

# Appendix M – Other Engagement Outcomes



Tēnā koe Kathryn,

## **Matakana Country Club - Pre-lodgement consultation under the Fast-track Approvals Act 2024 (FTAA)**

Thank you for your correspondence dated 15 September 2025 in relation to Sanderson Partners Limited's intention to lodge a referral application under the Fast-track Approvals Act 2024 (FTAA) in respect of the "Matakana Country Club" project.

As you are aware, the Ministry for the Environment (the Ministry) is the "relevant administering agency" for approvals relating to the Resource Management Act 1991 (RMA) and Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (EEZ Act) under the FTAA.

We have received the information you provided on 15 September 2025. As part of your referral application, you will need to provide an assessment of the project against any relevant national policy statement, national environmental standards and if relevant the New Zealand Coastal Policy Statement. The Ministry has prepared the following summary on the national direction made under the RMA, for your consideration.

### National Direction

Under the RMA, the government can create national direction to support local authorities' decision making under the RMA and develop a nationally consistent approach to resource management issues. This is typically done where an issue is of national importance, or involves significant national benefits or costs, or where necessary to give effect to other government policy or regulation. There are several types of national direction, including national policy statements and national environmental standards.

### National Policy Statements (NPS)

National Policy Statements are instruments issued under section 52(2) of the RMA. An NPS is a vehicle for the government to prescribe objectives and policies for matters which are relevant to sustainable management. All National Policy Statements currently in force are published on the Ministry's website and links are provided in the table below. It is recommended that you consider the relevance of each NPS to your project. If you are seeking an RMA approval, then under section 13(4)(y)(i) and schedule 5 paragraph 2 of the FTAA your application must include an assessment of your project against any relevant NPSs. Refer to the National Policy Statements linked below.

<b>National Policy Statement</b>	<b>Description</b>
<a href="#">National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023</a>	This NPS provides nationally consistent policies and requirements for reducing greenhouse gas emissions from industries using process heat. It works alongside

	the National Environmental Standards for Greenhouse Gases from Industrial Process.
<a href="#">National Policy Statement for Highly Productive Land 2022</a>	This NPS provides national direction to improve the way highly productive land is managed under the RMA. The objective is to ensure the availability of New Zealand's most favourable soils for food and fibre production.
<a href="#">National Policy Statement for Freshwater Management 2020</a>	This NPS provides local authorities with updated national direction on how they should manage freshwater under the RMA.
<a href="#">National Policy Statement for Indigenous Biodiversity 2023</a>	This NPS provides direction to local authorities to protect, maintain and restore indigenous biodiversity requiring at least no further reduction in indigenous biodiversity nationally.
<a href="#">National Policy Statement for Renewable Electricity Generation 2011</a>	This NPS provides guidance for local authorities on how renewable electricity generation should be dealt with in RMA planning documents.
<a href="#">National Policy Statement on Electricity Transmission</a>	This NPS sets out the objective and policies for managing the electricity transmission network.
<a href="#">National Policy Statement on Urban Development 2020</a>	This NPS recognises the national significance of well-functioning urban environments. It removes barriers to development to allow growth in locations that have good access to existing services, public transport networks and infrastructure.
<a href="#">New Zealand Coastal Policy Statement 2010</a>	The NZCPS provides guidance for local authorities in their day-to-day management of the coastal environment. The NZCPS is the only compulsory NPS under the RMA.

### National Environmental Standards (NES)

National Environmental Standards are regulations issued under section 43 of the RMA. They prescribe technical and non-technical standards, methods or other requirements for land use and subdivision, use of the coastal marine area and beds of lakes and rivers, water take and use, discharges and noise. NESs require each local authority to enforce the same standard in respect of these areas unless otherwise specified. All National Policy Statements currently in force are published on the Ministry's website and links are provided in the table below. It is recommended that you consider the relevance of each NES to your project.

If you are seeking an RMA approval under the FTAA, section 13(4)(y)(i) and schedule 5 paragraph 2 require that an assessment of your project against any relevant NES must be included with your application. Refer to the National Environmental Standards linked below.

<b>National Environmental Standard</b>	<b>Description</b>
<a href="#">National Environmental Standards for Air Quality</a>	This NES prohibits discharges from certain activities and set a guaranteed minimum standard for air quality for people living in New Zealand.

<a href="#">National Environmental Standards for Commercial Forestry</a>	This NES provides nationally consistent regulations to manage the environmental effects of forestry.
<a href="#">National Environmental Standards for Electricity Transmission Activities</a>	This NES sets out which electricity transmission activities are permitted, subject to conditions to control environmental effects. They apply only to existing high voltage electricity transmission lines.
<a href="#">National Environmental Standards for Freshwater</a>	This NES regulates activities that pose risks to the health of freshwater and freshwater ecosystems.
<a href="#">National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat</a>	This NES sets out nationally consistent rules for certain greenhouse gas emitting activities from industrial process heat.
<a href="#">National Environmental Standards for Marine Aquaculture</a>	This NES replaces regional council rules for existing marine farms and provides a more certain and efficient process for replacing consents, realigning farms and changing farmed species. In some instances, they allow regional council rules to remain in force.
<a href="#">National Environmental Standards for Sources of Human Drinking Water</a>	This NES sets requirements to protect sources of human drinking water from becoming contaminated.
<a href="#">National Environmental Standards for Storing Tyres Outdoors</a>	This NES provides nationally consistent rules for the responsible storage of tyres.
<a href="#">National Environmental Standards for Telecommunication Facilities</a>	This NES sets national rules regarding the deployment of telecommunications infrastructure across New Zealand.
<a href="#">National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health</a>	This NES includes requirements for assessing and managing potentially contaminated soil.

