

# Attachment 4 – Waimauku West Consultation Record



Organisation	Date	Method	Attendees	Summary
Department of Conservation	13 June 2025	Online Meeting	<b>DoC:</b> <ul style="list-style-type: none"> <li>• David Greaves</li> <li>• Fiona McKenzie</li> </ul> <b>Waimauku:</b> <ul style="list-style-type: none"> <li>• Rachel Morgan [Planner]</li> <li>• Angela Tinsel [Ecologist]</li> </ul>	Discussion around ecology of the site and DoC approvals required.
Auckland Council	19 June 2025	Online Meeting	<b>Auckland Council:</b> <ul style="list-style-type: none"> <li>• Fennel Mason [Planner]</li> <li>• Emma Chandler [Planner]</li> </ul> <b>Waimauku:</b> <ul style="list-style-type: none"> <li>• Rachel Morgan [Planner]</li> <li>• Rebecca Sanders [Planner]</li> </ul>	Discussion around overall development, Fast-track referral process and approach to Council feedback.
Ministry for the Environment	7 July 2025	Letter	<b>Acting General Manager, System Enablement and Oversight</b>	Acknowledgement letter.
Auckland Council	24 July 2025	Online Meeting	<b>Auckland Council:</b> <ul style="list-style-type: none"> <li>• Andonica Giborees [Planner]</li> <li>• Emma Chandler [Planner]</li> <li>• Hilary Johnston</li> <li>• Martin Meyer</li> <li>• Ravinesh Chand</li> <li>• Susan Andrews</li> <li>• Mereene Mathew</li> </ul> <b>Waimauku:</b> <ul style="list-style-type: none"> <li>• Rebecca Sanders [Planner]</li> <li>• Asha Patel [Stormwater Expert]</li> </ul>	Discussion around overall development, stormwater/flooding implications and approach to Council feedback.

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Auckland Council/ Transport/ NZTA	Auckland	31 July 2025	Online Meeting	<p><b>Auckland Council:</b></p> <ul style="list-style-type: none"> <li>• Andonica Giborees [Planner]</li> <li>• Emma Chandler [Planner]</li> <li>• Phillips Augustine [Transport]</li> <li>• Ravinesh Chand [Development Engineer]</li> </ul> <p><b>Auckland Transport</b></p> <ul style="list-style-type: none"> <li>• Tessa Craig [Planner]</li> <li>• Martin Peake [Transport]</li> </ul> <p><b>NZTA</b></p> <ul style="list-style-type: none"> <li>• Tessa Robins [Planner]</li> <li>• Heather Liew [Transport]</li> </ul> <p><b>Waimauku:</b></p> <ul style="list-style-type: none"> <li>• Rebecca Sanders [Planner]</li> <li>• Nick Roberts [Planner]</li> <li>• Daryl Hughes [Transport]</li> </ul>	Discussion around overall development, and transport implications.
Auckland Council		4 August 2025	Feedback Memo		

# Waimauku West – Department of Conservation



Feedback Sought	Response
<p>Integrated Transport Assessment</p>	
<p>A Wildlife Approval is required if there is wildlife on site and the project will affect that wildlife. The application for wildlife approval needs to include all the information listed in Schedule 7, Clause 2 (FTTA);</p>	<p>This is acknowledged and noted in the application.</p>
<p>DOC understands that demonstrating ‘best practice methods’ through documents such as management plans can’t be deferred to a subsequent Lizard Management Plan as there is no mechanism for subsequent approvals in the FTAA. As such, it is recommended that all potential approvals are sought as part of the FTAA process, which is supported by a comprehensive ecological assessment.</p>	<p>Noted. A comprehensive ecological assessment will be included to support the substantive application.</p>
<p>To obtain a wildlife approval DOC strongly recommends that the applicant undertakes a baseline survey and develop a Lizard Management Plan which documents:</p> <ul style="list-style-type: none"> <li>• The location of any species present and their number and location. It is noted that lizards are extremely difficult to detect unless best practice methods are used;</li> <li>• Actual and potential effect on any lizard species found to be present.</li> <li>• Details of avoidance and mitigation methods.</li> <li>• Methods to salvage and relocate lizards, including identifying and preparing release sites. Methods should be guided by species threat status (noting there are constraints on relocating lizards and specific consideration should be given to providing appropriate relocation sites).</li> <li>• Duration – DOC would anticipate a wildlife approval will be required for activities for the duration of the construction phase.</li> </ul>	<p>Noted. This will be looked at as part of the comprehensive ecological assessment that will be included within the substantive application.</p>
<p>As identified to the Applicant at the initial engagement meeting, the DOC database identifies historic records of frogs in the vicinity of the Site along with threatened plant species potentially on the Site. It is</p>	<p>Noted. This will be looked at as part of the comprehensive ecological assessment that will be included within the substantive application.</p>

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Feedback Sought	Response
<p>noted that these are historic records. It is recommended that the Applicant undertake Site surveys to determine the presence, or not, of these species and specifically address the same in the application documents.</p>	
<p>Confirmation should be provided if there are any works proposed within waterways and wetlands, including enhancement activities. It is recommended that the Applicant provide a stocktake of any current fish barriers present on the site and advise of any works to remove or alter them. The Applicant should be aware of the Freshwater Fisheries Regulations and should confirm whether any approvals are required.</p>	<p>Noted.</p>
<p>The preliminary ecological report identifies that bats are present in the vicinity and that the Site contains potential roosting sites. Please provide confirmation if any potential roosting sites are likely to be disturbed as a result of the proposed development. Should disturbance occur, Wildlife Act approvals will be required.</p>	<p>Noted. This will be looked at as part of the comprehensive ecological assessment that will be included within the substantive application.</p>

# Waimauku West – Auckland Council

Feedback Sought	Response
<b>Economist</b>	
<p>Please provide an assessment of the net economic benefits of the proposed developments considering the following;</p> <ul style="list-style-type: none"> <li>• Scale of net economic benefit; and</li> <li>• Any costs (e.g, infrastructure costs) that may arise from changes to the location and sequencing of growth.</li> </ul>	<p>We disagree that the FTAA requires calculation of economic benefits on a net basis, at least in the way framed by the Council. In particular, the suggestion that alleged transfer or displacement effects or asserted "alternative patterns of growth" might be relevant is entirely misconceived. The Waimauku West proposal involves a landowner who is ready and willing to develop, now, and it is that proposition which must be assessed not some speculative future proposal to be developed in some other location at some other time.</p>
<b>Planning, Policy, Growth and Strategy</b>	
Auckland Regional Policy Statement	Refer to Attachment 1 Planning Memorandum Section 5.5 which provides analysis which responds to this feedback.
Future Development Strategy	Refer to Attachment 1 Planning Memorandum Section 5.6 which provides analysis which responds to this feedback.
Spatial Land Use Strategy – North West 2021	Further discussion has not been included in relation to the Spatial Land Use Strategy given this is not a detailed structure plan and is only intended to be a highlevel outline of the future land uses in the Future Urban zone (which the subject site is not).
National Policy Statement Urban Development	Refer to Attachment 1 Planning Memorandum Section 5.1.4 which provides analysis which responds to this feedback.
National Policy Statement Highly Productive Land	Refer to Attachment 1 Planning Memorandum Section 5.1.2 which provides analysis which responds to this feedback.
<p>Auckland Unitary Plan</p> <ul style="list-style-type: none"> <li>• Consistency with AUP provisions relation to prime soils, Rural Production Zone, Infrastructure Provision and Natural Hazards.</li> <li>• How can the proposal be cohesively delivered without a correlating plan change.</li> </ul>	<p>Refer to Attachment 1 Planning Memorandum Section 5 which addresses the relevant statutory framework.</p> <p>The substantive application will provide more around how the scheme would be delivered under the current planning framework.</p>
<b>Watercare Services Limited</b>	

Feedback Sought	Response
<p>this application is to proceed that private water supply and wastewater systems would have to be provided.</p>	<p>Planning Memorandum Section 1.1.2 and Attachment 11 Infrastructure Memorandum for further details.</p>
<p><b>Stormwater and Healthy Waters</b></p>	
<p>Just upstream of the proposed development, there are houses which have been bought out by Council due to flood risk.</p>	<p>These houses referred to are situated in Waimauku Village on the eastern boundary of the subject site within the existing floodplain. The preliminary SMP indicates that the majority of the site discharges to the north and therefore should not further impact flooding in this area. Where the eastern side of the site discharges into a tributary the preliminary SMP states that where flooding is evident and attenuation may be required on this side of the development to not increase the local flood hazard in that area. This will be worked through as part of the detailed design when flood modelling has been undertaken.</p>
<p>The existing flood map is based on the assumption that this land remains zoned as Rural Production. Rezoning and developing this area for residential use would alter runoff characteristics and potentially expand the floodplain.</p>	<p>Flooding requires further investigation through a flood modelling during the final SMP stage. Given the identified flood hazard, the final SMP shall prioritise minimising post-development impacts on overland flow by adopting a hydraulic neutrality approach. The preliminary SMP indicates that there are options for this. In particular, with the majority of the site discharging to the north and with the site located mid-catchment for the Kaipara Stream then a pass forward approach could be possible (no attenuation). As discussed above attenuation may be required on the eastern side of the development to not increase the local flood hazard in that area. Similarly, the culverts underneath the railway to the north are likely to be constrained, and attenuation of site runoff may still be necessary to not increase the extent of flooding associated with those culverts.</p>
<p>The current floodplain mapping in the regionwide model assumes rural land use in this location. Converting this to residential development introduces uncertainty into flood predictions and undermines the reliability of the model. Placing 1,567 dwellings in this context would significantly contribute to cumulative effects across the catchment.</p>	
<p>This is upstream of a catchment and can create impacts downstream. Development in the upper catchment will increase imperviousness, resulting in higher and faster runoff volumes. This reduces the time of concentration and eliminates natural attenuation provided by existing vegetation and soil, placing added pressure on downstream channels and infrastructure. These hydrological changes can increase peak flows, flood depths, and frequencies downstream particularly concerning in a catchment already experiencing flood-related issues. It also introduces sedimentation and water quality risks during construction and post-development.</p>	

Feedback Sought	Response
<p>If this land within a Rural Production zone can proceed through the fast-track process, there is concern about how we will manage future out-of-sequence proposals in other rural zones. It may set a precedent that undermines current growth management and flood resilience planning.</p>	<p>Disagree that an application through the fast track process creates a precedent for future applications. Future applications will need to be assessed on catchment specific effects and mitigation proposed.</p>
<p>There was a mix of commentary on using either SMAF1 or SMAF2 detention in the provided documents, please be consistent in the type of detention proposed.</p>	<p>Noted.</p>
<p>The mentioned solar farm to the north is considered an impervious area, and will need to be included in the E8 private discharge consent. Key aspects to include in the assessment of effects for solar farms are soil type and effects on infiltration, pre and post development flows.</p>	<p>Noted. The application no longer includes a solar farm.</p>
<p><b>Landscape and Urban Design</b></p>	
<p><b>Urban Design</b></p>	
<p>From an urban form and amenity sense, the masterplan layout responds positively to site topography and features, including streams, wetlands and areas of significant vegetation.</p>	<p>Noted. No further action required.</p>
<p>The general arrangement of land uses and densities is well considered, with clusters of medium density residential lots amongst standard residential lots.</p>	<p>Noted. No further action required.</p>
<p>The masterplan retains a generous amount of open space which will be become a key amenity feature of the new neighbourhood.</p>	<p>Noted. No further action required.</p>
<p>The road and lot layout results in groupings of housings which lend themselves to developing as identifiable neighbourhoods within the overall site. This is a positive feature and will contribute to sense of place.</p>	<p>Noted. No further action required.</p>
<p>The road network has a level of connectivity that is appropriate to the planned urban form and site characteristics.</p>	<p>Noted. No further action required.</p>
<p>A neighbourhood centre is well positioned in a central location and on a main road where it will be both conveniently accessible and legible. The</p>	<p>Noted. No further action required.</p>

Feedback Sought	Response
centre is at a high point in the site so will benefit from good views out over the wider area.	
The stream at the western end of the site is a natural feature at a low point in the land which has the potential to form a logical boundary between urban and rural areas.	
The use of Countryside Living Lots as a tool to transition density down at the western end of the site is supported.	Noted. No further action required.
Parts of the Modified Ridgeline Protection overlay form a visual backdrop to the existing urban area of Waimauku. This area is primarily shown as open space, SEA and Large Lot Residential, with Standard Residential lots on the periphery. It would be desirable to understand the extent to which this housing would be seen behind Waimauku, with visual simulations recommended, to inform whether additional management tools are desirable, such as a bespoke landscaping/planting requirement on lots.	Noted. This can be provided with a more comprehensive landscape report to support the substantive application.
Documentation refers to retaining walls along roads and on residential lots of up to 3m in height. This is significant, with reduction in these heights recommended and/or appropriate management tools to reduce the potential visual (views to) and broader amenity effects of these retaining walls.	Noted. This will be looked at further as part of the detailed design to inform the substantive application.
Ms. Gilbert states that detailed design should integrate those matters which she lists at paragraph 3.1 of her 28 May 2025 memo. I support the incorporation of all these matters and consider each recommendation to be necessary to achieve positive development outcomes.	Noted.
<b>Landscape</b>	
Please provide a further comment on the “absence of ‘landscape’ or ‘viewshaft’ overlays along with the close proximity to an established settlement and transport links, make this area well suited to urban development from a landscape perspective”.	Noted. This will be provided as part of the more detailed landscape reporting to support a substantive application.

