

Your written comments on a project under the Fast Track Approvals Act 2024

Application number	FTAA-2603-1204
Project name	Brick Bay Lodge Project

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All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Auckland Council		
*First name	Russell		
*Last name	Butchers		
Postal address	Private Bag 92300, Victoria Street West, Auckland 1142		
*Contact phone number	s 9(2)(a)	Alternative	-
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Overview Thank you for the opportunity to provide comments on the referral application for 52 Kauri Drive, Sandspit by Richard and Christine Didsbury. We provide feedback below from the various relevant departments and Council-Controlled Organisations (CCOs) that comprise Auckland Council, including Auckland Transport and Watercare Service Limited. Overall, Auckland Council does not support the project proceeding to a substantive application under the Fast-track Approvals Act 2024 (the Act). Feedback received from most Council CCOs/departments is neutral, however, Auckland Council's Parks and Community Facilities department has raised concerns regarding the potential impacts on adjoining public open space, and the Chief Economist Unit considers that the project has not demonstrated significant regional or national economic benefits and therefore should not be accepted for the fast-track substantive process.

Specifically, the Chief Economist Unit considers that the proposal would not make a substantial contribution to regional or national GDP, employment generation, housing supply, or broader economic growth.

In the invitation letter, it has been requested that Auckland Council provide input on two questions pertaining to sections 17 and 22 of the Act. We respond below:

- 1. Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.*

We are not aware of any applications that have been lodged with the Council that would represent a competing project.

- 2. In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.*

Our understanding is that s42(4)(a) does not apply in this case for a referral. We are not aware of existing consents issued under s124C(1)(c) or s165ZI of the RMA that apply in this case.

It has been requested that the Council respond to two further questions regarding sections 21 and 22 of the Act. We respond below:

- 3. Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)*

Based on the information provided, Auckland Council has not identified any activity that clearly constitutes an ineligible activity under section 5 of the Act.

Council notes, however, that the proposal remains at a preliminary stage and that a number of technical investigations are yet to be completed, including wetland delineation, ecological assessment, archaeological assessment and coastal hazard investigations. The applicant acknowledges that additional assessment is required to confirm the presence and extent of environmental features and to inform the final project layout and design.

- 4. Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act).*

Auckland Council considers there are matters relevant to the Minister's assessment under sections 21 and 22 of the Act.

In response to section 21(5):

- As part of the proposal, the applicant's agent has conducted consultation with mana whenua groups. The proposal is not considered to be inconsistent with the listed requirements – s21(5)(a).

- The Project could be processed under a standard RMA resource consent application without the need of a plan change – s21(5)(b).
- From our preliminary assessment, the proposal is not considered to have significant adverse effects on the environment – s21(5)(c).
- Having researched the council record, a few notices, including abatement notice, were identified. However, those matters were subsequently addressed. It meets the requirements – s21(5)(d).
- The project area is not within the council's Treaty Settlement alert layer – s21(5)(e).
- The preliminary assessment of the proposal is not deemed to be a prohibited activity under the RMA – s21(5)(f).
- No other competing applications were identified – s21(5)(g).
- The subject site has various approved resource consents, but they are not within the project area – s21(5)(h).

In response to section 22:

Overall, Council's Chief Economist Unit reviewed the referral application and supporting economic assessment and concluded that, while the project would generate positive economic benefits, those benefits are unlikely to be significant at either a regional or national scale. The review found that the proposal would make a relatively modest contribution to GDP, employment generation and accommodation capacity when considered in the context of the Auckland and national economies.

Accordingly, Council is not satisfied that the information provided demonstrates that the project would deliver the significant regional or national benefits contemplated by section 22(1)(a) of the Act.

Council also notes that visitor accommodation is provided for as a discretionary activity within the Rural – Rural Coastal Zone under the Auckland Unitary Plan. On the information available, Council considers the proposal could be progressed through established RMA consenting pathways and is therefore not persuaded that referral to the fast-track process has been demonstrated as necessary to facilitate the project in the manner contemplated by section 22(1)(b)(i).