Please ensure your application includes a summary of this consultation with the Ministry, and an explanation of how this consultation has informed your project. This information must be included in your application, regardless of whether it is a referral application or a substantive application for a listed project.

Thank you for consulting with the Ministry for the Environment as the relevant administering agency for the RMA and the EEZ Act.

If you have any queries in relation to the FTAA process, please contact [info@fasttrack.govt.nz](mailto:info@fasttrack.govt.nz) for further assistance.

Ngā mihi,



**Acting General Manager, System Enablement and Oversight**



### Meeting Minute: Pre-application Meetings and Associated Work

<b>Date:</b> 8 October 2025 - Final	
<b>Start Time:</b> 3:00pm	<b>End Time:</b> 3:30pm
<b>Matter:</b> Matakana Country Club	
<b>Attendees:</b> Heritage New Zealand Pouhere Taonga – Stuart Bracey, Lisa Ahn, Mary Kienholz, Greg Walter, Craig Reidy BBO consultant planner – Kathryn Drew Consultant Archaeologist – Matthew Campbell Sanderson Partners Ltd – Nathan Sanderson	
<b>Description of Activity:</b> To develop a retirement village supported with communal facilities	
<b>Location of Activity:</b> 120 Tongue Farm Road, Matakana	
<b>Consideration/Notes regarding documents provided prior to meeting:</b> <ul style="list-style-type: none"><li>• Pre-application memo</li><li>• Proposal masterplan</li><li>• CFG Heritage Archaeological assessment</li></ul>	
<b>Discussion</b> <u>Proposal</u> <ul style="list-style-type: none"><li>• Sanderson Partners Ltd – to develop a retirement village on approximately 76ha land</li><li>• Landscape-led design outcome fit-for-purpose</li><li>• The development is concentrated in the northern portion of the site, not the lower portion where the site is more sensitive.</li><li>• 208 villas and 30 bed care facility supported with communal facilities</li><li>• Not a staged development</li><li>• Existing dwelling at the lower portion is to remain</li><li>• Darker green areas are for revegetation</li><li>• Self-contained infrastructure</li></ul>	



### Engagement

Engagement project introductions letters sent to all Auckland iwi.

Have engaged with one group who has expressed an interest to date – Ngāti Manahuri (key iwi group).  
Nathan Sanderson consulted with the Chair of the group.

### Stuart Bracey

Advice – very important to record consultation with iwi and hapu groups. Application will get returned if there isn't much consultation.

HNZPT advised an authority application would be best for the whole site – due to potential activities throughout the site.

### Archaeology

Matthew Campbell

- Sites are all scattered along the edge of the land
- Red sites on the map are ones that are already identified
- New middens have been identified
- Relocation (identified)

Greg Walter

- Would be interesting to see an archaeology site overlay plan (an indicator) of where the potential interference might be.
- As this evolves, things to avoid sites etc needs to be clearly stated in the assessment as it helps mitigate things

### Craig Reidy

Advice – Just be comprehensive with the consultation documentation.

### **Additional Information Required:**

#### **Action Steps:**

Applicant: Sanderson Partners Ltd / Consultant: BBO, Matthew Campbell

- To provide an archaeology site overlay plan
- To provide a summary of consultation with iwi groups and any assessments

Heritage New Zealand Pouhere Taonga:

- To provide meeting minutes

## Planner-led Pre-Application Meeting Record

Pre-Application No. PRR00043254		
Date of request	16/09/2025	
Applicant	Sanderson Partners Ltd	
Contact details	Phone	s 9(2)(a)
	Email	s 9(2)(a)
Site Address	120 Tongue Farm Road, Matakana, Auckland s	
Proposal	The proposal is for a retirement village and care facility comprising approximately 208 villas and an 80-bed care facility, clustered in the northern part of the site, with a clubhouse, café, health spa, and other amenities.	

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

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

Meeting held		
Date and Time	29 September 2025 10:00AM – 11:00AM	
Meeting participants – Customer / Agents	Kathryn Drew Julia Wick Matt Richards Nick Officer Nathan Sanderson	Planning Consultant, Bloxam Burnett & Olliver Ltd (BBO) Landscape Architect, Boffa Miskell Civil Engineer, CivilPlan Consultants Limited Architect, First Light Studio Applicant

<b>Meeting participants – Council</b>	Fennel Mason Masato Nakamura	Principal Project Lead, Auckland Council Consultant Planner, CoLab Planning Limited
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### Summary of key considerations and issues