Feedback Sought	Response
Please provide an assessment on how the proposed change in land use relates to the directives of the NPS-HPL.	Refer to Attachment 1 Planning Memorandum Section 5.1.2 which provides analysis which responds to this feedback.
Please provide a comment on how the landscape design will work with the management of urban runoff and the flooding overlays.	Noted. This will be provided as part of the more detailed landscape reporting to support a substantive application.
Please provide further comments on the proposed controls and requirements of the proposed buffer planting to the northern and western boundaries of the site and SH16.	Noted. This will be provided as part of the more detailed landscape reporting to support a substantive application.
<b>Ecology/Streamworks</b>	
<b>Terrestrial</b>	
The proposed enhancement of streams and wetlands, whilst supported, is not commensurate to the yield requested for rural sites. Chapter E39 provides the baseline for environmental enhancement / protection of Significant Ecological Areas in lieu of residential lots; being >5ha of planting per lot, or >4ha of SEA protection. This development falls significantly short of the expected ecological benefit derived from these provisions.	Noted. This can be further looked at further through the substantive application if it is confirmed that this is an additional reasons for consent.
The EcIA makes unsubstantiated claims to the ‘regionally significant’ restoration outcomes from this development. The ecologist is advised to provide qualitative and quantitative data and analysis to ensure that the claim that the enhancement is indeed regionally significant, noting the above comment regarding expected rural subdivision benefits which is not identified in the AUP(OP) as significant either locally or regionally, for restoration planting / protection.	Noted. More detailed analysis will be provided within the more comprehensive ecological reporting to support a substantive application.
Wetland reclamation for any new/upgraded crossing is prohibited, by way of Regulation 53, as the land is not Urban and therefore would not comply with NES-F Regulation 45C. There are several areas of wetland reclamation on the Master Plan.	More detailed work will confirm if work around wetlands triggers a prohibited activity status by way of Regulation 53. Regardless s21(7) of the Fast-track Approval Act enables the Minister to accept a referral application for an activity that is prohibited under the Resource Management Act 1991. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

Feedback Sought	Response
The application is based solely on desktop analysis for fauna. This is inappropriate for a development of this scale (as recently noted by an EPA panel).	More detailed analysis will be included within the more comprehensive ecological reporting to support a substantive application.
Feedback outlines detailed matters for inclusion within more detailed assessment documents.	Noted.
<b>Freshwater</b>	
Detailed description of the proposed activities (activity tables) in relation to the freshwater features on site and provide details of the impacts of proposed activities.	Noted. This will be included within the more comprehensive ecological reporting to support a substantive application.
Provide Regulatory context relevant to the proposed activities, specifically under the NESFW and relevant E3.4.1 Activity table.	Noted. This will be included within the more comprehensive ecological reporting to support a substantive application.
An updated master plan that clearly demonstrate the required setbacks (e.g., 10m, 100m), proposed earthworks areas, all structures within or adjacent to streams (e.g., bridges), stormwater ponds, and all outlet/discharge locations in proximity to water bodies.	Noted. The current masterplan is high level. These details will be more understood once more detailed design has taken place and will be included within a substantive application.
Associated plans and methodologies, where applicable, should be provided—such as fish relocation plans, finalised stream methodology plans for any in-stream works, where required.	Noted. These will be provided as part of the substantive application.
Provide detailed drawings , including outfall, riprap, and culvert details (cross section and long section) to demonstrate compliance with relevant design standards.	Noted. These will be provided as part of the substantive application.
If reclamation is proposed, details must be provided regarding the location, extent, functional need, and justification for the activity.	Noted. The current masterplan is high level and cannot determine if any reclamation will be required. If reclamation is required this will be assessed through more detail ecological reporting to support a substantive application.
Where reclamation or offsetting is proposed, the application should include detailed ecological data, such as Stream Ecological Valuation (SEV) assessments and supporting data files (e.g., Excel spreadsheets), to inform offset design and quantify ecological loss.	
The loss of stream and wetland extent and values must be addressed. The proposed approach to managing adverse effects must be clearly articulated	

Feedback Sought	Response
<p>using the effects management hierarchy (avoid, remedy, mitigate, offset, compensate), with justification for the selected approach and supporting evidence that offsetting or compensation is appropriate.</p>	
<p>As the master plan progresses, an in-depth hydrological assessment or catchment analysis is required for each identified wetland to determine how future development may affect wetland hydrology. Provide a hydrological assessment outlining the likely impacts of the proposed development on wetland hydrology and detail how such impacts will be managed.</p>	<p>Noted. This will be undertaken as part of the more detailed reporting and assessment to support the substantive application.</p>
<p>In terms of discharge and diversion of the water to the stream particularly, it is important the effect of changed flows to the stream are considered in the context of the geomorphological changes, particularly erosion within the stream, and the resulting impacts on both the stream and downstream environments.</p>	<p>Noted. A Geomorphic Risk Assessment will be undertaken and submitted as part of the substantive application.</p>
<b>Arboriculture</b>	
<p>Please provide a comment on a Arboriculture Assessment addressing the following matters;</p> <ul style="list-style-type: none"> <li>• How protected trees are being retained and protected;</li> <li>• Comment from an arboriculture consultant on appropriate tree protection methodologies; and</li> <li>• How these matters can be incorporated into a Tree Management Plan.</li> </ul>	<p>This is a matter for detailed design and will be addressed through the substantive application if successfully referred.</p>
<b>Contaminated Land</b>	
<p>Council’s Contaminated Land Specialist has advised that a Detailed Site Investigation will be required with any formal application made and has been recommended in the Preliminary Site Investigation provided by the applicant. Ideally this would be submitted at any further preapplication consultation with Council should the application be accepted for referral to allow an assessment of the application for contamination with certainty.</p>	<p>A Detailed Site Investigation will be submitted with the substantive application.</p>

Feedback Sought	Response
<b>Regional Earthworks</b>	
Council’s Regional Earthworks Specialist has advised that if/when any formal application is made the applicant will be expected to consider and comment on the need for an Adaptive Management Plan for the proposed earthworks, and that the documentation will need to clearly specify staging of earthworks and maximum open areas to limit discharge at any one time.	Noted. This will be addressed through the substantive application.
<b>Heritage/Archaeology</b>	
Council’s Heritage Specialist has advised that if/when any formal application is made, a full Heritage/Archaeological assessment will be required. There are a number of pa and undefended site clusters within the area.	Noted. A full Heritage/Archaeological assessment will provided in support of a substantive application.
<b>Wastewater</b>	
If wastewater treatment and disposal takes place to land on-site, then a huge area will need to allocated be needed for disposal – likely dozens of hectares. The area shown for a wastewater treatment plant on the plans is only about 3-4 ha in size.	The entire 463ha site is included within the application with approximately only 200 ha proposed to be urbanised. This provides scope to include further land for wastewater treatment if required.
If disposal is to land then the poor soakage characteristics and proximity to key features like streams, groundwater, bores, wetlands etc will need to be considered, as will public health risks.	Noted. This will be considered further through the civil engineering assessment to support the substantive application.
Wherever treated wastewater is discharged then a comprehensive AEE will be required e.g.: ecological studies, public health, a BPO study etc. These can be time consuming and costly.	Noted.
Regarding the previous point, the objectives and policies of all relevant regulation will also need to be addressed e.g.: The Auckland Unitary Plan, The National Policy Statement for Freshwater Management, The National Environmental Standards for Freshwater etc.	Noted.
I note that the proposed national wastewater environmental performance standards are in circulation, though not yet finalised. These provide limits for contaminants when discharging to water and are not currently	Noted.

Feedback Sought	Response
operable. But they may be by the time application is made, and the applicant is advised to monitor the status of the standards.	
I advise the applicant engages somebody experienced in preparation of such documentation for large scale discharges.	Noted.
<b>Parks Planning</b>	
<b>Open Space Provision</b>	
The council has not anticipated that the site will be developed, and no development contributions have been collected to fund open space on the site and no capital or operational funding has been forecast to be spent in this location.	Noted.
The initial policy assessment undertaken by council’s specialists indicates the requirement for between two and four neighbourhood parks within the masterplan area based on radial proxies applied to the proposed densities, noting the residential densities provided do not all neatly align with the AUP zoning.	Noted. The open space provisions will be further refined through the detailed design to support the substantive application.
<b>Greenways</b>	
The Rodney West Local Paths (Greenways) Plan (June 2019) identifies an Express Path – Open Space running parallel with the northern side of the North Auckland Rail Line which adjoins the site. This aspirational greenway connection provides an important link with the Waimauku township to the south-east. The masterplan indicates a network of pedestrian / cycling links throughout the development. Careful consideration should be given to how these internal networks can provide logical connections to the greenways route. Integrating public connectivity opportunities is encouraged throughout the development via shared pathways adjoining road networks or within riparian margins / esplanade reserves.	Noted. The intention of the masterplan is to provide pedestrian and cycle connectivity throughout the development with an alternative access being explored directly into the village through 93 Waimauku Station Road. The detailed design will take into account the aspirations of the Rodney West Local Paths (Greenways) Plan (June 2019).
<b>Esplanade Reserves</b>	

Feedback Sought	Response
Vesting of a full 20 metre esplanade reserve width would be expected with the application where streams qualify under s230 RMA, subject to the resource consent processing planner's confirmation that the trigger for esplanade provision has been met based on recent survey information to demonstrate the stream width.	Noted. This will be confirmed as part of the detailed design to support a substantive application.
<b>Transport</b>	
Confirm the Pedestrian Access (PA) where the road gradient is >8%.	Noted. This will be confirmed as part of the detailed design to support a substantive application.
Confirm the PA gradient in a plan, differentiating the grade difference (5-8%, 8-12%, >12%) and any high-friction surface treatment. This will help to assess the safety triggers easily.	Noted. This will be confirmed as part of the detailed design to support a substantive application.
Provide visibility assessment for all intersections in detail (including SH16, public roads, JOALS).	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Confirm the speed management treatments at public roads, JOALS.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Request to utilise the most updated traffic data, not estimated, considering the density of the proposal and wider development in the neighbourhood.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Specify if any active mode connectivity is on SH16.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Specify how active mode connectivity towards the Waimauku Central and Waimauku Station road will be safely built.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Request to provide an update on the future use of the light industrial area, if available.	Noted. This will be addressed as part of the substantive application.
Assess if any safety issues will be raised due to industrial vs residential shared vehicle access.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Confirm the traffic control arrangement at 2x SH16 Vehicle Crossings (VC). Request to provide/ comment on an alternative option to provide the proposed option is ideal.	Noted. The Integrated Transport Assessment to support the substantive application will address this.

Feedback Sought	Response
Review/ coordinate the speed management measures and speed limit with NZ Transport Agency Waka Kotahi.	Noted. Conversations on this matter with NZTA are ongoing.
Noted the draft peak traffic 1000-1300vphw with 1600 dwellings. When submitting traffic modelling, request to provide the traffic rate when the delay/ LOS is compromised and any draft conditions. This will help to provide any necessary comments/ conditions.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Confirm the private/ public bin collection arrangement at public and JOALs.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Public bins at JOALs are courtesy call, and the same needs to be arranged with AC Waste Management. Vehicle tracking needs to be submitted without any overlap with any other design elements and minimal turns (especially at the end). Future residents need to be aware of the bin collection arrangement.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Loading bay to be provided at JOALs. Priority to be provided where the dwelling rates, lengths or any complexity are higher.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Confirm if any visitor parking is proposed.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Lighting design to be submitted upfront. Including JOALS, Public roads, and any separate PA.	Noted. This will be included within the substantive application.
A passing bay to be provided if Vehicle Access (VA) is not up to the AUP requirement.	Noted.
Confirm any gate facility proposed. Make sure it doesn't create any queue on the road or block the PA.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Maintain visibility splay- at intersections, non-compliance dwellings VC.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
Vehicle tracking needs to show both forward and reverse-in, for any non-compliance design location/ elements.	Noted. The Integrated Transport Assessment to support the substantive application will address this.

Feedback Sought	Response
PC79DV - Primary Pedestrian Access (PA), need to incorporate the vertical clearance and width.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
If proposing any 2° parking space between the garage door and the PA (public footpath), request to consider 5.4m minimum spacing for safety reasons.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
On-site PUDO service must be provided for educational facilities. As multiple safety issues have been noted in the past years in educational facilities, this will be strictly reviewed.	Noted. The Integrated Transport Assessment to support the substantive application will address this.
A safe D-area/ turntable area must be provided for all dead ends of public roads and JOALs. Noted a few areas in the draft design.	Noted. The Integrated Transport Assessment to support the substantive application will address this.

# Waimauku West – New Zealand Transport Agency



Feedback Sought	Response
<b>Integrated Transport Assessment</b>	
<p>Please provide comments on the following intersections to confirm adverse impacts;</p> <ul style="list-style-type: none"> <li>• New accesses onto the highway;</li> <li>• SH 16/ Muriwai Rd roundabout;</li> <li>• SH 16 Coatesville/ Riverhead Roundabout;</li> <li>• SH 16/ Brigham Creek Round Roundabout; and</li> <li>• SH 16/ Taupaki Rd Roundabout.</li> </ul>	Noted. The Integrated Transport Assessment to support the substantial application will respond to these matters.
<p>Please provide an assessment of Multimodal connectivity and provisions for multimodal integrated transport networks (includes);</p> <ul style="list-style-type: none"> <li>• Pedestrian and cycle facilities;</li> <li>• Connectivity to local road networks and destinations; and</li> <li>• Linkage to schools, retail, and employment hubs.</li> </ul>	Noted. The Integrated Transport Assessment to support the substantial application will respond to these matters.
<p>Please provide an assessment of Pedestrian and Cycle Safety – assess the following considerations;</p> <ul style="list-style-type: none"> <li>• Safe crossing opportunities with refuge islands or signalised crossings;</li> <li>• Provision of footpaths and/ or shared use paths connecting to internal networks;</li> <li>• Assessment of expected pedestrian and cycle volumes based on land use mix; and</li> <li>• Speed environment.</li> </ul>	Noted. The Integrated Transport Assessment to support the substantial application will respond to these matters.
<b>Safety System Audit</b>	
<p>Please provide a Safety System Audit Assessment to identify and mitigate risks.</p>	Noted. Provision will be made for this process.
<b>Infrastructure Upgrades to SH 16</b>	

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Feedback Sought	Response
<p>Please provide details of proposed infrastructure upgrades to SH16, including;</p> <ul style="list-style-type: none"> <li>• Fully controlled intersection treatments;</li> <li>• Speed management measures including signage and zone adjustments;</li> <li>• Pedestrian and cycling facilities, such as footpaths, shared paths, and safe crossing points;</li> <li>• Public transport improvements and accessibility features; and</li> <li>• Upgrade on SH 16 to support increased volumes and improve corridor resilience.</li> </ul>	
<p><b>Traffic Generation</b></p>	
<p>Please provide details on traffic generation associated with the Solar Farm, specifically construction traffic and temporary mitigation measures that may be required at the access point with the state highway.</p>	<p>Noted. The application no longer includes a solar farm.</p>
<p><b>Development Staging</b></p>	
<p>Please provide an assessment of the timing and staging of the development, specifically linked to any required infrastructure upgrades.</p>	<p>Noted. The Integrated Transport Assessment to support the substantial application will respond to these matters.</p>

