposals.

The investigation and analysis which has been conducted across most of the land within the Upper Orewa area is detailed and provides a reliable basis to consider the likely nature of future development in the area. This can be contrasted with typical structure planning and plan change processes which typically rely on very broad assessments by various subject matter experts. Further, projected housing / population numbers within a Structure Plan process are also undertaken through broad area-based assumptions around densities in line with an underlying preferred zone configuration. Invariably this requires further detailed evidence and investigation to determine an appropriate solution as and when development looks to proceed.

Overall, the work that has been undertaken to inform the application (and that of the neighbouring Ara Hills development) provides a robust evidence base to understand future development consistent with the matters outlined in Appendix 1 of the AUP.
