



FTAA–2511–1135: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 1 decisions

Project Name: Orawaahi – A Complete Community

Date submitted:	2 December 2025	Tracking #: BRF–15949	
Security level:	In-Confidence	MfE priority:	Urgent

	Action sought:	Response by:
To Hon Chris Bishop, Minister for Infrastructure	Decisions on recommendations in Table A	9 December 2025

Actions for Minister's Office staff	Return signed briefing to the Ministry for the Environment – email: FTAreferrals@mfe.govt.nz Send email to Ministers' to invite written comments.
Number of appendices: 3	Appendices: 1. Statutory framework summary 2. Application documents for Orawaahi – A Complete Community (in File Exchange) 3. List of Māori groups referred to in section 18(2)

Ministry for the Environment contacts:

Position	Name	Cell phone	1 st contact
Principal Author	Stephanie McNicholl		
Manager	Stephanie Frame	s 9(2)(a)	✓
General Manager	Ilana Miller	s 9(2)(a)	

Project area



Key messages

1. This briefing seeks your initial decisions on an application from Knight Investments Limited to refer the Orawaahi – A Complete Community project (the project) under the Fast-track Approvals Act 2024 (the Act) to the Fast-track approvals process.
2. At this stage you can either decline an application for the reasons set out section 21, or provide the application to, and invite comments from, the parties identified in section 17. If you do not decline the application, you will receive a further briefing following receipt of comments, to support your final decision on whether to refer the project.

3. The project is to establish a master-planned development on approximately 75 hectares at 156 (Lot 1) and Lot 3 DPS 337204 Clarks Beach Road, Auckland region.
4. The project involves:
 - a. A retirement village of approximately 220 units and supporting communal facilities.
 - b. Subdivision to create:
 - i. approximately 700 – 800 residential lots and provide servicing infrastructure to enable the future construction including by third parties
 - ii. a neighbourhood centre of approximately 6,000m² gross floor area on 1.7 hectares
 - iii. a service / light industrial / trade supply hub approximately 25,000m² gross floor area on 5 hectares
 - c. A multi-functional green/blue network including neighbourhood parks, recreational walkways and pedestrian and cycle links across the site that connect into existing networks in the Clarks Beach community.
5. The project will require the proposed approvals:
 - a. Resource consents under the Resource Management Act 1991
 - b. Archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014
6. We have undertaken initial analysis of the referral application, and this is presented along with our considerations and recommendations in Table A.
7. We have decided the application is complete and complies with section 14 of the Act, as the application complies with section 13 requirements, may be capable of satisfying the criteria in section 22 and does not appear to involve an ineligible activity. The applicable fee and levy have been paid.
8. We recommend you progress consideration of the referral application to the next stage of analysis (Stage 2) and invite written comments from the parties prescribed in section 17(1) of the Act being:
 - a. Auckland Council as the relevant local authority
 - b. The Minister for the Environment
 - c. The Minister for Seniors and the Associate Minister of Housing as other relevant portfolio Ministers
 - d. Ministry for the Environment and Heritage New Zealand Pouhere Taonga as relevant administering agencies and
 - e. identified Māori groups from section 18(2) of the Act, listed in Appendix 3.

9. We recommend that you invite written comments from Minister for Economic Growth, Minister for Regional Development as additional parties under section 17(5) of the Act.

Action sought

10. Please indicate your decisions on the recommendations in Table A.

Signature

A handwritten signature in black ink, consisting of a large, stylized 'I' followed by a horizontal line that tapers to the right.