# Waimauku West - Auckland Transport



Feedback Sought	Response
<p>Integrated Transport Assessment</p> <p>Please provide comments on the following intersections to confirm adverse impacts;</p> <ul style="list-style-type: none"> <li>• New accesses onto the highway;</li> <li>• SH 16/ Muriwai Rd roundabout;</li> <li>• SH 16 Coatesville/ Riverhead Roundabout;</li> <li>• SH 16/ Brigham Creek Round Roundabout; and</li> <li>• SH 16/ Taupaki Rd Roundabout.</li> </ul>	<p>Noted. The Integrated Transport Assessment to support the substantial application will respond to these matters.</p>
<p>Please provide comments in the ITA to take into account/cover off the following;</p> <ul style="list-style-type: none"> <li>• Wider development including PC100 and the Rangitooopuni fast-track consent;</li> <li>• Access to amenities;</li> <li>• Roading design details including road hierarchy, internal intersection safety gradients, design speed, cycle facilities;</li> <li>• Suitability for AT to be able to run buses (collector road standard required and staging to allow service to run as early as required i.e. road fully built);</li> <li>• Pedestrian and cycle links to wider area including appropriate facilities to link to key attractions (schools, shops etc.);</li> <li>• Internal road layout should minimise the use of cul-de-sacs to provide a well-connected road network particularly for active modes;</li> <li>• Active mode connections through the development should be safe, direct and attractive;</li> <li>• Any roads with gradients exceeding 8% should consider how accessible pedestrian facilities would be provided;</li> </ul>	<p>Noted. The Integrated Transport Assessment to support the substantial application will respond to these matters.</p>

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

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Feedback Sought	Response
<ul style="list-style-type: none"> <li>• Waimauku school (school attendee safety during construction period) considered in Construction Traffic Management Plan; and</li> <li>• Details of the solar farm including construction period and potential glare.</li> </ul>	
<p>Other Matters</p>	
<p>Please provide comments on wetlands and communal gardens detailing who would take ownership and other details related to stormwater management and overland flow paths for roads to be vested.</p>	<p>Noted. The Integrated Transport Assessment to support the substantial application will respond to these matters.</p>

# Fast-Track Pre-Lodgement Consultation Summary

**Purpose** - This document provides a summary of information from DOC following a pre-lodgement consultation request.

## Project Details

<b>Project name:</b>	FT-0081-PRE Waimauku West
<b>Engagement type:</b>	Pre-lodgement engagement Referral Application
<b>Applicant/agent:</b>	Halberg Holdings Ltd / Rebecca Sanders (Barker & Associates)
<b>Proposal overview:</b>	<i>HHL intends to develop the site to enable an extension of the existing Waimauku settlement. The proposal will result in approximately 1600 residential dwellings at a range of densities including lifestyle blocks (4000m<sup>2</sup> site area) to large lot residential (1000m<sup>2</sup> site area), single house (300-400m<sup>2</sup> site area) and medium density (150m<sup>2</sup> site area with some attached). The proposal also includes light industrial development in the west fronting Great North Road and a neighbourhood Centre. There is a proposed green network weaving through the development providing for open space, stormwater management and revegetation. This network largely aligns with the ecological features of the site.</i>
<b>Location:</b>	1080 State Highway 16, Waimauku, Auckland
<b>Date pre-lodgement request received:</b>	3 June 2025
<b>Summary of pre-lodgement Consultation</b>	
<b>Fast track project lead DOC:</b>	David Greaves– Consultant Fast Track Consents Advisor (Enspire)
<b>DOC specialist input required:</b>	Fast Track Project Lead – David Greaves Ranger/Project Lead Community – Fiona McKenzie Senior Ranger – David Wilson Statutory Manager (Auckland) - John Galilee Permissions – Kelly McQuinn RMA – Leah McEnhill
<b>DOC Permissions/ Approvals Identified by applicant in pre-</b>	<ul style="list-style-type: none"><li>Authority under Wildlife Act 1953 - Permit for lizard relocation</li></ul>

<p><b>lodgement request as potentially required:</b></p>	
<p><b>DOC Commentary on Fast Track approvals and permissions identified:</b></p>	<p><b>Wildlife Act 1953 Permissions/Permits</b></p> <p>The information provided to date sets out that:</p> <ul style="list-style-type: none"> <li>• The Applicant has undertaken a desktop review and site visits (3, 6, 10 and 13 March 2025);</li> <li>• Review of data on Auckland Council’s Geomaps;</li> <li>• No formal fauna surveys were undertaken;</li> <li>• Potential wetlands were assessed in accordance with wetland delineation protocols to determine if any area met the regulatory definition of ‘natural inland wetland’;</li> <li>• Most of the Site is in pasture used for grazing stock and is of low botanical value;</li> <li>• There are several strands of remnant native vegetation on the Site, three of which are identified as Significant Natural Areas in the Auckland Unitary Plan;</li> <li>• Long-tailed bats have been recorded within 10km of the Site and vegetation present within the Site provides some potential habitat for bats;</li> <li>• Lizard habitat within the Site is largely limited to the areas of native, mixed native/exotic vegetation and weedy vegetation;</li> <li>• Avifauna habitat within the Site includes areas of native vegetation, mixed native/exotic vegetation and amenity plantings, shelterbelts, isolated trees and rank grass/weedy vegetation that may provide nesting and roosting habitat. It is noted that the extensive pasture across the site provides habitat for a limited number of species;</li> <li>• The Kaipara River flows east to west, north of the Site before heading north to discharge into the Kaipara Harbour. Several tributaries of this river run through the Site and close to the eastern and western boundaries;</li> <li>• There are a network of wetlands present across the Site, most are grazed and narrow with little vegetation;</li> <li>• The proposal is not seeking to undertake any disturbance of wetlands or in waterways.</li> </ul> <p>Based on the information provided DOC advises that:</p> <ul style="list-style-type: none"> <li>• A Wildlife Approval is required if there is wildlife on site and the project will affect that wildlife. The application for wildlife approval needs to include all the information listed in Schedule 7, Clause 2 (FTTA);</li> <li>• DOC understands that demonstrating ‘best practice methods’ through documents such as management plans can’t be deferred to a subsequent Lizard Management Plan as there is no mechanism for subsequent approvals in the FTAA. As such, it is recommended that all potential approvals are sought as part of the FTAA process, which is supported by a comprehensive ecological assessment.</li> </ul>

	<ul style="list-style-type: none"> <li>• To obtain a wildlife approval DOC strongly recommends that the applicant undertakes a baseline survey and develop a Lizard Management Plan which documents: <ul style="list-style-type: none"> <li>• The location of any species present and their number and location. It is noted that lizards are extremely difficult to detect unless best practice methods are used;</li> <li>• Actual and potential effect on any lizard species found to be present.</li> <li>• Details of avoidance and mitigation methods.</li> <li>• Methods to salvage and relocate lizards, including identifying and preparing release sites. Methods should be guided by species threat status (noting there are constraints on relocating lizards and specific consideration should be given to providing appropriate relocation sites).</li> <li>• Duration – DOC would anticipate a wildlife approval will be required for activities for the duration of the construction phase.</li> </ul> </li> <li>• As identified to the Applicant at the initial engagement meeting, the DOC database identifies historic records of frogs in the vicinity of the Site along with threatened plant species potentially on the Site. It is noted that these are historic records. It is recommended that the Applicant undertake Site surveys to determine the presence, or not, of these species and specifically address the same in the application documents.</li> <li>• Confirmation should be provided if there are any works proposed within waterways and wetlands, including enhancement activities. It is recommended that the Applicant provide a stocktake of any current fish barriers present on the site and advise of any works to remove or alter them. The Applicant should be aware of the Freshwater Fisheries Regulations and should confirm whether any approvals are required.</li> <li>• The preliminary ecological report identifies that bats are present in the vicinity and that the Site contains potential roosting sites. Please provide confirmation if any potential roosting sites are likely to be disturbed as a result of the proposed development. Should disturbance occur, Wildlife Act approvals will be required.</li> </ul>
<p><b>Treaty partners:</b></p>	<p>In the time available, DOC has not carried out a process to identify Treaty partners with interests relevant to this site</p>
<p><b>Treaty Settlement implications/considerations:</b></p>	<p>In the time available, DOC has not carried out a process to identify Treaty settlement obligations specifically relevant to this site but notes for the applicant that this will form part of the section 18 report prepared by MFE.</p> <p>We encourage the applicant to engage directly with Iwi as required by section 29 of the Act.</p>
<p><b>Potential Resource Management Act (RMA) considerations and effects:</b></p> <p><i>Note: DOC's role in relation to 53(2)(m)(i) FTAA</i></p>	<p>As pre-lodgement consultation was primarily in relation to the wildlife approval being sought, very high-level RMA commentary has been provided. Some primary considerations for DOC include:</p> <ul style="list-style-type: none"> <li>• That the relevant biodiversity and environmental effects are considered as part of the full and comprehensive AEE included with the future application</li> </ul>

	and shall specifically address the presence and management of lizards, birds, bats, threatened plant species and freshwater values.
<b>DOC Statutory Planning Document considerations in relation to site (e.g. CGP/CMS/CMP):</b>	The site does not contain any Public Conservation Land. It is noted however that the areas of indigenous vegetation present have significant values and their retention will benefit the wider ecological setting.
<b>Any further information/considerations:</b>	<p>It is recommended that the Applicant undertake Site surveys to determine the presence, or not, of threatened plants, bats and frog species on the Site and specifically address the same in the application documents.</p> <p>Confirmation should be provided if there are any works proposed within waterways and wetlands, including enhancement activities. It is recommended that the Applicant provide a stocktake of any current fish barriers present on the site and advise of any works to remove or alter them. The Applicant should be aware of the Freshwater Fisheries Regulations and confirm whether any approvals are required.</p> <p>The preliminary ecological report identifies that bats are present in the general vicinity and that the Site contains potential roosting sites. Please provide confirmation if any potential roosting sites are likely to be disturbed as a result of the proposed development. Should disturbance occur, Wildlife Act approvals may be required. The application should provide a comprehensive assessment on the potential effects on bats.</p>
<b>Additional Notes:</b>	<p>While DOC will assist applicants as much as we can when they engage in pre-lodgement consultation, it is the applicants' responsibility to comply with the FTAA and to ensure they have applied for all permissions they need.</p> <p>DOC encourages the applicant to share draft application documents so that feedback can be provided on how it views alignment with information requirements of schedule 7 of the FTAA, noting DOC is unable to request further information once a completeness check is commenced by the EPA.</p> <p>Note that a panel will invite the statutory bodies listed in clause 4 of Schedule 7 to comment on the application (NZCA, conservation boards, Fish and Game Council, and Game Animal Council). We encourage applicants to engage with these bodies in advance of filing a substantive application.</p>

Tēnā koe Rebecca,

## **Waimauku West Development - Pre-lodgement consultation under the Fast-track Approvals Act 2024 (FTAA)**

Thank you for your correspondence dated 2 July 2025 in relation to Halberd Holdings Limited's intention to lodge a referral application under the Fast-track Approvals Act 2024 (FTAA) in respect of the "Waimauku West Development" 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 2 July 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**

1 August 2025

## **PRR00042916 - PRE-APPLICATION RESOURCE CONSENTING MEMO – WAIMAUKU WEST (FAST TRACK REFERRAL PROJECT)**

### **PROPOSAL**

The proposal is for the development of a portion of Halberd Holdings Limited's site in Waimauku to form a new residential community that will become an extension to the existing Waimauku settlement. Supporting employment land is proposed, accommodating 5 key components:

1. 1567 residential dwellings ranging in density from Large Lot Residential (95 dwellings), Standard Residential (1114 dwellings) to Medium Density Residential (358 dwellings);
2. A neighbourhood centre to provide for residents day to day needs;
3. A green network incorporating existing ecological areas and features, stormwater management and open spaces;
4. A light industrial area to the west surrounded by Countryside Living (29 dwellings); and
5. Associated infrastructure.

The applicant is currently seeking pre-application advice to support an application for Referral for processing under the Fast Track Approval Act 2024 (FTAA). As such, the application is in early and developing stages, and as such the applicant has advised that they are expecting the proposal to develop and change through further development processes and consultation with Council should the application be accepted for referral under the FTAA process.

### **SPECIALIST FEEDBACK**

Given the scale and context of the application, preliminary feedback from as many relevant specialists as possible has been obtained on key matters as part of this pre-application process. The applicant has only requested meetings in relation to Stormwater/Healthy Waters and Transport matters, and as such the majority of the feedback summarised below is provided in written form only at this stage. Should the applicant wish to organise any further meetings to discuss any of the below, we would be happy to arrange.

#### **Economist**

Council have engaged M.E Consulting to complete a peer review of the submitted Economic Assessment of the proposed development. The key conclusions from that review are:

1. *The assessment has provided a reasonable estimation of the potential levels of economic activity and associated gross benefits generated by the proposal. It has also shown that the contribution to housing supply is sizeable within the context of projected growth in the outer northwestern part of Auckland, with benefits associated with increased housing choice.*
2. *However, the report has not identified the scale of the net economic benefit. We consider this is an important aspect to understand as the proposal would produce a pattern of urban expansion that differs to the planned pattern of growth in this area. The proposal would involve urbanisation of land outside of the RUB in areas that are further from the urban edge than other areas in northwestern Auckland that are currently planned for urbanisation. It is important that the assessment takes into account any costs (such as infrastructure) that may arise from the changes to the location and sequencing of growth in these areas ... These are important for understanding the likely overall net effect.*

The review has also identified a range of areas where further technical clarifications and additional information would be recommended for next stages. These are not repeated here, and instead we refer to the full Economic Memo which is appended to Attachment 1 of this report.

### **Planning, Policy, Growth and Strategy**

Council's feedback in relation to planning, policy, and growth and strategy matters has been summarised below with respect to the specific relevant planning documents and frameworks that apply to this consent.