<b>1. Proposal</b>	<p>The applicant has a long-standing interest in the area and has undertaken detailed market demand analysis for this type of activity in this location. The applicant has also commenced consultation with Mana Whenua and members of the community.</p> <p>The proposal is a master-planned retirement and care facility that also includes cafes, spa, clubhouse and other amenities. The café and Lodge (at the southern end of the site) may be available for the public.</p> <p>A distinct feature of the proposal is the cluster of buildings (16 X 12 dwellings approx.). This is to maximize landscaping, and restoration works across the site, while reducing and concentrating the built form and hardstand.</p> <p>Intended timing of lodgement with the EPA for the referral application is at the end of October. It is intended for ongoing engagement with the Council including expert input and feedback.</p>
<b>2. Landscape</b>	<p>A detailed landscape context assessment has been undertaken to inform the proposed masterplan. This assessment has concluded that:</p> <ul style="list-style-type: none"> <li>• The subject site is more connected to Matakana than the wider rural environment in the area.</li> <li>• Due to the topography and the coastline, the site is within a relatively limited visual catchment.</li> <li>• There is a site to the north-west between the subject site and the Matakana township that are zoned as the Rural – Countryside Living Zone and the Matakana 1 Precinct.</li> <li>• Noting the features and contours of the site, the site is considered to have three distinct areas.</li> <li>• As a result, the development will be centred on the northern side of the site, with clusters of buildings and amenities as described above.</li> <li>• Focus will be on achieving a rural reserve aesthetic and emphasis on the coastal edge.</li> <li>• It is intended that further discussion would be had once landscape and design experts have been appointed for the Council.</li> </ul>
<b>3. Infrastructure and Transport</b>	<p>It is intended for the proposal to be serviced by private infrastructure including water supply, stormwater, wastewater and internal roading. There is recognition that there will be limited opportunity for public infrastructure upgrades and</p>

	<p>connections to support the proposal noting the location zoning of the site. As outlined in the memo, this would require a series of discharge and water permits to support the project.</p> <p>While there would be technical matters would need to be reviewed and assessed, we acknowledge that potential infrastructure costs onto the Council would be avoided, which is a common occurrence in instances where there is out of sequence development.</p> <p>In this regard, the following is noted:</p> <ul style="list-style-type: none"> <li>• It was discussed and confirmed that the site is able to be serviced with private wastewater infrastructure including pressurised systems and dispersal fields.</li> <li>• A network of groundwater bores would be prepared in servicing the proposal in terms of water supply.</li> <li>• Firefighting supply is provided through the take from an existing lake.</li> </ul> <p>It was expressed that there is a desire to contribute into cycling infrastructure upgrades by Auckland Transport should the opportunity arise.</p>
<p><b>4. Policy and Zoning Context</b></p>	<p>From a preliminary review of the proposal, the following is noted:</p> <ul style="list-style-type: none"> <li>• The proposal is at odds with the overall thrust of the Rural - Rural Coastal Zone, which is to "retain and enhance the rural character and amenity values". A 208-unit retirement village with an 80-bed care facility introduces a concentrated, urban scale of development that is inconsistent with the zone's focus on scattered rural activities and maintaining a low density of buildings.</li> <li>• The development is also at odds with the policy direction for the Whangateau-Waiwera coastal area. The proposal establishes a large-scale facility in a rural coastal location, rather than within an existing settlement.</li> <li>• As a retirement village is not a rural production activity, the proposal is inconsistent with this clear policy directive to prevent the fragmentation of rural land for residential purposes.</li> <li>• The policies also require development to not give rise to reverse sensitivity issues. It is important to outline the measures that would be employed to ensure that the proposal does not impact on present and future rural activities.</li> </ul>
<p><b>5. Regional Benefit</b></p>	<p>Noting the potential policy issues in relation to the proposal as outlined above, the significant regional benefit from the proposal must be demonstrated clearly. In this regard, we anticipate that the economics reporting would be reviewed to test and determine the regional benefits from the proposal.</p>
<p><b>6. Ecology</b></p>	<p>It was clarified that the applicant has undertaken an ecological assessment of the site. We recommend that the reporting is provided for review, and discussions continue to ensure that there is agreement regarding the classification and extent of freshwater features on the subject site.</p>

<p><b>7. Reasons for Consent</b></p>	<p>The reasons for consent outlined in the memo appear to be generally correct. The following is noted:</p> <ul style="list-style-type: none"> <li>• As it relates to integrated residential development, as this is an activity not provided for, this would be a discretionary activity pursuant to rule C1.7(1) under the general rules.</li> <li>• E8.4.1(A10) would sit within the Discharge Permit header, noting that section E8 is related to s14 and s15 matters.</li> <li>• The memo makes reference to the take of water from an existing lake on site for firefighting water supply. It is recommended that the consenting matters be identified from E7 regarding this take once the required volume required is identified.</li> <li>• We agree with the overall activity status of the application being a non-complying activity overall.</li> </ul>
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<p><b>Actions arising from meeting</b></p>	
<p>Distribution of technical reports to Council</p>	<p>Kathryn</p>
<p>Brief Key experts for Council</p>	<p>Fennel / Masato</p>
<p>Arrange Meeting in 3 weeks' time</p>	<p>Fennel / Kathryn</p>