In addition, the application identifies a range of matters requiring further investigation and assessment, including landscape, natural character, ecology, historic heritage, archaeological values, natural hazards, infrastructure servicing and public open space effects. While these matters do not necessarily preclude referral, they indicate that the project's effects and mitigation measures remain to be fully evaluated.

For these reasons, Auckland Council does not support referral of the project and considers there is a basis for the Minister to consider whether the requirements of section 22 have been sufficiently demonstrated for the purposes of section 21 of the Act.

Further detail including specific response to s22(2)(a) is provided below, including assessment from the following Council departments and CCOs:

- Resource Consents and Planning
- Auckland Transport

- Watercare Services Limited
- Healthy Waters and Flood Resilience
- Parks and Community Facilities
- Chief Economist Unit

Feedback has also been provided by the Rodney Local Board.

Auckland Council Resource Consents and Planning Department

The Brick Bay Lodge Project comprises approximately 45 accommodation suites for visitor accommodation, clustered in the eastern portion of the site, with supporting facilities, including a restaurant and other amenities. The project will also require earthworks to construct and install infrastructure, access and building platforms, partially within ecological and natural management overlays, as well as in cultural and natural hazard areas.

The information presented within the application documents is consistent with our understanding of the project and its overall scope. Regarding section 22 of the Act, we provide our preliminary views:

Does the project have significant regional or national benefits?

The Council's Chief Economist Unit reviewed the proposal and the supporting economic assessment and concluded that, while the project would generate economic benefits, those benefits are unlikely to be significant at a regional or national scale. The review noted that the proposal would result in only a modest increase in employment, GDP, and accommodation capacity, and therefore would not make a substantial contribution to regional or national economic growth. Accordingly, the economist concluded that the proposal does not satisfy the threshold of delivering significant regional or national economic benefits as stipulated under the Act.

Would referring the project facilitate its delivery in a more timely and cost-effective way?

Referral may facilitate the delivery of the project in a timelier and cost-effective way; however, it is noted that:

- With visitor accommodation being a discretionary activity in the *Rural - Rural Coastal Zone, Whangateau to Waiwera coastal area*, we consider that the proposal could be progressed as a standard RMA resource consent application (and without the need for a plan change), with the referral of this part of the project not necessarily resulting in any significant time or cost advantage.
- Based on a preliminary review, the project is likely to require a number of resource consents, including, but not limited to, district and regional land use consents for the proposed development, associated earthworks, and infrastructure works; discharge consents for stormwater and wastewater arrangement; and, if necessary, a water permit for groundwater take from a bore for water supply and ; and coastal permits for any activities or structures located within the Coastal Marine Zone.

Is the referral unlikely to materially affect the efficient operation of the fast-track approvals?

In our view, the regional and national economic benefits of the proposal have not been adequately demonstrated, as assessed by the Council's Chief Economist Unit. Accepting the project into the fast-track process could place additional demands on the Environmental Protection Authority (EPA), potentially reducing its capacity and affecting timeframes for future fast-track applications that may present clearer regional or national benefits. More specific comments from the Council's Chief Economist Unit are available in the next section.

Has the project been identified as a priority in any government or sector plan or strategy?

The project has not been identified by Auckland Council, its CCOs, or any relevant plan, strategy or central government infrastructure priority list as a priority project.

Will the project deliver new or support primary industries (e.g. aquaculture)?

The proposal will not directly support primary industries.

Council GIS shows that the proposed project's area is on LUC Class 6 soils (*non-arable with moderate limitations*).

Will the project support development of natural resources (e.g. minerals, petroleum)?

The proposal will not directly support the development of natural resources.

Will the project support climate change mitigation (e.g. reduce/remove greenhouse gas emissions)?

There is no evidence in the proposal that the project will support climate change mitigation.

Will the project support climate change adaptation, reduce risk arising from natural hazards or support recovery from natural hazard events?