Overall, the application is considered to be an inappropriate, unplanned development that would be inconsistent with most, if not all, relevant statutory documents, and as such is not supported by Policy, Growth and Strategy.

#### Auckland Regional Policy Statement

As the land is Rural Production zoned land, the application is effectively rezoning by resource consent. This approach is contrary to the objectives and policies of the Regional Policy Statement (RPS) and the underlying zone which does not anticipate urbanisation of the rural environment that is not identified for future development by being zoned Future Urban Zone.

#### Future Development Strategy

Auckland Council's Future Development Strategy 2023 - 2053 (FDS) promotes integrated, long-term strategic planning to set a high-level vision for accommodating urban growth and identifying strategic priorities for development-related decisions. The FDS states "around 9,500 hectares of future urban land remains identified for urban development across the region and the intention is for these areas to not further expand during the timeframe of this strategy. Growth in rural areas will be minimal to retain the rural environment and rural productivity." The subject site is not identified in the FDS as these sites are not anticipated for urban development at any time within the next 30 years.

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

The Spatial Land Use Strategy was developed for the Kumeū-Huapai, Riverhead, and Redhills North Future Urban zoned areas to inform planning for the future transport network. The Strategy

identifies locations for future centres and business land that the transport network will support and impact upon.

The Spatial Land Use Strategy is not a detailed structure plan and is only intended to be a high-level outline of the future land uses in the Future Urban zone (which the subject site is not). It reinforces that significant growth at Waimauku has not been planned for.

Furthermore, the strategy was used to help inform a combined local and central government entity (the Supporting Growth Alliance) on what future transport networks would be required in the North-West area. Ad-hoc development like this one could undermine the time and investment spent by central and local government to comprehensively plan for the future transport infrastructure for this area, which is a significant concern.

### National Policy Statement – Urban Development

The National Policy Statement on Urban Development, through various objectives and policies, requires that planning decisions contribute to well-functioning urban environments. The application considers that the proposal will result in a well-functioning urban environment.

We are unclear at this stage whether this would indeed be the case. Of note:

- It is unclear whether the proposal integrates the provision of the necessary infrastructure, noting that public wastewater and water supply cannot be provided to the development as per the feedback from Watercare Services Limited below, and significant concerns have been raised with respect to stormwater management and flooding by Healthy Waters.
- It is also not clear why the proposed development would not simply create a relatively remote commuter suburb, with reliance on the private car for all trips. There is no current or planned rapid or frequent public transport to Waimauku and this proposal does not seek to address this through any public transport provision.

### National Policy Statement – Highly Productive Land

The National Policy Statement for Highly Productive Land ('NPS-HPL') introduces new strong directives to protect Highly Productive Land. The subject site is zoned Rural – Rural Production Zone and the majority of the land is shown in the New Zealand Land Resource Inventory (NZLRI) maps to contain Land Use Capability class 3 (LUC 3) soils. We note here also the Blue Grass case and decision [2024], NZEnvC 83, which found that site specific mapping could not prevail over the NZLRI maps for the purposes of determining which land is subject to the NPS: HPL. Therefore, the subject site meets the current definition of Highly Productive Land.

We have concerns at this stage about the consistency of the application with the provisions of the NPS: HPL, as detailed by Council's Policy Planner:

- *Clause 3.6 states that council "may allow urban rezoning of highly productive land only if" all three of the exemptions in 3.6(1) apply. None of these exemptions are found to be relevant for this proposal. While this is not a proposal for rezoning, the effects of the application would be effectively a rezoning by allowing urban activities on a rural zone.*
- *Clause 3.7 states that council "must avoid rezoning of highly productive land as rural lifestyle, except as provided in clause 3.10". Again, while this is not a proposal for rezoning, the consent would be effectively a rezoning by allowing rural lifestyle sites to establish on highly productive soils.*

- *Clause 3.9 states that council “must avoid the inappropriate use or development of highly productive land that is not land-based primary production” except where at least one of the exceptions applies to the use or development. None of the exceptions listed in 3.9(2) are found to be relevant for this proposal.*
- *Clause 3.10 states the “Territorial authorities may only allow highly productive land to be subdivided, used, or developed for activities not otherwise enabled under clauses 3.7, 3.8, or 3.9 if satisfied” that all of the high-level exceptions identified in 3.10(1) are met. I consider that the proposal does not meet any of these exceptions and no justification has been provided by the applicant.*

While Central government has indicated through a discussion document that LUC 3 soils may be removed from the definition of highly productive land, this has not occurred yet. There is still uncertainty about what the actual wording of the NPS-HPL will be around LUC 3 land. Therefore, the National Policy Statement must be considered at this stage as it is currently worded.

### Auckland Unitary Plan

There are a range of provisions within the Auckland Unitary Plan that at this stage the application appears to be inconsistent with, if not contrary to:

- Prime Soils – the AUP accommodates a range of provisions across various sections that seek to ensure that prime soils are protected and unproductive activities on these soils be avoided where possible. The documentation provided to Council has not adequately demonstrated the necessity of these activities being located on this site.
- Rural Production Zone – this zone primarily seeks to provide for rural production activities and to avoid and restrict activities not associated with rural production. The proposal is for an urban redevelopment of the site, not rural production activities.
- Infrastructure provision – there are a range of provisions that seek to ensure that infrastructure is protected from inappropriate subdivision, use and development, and that development is appropriately serviced. There are significant infrastructure concerns with the application as detailed throughout this memo.
- Natural Hazards – the AUP seeks to ensure that the risks of natural hazards are appropriately managed and hazards are not exacerbated or worsened by development. As detailed below, there are significant flooding concerns with the application, including the potential for the proposal to significantly exacerbate the hazard across the wider Kumeu-Huapai area.

There may yet be other areas of concern with the AUP provisions, however further information will be required to enable a complete assessment, as detailed in the preliminary comments relating to the other specialist areas discussed below.

There is also concern relating to how an urban development like this would be cohesively delivered without a correlating plan change. The underlying zoning would remain Rural Production, and as such future development on any vacant lots, or redevelopment of lots into the future would be subject to these underlying Rural provisions and not a suitable urban planning framework. This could cause significant issues for achieving a well-functioning, consistent and quality urban area. Any Referral application should provide details around how the scheme would be delivered under the current planning framework.

## **Watercare Services Limited**

Watercare Services Limited have reviewed the application in relation to providing public water supply and wastewater servicing for the proposed development. They have concluded that public water supply and wastewater cannot be provided for this development, that Watercare does not provide water supply or wastewater servicing to rural zoned land (such as the Site), and that if this application is to proceed that private water supply and wastewater systems would have to be provided.

They have specifically commented:

- *For water supply, the development area is within the area supplied with water by the Waitakere 2 Watermain which is at full capacity. Overallocation of capacity in the Waitakere 2 Watermain would ultimately result in reduced levels of service to the wider western and north Auckland community, particularly at peak times. Additionally, the 10km watermain pipe that is proposed to be installed to service the development and inclusion of a new local reservoir may result in water quality issues, which would require design of chlorine dosing equipment/infrastructure within the extended system. The North Harbour 2 (NH2) would be required, as a minimum, to service this development however, in addition, servicing this area would trigger multiple unplanned bulk water supply upgrades. Considering the scale of unplanned and unfunded upgrades required, Watercare considers servicing the area for water supply is not feasible.*
- *For wastewater, the current network does not have the capacity to support large-scale developments, such as this one. Furthermore, there are no planned upgrades to accommodate this unanticipated growth. Watercare's priority is to the existing live zoned areas and substantial Future Urban Zone (FUZ) in the Northwest, in alignment with the FDS. Watercare notes that the Huapai Pump Station that the Applicant refers to is not functioning as a standard wastewater pump station. Instead, it serves as a top-up water and chemical dosing facility. The local wastewater network within Huapai discharges directly to the Riverhead Pump Station. The Riverhead Pump Station itself lacks capacity for this development, and downstream infrastructure, including Pump Station 68, Pump Station 70, and even the Northern Interceptor, have been sized and planned with staged upgrades to serve their respective catchments based on live zoning and the FUZ as set out and sequenced by the FDS. Providing connections to significant development in rural areas, such as this one, would undermine the ability of these assets to serve existing live zones and the planned FUZ.*

The full Watercare Services Memo received as part of this pre-application feedback is appended to this memo at Attachment 2.

## **Stormwater and Healthy Waters**

A pre-application meeting was held with the applicant in relation to stormwater and flooding matters on 24/07/25. This included representatives from Council's Stormwater Specialist and Development Engineer, and Healthy Waters.

Based on a preliminary review and the information available to date (including a Preliminary Stormwater Management Plan, dated 13 June 2025), the application cannot be supported by Healthy Waters or Stormwater due to extensive known flood hazards within the area and the risks this unplanned urban form of development would place on these hazards and existing activities within the area. Of particular note, Healthy Waters Catchment Planning Team have advised:

- *Just upstream of the proposed development, there are houses which have been bought out by Council due to flood risk.*
- *The existing flood map is based on the assumption that this land remains zoned as Rural Production. Rezoning and developing this area for residential use would alter runoff characteristics and potentially expand the floodplain.*
- *The current floodplain mapping in the regionwide model assumes rural land use in this location. Converting this to residential development introduces uncertainty into flood predictions and undermines the reliability of the model. Placing 1,567 dwellings in this context would significantly contribute to cumulative effects across the catchment.*
- *This is upstream of a catchment and can create impacts downstream. Development in the upper catchment will increase imperviousness, resulting in higher and faster runoff volumes. This reduces the time of concentration and eliminates natural attenuation provided by existing vegetation and soil, placing added pressure on downstream channels and infrastructure. These hydrological changes can increase peak flows, flood depths, and frequencies downstream particularly concerning in a catchment already experiencing flood-related issues. It also introduces sedimentation and water quality risks during construction and post-development.*
- *If this land within a Rural Production zone can proceed through the fast-track process, there is concern about how we will manage future out-of-sequence proposals in other rural zones. It may set a precedent that undermines current growth management and flood resilience planning.*

In the event this application is accepted for Referral comprehensive flood modelling and detailed assessments will be required to demonstrate how the activity will not exacerbate or worsen any existing flood hazards within the surrounding area. It is also recommended that a geomorphological assessment be provided to show the tributaries/streams have capacity for the stormwater changes proposed and that the riparian margins proposed are adequate as part of this more detailed assessment of the application and its stormwater and flooding effects. It is, however, likely that Council will remain unsupportive of an application of this scale with respect to flooding effects.

The applicant should also be aware that as the site is within rural zoned land they cannot seek authorisation of stormwater diversion and discharge under the Region Wide Network Discharge Consent. Any application therefore will need to consider the provisions of E8 and provide an appropriate associated assessment.

Council's Stormwater Specialist has additionally noted:

- *There was a mix of commentary on using either SMAF1 or SMAF2 detention in the provided documents, please be consistent in the type of detention proposed.*

- *The mentioned solar farm to the north is considered an impervious area, and will need to be included in the E8 private discharge consent. Key aspects to include in the assessment of effects for solar farms are soil type and effects on infiltration, pre and post development flows.*

## **Landscape and Urban Design**

### Urban Design

Council's Urban Designer has provided the following high-level comments in relation to this application:

- *From an urban form and amenity sense, the masterplan layout responds positively to site topography and features, including streams, wetlands and areas of significant vegetation.*
- *The general arrangement of land uses and densities is well considered, with clusters of medium density residential lots amongst standard residential lots.*
- *The masterplan retains a generous amount of open space which will become a key amenity feature of the new neighbourhood.*
- *The road and lot layout results in groupings of housings which lend themselves to developing as identifiable neighbourhoods within the overall site. This is a positive feature and will contribute to sense of place.*
- *The road network has a level of connectivity that is appropriate to the planned urban form and site characteristics.*
- *A neighbourhood centre is well positioned in a central location and on a main road where it will be both conveniently accessible and legible. The centre is at a high point in the site so will benefit from good views out over the wider area.*
- *The stream at the western end of the site is a natural feature at a low point in the land which has the potential to form a logical boundary between urban and rural areas.*
- *The use of Countryside Living Lots as a tool to transition density down at the western end of the site is supported.*
- *Parts of the Modified Ridgeline Protection overlay form a visual backdrop to the existing urban area of Waimauku. This area is primarily shown as open space, SEA and Large Lot Residential, with Standard Residential lots on the periphery. It would be desirable to understand the extent to which this housing would be seen behind Waimauku, with visual simulations recommended, to inform whether additional management tools are desirable, such as a bespoke landscaping/planting requirement on lots.*
- *Documentation refers to retaining walls along roads and on residential lots of up to 3m in height. This is significant, with reduction in these heights recommended and/or appropriate management tools to reduce the potential visual (views to) and broader amenity effects of these retaining walls.*
- *Ms. Gilbert states that detailed design should integrate those matters which she lists at paragraph 3.1 of her 28 May 2025 memo. I support the incorporation of all these matters*

*and consider each recommendation to be necessary to achieve positive development outcomes.*

## Landscape

Overall, the Landscape Comments memo provided by Bridget Gilbert Landscape Architects (BGLA) provides a high-level overview of the potential landscape aspects of the proposal, which Council's Landscape Architect generally agrees with the key principles of.

There are, however, a number of issues which will need to be explored in further detail with the full assessment:

- *It is stated in the memo that the "absence of 'landscape' or 'viewshaft' overlays along with the close proximity to an established settlement and transport links, make this area well suited to urban development from a landscape perspective". Potentially this criteria would apply to a large area of rural productive land in Auckland and would need to be more specific to why this site in particular is suitable.*
- *The western/southwestern portion of the site subject to a Highly Productive Land overlay and how does the proposed change in land use relate to the directives of the NPS-HPL.*
- *How the landscape design will work with the management of urban runoff and the flooding overlays.*
- *The proposed controls and requirements of the proposed buffer planting to the northern and western boundaries of the site and SH16.*

## **Ecology/Streamworks**

### Terrestrial

It is understood that from a terrestrial ecology perspectives consents will likely be required for works and the removal of vegetation within the riparian margins of rural streams and natural wetlands, and within the beds of streams. Consent is also anticipated to be required under the National Environmental Standard: Freshwater (NES-F) for vegetation clearance and land disturbance within 10m of natural inland wetlands, outside 10m but within 100m of natural inland wetlands, and discharge and diversion of stormwater within 100m of natural inland wetlands. It is possible also that consent will be required pursuant to Significant Ecological Area controls of the AUP: OP.