**Important Information**

<p>The purpose of a pre-application is to facilitate communication between applicants and the council so that the applicant can make informed decisions about applying for consents, permits or licences.</p> <p>The views expressed by council staff in or following a pre-application are those officers' preliminary views, made in good faith, on the applicant's proposal. The council makes no warranty, express or implied, nor assumes any legal liability or responsibility for the accuracy, correctness, completeness or use of any information or views communicated as part of the pre-application process.</p> <p>The applicant is not required to amend their proposal to accommodate the views expressed by council staff. Further, it remains the applicant's responsibility to get their own professional advice when making an application for consents, permits or licences, and to rely solely on that advice, in making any application for consents, permits or licences.</p> <p>To the extent permissible by law, the council expressly disclaims any liability to the applicant (under the theory of law including negligence) in relation to the pre-application process. The applicant also recognises that any information it provides to the council may be required to be disclosed under the Local Government Official Information and Meetings Act 1987 (unless there is good reason to withhold the information under that act).</p>
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All consent applications become public information once lodged with council. Please note that council compiles, on a weekly basis, summaries of lodged resource consent applications and distributes these summaries to all local boards and all mana whenua groups in the Auckland region. Local boards and mana whenua groups then have an opportunity to seek further details of applications and provide comment for council to take into account.

**Prepared by:**

Name: Masato Nakamura

Title: Consultant Planner

Signed:



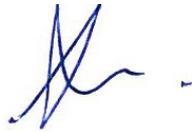
Date: 02 October 2025

**Reviewed by:**

Name: Fennel Mason

Title: Principal Project Lead

Signed:



Date: 2 October 2025

## Pre-Application Meeting Record

Pre-Application No. PRR00043254	
Date of request	16/09/2025
Applicant	Sanderson Partners Ltd
Contact details	Phone s 9(2)(a)
	Email s 9(2)(a)
Site Address	120 Tongue Farm Road, Matakana, Auckland s
Proposal	The proposal is for a retirement village and care facility comprising approximately 208 villas and an 80-bed care facility, clustered in the northern part of the site, with a clubhouse, café, health spa, and other amenities.

Summary of key considerations	
<b>1. Expert Reviews Undertaken</b>	<p>The following experts have provided their input into the proposal in preparing this memo:</p> <ul style="list-style-type: none"> <li>• Gabrielle Howdle, Principal Landscape Architect, Auckland Council</li> <li>• Rob Mainwaring, Principal Urban Design, Auckland Council</li> <li>• Antoinette Bootsma, Senior Specialist (Freshwater Ecology), Auckland Council</li> <li>• Kirsty Myron, Ecologist (Terrestrial Ecology), Auckland Council</li> <li>• Vaishali Sankar, Senior Transport Planner, Auckland Transport</li> <li>• Rodney Yeoman, Consultant Economist (Formative Economics), Auckland Council</li> <li>• Alison Pye, Senior Policy Planner, Auckland Council</li> </ul> <p>The below outlines the summary of the comments provided in relation to this project.</p>
<b>2. Landscape</b>	<ul style="list-style-type: none"> <li>• From a landscape perspective and consider it could have up adverse effects on landscape character, rural-coastal character and visual amenity values that are significant. The intensity and density of the proposal appear urban in scale and is greater than that anticipated in Countryside Living zones. The overall intensity, spread, and strategy of the proposal are considered inappropriate and would not maintain the sensitive rural-coastal landscape.</li> <li>• There is concern that the development will have significant adverse effects on landscape character, rural-coastal character, and visual amenity values.</li> </ul>

	<ul style="list-style-type: none"> <li>• While the "clustered" approach is noted, the scale and repetition may not retain the area's rural characteristics. The clusters themselves appear urban in their arrangement and need refinement to respond organically to the nature and topography of the site.</li> <li>• The visual catchment is wide, and the proposal risks changing the landscape from an open rural character to an urban settlement. The visual catchment would include recreational users of Matakana River and inlets/estuaries, motorists/visitors and locals to the west along and off Green Road, Matakana Road and Whitmore Road. The proposal could not only impact on the visual amenity values from public locations, but the anticipated rural character and outlook of neighbouring properties.</li> <li>• Positive elements include the proposed revegetation along river edges and wetlands. However, there is concern that planting cannot be immediately relied upon to mitigate visual effects, as it will take 10+ years to establish.</li> <li>• A comprehensive Landscape and Visual Impact Assessment (LVIA) will be required for any formal application. This should also be supported by site and context photos, visual simulations, landscape strategy / planting plans and supporting details and specifications, staging plans (if relevant for the development), architectural material and colour strategy, site sections showing landform modification, access, planting, built form and fencing strategies, details for lighting and signage.</li> <li>• Engagement with mana whenua is also recommended due to cultural heritage sites. The proposal should also reflect and respond to the results of this engagement.</li> </ul>
<p><b>3. Urban Design</b></p>	<ul style="list-style-type: none"> <li>• There is a disconnect between the stated design principles (which are generally supported) and the proposed layout. It is unclear how the current diagrammatic plan will translate into a meaningful pattern of development that maintains the rural context, outlook, and feel of this sensitive site.</li> <li>• The project should move away from comparisons to standard suburban layouts. This unique site merits a unique, site-specific design response rather than a repetitive pattern.</li> <li>• The uniformity, repetition, and overall scale of the clusters may combine to resemble a suburban development at a larger scale, reading as a single collective mass rather than integrated "clusters". There are concerns about the overall combined scale of all the clusters, and how they may read as a collective mass.</li> <li>• The repetitive layout raises concerns about legibility, navigation, and creating a distinct identity, which is particularly important for residents with a variety of physical and cognitive needs.</li> <li>• The "rural lane" roading style (no kerbs, swales) is supported. However, the proposed access to clusters (requiring vehicles to 'double back') appears inefficient and increases the amount of roading in the landscape.</li> </ul>