The site is subject to coastal hazard (Coastal erosion) and flood hazard (1% annual exceedance probability (AEP) floodplain, and is affected by overland flow paths). The Council does not consider that this natural hazard exposure, of itself, precludes referral. The project itself, however, will not support climate change adaptation or recovery from natural hazards.

Will the project address significant environmental issues?

The project is not directed at addressing existing significant environmental issues.

Is the project consistent with local or regional planning documents (e.g. spatial strategies)?

The primary statutory planning document governing development on the site is the Auckland Unitary Plan (Operative in Part):

Auckland Unitary Plan (Operative in Part) ('AUP')

Rural – Rural Coastal Zone (RCZ) anticipated that open, high-quality natural character, coastal landscape and natural environmental values are retained, with some of the key metric standards below:

- One dwelling per site is a restricted discretionary activity under H19.9.2(A72).
- Three or more dwellings per site where the site is less than 100ha, is a non-complying activity under H19.9.2(A77).
- Visitor accommodation is a discretionary activity under H19.8.1(A34).
- The zone requires a setback distance of 20m for the riparian yard and 50m for the coastal protection yard.

Based on a preliminary review of the proposal, site characteristics, and the operative planning framework, the development must carefully manage the scale and intensity of the proposed accommodation. This should respond to the site's constraints, including natural hazards and significant natural and cultural features, to ensure the proposal does not detract from the rural and coastal character of the zone or its ecological, cultural and amenity values. The development must also demonstrate that natural hazards and associated risks will not be increased.

Any substantive application will need to demonstrate how the project aligns with the intended rural character and density direction for the Whangateau-Waiwera coastal area. This could involve a density or yield assessment to show that the scale and distribution of development maintains the rural character of the coastline.

Future Development Strategy ('FDS') 2023 – 2053

The FDS does not anticipate development of this site between 2023 and 2053 and it is expected to remain within the Rural Coastal Zone over this period, despite urbanisation occurring in parts of the wider Snells Beach area. Notwithstanding this, it is noted that visitor accommodation is a discretionary activity in the Rural Coastal Zone.

Are there any other relevant matters to consider?

Having researched the council records for applications over the last 10 years, the below resource consents were identified within the site (but they are not within the proposed area of this referral project):

- Resource Consent BUN60443347 (LUC60442377 & DIS60443348) was approved on 11/03/2026 for the construction of a new building and use of existing buildings for community facility, entertainment and rural tourist and visitor activities, with associated earthworks, construction noise and transport standard non-compliance and the diversion and discharge of stormwater.
- Resource Consent LUC60432528 was approved on 05/09/2024 for the construction of workers' accommodation, which can accommodate up to 12 workers.

- Resource Consent SUB60426338 was approved on 07/06/2024 for boundary adjustment between two contiguous sites exceeding 10% of the original site area, to create one allotment – lot 1 of 4.2m ha and one allotment – lot 2 of 58.3ha.
- Resource Consent LUC60343747 was approved on 21/08/2019 for the construction of a new semi-circular four-car carport with associated retaining structures.

Inputs from Auckland Council Departments and Organisations

Inputs from various Auckland Council developments and organisations are appended to these comments as attached. An overview of the inputs is provided below:

Auckland Council CCO: Auckland Transport (AT) (Development Planning)

Overall, AT is **neutral** on the application for referral.

AT comments do not raise significant concerns regarding the visitor accommodation.

The substantive application would need to consider local transport effects, access design, safety and construction traffic effects etc.

AT notes that the proposal includes ‘events’ that could be enabled on the site, but the frequency, scale, and nature are unknown. From a planning perspective, the operative Unitary Plan is considered to have adequate provisions and standards to manage temporary events, while subsequent adverse effects can be assessed and managed through a standard resource consent application if required.

Auckland Council CCO – Watercare Services Limited

Overall, Watercare Service Limited (WSL) provided a **neutral** commentary on the application of referral.