Council's Terrestrial Ecologist has provided the following comments based on the information available and reviewed to date:

- *The proposed enhancement of streams and wetlands, whilst supported, is not commensurate to the yield requested for rural sites. Chapter E39 provides the baseline for environmental enhancement / protection of Significant Ecological Areas in lieu of residential lots; being >5ha of planting per lot, or >4ha of SEA protection. This development falls significantly short of the expected ecological benefit derived from these provisions.*
- *The EclA makes unsubstantiated claims to the 'regionally significant' restoration outcomes from this development. The ecologist is advised to provide qualitative and quantitative*

*data and analysis to ensure that the claim that the enhancement is indeed regionally significant, noting the above comment regarding expected rural subdivision benefits which is not identified in the AUP(OP) as significant either locally or regionally, for restoration planting / protection.*

- *Wetland reclamation for any new/upgraded crossing is prohibited, by way of Regulation 53, as the land is not Urban and therefore would not comply with NES-F Regulation 45C. There are several areas of wetland reclamation on the Master Plan.*
- *The application is based solely on desktop analysis for fauna. This is inappropriate for a development of this scale (as recently noted by an EPA panel).*

The following would be recommended to be included in more detailed assessment documents:

- Reassessment of all indigenous vegetation, wetland, and the habitats of indigenous fauna in terrestrial and freshwater environments as per Schedule 3.
- EclA should include a detailed assessment against AUP(OP) and other statutory considerations (e.g. NES-F, NPS-FM and NPS-IB).
- Culvert/stream/wetland crossings would need to maintain hydrology and fish passage – the details provided do not provide sufficient clarity on the proposed construction and this should be addressed in detail in developed documents.
- All crossings require finer grained analysis as to its suitability from a hydrologist. Some crossings may better suit a bridging structure(s), with sufficient height above the wetland plants to maintain habitat viability.
- Any proposed offsets, if applicable, will need to be evaluated against AUP Appendix 8 and/or accountancy models such as the Guidance on Good Practice Biodiversity Offsetting in New Zealand 2014.
- Detailed site-specific surveys should be carried out for avifauna (notably cryptic wetland species), lizards, fish and bats. There are records of several regionally and nationally threatened species in close proximity to the site, and it is entirely possible, if not probable, that some are utilising the terrestrial and freshwater habitats on this property.
- Restoration efforts must be commensurate to species specific habitat.
- Flora assessment appears to be ‘representative’ and is not thorough. Further surveys for botanical values should be carried out.
- Analysis of the actual and potential impacts of this scale of development adjacent to Significant Ecological Areas and areas of restoration and provide recommendations regarding appropriate dwelling/road and pathway setbacks to sensitive indigenous areas. Development of this scale is not currently expected for this property/area. Light, noise and habitat disturbance, for example, are known to have adverse effects on indigenous biodiversity. This analysis can only be undertaken once extensive and thorough fauna/flora surveys have been completed.
- The EclA needs to guide restoration to ecosystem derived outcomes, commensurate to those known or expected. Planting plans should provide sufficient analysis and detail of those ecosystem outcomes, including provision of wildlife corridors.

- The proposed master plan fragments SEAs and planting areas, with a roading layout that does not appear to provide for wildlife movement (other than highly mobile fauna (birds / bats)). The baseline expectation for biodiversity connectivity and enhancement, in rural areas by way of restoration, is provided for in appendix 15.6 (1) & (2).
- Details of the ongoing protection and management of the restoration areas, and or assurance from Auckland Council/Local Board or their acceptance of the vesting of such areas.

### Freshwater

The master plan appears to have been developed with consideration of key ecological features, including streams and wetlands, and the ecology report states that an initial intent to avoid reclamation or modification of these areas however, reclamation may be required if avoidance cannot be achieved. A key concern at this stage, therefore, relates to the potential prohibited activity status under the National Environmental Standard: Freshwater (NES: FW) pursuant to Regulation 53 the NES: FW. Regulation 45C would not apply here as the site is not zoned Urban. The applicant will need to demonstrate how any such works, if reclamation or drainage is required, are not a prohibited activity under these regulations in order to proceed.

Council's Freshwater Ecologist is otherwise unable to provide any further high-level comments based on the information available to date. The ecological assessment lacks sufficient detail regarding the proposed activities and associated impacts which may trigger requirements under the National Environmental Standards for Freshwater (NES-FW) and the Auckland Unitary Plan (AUP), specifically Chapter E3 provisions. To enable a full and accurate assessment of potential effects and compliance obligations, further information will be required, and is recommended to be provided at the next stages of pre-application consultation should the application be accepted for Referral, to enable further Council input prior to formal lodgement of the substantive application:

- *Detailed description of the proposed activities (activity tables) in relation to the freshwater features on site and provide details of the impacts of proposed activities.*
- *Provide Regulatory context relevant to the proposed activities, specifically under the NES-FW and relevant E3.4.1 Activity table.*
- *An updated master plan that clearly demonstrate the required setbacks (e.g., 10m, 100m), proposed earthworks areas, all structures within or adjacent to streams (e.g., bridges), stormwater ponds, and all outlet/discharge locations in proximity to water bodies.*
- *Associated plans and methodologies, where applicable, should be provided—such as fish relocation plans, finalised stream methodology plans for any in-stream works, where required.*
- *Provide detailed drawings , including outfall, riprap, and culvert details (cross section and long section) to demonstrate compliance with relevant design standards.*
- *If reclamation is proposed, details must be provided regarding the location, extent, functional need, and justification for the activity.*

- *Where reclamation or offsetting is proposed, the application should include detailed ecological data, such as Stream Ecological Valuation (SEV) assessments and supporting data files (e.g., Excel spreadsheets), to inform offset design and quantify ecological loss.*
- *The loss of stream and wetland extent and values must be addressed. The proposed approach to managing adverse effects must be clearly articulated using the effects management hierarchy (avoid, remedy, mitigate, offset, compensate), with justification for the selected approach and supporting evidence that offsetting or compensation is appropriate.*
- *As the master plan progresses, an in-depth hydrological assessment or catchment analysis is required for each identified wetland to determine how future development may affect wetland hydrology. Provide a hydrological assessment outlining the likely impacts of the proposed development on wetland hydrology and detail how such impacts will be managed.*
- *In terms of discharge and diversion of the water to the stream particularly, it is important the effect of changed flows to the stream are considered in the context of the geomorphological changes, particularly erosion within the stream, and the resulting impacts on both the stream and downstream environments.*

### **Arboriculture**

At this stage, limited information has been provided with respect to arboricultural matters. Council's Arborist has advised that an arboricultural assessment will be required, noting that *the main point of concern is how the protected trees being retained will be adequately protected. An arboricultural consultant will be able to provide the appropriate tree protection methodologies that can be incorporated into a Tree Protection Management Plan.*

### **Contaminated Land**

Council's Contaminated Land Specialist has advised that a Detailed Site Investigation will be required with any formal application made and has been recommended in the Preliminary Site Investigation provided by the applicant. Ideally this would be submitted at any further pre-application consultation with Council should the application be accepted for referral to allow an assessment of the application for contamination with certainty.

### **Regional Earthworks**

Council's Regional Earthworks Specialist has advised that if/when any formal application is made the applicant will be expected to consider and comment on the need for an Adaptive Management Plan for the proposed earthworks, and that the documentation will need to clearly specify staging of earthworks and maximum open areas to limit discharge at any one time.

### **Heritage/Archaeology**

Council's Heritage Specialist has advised that if/when any formal application is made, a full Heritage/Archaeological assessment will be required. There are a number of pa and undefended site clusters within the area.

## **Wastewater**

Given Watercare have confirmed that public water and wastewater supply will not be possible for the site, on-site wastewater servicing will be required to be developed for the project. Council's Wastewater specialist has reviewed the information provided to date, which includes a brief consideration of possible on-site wastewater handling and disposal. More detailed investigation and design will be required through next steps, and we encourage further pre-application consultation to discuss the more detailed design once developed, should the application be accepted for Referral.

At this stage, Council's specialist has provided the following preliminary comments:

- *If wastewater treatment and disposal takes place to land on-site, then a huge area will need to be allocated for disposal – likely dozens of hectares. The area shown for a wastewater treatment plant on the plans is only about 3-4 ha in size.*
- *If disposal is to land then the poor soakage characteristics and proximity to key features like streams, groundwater, bores, wetlands etc will need to be considered, as will public health risks.*
- *Wherever treated wastewater is discharged then a comprehensive AEE will be required e.g.: ecological studies, public health, a BPO study etc. These can be time consuming and costly.*
- *Regarding the previous point, the objectives and policies of all relevant regulation will also need to be addressed e.g.: The Auckland Unitary Plan, The National Policy Statement for Freshwater Management, The National Environmental Standards for Freshwater etc.*
- *I note that the proposed national wastewater environmental performance standards are in circulation, though not yet finalised. These provide limits for contaminants when discharging to water and are not currently operable. But they may be by the time application is made, and the applicant is advised to monitor the status of the standards.*
- *I advise the applicant engages somebody experienced in preparation of such documentation for large scale discharges.*

## **Groundwater**

We are currently awaiting groundwater feedback on this application. This memo will be updated as soon as we have received their comments.

## **Parks Planning**

Parks Planning have reviewed the proposed application at a high-level, and have provided the following key comments:

### Open Space Provision

- *The council has not anticipated that the site will be developed, and no development contributions have been collected to fund open space on the site and no capital or operational funding has been forecast to be spent in this location.*

- *The initial policy assessment undertaken by council's specialists indicates the requirement for between two and four neighbourhood parks within the masterplan area based on radial proxies applied to the proposed densities, noting the residential densities provided do not all neatly align with the AUP zoning.*

### Greenways

- *The Rodney West Local Paths (Greenways) Plan (June 2019) identifies an Express Path – Open Space running parallel with the northern side of the North Auckland Rail Line which adjoins the site. This aspirational greenway connection provides an important link with the Waimauku township to the south-east. The masterplan indicates a network of pedestrian / cycling links throughout the development. Careful consideration should be given to how these internal networks can provide logical connections to the greenways route. Integrating public connectivity opportunities is encouraged throughout the development via shared pathways adjoining road networks or within riparian margins / esplanade reserves.*

### Esplanade Reserves

- *Vesting of a full 20 metre esplanade reserve width would be expected with the application where streams qualify under s230 RMA, subject to the resource consent processing planner's confirmation that the trigger for esplanade provision has been met based on recent survey information to demonstrate the stream width.*

The full Parks Planning Memo received as part of this pre-application feedback is appended to this memo at Attachment 3. This includes additional comments in relation to expected information that would be required with any formal application made (and ideally at any further pre-application consultation with Council should the application be accepted for referral) and additional explanatory and background comments in relation to the comments above, which is not repeated here for conciseness.

### **Traffic, Auckland Transport & NZTA**

A meeting with Council's Traffic Engineer, Auckland Transport and NZTA was held 31/07/25. Written feedback on traffic matters will be provided in due course once received, and this memo updated accordingly.

### **FTAA REFERRAL CRITERIA**

In addition to the feedback provided above, we note for completeness that the application for a Referral project under the FTAA should address the FTAA Referral Criteria.

### **CONCLUSION**

Overall, Council have some significant preliminary concerns with this application on the basis of the information available to date.

The key areas of concern relate to:

- The development is not consistent with the Future Development Strategy or Spatial Land Use Strategy for the area, and is outside the anticipated growth modelling which will place significant and undue pressure on infrastructure planning and funding;
- The “rezoning by resource consent” nature of the application and associated plan integrity and precedent issues, along with practical implementation issues for future development and use of the sites within this area, given the Rural Production Zoning of the site;
- Significant flooding hazards within the subject site and wider surrounding area and likely associated exacerbation of these hazards as a result of this development;
- Infrastructure capacity issues and inability for the development to be serviced by public wastewater and water supply;
- Potential for aspects of the application to be a prohibited activity pursuant to the NES: FW.

Moving forward, we encourage on-going pre-application consultation with Council as the project develops and further assessment is completed and available for review, in particular in relation to the above areas of preliminary concern.

Yours sincerely,



**Emma Chandler**  
Associate  
Sentinel Planning Limited



**Adonica Giborees**  
Principal Project Lead  
Auckland Council Premium Resource Consents

To: Adonica Giborees (Principal Project Lead) and Fennel Mason (Principal Project Lead), Auckland Council

From: Susan Fairgray-Mclean (Associate Director) and Tom Harris (Senior Consultant), M.E Ltd

Date: 18 July 2025

Re: Initial Review of Applicant's Economic Assessment for Waimauku FTAA Application

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## 1. Introduction

Market Economics Ltd (M.E) have been engaged by Auckland Council to provide an initial review of the Economic Assessment (EA) prepared by Insight Economics in support of the proposed fast-track development at Waimauku West. The economic report<sup>1</sup> has been provided to Council for preliminary feedback ahead of the EPA application process.

Auckland Council have requested that we undertake a high-level review that focuses on whether the scope of the applicant's economic assessment identifies and sufficiently covers the likely economic issues of the proposal (taking account of the fast-track legislative requirements), including whether sufficient assessment has been undertaken to support the conclusions contained within the report.

While we have considered the ranges applied within the report, a detailed peer review of the accuracy of the figures and assessment contained within the applicant's economic report forms a subsequent stage of this process. We focus on whether the reasoning is robust and fit for purpose under the assessment requirements of the Fast-track Approvals Act 2024 (FTAA). This review also identifies areas of likely economic effects relevant to Auckland Council that may occur beyond the FTAA assessment framework.

## 2. Structure of Review

Our review is structured as follows:

1. We first outline the key details of the proposal that we consider are most relevant to understanding the likely economic effects (Section 3).
2. Our review then considers the scope and structure of the applicant's economic assessment and whether it covers the relevant economic effects in relation to the FTAA requirements (Section 4). We provide some further suggestions for areas of improvement or clarification on the technical approach undertaken within the main areas covered by the economic assessment in an appendix.