	<ul style="list-style-type: none"> <li>• Further development and refinement of the "cluster" concept is needed. This could involve the consideration of the following: <ul style="list-style-type: none"> <li>○ How the clusters can relate to their specific immediate context within the wider development site.</li> <li>○ Variety in cluster size – if areas of the site suit, some clusters could be combined into larger groupings (e.g. in the northwest end of the site / or if screened by trees)</li> <li>○ Clusters could have an open side / end, to suit a particular location/aspect, as well as breaking overall mass.</li> <li>○ Character of clusters – it seems a variety of internal spaces may be achievable (e.g. formal / informal, greens / courts / yards / orchards / vineyards/ walled gardens) in contrast to the external pastoral/wetland landscapes</li> <li>○ Appearance – form, detailing, materiality, colour</li> <li>○ The relationship or incorporation of any communal buildings into the clusters (e.g. the village church or pub)</li> <li>○ How the parkland landscaping and planting can complement the above</li> </ul> </li> <li>• The relationship between the roads and clusters should be reconsidered to improve legibility and differentiation (e.g., roads passing through, terminating at, or running alongside clusters).</li> <li>• While noting that the proposal is progressing through the Fast Track Approvals process, it is recommended that the applicant seek input from the Auckland Urban Design Panel to ensure a high-quality urban design outcome.</li> </ul>
<p><b>4. Transport</b></p>	<ul style="list-style-type: none"> <li>• There are no identified regional transport benefits from this proposal. It is a car-centric urban development on a largely unsealed rural road. The proposal will not contribute to public transport provision, regional freight movement, mode shifts, strategic access or significant roading upgrades.</li> <li>• There are safety concerns regarding the intersection of Tongue Farm Road and Leigh Road, given the increase in right-turning traffic against existing high-speed (80kph) traffic. A full safe system assessment (and mitigation) is required for this intersection.</li> <li>• The proposal will introduce some conflict between vehicle traffic and cyclists, as Tongue Farm Road is part of the Matakana cycle trail. An assessment of safety implications for cyclists is required, along with improvements for active mode users.</li> <li>• AT supports the applicant's proposal to seal the unsealed section of Tongue Farm Road up to the site access points. This pavement upgrade must be designed in accordance with TDM standards.</li> <li>• The applicant must provide detailed vehicle tracking diagrams for all access points and review the capacity and safety of the existing right-turn bay on Leigh Road.</li> <li>• The following is recommended for this project moving forward:</li> </ul>

	<ul style="list-style-type: none"> <li>○ The submission of an integrated traffic assessment including a safe system assessment of the intersection of Leigh Road and Tongue Farm Road.</li> <li>○ A detailed CTMP, with the construction traffic routes identified. A pavement analysis of the route might be required.</li> <li>○ Include measures to ensure that cyclists can continue to safely use Tongue Farm Road as part of the Cycle Trail during construction.</li> <li>○ AT recommends the applicant undertake a Safe System Assessment of the intersection of Leigh Road/ Tongue Farm Road and propose mitigation measures to reduce the safety risk.</li> <li>○ Consider including a rural path for active modes along Tongue Farm Road to safely accommodate the foot traffic from the site.</li> <li>○ Consider making Tongue Farm Road into a slow speed environment as it is a part of a cycle trail and to reduce the severity of crashes.</li> <li>○ Minor improvements along Tongue Farm Road must be considered to provide safer access for cyclists.</li> <li>○ The existing unsealed section of Tongue Farm Road must be sealed to accommodate the additional traffic.</li> </ul>
<p><b>5. Plans and Places</b></p>	<ul style="list-style-type: none"> <li>● The proposal is considered to be in conflict with the strategic direction of the Auckland Unitary Plan (AUP). It constitutes urban development outside the defined Rural Urban Boundary (RUB) and Future Urban Zone (FUZ).</li> <li>● The proposal is effectively a rezoning by way of a resource consent which is contrary to the AUP's intended process for managing urban growth and is inconsistent with the recent High Court case (Auckland Council v Matvin Group Limited [2023]). It undermines the RUB and the regional hierarchy of centres. The site is not identified by the Council as areas of any future growth by the Future Development Strategy.</li> <li>● The scale of development (150x the anticipated dwelling density) is in direct conflict with the objectives of the Rural Coastal zone, which are to preserve natural character and avoid sprawling or sporadic development.</li> <li>● The proposal is inconsistent with the National Policy Statement for Highly Productive Land (NPS-HPL) and AUP policies, as it involves inappropriate urban development on Class 3 LUC soils, removing this land from rural production. This is noting that class 3 soils are still included in the NPS-HPL as the time of preparing this memorandum.</li> <li>● The proposal is unlikely to meet the "regionally significant" purpose of the Fast-track Approvals Act. Noting the scale, we consider the contribution to the overall regional housing supply is minimal, and it proposes no significant infrastructure upgrades.</li> <li>● The chosen location is at odds with quality built environment objectives within the Plan and RPS, which co-locate retirement villages with urban amenities. The applicant's own supporting documents note locational</li> </ul>