- The Project has not yet confirmed the servicing strategy to support the proposal; however, on-site rainwater collection and disposal are under consideration.
- WSL currently does not have any long-term plan to provide public reticulated wastewater or water supply services to the project area.
- Snells Beach Wastewater Treatment Plant was commissioned in 2025 and is designed to provide capacity for 18,000 people. The capacity is intended to service existing live zoned areas [inferred: urbanised area] and Future Urban Zoned land. The project site, being located within rural land, is excluded from the planned growth area.
- The current Snells Water Treatment Plant does not currently have sufficient available capacity to service the Project.
- WSL also acknowledged there may be limited exceptional circumstances under which a connection to the public reticulated network, subject to further investigation and discussion.

Auckland Council – Healthy Waters and Flood Resilience (HWFR)

Overall, the Auckland Council – Healthy Waters Unit is **neutral** on the application of referral.

- Private stormwater management measures will be installed on site to collect and dispose of stormwater from the proposed impervious areas, which are subject to requirements under Chapter E8 of the AUP.
- Given that stormwater runoff will not be discharged to the public stormwater network, authorisation under the Council's Regional Wide Network Discharge Consent (RWND) is not required.

Auckland Council – Parks and Community Facilities

Overall, Auckland Council – Parks and Community Facilities (Parks) is **opposed** to the application for referral.

The overarching comment from Parks includes that this referral project lacks adequate assessment to understand the adverse effects on the adjoining open space and whether it is consistent with the relevant local and regional planning documents.

Parks' feedback recommends exploring pedestrian connectivity from the site to the surrounding open spaces, providing more connected footpath access.

Parks would like to ensure that the purpose, amenity, and useability of adjacent reserves to the proposed development are maintained.

The substantive application would need to consider:

- Boundary treatment and landscape design between the proposal and adjacent open spaces, including Brick Bay Drive, Puriri Places Reserve, and the esplanade coastal reserve land to the east.
- Consideration of landowner matters if works/temporary occupation are required on public land.
- Consideration of tree owner matters if work is in proximity to trees in open space.
- Suitable measures to avoid any adverse effects, including flooding, instability or settlement risk on the adjacent open space during the construction stage.

Auckland Council – Chief Economist Unit – Consulting Economist

The Auckland Council – Chief Economist Unit (CEU) **opposes** the application for referral.

Overall, the Chief Economist Unit considers that the economic assessment is well prepared and acknowledged that the Project would generate positive economic benefits. However, it is considered that the Project is unlikely to deliver 'significant' regional or national economic benefits (including GDP contribution, employment opportunity and housing supply), and therefore does not support referral to the fast-track process.

The Chief Economist Unit provided the following comment:

- The report goes on to say that this development would result in quantified economic benefits of between \$630 million and \$767 million over the 30-year analysis period. On its face, this seems like a large number. It is made up of approximately half from construction (~\$350 million), one-third from operational spending, and the rest from GST and rates.
- For scale, Auckland's GDP in 2025 is estimated to be approximately \$165 billion. That is, this project would have a direct impact on GDP over the next 30 years equivalent to 0.09% of one year's GDP. At \$5 million per year, the impact on Auckland's annual GDP is approximately 0.003% of Auckland's total GDP.
- Similarly, Auckland was estimated to have approximately 977,000 jobs in 20257. The ongoing employment of approximately 150 people represents approximately 0.015% of Auckland's employment.
- In terms of the accommodation sector, the data cited in the report⁸ shows that Auckland has 34% of New Zealand's room supply (approximately 14,000 rooms based on their graphs). Of these, nearly 20% are shown to be in the "Upper Upscale" and "Luxury" categories. In fact, Auckland has a higher share of Luxury rooms than any other region discussed (including Queenstown). While this data source does not report the actual numbers (only graphs), it appears that, of the full room stock in Auckland, approximately 9% are Luxury rooms and 10% Upper Upscale rooms. Consequently, there is an estimate of approximately 1,260 Luxury rooms and 1,400 Upper Upscale rooms in Auckland. The addition of 45 Luxury rooms at the proposed project site would increase the Luxury capacity in Auckland by 3.5% and the Upper Upscale + Luxury capacity by 1.7%. The overall room capacity would increase by 0.3%.