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<sup>1</sup> Insight Economics Ltd, 2025. *Economic Assessment of Proposed Waimauku West Development for Fast-Track Referral*, prepared for Halberd Holdings Limited, Final Report, 13 June 2025.

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3. In Section 5 we identify areas that we consider are not covered by the applicant's economic assessment. This includes economic effects that are likely to be relevant to Auckland Council in understanding the potential effects of the proposal, but that may fall outside the assessment requirements of the FTAA.
  4. Our concluding comments are contained in Section 6.

### 3. Proposal Key Details

A 200ha urban development is being proposed within the outer northwestern part of Auckland under the FTAA. The proposal is to contiguously expand the size of Waimauku township, which is located within the outer northwestern part of the Auckland Region. The township is located beyond the northwestern edge of Auckland's main urban area, and is beyond the spatial extent of the Rural Urban Boundary (RUB). Further urban expansion of the township would therefore occur outside of the RUB.

The proposal is for urbanisation of 200ha of land that is currently has a Rural Production Zone. It would include predominantly residential land uses at a range of densities, with a component of light industrial development. Once fully developed, the proposal is estimated to contain around 1,600 dwellings, and 8.2 ha of light industrial land.

The Auckland Unitary Plan (AUP) contains substantial areas of Future Urban Zoned land around the northwestern urban edge of Auckland that are within proximity to the proposed development. This includes large areas of land surrounding Kumeu and Whenuapai, with a smaller area in Riverhead.

### 4. Structure and Scope of Assessment in Relation to Fast Track Legislative Requirements

The economic report assesses the proposal in relation to the FTAA legislative requirements under Section 22(2)(a). Under this section, the economic report's stated scope is to include assessment on whether the project:

- iii. 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); and
- iv. will deliver significant economic benefits.

In relation to the above areas, the economic report has:

- a. Undertaken an economic impact assessment (EIA) to estimate the likely economic benefits of the proposal arising from the economic activity generated from the initial development of the land and residential and industrial land uses. This is an initial impact that would occur during the construction stages of the development and would not produce ongoing benefits once construction has been completed.
- b. Considered the ongoing economic effects from employment that is likely to be sustained on the industrial area component of the development.

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- c. Assessed the contribution of the development to local housing supply within the Rodney Local Board Area. This includes assessment of the overall scale and type of housing supply in comparison to existing patterns of development within Waimauku and projected demand across the local board area. Within this, it has commented on potential effects on housing affordability arising through increased competition in housing supply and increased dwelling mix.

#### *Economic Impact Assessment – Net Benefits*

Under Section 22(2)(a)(iv), the EIA within the report claims that there will be a significant (\$650m) boost in regional GDP and 4,590 FTE-years of employment (across 15 years) arising from the initial development and construction impacts. From our high-level review of the EIA, we consider that these are likely to broadly form plausible high-level *gross* estimates<sup>2</sup>.

In our view, a key issue is that the report has only identified the likely *gross* economic impacts of the proposal and has not identified whether or not key parts of these are likely to form *net* economic impacts. It is likely that some of these impacts are transfer effects which would still occur if demand for growth were instead met within another location (we note that the proximity of substantial areas for urban expansion within the northwestern area).

We consider that an important part of understanding any net benefit of the proposal is whether it is likely to generate differences in costs in comparison to alternative patterns of growth within this part of the region. The economic report has not covered the level of consistency of the proposal with local or regional planning documents, including spatial strategies under FTAA 22(2)(a)(x). We note that this may be covered elsewhere within the applicant's assessment, but consider that this is likely to be useful in informing whether there are likely differences in cost (such as infrastructure costs) that would form part of any calculation of net benefits.

Section 5 of the EIA estimates the economic activity that might be sustained by the non-residential uses at full build-out. These figures are presented as economic impacts, but they are implicitly framed as net benefits. We consider that whether new non-residential floorspace delivers economic benefits depends on a range of factors including the existence of unmet demand, the productivity of the firms it attracts and the extent to which activity is displaced from existing centres. These issues are partly explored within the assessment from the perspective that the residences will support some of the non-residential activity, including providing a potential workforce.

#### *Housing Market Assessment*

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<sup>2</sup> While a detailed technical review is outside the scope of this initial review, we consider that the ranges of costs and level of activity applied within the assessment are likely to form reasonable estimates.



Under Section 22(2)(a)(iii), the assessment also shows that the proposal would enable the construction of approximately 1,593 residential dwellings across a range of typologies and densities. This represents a material increase in zoned housing capacity in the Rodney Local Board Area that contributes to overall housing supply. We agree that the level of housing supply is sizeable within the context of the level of growth that is projected to occur within the outer northwestern area of Auckland.

The economic report asserts that the proposal will materially improve housing affordability by increasing supply and fostering competition in the land market. We consider that the report has only partially demonstrated whether the development will increase land market competition to compel developers to bring product to market “in a more timely and cost-effective manner”.

In practice, land development is influenced by a range of structural factors in addition to the presence of nominal competitors. These include capital constraints, infrastructure sequencing, planning approvals and return expectations. Developers might engage in strategic staging to protect profit margins and are inclined to withhold supply even in competitive markets if prices are rising.

We consider that the housing market assessment identifies likely benefits as a result of the proposal occurring within the proposed location. These include the effect of expanding the housing choice within the local Waimauku area. The assessment shows that the proposed lot structure would be likely to deliver an increased range and size of dwellings in comparison to the existing larger and lower density dwelling profile within the township. This is likely to improve the affordability of different housing options at this location in comparison to the existing dwelling profile.

## 5. Areas of Economic Effects not Covered by the Assessment

This section outlines the areas of economic effects that we consider are not covered by the applicant’s economic assessment.

### *Net Economic Effect of Changes to Northwestern Growth Pattern*

In our view, it is important to understand the likely *net* economic benefits of the proposal. As outlined above, the report has identified potential gross impacts and benefits in terms of the initial construction activity effects, ongoing employment and contribution to local housing supply. However, it has not considered the share of these benefits which are likely to be transfer effects (and therefore not net benefits), nor has it considered the potential costs.



As shown in the assessment, the scale of the proposal is significant within the context of urban growth projected within the outer northwestern part of Auckland<sup>3</sup>. It would occur as urbanisation of a sizeable land area (200ha) outside of the RUB, and is further from Auckland's current urban edge than other alternative locations for growth (i.e. the distribution of FUZ land across the northwestern outer area). We therefore consider it is important to understand whether this growth pattern is likely to produce a difference in cost to the pattern of growth that is aligned with planned areas of urban expansion. A key aspect is the difference in any infrastructure costs arising from changes to the sequencing/timing or location of growth. We note that this may be covered elsewhere within the applicant's assessment, but consider it is important to understand any likely net benefits.

### *Commercial Centre*

The proposal contains provision for a small neighbourhood centre. We generally agree that a small commercial centre is appropriate to meet the convenience needs of the surrounding local catchment.

At the scale currently proposed, we consider that the additional centre is likely to serve local convenience needs and is unlikely to undermine the existing local centre. We agree that the proposed development would increase demand within the catchment area of both centres.

However, if there are further changes to the proposed configuration of the development, we suggest that it may be useful for Auckland Council to consider:

- i. whether the scale and location of the centre is best suited to efficiently serve the surrounding catchment area; and
- ii. the balance of activity across the existing Waimauku local centre and proposed centre.

### *Housing Market Assessment*

In our view, the residential lot structure contained within the economic assessment is likely to be broadly consistent with the patterns of development likely to be sustained by the market with urbanisation at this location. As set out above, we consider the report has shown this will increase the dwelling mix and housing choice in this location.

We identify this as an important area for Auckland Council to understand the likely impacts of the proposal. If the proposed pattern of residential development changes significantly from that contained within the assessment, then we would recommend that any economic effects are examined accordingly.

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<sup>3</sup> We have compared the estimated contribution to housing supply at a more localised level at the scale of projected demand within the outer northwestern part of Auckland (the catchment area broadly focused around SH16). At this scale, we estimated that the proposed dwelling supply (1,600 dwellings) would amount to around a 15% of the household growth projected over the next 15 years (or around one-third excluding the growth projected to occur within Whenuapai).



## 6. Concluding Comments

Overall, we consider that the assessment has provided a reasonable estimation of the potential levels of economic activity and associated gross benefits generated by the proposal. It has also shown that the contribution to housing supply is sizeable within the context of projected growth in the outer northwestern part of Auckland, with benefits associated with increased housing choice.

These are important considerations in relation to the FTAA criteria under Section 22(a). However, the report has not identified the scale of the *net* economic benefit. We consider this is an important aspect to understand as the proposal would produce a pattern of urban expansion that differs to the planned pattern of growth in this area.

The proposal would involve urbanisation of land outside of the RUB in areas that are further from the urban edge than other areas in northwestern Auckland that are currently planned for urbanisation. It is important that the assessment takes into account any costs (such as infrastructure) that may arise from the changes to the location and sequencing of growth in these areas. While we note that these may be assessed elsewhere by the applicant, (including in any assessment in relation to FTAA 22(2)(a)(x)), we consider these are important for understanding the likely overall net effect.



## Appendix – Further Comment on Assessment Approach

This section contains further detail to our high-level comment on the approach undertaken in the applicant’s economic assessment. It also contains suggestions in some areas for minor technical clarifications.

### ***Economic Impact Assessment of Construction and Development Effects***

The EIA begins with anticipated development yields and quantity of non-residential floorspace. The floor area ratios applied are reasonable for the assumed land use.

Next, the EIA estimates one-time impacts of development. There is minimal detail provided on how the multiplier analysis is conducted, such as the source for information but it is likely based on Stats NZ National accounts input-output tables for the year ended March 2020.<sup>4</sup> These tables are now five years old and do not reflect more recent input price shifts, though it is fairly easy to account for this using appropriate sector price indices. A more thorough discussion would describe these issues and note the applicability of these ratios to construction work being completed in more than 15 years’ time.

It is assumed that 90% of impacts will accrue to Auckland<sup>5</sup>. The national accounts tables enable a calculation of how much spending by Auckland firms occurs within the region compared with outside it at an economic sector level. Therefore, this assumption could be developed from an assumed (justifiable) spend location to the share of economic impacts eventuating in Auckland. It is unclear whether the multiplier ratios are national or have been adjusted to the Auckland economy.

The analysis of key economic indicator effects begins with calculation of the build costs per m<sup>2</sup>. These appear to be calculated robustly, though it might be possible to refine these at a later stage if developer specific information becomes available. Planning, design and infrastructure costs are added as fixed percentages (2% and 20% respectively), but no source or benchmarking is provided for these ratios. The figures are presented in 2025 dollars, which is appropriate for economic analysis, though there is no discussion of inflation, delivery risks or escalation over the 15-year time frame. There is no discounting or treatment of time value, although we consider that a note justifying the decision not to discount would probably suffice.

We consider that further clarification of the Table 5 label (“spread over 15 years”) could increase understanding to a wider audience that these effects are divided across 15 years. Table 5 also suggests that equal costs might be borne in each year. A nuanced discussion of construction phasing and market timing would be instructive. For example, are developers liable to delay initiating construction in certain periods and undertake more in other periods? When might the first buildings be built, and

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<sup>4</sup> [National accounts input-output tables: Year ended march 2020](#) – Stats NZ (published 20 December 2021)

<sup>5</sup> It should be noted that although 90% is crude, the true figure is likely to be within a 10% margin of that. Increasing or decreasing it by 10% will not have affect whether the GDP/ employment benefits are significant or not.



in what sequence? What would these considerations mean for job stability, economies of scale or potential impact on prices through time (houses completed first vs last).

The top 10 industries supported table is helpful to understand the spread of impacts. Additional analysis on a couple of topics would be likely to provide useful information.

1. A discussion of the counterfactual scenarios and how these would affect net GDP and employment impacts.
2. Consideration of current and forecasted conditions in the Auckland construction sector including labour availability, capacity constraints and economic cycles. This should be described within the context of how long the application is anticipated to take and therefore how much might change.

**To:** Fennel Mason and Emma Chandler – Auckland Council

**From:** Amber Taylor, Development Planning Team Lead – Watercare Services Ltd

**Re:** Pre-Application for Fast Track Referral - Waimauku West – 1080 state Highway 16, Reweti - Pre-Application No. PRR00042916

**Dated:** 15 July 2025

## Introduction

1. Halberd Holdings Limited (**Applicant**) is proposing to develop a portion of its site at 1080 State Highway 16 Waimauku (**Site**) to form a new residential community that will become an extension to the existing Waimauku settlement (**Proposal**). It is proposed to apply for the Proposal to be referred for processing under the Fast Track Approval Act 2024.
2. The Proposal will result in approximately 1600 residential dwellings at a range of densities including lifestyle blocks (4000m<sup>2</sup> site area) to large lot residential (1000m<sup>2</sup> site area), single house / “standard residential” (300-400m<sup>2</sup> site area) and medium density (150m<sup>2</sup> site area with some attached). The Proposal also includes light industrial development in the west and a neighbourhood centre.
3. The Site is zoned Rural Production Zone. The Applicant seeks Watercare’s input at a pre-application meeting on its high-level proposal and the potential for public servicing.
4. A technical memorandum from Crang Civil dated 16 June 2025 refers to development of up to 1800 residential lots (rather than 1600). Crang’s memorandum proposes:
  - a) In relation to wastewater, two options:
    - i. **Option 1: A public wastewater network connection.** This would involve installing a new public pump station within the development area, and a new 6.55 km public rising main to the Huapai Pump Station. This option is described as depending on whether Watercare confirms it has capacity in its system for the Proposal;
    - or
    - ii. **Option 2: onsite treatment and disposal.** This would involve the installation of a private treatment plan located in the northwestern corner of the Site. Treatment design would be put out to tender to identify the best solution that achieves the required treatment outcomes. Preliminary concepts include a membrane bioreactor and UV disinfection from Apex Water, and an AdvanTex secondary treatment with UV disinfection from Innoflow. Treated effluent discharge options include discharge to stream or to land.

- b) The only option proposed in relation to water supply is **connection to the public potable water network**. Crang's memorandum attaches a Water Supply Assessment by Bear Enterprises Ltd dated 13 June 2025, which proposes a supply point off the Kumeu/Riverhead water main approximately 10 km away from the Site, and a local reservoir and booster pump station.