	<p>drawbacks, including car dependency, isolation, and distance from acute medical care.</p>
<p><b>6. Economics</b></p>	<ul style="list-style-type: none"> <li>• The applicant's economic assessment does not demonstrate that the project's benefits outweigh its costs, nor does it substantiate the claim that the project will deliver economic benefits of <i>regional or national significance</i>, which is a key requirement of the FTAA.</li> <li>• The economic assessment does not apply a Cost-Benefit Analysis (CBA), which is the standard methodology for a project of this nature that asserts to have regional significance.</li> <li>• The assessment does not account for "transfer effects," meaning it does not demonstrate whether the economic activity is <i>new</i> to Auckland or simply activity that would have occurred elsewhere in the Auckland region that is relocated to the subject site. The proposal may not contribute to the regional economy as asserted in the assessment undertaken.</li> <li>• The report does not quantify any <i>costs</i> or opportunity costs (e.g., the value of forgone agriculture, pressure on public infrastructure, or the economic impacts of poor accessibility/isolation for residents). It does not allow the verification of the assessment that benefits associated with the project outweigh the costs.</li> <li>• Key assumptions in the applicant's report appear optimistic and potentially inflate the benefits, such as the high per-unit construction cost and the short 6-year build/occupation timeframe (a supporting report suggests 8-10 years is more realistic).</li> <li>• Supporting documentation confirms the proposal is for the "luxury" market, likely attracting affluent Aucklanders rather than serving a specific local demand. The report also identifies significant locational issues (e.g., lack of healthcare, car dependency, isolation), which function as economic costs but are not quantified in the economic assessment.</li> <li>• the information provided by the applicant fails to demonstrate that the benefits outweigh the costs, or that the proposal would deliver economic benefits of regional or national significance.</li> <li>• In any substantive application, it is recommended that the assessment includes: <ul style="list-style-type: none"> <li>○ The application of a CBA to provide evidence to support the conclusion that economic benefits outweigh the costs.</li> <li>○ Assessment of opportunity costs and unquantified values.</li> <li>○ Additional sensitivity analysis to cover other key uncertainties.</li> <li>○ Evaluation of the proposal's significance for the region.</li> <li>○ More detail on the quantified benefits.</li> <li>○ Assessment of the demand and supply of luxury retirement units.</li> </ul> </li> </ul>
<p><b>7. Ecology</b></p>	<ul style="list-style-type: none"> <li>• Any wetland delineation information should include the position of sample points across gradients so that an objective delineation is demonstrated.</li> </ul>

	<p>It is acknowledged that the site has been disturbed in the past, and it may be complex to tease out wetlands from wet pasture.</p> <ul style="list-style-type: none"> <li>• As the site is grazed, hydric soils and hydrology information will also be needed as vegetation cannot be relied on as the sole indicator for wetland classification. A hydrology and hydric soils assessment should be undertaken separately from the vegetation assessment, and the data should be presented as linked to sample plots. For clarification, data where soil and vegetation are not assessed at the same sample plot, do not follow the wetland delineation protocol and information gleaned from species that are disjunct from soil and hydrology is not sufficiently specific from which to draw conclusions on whether a point meets the definition of a wetland.</li> <li>• It is noted that even if some areas are excluded as 'natural inland wetlands' under the NPS:FM due to grazing, they may still be classified as wetlands under the RMA. In this regard, there may be further features on site that maybe subject to the rules of the AUPOP in section E3.</li> <li>• Where aquatic offset or compensation are proposed, Council's interpretation of offset follows the definition in the NPS:FM. Where loss of extent must result, then offsetting cannot be achieved but compensation becomes relevant. Offsetting can only be achieved if there is a no net loss of value or extent.</li> <li>• A detailed assessment of the potential effects of groundwater drawdown on any wetlands on-site is essential.</li> <li>• All plans must clearly show the proposed works footprint and demonstrate clear setbacks from all aquatic features (streams and wetlands). The location of stormwater outfalls relative to these features must also be shown.</li> <li>• We have also identified the following potential reasons for consent as it relates to terrestrial ecology matters under E15.4.1 as follows: <ul style="list-style-type: none"> <li>○ A16 (20m vegetation removal and alteration within a stream) – noting the potential location roads.</li> <li>○ A18 (20m vegetation removal and alteration from a natural wetland) – related to the proposed walking track and building 3.</li> <li>○ A20 Vegetation alteration or removal of greater than 25m<sup>2</sup> of contiguous vegetation, or tree alteration or tree removal of any indigenous tree over 3m in height, 50m of mean high-water springs rural-rural coastal zone. It appears buildings 4 &amp; 5 are within this area, and some of the internal roading network proposed.</li> </ul> </li> </ul>
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## Important Information

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

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

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

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

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

**Prepared by:**

Name: Masato Nakamura

Title: Consultant Planner

Signed:



Date: 23 October 2025



# Memorandum

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To: Fennel Mason (AC) – Principal Project Lead/ Masato Nakamura (CoLab) – Resource Management Planner  
From: Vaishali Sankar (AT) – Senior Transport Planner, Development Planning  
Date: 16 October 2025  
Subject: PRR00043241 – 120 Tongue Farm Road, Matakana

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## **Introduction**

Thank you for the opportunity to provide preliminary feedback on the pre-application of a retirement village and care facility (PRR00043241) located at 120 Tongue Farm Road, Matakana. The Applicant is intending on submitting a proposal for referral for fast-track consenting to the Ministry for Environment under the Fast-track Approvals Act 2024 (FTAA).