Rodney Local Board

The Rodney Local Board has advised that they are generally **supportive** of the project that allows a luxury visitor accommodation facility at the site, which contributes to job opportunities and direct export revenues.

The local board also acknowledges that the applicant's collaboration with mana whenua for this project aligns with the core directives for Māori Outcomes within the local board plan.

At the same time, the local board acknowledges that there is a transport infrastructure deficit within the area

In terms of environmental considerations, the local board anticipated that stormwater management, sediment run-off and low-carbon construction methodologies would be integrated as part of the proposal. In addition, the following environmental effects are to be addressed during the substantive application phase [inferred if the proposal has been successfully referred].

- Landscape.
- Local transport.
- Wastewater.
- Ecology.

Conclusion

Overall, Auckland Council does not support the project proceeding through the fast-track consenting process.

List of Appendices:

1. Auckland Transport Comments
2. Watercare Services Limited Comments
3. Healthy Waters & Flood Resilience Comments
4. Parks & Community Facilities Comments
5. Chief Economist Unit Comments
6. Rodney Local Board Comments

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Comments prepared by



Perry Ng

Acting Senior Planner

For Resource Consents

Dated: 30 June 2026



Russell Butchers

Principal Project Lead

Planning & Resource Consents

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Brick Bay Lodge Project
Address	52 Kauri Drive Sandspit 0982
FT application number	FTAA-2603-1204

Respondent Information

Name	Shahriar Tehrani
Role	Senior Development Planner
Agency / Department	Auckland Transport
Date	18/06/2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

Agency/Department Response

Auckland Transport has no significant concerns regarding the visitor accommodation. However, there has been material change from what was presented during the pre-application stage, namely the inclusion of events as part of the proposal.

Page 21 of the report titled 'Brick Bay Lodge Referral Application under section 13 of the Fast-track Approvals Act 2024', notes that plans will "be able to be developed to support the various events that would be undertaken on the site." No further detail is provided on the nature, scale, or frequency of these events.

In the absence of this information, it is not possible to adequately assess the potential transport effects of the proposal, including impacts on the surrounding network or whether a travel demand management plan would provide sufficient mitigation.

Accordingly, Auckland Transport recommends that the applicant provide further detail on the proposed events as part of the substantive application. In particular, the following information should be provided:

- **Traffic Assessment Report:** A comprehensive assessment prepared by a suitably qualified and experienced traffic specialist, evaluating the proposal against the Auckland Unitary Plan (in particular, but not limited to, Chapter E27) and Plan Change 79, and identifying any mitigation measures required.
- **Access Design and Safety:** For each access point, provide vehicle tracking (based on the largest anticipated vehicle) and assessment of driver sightlines in accordance with Austroads Safe Intersection Sight Distance requirements.
- **Construction Traffic Effects:** An assessment of the transport effects associated with construction activities, including impacts on Auckland Transport's road network and any proposed management measures.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

23rd June 2026

Russell Butchers
Principal Project Lead, Auckland Council
s 9(2)(a)

Dear Russell,

Brick Bay Lodge
52 Kauri Drive, Sandspit 0982

Introduction

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Brick Bay Lodge Fast-track referral application (**Application**), made under section 13 of the Fast-track Approvals Act 2024 (**Act**).
2. Christine and Richard Didsbury (**Applicant**) proposes to construct a luxury visitor accommodation containing approximately 45 units and associated lodge amenities and infrastructure (**the Project**).
3. The zoning of the Project is Rural Coastal Zone under the Auckland Unitary Plan – Operative in Part (**AUP-OP**).
4. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
 - Brick Bay Lodge Referral Application under section 13 of the Fast-track Approvals Act 2024, dated 14th April 2026.
 - Appendix 1 Masterplan and Concept Drawings, dated 7th March 2025.
 - Appendix 8 Summary of Consultation, dated 4th April 2026.
5. Any amendment to the Application will require further review from Watercare.