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

5. 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.
6. Watercare is required to manage its operations efficiently with a view to keeping overall costs at minimum levels while maintaining long-term asset integrity, subject to economic regulation under the Watercare Charter with oversight by the Commerce Commission as the appointed Crown Monitor, and must give effect to relevant aspects of Council's Long-Term Plan and act consistently with other Council plans and strategies including the Auckland Plan 2050 and Future Development Strategy (**FDS**). Through its annual Statement of Intent responding to Council's Letter of Expectation, Watercare commits to contributing to Auckland Plan 2050 outcomes by collaborating with the wider Council group to support areas of growth identified by Council, acting consistently with Council's FDS for major infrastructure development for future urban areas, ensuring alignment of infrastructure projects with other utilities, fully recovering growth costs so that growth pays for growth, and abiding by the Statement of Expectations of Substantive CCOs which requires working with Council and other CCOs to achieve the outcomes and objectives set out in the Auckland Plan 2050.

### **Current Watercare network**

7. For water supply, there is currently no public water supply servicing to Waimauku with the further north-west area within Watercare's metropolitan network which is serviced being Huapai.
8. For wastewater there is an existing public Wastewater Treatment Plant (**WWTP**) which services 18 lots within Waimauku. Watercare has no plans to expand wastewater services to Waimauku beyond the 18 lots currently serviced.

### **Watercare's position on public servicing of the Proposal**

9. It is understood that the Applicant seeks further information from Watercare in relation to the potential for **public** servicing of its development, if approved. As noted, the Applicant seeks public water supply servicing and also – as its option 1 – public wastewater servicing for its Proposal.
10. In summary, Watercare advises as follows:
  - a) In line with Watercare's statutory obligations, which include requirements to support growth areas identified by Auckland Council, Watercare does not provide water supply or wastewater servicing to rural zoned land (such as the Site).

- b) In any event, as depicted on Watercare’s updated network capacity maps, the Waimauku area is an area with ‘no capacity long term’.<sup>1</sup> Broadly:
    - i. This category relates to rural areas with historic constraints inherited when Watercare took over the region’s water and wastewater services in 2010; and
    - ii. In these areas, Watercare is not planning to increase network capacity.
11. To expand on the above, the present position in the Waimauku area, in terms of both water supply and wastewater servicing, is as follows:
- a) For water supply, the development area is within the area supplied with water by the Waitakere 2 Watermain which is at full capacity. Overallocation of capacity in the Waitakere 2 Watermain would ultimately result in reduced levels of service to the wider western and north Auckland community, particularly at peak times. Additionally, the 10km watermain pipe that is proposed to be installed to service the development and inclusion of a new local reservoir may result in water quality issues, which would require design of chlorine dosing equipment/infrastructure within the extended system. The North Harbour 2 (**NH2**) would be required, as a minimum, to service this development however, in addition, servicing this area would trigger multiple unplanned bulk water supply upgrades. Considering the scale of unplanned and unfunded upgrades required, Watercare considers servicing the area for water supply is not feasible.
  - b) For wastewater, the current network does not have the capacity to support large-scale developments, such as this one. Furthermore, there are no planned upgrades to accommodate this unanticipated growth. Watercare’s priority is to the existing live zoned areas and substantial Future Urban Zone (**FUZ**) in the Northwest, in alignment with the FDS. Watercare notes that the Huapai Pump Station that the Applicant refers to is not functioning as a standard wastewater pump station. Instead, it serves as a top-up water and chemical dosing facility. The local wastewater network within Huapai discharges directly to the Riverhead Pump Station. The Riverhead Pump Station itself lacks capacity for this development, and downstream infrastructure, including Pump Station 68, Pump Station 70, and even the Northern Interceptor, have been sized and planned with staged upgrades to serve their respective catchments based on live zoning and the FUZ as set out and sequenced by the FDS. Providing connections to significant development in rural areas, such as this one, would undermine the ability of these assets to serve existing live zones and the planned FUZ.
12. In conclusion, Watercare will not be able to provide public water supply and wastewater servicing for the Proposal.

### **Watercare’s position on private servicing of the Proposal**

- 13. Given that Watercare will not provide connections to rural zoned land (and noting the absence of capacity in any event), a permanent private solution to both water supply and wastewater servicing would be required for the Proposal, if approved.
- 14. The Applicant would need to provide detailed information regarding how the Proposal would be serviced independently of the public networks.

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<sup>1</sup> <https://www.watercare.co.nz/builders-and-developers/consultation/network-capacity-in-auckland>.

15. This must include clear, technically robust, and sustainable proposals for permanent private potable water supply and wastewater servicing of the entire development.
16. This information is essential to understanding whether a viable and sustainable solution exists for water supply and wastewater.
17. If this Application is accepted to the Fast Track process, Watercare considers that the private wastewater discharge should be held to a high standard to ensure no impact to the downstream receiving environment for the Helensville Wastewater Treatment Plant discharge, which Watercare owns and operates. Watercare also recommends that any private scheme be designed in accordance with the Code of Practice and be subject to robust long-term governance arrangements that ensure long-term maintenance and financial sustainability.

## **Conclusion**

18. In line with Watercare's statutory obligations, which include requirements to support growth areas identified by Auckland Council, Watercare does not provide water supply or wastewater servicing to rural zoned land.
19. Notwithstanding that Watercare does not provide connections to rural areas it is noted that there is no capacity for the Proposal with Watercare's existing and planned bulk water supply and wastewater networks and therefore this development cannot be feasibly serviced by the public networks.
20. Given that public servicing is not available to support the Proposal, a permanent private solution to both water supply and wastewater servicing would be required, if the Proposal is approved.

21 July 2025

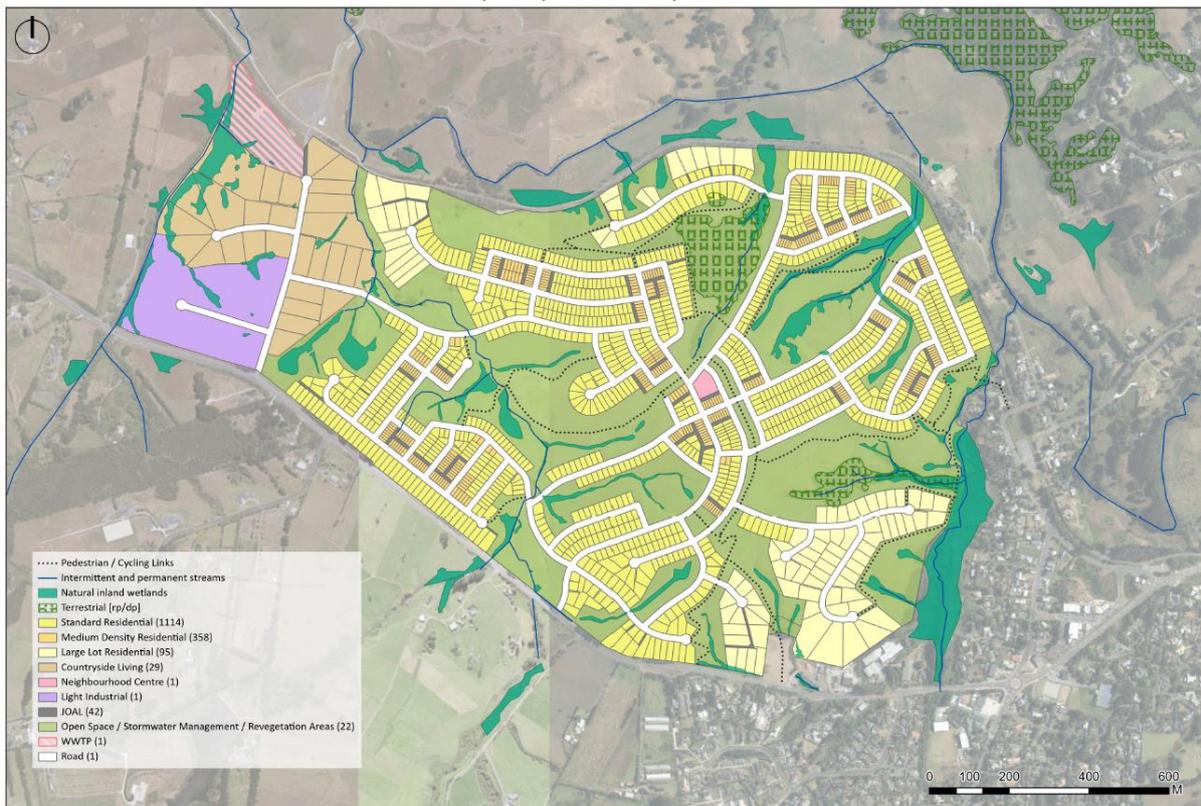
Adonica Giborees  
Principal Project Lead  
Planning & Resource Consents - Premium Unit

Cc: Emma Chandler – Consultant Planner, Regulatory Services

**RE: PARKS PLANNING INPUT FOR PRE-APPLICATION PRR00042916 1080 SH16 Reweti**

Thank-you for your request for specialist input from the Parks Planning team. Please find below pre-application advice based on the information and plans provided to Parks Planning, including:

- Waimauku West Master Plan layout provided by Barker & Associates (undated)



### Proposal

To allow for urban development of approximately 1596 residential allotments at a mix of densities described by the applicant as medium density, standard residential, Large Lot and Countryside Living. The Waimauku West masterplan has five key components:

- 1) 1567 residential dwellings ranging in density from Large Lot Residential (95 dwellings), Standard Residential (1114 dwellings) to Medium Density Residential (358 dwellings);
- 2) A neighbourhood centre to provide for residents' day to day needs;
- 3) A green network incorporating existing ecological areas and features, stormwater management and open spaces;
- 4) A light industrial area to the west surrounded by Countryside Living (29 dwellings); and
- 5) Associated infrastructure.

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

- Ezra Barwell, Senior Policy Advisor, Community Investment
- Rahman Bashir, Principal Property Provision Specialist, Property and Commercial Business
- Graham Hooper, Principal Planner, Parks & Community Facilities
- Matt Woodside, Parks & Places Specialist, Parks & Community Facilities

The following comments are provided at a high-level only and reflect the limited detail supplied in the pre-application request relating to open space provision, landscaping assets, and public connectivity. It is noted that a previous unsuccessful application for the urban development of the site under the AUP has been made previously to council. In this instance, the Fast-track Approvals Act 2024 is considered as taking precedence.

### **Open Space Provision**

- The provision of public open space is guided by the Manaaki Tamaki Makaurau: Auckland open space, sport and recreation strategy (May 2025) which supersedes the Open Space Provision Policy (2016) and Parks and Open Space Acquisition Policy (2013). Please refer to this strategy for further guidance on the provision of open space outcomes within the masterplan area.
- The council has not anticipated that the site will be developed, and no development contributions have been collected to fund open space on the site and no capital or operational funding has been forecast to be spent in this location.
- The masterplan concept provided for the pre-application process indicates extensive areas of open space throughout the development for stormwater management and revegetation areas but is otherwise silent on the open space provision strategy for the development.
- Any land used primarily for stormwater management purposes would not be acquired by council for neighbourhood park purposes. Such land could vest to Healthy Waters as Local Purpose (Drainage) Reserve (at no cost), at their discretion and for them to confirm.
- The integration of green infrastructure land and recreational areas using landscaping, path networks, and terrain is supported by the policy documents. Exploring opportunities to consider how this land can incorporate informal recreation opportunities is encouraged. The leveraging of pedestrian movement patterns through the extensive green corridors between the formal neighbourhood parks is encouraged.
- However, drainage reserves are not appropriate mechanisms for meeting the metrics of formal neighbourhood park provision and public recreation and community infrastructure determined by the open space strategy above. The classification of drainage reserve under the Reserves Act 1977 will not be appropriate for this purpose or consistent with any leasing requirements for future community facilities and infrastructure.
- The initial policy assessment undertaken by council's specialists indicates the requirement for between **two** and **four** neighbourhood parks within the masterplan area based on radial proxies applied to the proposed densities, noting the residential densities provided do not all neatly align with the AUP zoning.
- Acquisition of neighbourhood park by council will be subject to Local Board approval. No specific comments are available currently on community infrastructure provision such as playgrounds and sports fields to supplement the existing recreation assets within the existing Waimauku township and wider north-west locality. This requires specific modelling and investigation to establish the appropriate mitigation for parks and open space to ensure the community envisaged by this development is provided with the necessary amenity envisaged for this scale of development. Any such provision would also be subject to Local Board approval.

- Neighbourhood parks are preferred to be acquired as land in lieu of reserve under the Local Government Act. These areas should be indicated as such on any application plans. Conditions of consent will require these areas to be confirmed by a signed sale and purchase agreement with council prior to certification of the s223 survey plan. If no such agreement is reached, then these areas must remain as balance lots in private ownership. Consent notices will be applied via conditions of consent requiring these privately owned areas be developed for open space purposes for the development and as a form of mitigation for the establishment of built-up impervious areas within the development.
- Further discussion with council on the potential vesting of the limited SEA areas within open spaces areas is encouraged. It is noted that under s239 of the RMA any reserve land to be vested in Council will need to be free from encumbrances, of which any covenant or protection mechanism would be.
- In regard to the provision of neighbourhood parks in a proposal lodged for approval under the Fast Track consenting process, the following general notes are provided:
  - In the application documents please superimpose the extent of any flood plains in relation to the proposed neighbourhood parks. The Auckland open space, sport and recreation strategy (May 2025) does not necessarily encourage the acquisition of land for open space purposes that is subject to flooding.
  - The application will need to confirm the total area of the proposed neighbourhood parks and clearly delineate the boundary of the proposed neighbourhood parks. An area of between 0.3 and 0.5 hectares is typically required to fulfil the purpose of a neighbourhood park. The proposed area for a park could incorporate surrounding SEA and riparian areas within the development, however the size would be determined in accordance with the usable space to provide for the purpose it would be acquired for. The application plans will need to provide for an indicative 30x30 metre kick ball space no steeper than 3% gradient, with surrounding gradients no steeper than 1:5 for grass and 1:3 for planted spaces. Cross sections of the whole site including gradients will be required.
  - The proposed neighbourhood parks being fronted by roads on two sides for passive surveillance is should be demonstrated. An intimate residential interface through outdoor living areas facing the open spaces on the other two boundaries would be beneficial where this can be achieved. Side elevations of dwellings and high retaining walls facing on to the proposed open spaces is not envisaged.
  - Intentional design in the streetscape environments via pedestrian crossings to support pedestrian safety and connectivity to the open spaces is encouraged.