As part of our preliminary feedback for Auckland Council (AC), the following pre-application documents were reviewed:

- Pre-Application Engagement Memo prepared by Bloxam Burnett & Olliver;
- Transportation Overview prepared by Flow dated 8 October, 2025; and
- Pre-Application plan prepared by First Light, Plan number SK-03b.

## **Site and Proposal**

Key details regarding the site and proposal are outlined in the following table (with relation to Transport):

Site Address:	120 Tongue Farm Road, Matakana
AUP Zoning:	Rural – Coastal Zone
Proposal:	<p>Retirement village and care facility comprising of approximately 208 villas and 30 bed-care facility, clustered in the northern part of the site, with a clubhouse, café, health spa, and other amenities. A total of 40 staff to service the retirement village is proposed.</p> <p>The retirement village and care facility will be accessed via two one-way entrance and exit, and the café/restaurant will comprise of a separate access to the east. The proposal will be accessed via internal private roads. The café/restaurant is proposed to be open to the public.</p> <p>The residential units are expected to have parking in the form of garage for each unit and the café/restaurant will consist of parking on the eastern side of the site.</p>

# Memorandum

<p>Layout Plan:</p>	
<p>Surrounding Network:</p>	<p><b>Tongue Farm Road</b></p> <p>The site has direct frontage to Tongue Farm Road, with a posted speed limit of 60kph. The carriageway width varies between 6-7.3m. The first 600 metres from Leigh Road is sealed and the remainder is formed as a gravel surface.</p> <p><b>Leigh Road</b></p> <p>Leigh Road provides the primary connection between Matakana Town Centre, Tongue Farm Road and Omaha on the east, with a posted speed limit of 80kph. The intersection of Leigh Road and Tongue Farm Road is a priority-controlled T-intersection, and a dedicated right-turn bay is provided on Leigh Road for vehicles turning into Tongue Farm Road.</p>

## Preliminary Comments

The proposal comprises of car centric urban type residential development on a largely unsealed rural road with limited public transport access. The economic benefits specified by the applicant are primarily construction related and may not meet the requirements of Fast-track legislation. AT has not identified any regional transport benefits that form part of the proposal. The proposal does not contribute to Auckland's strategic transport network in terms of:

- Public transport provision or regional freight movements.
- Strategic accessibility.
- Significant roading upgrades or network capacity improvements to the existing network.
- Mode shift outcomes, particularly at a regional scale.

Therefore, it is currently unclear as to whether it is appropriate for the proposal to proceed as a fast-track consent.



# Memorandum

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AT requests the applicant consider and address the matters raised in this memo to enable us to make an informed assessment of the development implications.

## ***Transport Design Manual***

The [Transport Design Manual \(TDM\)](#) sets out the engineering design requirements for works within the transport corridor.

Please note, proposed future works (such as seal extension, etc) within an AT transport corridor, will need to be designed to comply with the TDM Engineering Design Code and applicable Practice Notes with Engineering Standard Drawing published in AT TDM web site. Design which cannot be executed in accordance with the TDM will require a Departure from Standards, which is at the discretion of AT to approve.

## ***Specialist Comments***

The pre-application plan and the Transportation Overview has been reviewed by AT Subject Matter Experts for high level feedback, which has been outlined below:

### ***1. Safety***

#### ***Tongue Farm/Leigh Road Intersection***

The intersection at Tongue Farm Road and Leigh Road is a concern for both safety and travel connections. Higher volumes of right turning traffic against higher speed southbound traffic will increase the exposure risk for right turn crashes. Tongue Farm Road is part of the Matakana cycle trail, the increase in trip generation would increase the likelihood of cyclist crashes.

With additional traffic and no formalised alternative mode (public transport or walking/cycling), the intersection will be a constraint for safety. For the above reasons, the following recommendations/suggestions are provided.

- The additional right turn movements at the intersection of Leigh Road/ Tongue Farm Road would result in an increase in the exposure to Deaths and Serious Injury (DSI) crashes at an intersection. Therefore, AT requests the applicant to assess the safety risk at the intersection by way of conducting a safe system assessment and provide mitigation measures.

#### ***Tongue Farm Road***

Improvements for active mode users for the section of Tongue Farm Road from the site boundary to connect with the “Matakana to Omaha Cycle Trail”, must be considered. Minor improvements such as road shoulder, signage and potential for localised narrowing of the carriageway to improve safety along the corridor for active mode users.

- As part of the application, the safety implications on cyclists must be assessed. With the increased trips along Tongue Farm Road and potential conflict with cyclists, the likelihood of cyclist crashes increases.
- The Applicant should consider ways of making Tongue Farm Road a low-speed environment.