Watercare's purpose and statutory obligations

6. 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.
7. Watercare is required to manage its operations efficiently, with a focus on minimising overall costs while maintaining long-term asset integrity. These obligations are subject to economic regulation under the Watercare Charter, with oversight provided by the Commerce Commission as the appointed Crown monitor. Watercare must also give effect to the relevant aspects of Auckland Council's Long-term Plan and act consistently with other council plans and strategies, including the Auckland Plan 2050 and the Future Development Strategy (**FDS**).
8. Through its annual Statement of Intent responding to the council's Letter of Expectation, Watercare commits to contributing to Auckland Plan 2050 outcomes. This includes working collaboratively with

the wider council group to support areas of growth identified by the council, acting consistently with the FDS for major infrastructure development for future urban areas and ensuring alignment of infrastructure projects with other utilities. Watercare also commits to fully recovering growth-related costs so that growth pays for growth.

Watercare's comments

9. As noted, the Project Area is zoned Rural Coastal Zone under the AUP-OP.
10. In line with Watercare's statutory obligations, which include requirements to support growth areas identified by Auckland Council, Watercare does not provide water supply and wastewater servicing to rural zoned land, such as the Project.
 - a. Servicing rural zoned land is unanticipated by Watercare and, in accordance with Auckland Council's plans and strategies, has not been provided for in Watercare's Asset Management Plan.
 - b. This means that planned upgrades and projects in the network and associated treatment infrastructure do not provide capacity for servicing rural land, and therefore the provision of connections to rural land would significantly impact the available capacity for the anticipated growth of live zoned areas and Future Urban Zone areas.
 - c. This position is consistent with Watercare's statutory obligations to act consistently with any plan or strategy of the council, including but not limited to, the Auckland Unitary Plan (Operative in Part), the Auckland Plan 2050 and the FDS.
11. This position is outlined in Watercare's Board approved Strategic Direction for Providing Services to Support Urban Growth (approved 17 May 2015), which restricts the provision of water supply and wastewater services outside of the rural urban boundary. This Board direction allows Watercare to provide services outside of the rural urban boundary, only if expressly requested to do so by Council and where the cost of servicing the development is fully funded by the developer.
12. As such, Watercare has no long-term plan to provide public reticulated wastewater or water servicing to the Project Area.
13. Notwithstanding this position, the below comments are provided in relation to the existing and future capacity of the bulk networks and the local network servicing requirements.
14. The information provided below is valid as at the date of this letter. Where more than six months has passed, or a Long-Term Plan review has occurred, it is recommended that you seek review of this information from Watercare, as all servicing advice is based on the best available information at the time and may change if updated network modelling or programme reviews indicate materially different outcomes.

Private servicing

15. If connection to the public system is not possible, the Applicant states that wastewater servicing would be provided via an onsite wastewater treatment plant (**WWTP**) and land disposal area and potable water would be supplied via onsite rainwater harvesting and/or bore water collection and distribution.

16. Any comments on the proposed private water supply and/or wastewater servicing for the Project will be made by Auckland Council. Additionally, any private water supply would be subject to regulation by Taumata Arowai as the water services regulator. However, Watercare recommends that any private scheme be designed in accordance with the relevant codes of practice for infrastructure.