### **Greenways**

- The Rodney West Local Paths (Greenways) Plan (June 2019) identifies an Express Path – Open Space running parallel with the northern side of the North Auckland Rail Line which adjoins the site. This aspirational greenway connection provides an important link with the Waimauku township to the south-east. The masterplan indicates a network of pedestrian / cycling links throughout the development. Careful consideration should be given to how these internal networks can provide logical connections to the greenways route.
- Integrating public connectivity opportunities is encouraged throughout the development via shared pathways adjoining road networks or within riparian margins / esplanade reserves.
- Any shared use pedestrian / cycling paths within local purpose reserves are owned and managed by Auckland Transport as a specific mode of transport, which have certain requirements in terms of surface treatments, minimum width, signage and lighting.

- Street to street pedestrian connections are also vested to Auckland Transport as Accessways which also must meet certain design criteria concerning width, surface treatment, and lighting.

### **Esplanade Reserve Provision**

- Vesting of a full 20 metre esplanade reserve width would be expected with the application where streams qualify under s230 RMA, subject to the resource consent processing planner's confirmation that the trigger for esplanade provision has been met based on recent survey information to demonstrate the stream width.
- Any land beyond the 20 metres width that is subject to the 1% AEP floodplain is unlikely to be supported for vesting as esplanade reserve.
- The land must vest to council free of health and safety issues, dangerous trees, pest plants, inorganic and organic debris, private infrastructure, structures / retaining walls etc.
- Parks do not accept infrastructure (including pipes, outfalls & stormwater ponds) on esplanade reserves to vest.
- Parks do not accept utility structures such as transformers on reserves/parks or within the road reserve in front of reserves/parks and they should be contained within private lots which would not restrict any of the road frontages to a reserve.
- Any proposed hard landscape assets such as seats, tables, drinking fountains, and footbridges, to name a few, on reserves to vest or being acquired must receive local board approval, separate to the vesting or acquisition process. Any substantial structures such as footbridges within esplanade reserves will require careful consideration by council due to their ongoing opex and renewal cost implications for council.
- The applicant will be required to maintain the esplanade reserves (and drainage reserves) for 5 years post completion.
- Conditions of consent will outline requirements for esplanade reserves in regard to vesting process; condition at time of vesting; any mitigation planting requirements; as-builts; maintenance bonding; and maintenance and reporting requirements.

### **Street Landscaping**

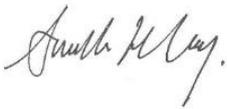
- Landscape concept plans for the streetscape for any proposed roads and accessways to vest will be required at resource consent stage and then at Engineering Plan Approval (EPA) stage.
- Landscaping proposed should be designed in accordance with:
  - The Auckland Code of Practice for Land Development and Subdivision Chapter 7: Landscape (June 2024, Ver. 1.2) (design, planting, maintenance);
  - Auckland's Urban Ngahere (Forest) Strategy (2019) (average canopy cover to 30 per cent across Auckland's urban area);
  - Auckland Transport Sustainability Strategy 2024-2031 (12% street tree canopy closure).
- Ensure the width of the road reserve berms is sufficient to accommodate street trees to achieve the goals of the above strategies, and that infrastructure location in proximity to street trees is provided with sufficient setback distances and depths.
- Street tree planting and rain garden designs will be reviewed in detail by Parks Planning's landscape specialists at EPA stage. The applicant will be required to maintain streetscape landscaping and street trees for 2 years post completion.
- Planted berms and amenity gardens are not accepted on road reserves.

- Conditions of consent will outline requirements for streetscape landscaping in regard to engineering plan approval; condition at time of vesting the landscape assets; as-builts; maintenance bonding; and maintenance and reporting requirements.

Please note that the above is pre-application advice only, and is based on the plans and information presented at the pre-application stage. The above is not a final specialist memo, **and does not constitute written approval**. Any resource consent application will be forwarded to the Parks Planning Team [parksconsent@aucklandcouncil.govt.nz](mailto:parksconsent@aucklandcouncil.govt.nz) by Regulatory Services for assessment at the time of lodgement.

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

Kind regards,



Andreas Lilley  
Consultant Parks Planner  
Parks Planning Team  
Parks and Community Facilities  
Auckland Council

**From:** s 9(2)(a)  
**To:**  
**Cc:**  
**Subject:** RE: PRR00042916, Waimauku West Referral 1080 SH16 - Pre App Memo  
**Date:** Tuesday, 5 August 2025 1:45:25 pm  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
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Hi Rebecca,

Comments from NZTA, AT and Traffic as follows:

### **NZTA**

The subject site currently has access from State Highway 16 (Limited Access Road - Waimauku West Coast Road to Woodhill Station Road, AADT 4953, 100km/h) from four registered crossing places: CPs 81, 83, 84 and 85. The draft master plan indicates two key access points to the development area as CP's 83 and 85. It is assumed CPs 81 and 84 will be closed. Access of a limited access road requires NZTA approval under the Government Rooding Powers Act.

The following information should be provided for NZTA to consider the effects on the state highway network and to confirm that any infrastructure/changes to the network would be appropriate:

- A comprehensive Integrated Transport Assessment (ITA) to evaluate intersection form, traffic generation, modal connectivity, pedestrian and cycle safety and cumulative network effects
  - The ITA would need to address consider the following intersections to confirm any adverse impacts:
    - New accesses onto the highway
    - SH 16/ Muriwai Rd roundabout
    - SH 16 Coatesville/ Riverhead Roundabout
    - SH 16/ Brigham Creek Round Roundabout
    - SH 16/ Taupaki Rd Roundabout
  - Multimodal connectivity

Given the scale of the development—over 1,600 residential dwellings—there is a critical need to assess and plan for a multimodal integrated transport network. Public transport accessibility and stop infrastructure

    - Pedestrian and cycle facilities
    - Connectivity to local road networks and destinations

- Linkage to schools, retail, and employment hubs
  - Pedestrian and Cycle Safety
    - Key considerations include:
      - Safe crossing opportunities with refuge islands or signalised crossings
      - Provision of footpaths and/ or shared use paths connecting to internal networks
      - Assessment of expected pedestrian and cycle volumes based on land use mix
      - Speed environment
- A Safe System Audit to identify and mitigate risks for all road users, especially in a high-speed environment
- Details of proposed infrastructure upgrades/ urbanisation to SH 16, including (but not limited to):
  - Fully controlled intersection treatments
  - Speed management measures including signage and zone adjustments
  - Pedestrian and cycling facilities, such as footpaths, shared paths, and safe crossing points
  - Public transport improvements and accessibility features
  - Upgrade on SH 16 to support increased volumes and improve corridor resilience
- Details of the traffic generation associated with the Solar Farm, specifically construction traffic and temporary mitigation measures that may be required at the access point with the state highway.
- Timing and Staging of the development, specifically linked to any required infrastructure upgrades.

In order to change a speed limit NZTA is required to undergo the process as per the Land Transport Rule - Setting of Speed Limits 2025. Typically, this requires extensive consultation and would need to be a more comprehensive conversation with NZTA, especially if the applicant will be urbanising this section of the state highway. My understanding from the meeting is that this may not be occurring and village access can be more direct from an existing pedestrian access on the eastern boundary. If this conversation needs to occur, we would need to have a better understanding of any infrastructure proposed on the state highway corridor.

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-

**AT**

*Please note that these comments have set aside the high-level concerns related to suitability for urban development/zoning which have been raised by other specialist areas (in particular flooding & suitability for urbanisation).*

-

We consider the following intersections in the wider network will need assessment in the ITA to confirm any adverse impacts:

- SH16 / Muriwai Road roundabout;
- SH16 / The Avenue (new intersection just being constructed);
- SH16 / Access Road;

- SH16 / Old North Road roundabout;
- SH16 / Coatesville Riverhead Highway; and
- SH16 / Brigham Creek Road roundabout.

The ITA should take into account and/or cover off :

- Wider development including PC100 and the Rangitooopuni fast-track consent
- Access to amenities
- Roading design details including road hierarchy, internal intersection safety gradients, design speed, cycle facilities
- Suitability for AT to be able to run buses (collector road standard required and staging to allow service to run as early as required i.e. road fully built)
- Pedestrian and cycle links to wider area including appropriate facilities to link to key attractions (schools, shops etc.)
- Internal road layout should minimise the use of cul-de-sacs to provide a well connected road network particularly for active modes
- Active mode connections through the development should be safe, direct and attractive
- Any roads with gradients exceeding 8% should consider how accessible pedestrian facilities would be provided
- Waimauku school (school attendee safety during construction period) considered in Construction Traffic Management Plan
- Details of the solar farm including construction period and potential glare

Other comments:

- Wetlands and communal raingardens are supported by AT, we would be interested in who would own these and the details of stormwater management and overland flow paths for roads to be vested.
- AT are also interested in the NZTA intersection treatments and widening that might be required on SH16.

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### **Traffic**

The following are largely detail related matters that we would encourage be prepared provided for further pre-application discussions with Council, should the application be accepted for Referral and ahead of any substantive application being made.

1. Confirm the Pedestrian Access (PA) where the road gradient is >8%.
2. Confirm the PA gradient in a plan, differentiating the grade difference (5-8%, 8-12%, >12%) and any high-friction surface treatment. This will help to assess the safety triggers easily.
3. Provide visibility assessment for all intersections in detail (including SH16, public roads, JOALS).
4. Confirm the speed management treatments at public roads, JOALS.
5. Request to utilise the most updated traffic data, not estimated, considering the density of the proposal and wider development in the neighbourhood.

6. Specify if any active mode connectivity is on SH16.
7. Specify how active mode connectivity towards the Waimauku Central and Waimauku Station road will be safely built.
8. Request to provide an update on the future use of the light industrial area, if available.
9. Assess if any safety issues will be raised due to industrial vs residential shared vehicle access.
10. Confirm the traffic control arrangement at 2x SH16 Vehicle Crossings (VC). Request to provide/ comment on an alternative option to provide the proposed option is ideal.
11. Review/ coordinate the speed management measures and speed limit with NZ Transport Agency Waka Kotahi.
12. Noted the draft peak traffic 1000-1300vphw with 1600 dwellings. When submitting traffic modelling, request to provide the traffic rate when the delay/ LOS is compromised and any draft conditions. This will help to provide any necessary comments/ conditions.
13. Confirm the private/ public bin collection arrangement at public and JOALs.
14. Public bins at JOALs are courtesy call, and the same needs to be arranged with AC Waste Management. Vehicle tracking needs to be submitted without any overlap with any other design elements and minimal turns (especially at the end). Future residents need to be aware of the bin collection arrangement.
15. Loading bay to be provided at JOALs. Priority to be provided where the dwelling rates, lengths or any complexity are higher.
16. Confirm if any visitor parking is proposed.
17. Lighting design to be submitted upfront. Including JOALS, Public roads, and any separate PA.
18. A passing bay to be provided if Vehicle Access (VA) is not up to the AUP requirement.
19. Confirm any gate facility proposed. Make sure it doesn't create any queue on the road or block the PA.
20. Maintain visibility splay- at intersections, non-compliance dwellings VC.
21. Vehicle tracking needs to show both forward and reverse-in, for any non-compliance design location/ elements.
22. PC79DV - Primary Pedestrian Access (PA), need to incorporate the vertical clearance and width.
23. If proposing any 2° parking space between the garage door and the PA (public footpath), request to consider 5.4m minimum spacing for safety reasons.
24. On-site PUDO service must be provided for educational facilities. As multiple safety issues have been noted in the past years in educational facilities, this will be strictly reviewed.
25. A safe D-area/ turntable area must be provided for all dead ends of public roads and JOALs. Noted a few areas in the draft design.

Kind Regards,  
Emma

**Emma Chandler**  
Associate | Team Lead



s 9(2)(a)



<https://www.sentinelplanning.co.nz/>



Lvl 1, 150 Hurstmere Road, Takapuna, Auckland



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**From:** Rebecca Sanders s 9(2)(a)  
**Sent:** Monday, 4 August 2025 2:50 pm  
**To:** Emma Chandler s 9(2)(a) Rachel Morgans s 9(2)(a)  
Nick Roberts s 9(2)(a)  
**Cc:** Adonica Giborees s 9(2)(a)  
**Subject:** RE: PRR00042916, Waimauku West Referral 1080 SH16 - Pre App Memo

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Hi Emma,

Thanks for pulling this together. As we are lodging this week if you could just forward the transport feedback from AT/NZTA we can attach. There is no need to update the memo. We are happy to receive this feedback as meeting minutes if that is easier.

Ngā mihi | Kind regards,

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REBECCA SANDERS  
Senior Associate  
s 9(2)(a)

B&A Logo



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



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I work Monday-Thursday and will respond to your email as soon as I can.

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**From:** Emma Chandler s 9(2)(a)  
**Sent:** Friday, 1 August 2025 2:22 pm  
**To:** Rebecca Sanders s 9(2)(a); Rachel Morgan s 9(2)(a); Nick Roberts s 9(2)(a)  
**Cc:** Adonica Giborees s 9(2)(a)  
**Subject:** PRR00042916, Waimauku West Referral 1080 SH16 - Pre App Memo

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Hi Rebecca, Rachel and Nick,

As promised, please find attached a pre-app memo covering all the specialist feedback we have received to date. This covers everything except Groundwater & Traffic/AT/NZTA.

Groundwater I understand may not be a priority for you, but if that does come in we will update the memo and circulate in due course.

Re. Traffic, following the meeting yesterday we are working on collating the feedback into written form and will again update the attached memo with those comments and re-circulate in due course. Hopefully this will be by early next week - most have already come back to us, just waiting on Philips and then I'll just need to collate.

As noted in the memo, if there are any areas of the written feedback which you would like to discuss further via a meeting, please do let us know & we'd be happy to facilitate.

Kind Regards,  
Emma

**Emma Chandler**  
Associate | Team Lead



s 9(2)(a)

<https://www.sentinelplanning.co.nz/>

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