### ***2. Visibility/Tracking***

The Transportation Overview submitted indicates that the proposed access for the café/restaurant may present potential sightline restrictions towards both the east and west. Given the anticipated volume of trips to the site, a more detailed assessment of the access location and visibility is recommended for both access to ensure safe and efficient vehicle movements.

In addition to the above, AT recommends the applicant to provide detailed internal and external tracking to and from the site, to ensure tracking can be accommodated.



# Memorandum

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### **3. Pavement**

AT supports the sealing of Tongue Farm Road up to the access point of the café/ restaurant, recommended by Flow in the Transportation Overview. This upgrade is considered necessary due to the significant increase in traffic volumes that will be generated by the development, which will result in a doubling of the Average Daily Traffic (ADT). The following recommendations are suggested for the pavement design.

- Pavement upgrade design - TDM Catalogue design with 1million ESA is suggested considering future traffic growth resulting further development activities along this road. Standard practice is to retain by stabilisation with cement and overlaying another unbound granular basecourse then follow by membrane sealing and thin asphalt concrete or two coat chip seal surfacing.
- Please refer to TDM Standards and Rodney District Council Rural Road standards.
- Any work within the AT corridor requires a Temporary Traffic Management Plan (TTMP)/Corridor Access Request (CAR) approval.

### **4. Footpath and Cycle Facility Requirements**

As mentioned in the Transportation Overview, Tongue Farm Road is part of the Matakana Cycle trail and forms part of the regional cycle network connection. As the site heavily relies on private vehicle usage, the interaction with the cycle trail will be higher.

AT recommends the applicant to consider the following mitigation measures to address the effects on vulnerable road users:

- Compliance with the standard road width must be ensured and considerations must be given to sharrow markings.
- Consider including a rural path along the western side of Tongue Farm Road to connect with the cycle trail given the proximity of the Town Centre.
- A rural path suitable for wheeled users and mobility scooters.
- Ensure that accesses to the development (#3 Café, restaurant, car park access) is set back from the on-road cycle and path movement to maintain safety for all users.

### **5. Trip Generation and Right Turn Bay Review**

The Transportation Overview assessed the anticipated trip generation from the site and its effects on the network. AT would like the applicant to review the capacity and safety of the existing Right turn bay on Leigh Road and provide further details on the survey that was obtained and its relevance to current scenario.

- Further assessment on the capacity of the existing Right Turn Bay at the intersection of Leigh Road/ Tongue Farm Road.
- AT request the applicant to provide the source for the traffic surveys conducted by Flow (outlined in the report).

### **6. CTMP/ Rubbish Collection:**

- The applicant must provide a CTMP as part of the application which identifies the route of the construction traffic and analyses the pavement condition. The CTMP must also include the necessary assessments to determine whether localised widening is required to accommodate the tracking of construction vehicles.
- AT recommends the applicant provide details around rubbish collection and include the information in the traffic assessment.



# Memorandum

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## Recommendations/Advice

AT supports the proposed mitigation measures mentioned in the Transportation Overview prepared by Flow listed below,

- Provision of safe pedestrian connections from the internal walking track to the frontage of all units
- Sealing of the existing gravel section of Tongue Farm Road up to the site accesses, including café / restaurant access
- Mitigation at the café / restaurant access given the constrained visibility, which may include
  - Localised widening, to position turning vehicles in safe locations
  - Vegetation trimming or removal
  - Sealing the carriageway
  - Some embankment regrading on the northern side of Tongue Farm Road to improve visibility to the west of the café / restaurant access

In addition to that proposed mitigation, AT recommends the applicant to consider the following:

- Recommends applicant to submit an integrated traffic assessment including a safe system assessment of the intersection of Leigh Road and Tongue Farm Road.
- A detailed CTMP, with the construction traffic routes identified. A pavement analysis of the route might be required.
  - Include measures to ensure that cyclists can continue to safely use Tongue Farm Road as part of the Cycle Trail during construction.
  - The CTMP must also include the necessary assessments to determine whether localised widening is required to accommodate the tracking of construction vehicles.
- AT recommends the applicant undertake a Safe System Assessment of the intersection of Leigh Road/ Tongue Farm Road and propose mitigation measures to reduce the safety risk.
- Consider including a rural path for active modes along Tongue Farm Road to safely accommodate the foot traffic from the site.
- Consider making Tongue Farm Road into a slow speed environment as it is a part of a cycle trail and to reduce the severity of crashes.
- Minor improvements along Tongue Farm Road must be considered to provide safer access for cyclists.
- The existing unsealed section of Tongue Farm Road must be sealed to accommodate the additional traffic.

## Conclusion:

AT would question where the proposed development is appropriate to go through the fast-track consenting pathway as it appears to offer limited to no regional transport benefits.

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### *Important note to Auckland Council:*

*The views expressed by AT specialists within a preapplication are their preliminary views, made in good faith, on the applicant's proposal. Not all specialists may have reviewed this proposal nor has any specialist conducted a precise review for design and standards compliance. We reserve the right to change and/or add to our comments in the future. The views stated in this document are to be taken as high level and used for guidance only.*