Ilana Miller
General Manager, Investment Strategy and Operations

Table A: Stage 1 analysis

Project details	Project Name	Applicant				Project Location
	Orawaahi – A Complete Community	Knight Investment Group Limited c/- Tollemache Consultants Limited The applicant is a registered company and is eligible to apply for approvals.				156 (Lot 1) and Lot 3 DPS 337204 Clarks Beach Road, Auckland
Project description	<p>The project is to establish a master-planned development on 75 hectares at 156 (Lot 1) and Lot 3 DPS 337204 Clarks Beach Road, Auckland region.</p> <p>The project involves:</p> <ol style="list-style-type: none"> A retirement village of approximately 220 units including supporting facilities (communal facilities (bowling green, swimming pool, café and clubroom with hospital care facilities). Subdivision to create: <ul style="list-style-type: none"> approximately 700 – 800 residential lots and provide servicing infrastructure to enable the future construction including by third parties a neighbourhood centre of approximately 6,000m2 gross floor area on 1.7 hectares a service / light industrial / trade supply hub approximately 25,000m2 gross floor area on 5 hectares A multi-functional green/blue network including neighbourhood parks, recreational walkways and pedestrian and cycle links across the site that connect into existing networks in the Clarks Beach community. <p>The project will require the proposed approvals:</p> <ol style="list-style-type: none"> Resource consents under the Resource Management Act 1991 Archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 					
Consultation undertaken	As required by s11, the applicant has consulted with:					
	Relevant local authorities	Relevant iwi authorities, hapu and Treaty settlement entities	Relevant MACA groups	Ngā hapū o Ngāti Porou	Relevant administering agencies	Holder of land to be exchanged
Section 22 assessment criteria						
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	<p>You may consider any of the following matters, or any other matters you consider relevant.</p> <p>Under section 22(1)(a) of the Act, the applicant considers that the project is a development project that would have significant regional benefits, and provides the following reasons:</p> <p><i>Will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment [s22(2)(a)(iii)]</i> The applicant considers this will be achieved by providing the applicant considers that the project as a complete community providing affordable housing, multi-generational living (social, economic and cultural benefits), coastal restoration areas, community centre and employment opportunities.</p> <p><i>Will deliver significant economic benefits [s22(2)(a)(iv)]</i> The application is supported by an economic assessment which estimates the eight-year construction phase will support approximately 6,985 full-time equivalent (FTE) jobs in construction and servicing and will contribute \$806 million to regional GDP. Approximately 825 FTE jobs in the community are anticipated ongoing, across multiple sectors.</p> <p><i>Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]</i> The applicant considers that the stormwater management approach has been designed to account for climate change and natural hazard scenarios.</p>					
Referring the project to the fast-track approvals process [section 22(1)(b)]	<p><i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i> The applicant considers private plan changes can take three years and be appealed, and that resource consents for projects of this scale can take a similar period for decision and be appealed. The applicant considers the fast-track process would reduce processing time by between 5-8 years.</p> <p><i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i> The applicant considers the project will not materially affect the efficient operation of the approvals process.</p>					

Minister invites comments	<i>You <u>must</u> copy the application to, and invite written comments from [s17(1)]:</i>	<i>You <u>may</u> copy the application to, and invite written comments from, any other person [s17(5)]:</i>	<i>You <u>may</u> request further information about a referral application from the applicant, the relevant local authorities, or the relevant administering agencies to be provided within the time frame specified in the request.</i>
	<ul style="list-style-type: none"> a. Relevant local authorities: Auckland Council (including Auckland Transport and Watercare) b. Minister for the Environment c. Other relevant portfolio Minister(s): Minister for Seniors and Associate Minister for Housing d. Relevant administering agencies: Ministry for the Environment and Heritage New Zealand Pouhere Taonga e. Māori groups identified in Appendix 3 	<ul style="list-style-type: none"> a. Minister for Regional Development b. Minister for Economic Growth 	N/A
Recommendations			Minister's decision
a. Note that section 25 of the Act permits you to decline the referral application without inviting comments from the relevant local authorities, the Minister for the Environment, any relevant Ministers, any relevant administering agencies and the Māori groups identified in the list provided.			Noted
b. Note that you have not yet provided the application to, nor sought any written comments on it from, the parties listed in section 17(1) but that you are required to do so if you do not decline the application under section 21 of the Act.			Noted
c. Note that section 17(5) of the Act permits you to forward an application to, and invite written comments from, any other person.			Noted
d. Note that if comments have been sought and provided within the required time frame you are required to consider it, along with the referral application, before deciding to decline the application.			Noted
e. Note that section 20 of the Act permits you to request further information from the applicant or relevant local authorities or relevant administering agencies at any time before you decide whether to accept or decline an application.			Noted
f. Agree to progress the Orawaahi – A Complete Community Project to our Stage 2 analysis (invite written comments and request section 18 Treaty report).			Yes / No
g. Agree to provide the application to, and invite written comments from:			Yes / No
i. Relevant local authorities: Auckland Council			Yes / No
ii. Minister for the Environment			Yes / No
iii. Other relevant portfolio Minister(s): Minister for Seniors and Associate Minister for Housing			Yes / No
iv. Relevant administering agencies: Ministry for the Environment and Heritage New Zealand Pouhere Taonga			Yes / No
v. Māori groups identified in Appendix 3			Yes / No
vi. Any parties you are required to invite comments from under section 17(1)(d) and (e) who may be subsequently identified			Yes / No
h. Agree to provide the application to and invite written comments from the following additional entities/persons under section 17(5):			Yes / No
i. Minister for Regional Development			Yes / No
ii. Minister for Economic Growth			Yes / No

i. Note that you have agreed to delegate to the Secretary for the Environment your responsibility to send all correspondence, other than to Ministers	Noted
j. Agree to send email and invite written comments from Ministers'.	Yes / No

Signed:

Hon Chris Bishop
Minister for Infrastructure

Date:

Appendix 1: Statutory framework summary

1. You are the sole decision maker for referral applications. If you accept a referral application, then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
 - a. Give the document the same or equivalent effect through this process as it would have under any specified Act; and
 - b. Comply with any applicable procedural requirements.
3. You must decline a referral application if:
 - a. you are satisfied the project does not meet the referral criteria in s22
 - b. you are satisfied the project involves an ineligible activity (s5)
 - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in s21(5) and even if the application meets the s22 referral criteria.
5. You can decline an application before or after inviting comments under s 17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at this initial stage you must copy the application to, and invite written comments from:
 - a. the relevant local authorities,
 - b. the Minister for the Environment and relevant portfolio Ministers
 - c. the relevant administering agencies
 - d. the Māori groups identified by the responsible agency
 - e. the owners of Māori land in the project area:
 - f. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.

Appendix 2: Application documents for Orawaahi – A Complete Community Project: (in File Exchange)

Appendix 3: List of the Māori groups referred to in section 18(2)

Name of group	Type of group (section of Act)
Ngāti Tamaoho Settlement Trust	Iwi authority (s18(2)(a)); Treaty settlement entity (s18(2)(a))
Ngāi Tai ki Tāmaki Trust	Iwi authority (s18(2)(a)); Treaty settlement entity (s18(2)(a))
Te Ākitai Waiohua Waka Taua Inc	Iwi authority (s18(2)(a))
Ngāti Te Ata Claims Support Whānau Trust	Iwi authority (s18(2)(a)), mandated entity (s18(2)(d))
Te Whakakitenga o Waikato Incorporated	Iwi authority (s18(2)(a)), mandated entity (s18(2)(d))
Te Ākitai Waiohua Settlement Trust	Treaty settlement entity (s18(2)(a)), mandated entity (s18(2)(d))
Tūpuna Taonga o Tāmaki Makaurau Trust/ Whenua Haumi Roroa o Tāmaki Makaurau Limited Partnership	Treaty settlement entity (s18(2)(a))
Ngāti Koheriki Claims Committee	Mandated entity (s18(2)(d))
Te Ahiwaru Waiohua	other Māori group with relevant interests (s18(2)(k))
Te Ara Rangatu o Te Iwi o Ngaati Te Ata Waiohua	other Māori group with relevant interests (s18(2)(k))
MAC-01-04-014/CIV-2017-419-084: Ngāa marae o te takutai moana o Waikato-Tainui/Te Whakakitenga o Waikato Inc	other Māori group with relevant interests (s18(2)(k))
MAC-01-03-010: Ngāti Tamaoho	other Māori group with relevant interests (s18(2)(k))
MAC-01-02-005/CIV-2017-404-569: Ngāti Te Ata	other Māori group with relevant interests (s18(2)(k))
MAC-01-02-003/CIV-2017-404-564: Ngāi Tai ki Tāmaki	other Māori group with relevant interests (s18(2)(k))
MAC-01-01-056: Ngā Puhi Nui Tonu (Te Kotahitangā Marae)	other Māori group with relevant interests (s18(2)(k))
MAC-01-01-073/CIV-2017-485-398: Ngāti Kawau and Te Waiariki Korora	other Māori group with relevant interests (s18(2)(k))
CIV-2017-404-558: Ngāitawake	other Māori group with relevant interests (s18(2)(k))
CIV-2017-404-537: Ngā Puhi nui tonu, Ngāti Rāhiri, Ngāti Awa, Ngāi Tāhuhu and Ngāitawake	other Māori group with relevant interests (s18(2)(k))