Bulk and local Wastewater

17. As stated in the Application, the preferred option is to connect to the public wastewater system by extending the wastewater network in Arabella Lane and ultimately connect to the Snells Beach WWTP. No demand calculations or detailed information has been supplied as part of the referral Application, therefore our comments below are limited to the current wastewater network.
18. The recent Snells Beach WWTP upgrade was commissioned in September 2025 and has capacity for 18,000 people. This available capacity is planned to service the existing live zoned areas and Future Urban Zoned land (**FUZ**). The Snells Beach WWTP Stage 2 upgrades are timed for 2035+. These upgrades are planned to service growth in accordance with Auckland Council's Growth Scenario (**AGS**) and the sequencing of Future Urban Areas, not rural land such as the Project.
19. In terms of local infrastructure, the proposed connection point on Arabella Lane discharges to the Sunburst local network pumping station. This pumping station and potentially downstream infrastructure would require upgrades to accommodate the Project. Depending on the proposed servicing methodology within this site, it is likely that a feasible solution could be found, however any network upgrades required to achieve this would be solely the responsibility of the developer. Options would include upgrading the existing network, or extending the network from a location where sufficient capacity is available.

Bulk Water Supply

20. The Applicant notes that there is an existing public water supply network in Arabella Lane that could be extended to service the Project. However, the Application also states that water supply could be supplied via onsite rainwater harvesting and/or bore water collection and distribution. No demand calculations or detailed information has been supplied as part of the referral Application, therefore our comments below are limited to the current water supply network.
21. The Snells water treatment plant (**WTP**) is Watercare's sole supply to the Snells-Algies area. This WTP does not currently have available capacity to support the Project.
22. The current infrastructure at the Snells WTP limits Watercare's ability to take the total approved consented limit from our bores. There is an upgrade planned to increase the capacity of the WTP to this abstraction consent limit. This upgrade is intended to provide for growth in live-zoned and 2025+ Future Urban areas in the short to medium term.
23. The current timeline for completion of the WTP upgrade is uncertain as the project is currently in the project definition phase and the extent of works required is not known.
24. Watercare's future Snells-Algies water supply beyond the current abstraction consent requires securing and consenting a new water source, as well as constructing infrastructure to treat the source

water and convey the treated water to the Snells community. This work is not currently funded in the AMP.

Conclusion

25. In line with its statutory obligations and Board-approved strategic direction, Watercare does not provide wastewater or water services outside the Rural Urban Boundary, including to rural-zoned land, other than in the limited exceptional circumstances discussed earlier in this letter. Extending services to such areas using existing or planned infrastructure would significantly impact Watercare's ability to plan for and service the existing live-zoned and FUZ areas. Planned upgrades to the bulk wastewater and water supply networks are designed to support / meet the needs of those areas, in accordance with the AGS and the FDS, and do not provide for any rural zoned land.
26. Any comments on, or assessment of, potential private water supply and/or wastewater servicing will be made by Auckland Council.
27. Watercare is open to further discussions with the Applicant.

Yours faithfully,



Anna Jennings

Manager – Major Developments

Watercare Services Limited

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Brick Bay Lodge Project
Address	52 Kauri Drive Sandspit 0982
FT application number	FTAA-2603-1204

Respondent Information

Name	Hillary Johnston
Role	Fast-Track Lead
Agency / Department	Healthy Waters & Flood Resilience
Date	24.06.2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

Agency/Department Response

Healthy Waters & Flood Resilience (HWFR) has reviewed the Referral Application for the proposed Brick Bay Lodge. The Application includes 45 luxury visitor accommodation suites and associated lodge amenities within the *Rural – Rural Coastal Zone*.

Reasons for Consent

The reasons for consent outlined within the Planning Assessment are agreed with. The Applicants Agent has outlined a private stormwater diversion and discharge consent will be required under Chapter E8 of the AUP.

HWFR holds a Regionwide Network Discharge consent (RWNDC) which authorises the diversion into and discharge from public stormwater networks within the Auckland Region. The RWNDC is only applicable to existing urban zoned land or land rezoned urban through a Plan Change process.

The site is not within urban zoned land, and the development is not proposed to discharge to or establish any new public stormwater networks.

Flood Hazards

Even though this site is located close proximity to the coast, Auckland Councils GeoMaps viewer indicates that there is existing development downstream of the site to the south that is subject to existing flood hazards. It is expected that any potential impacts of the development on this area in particular is addressed if the Application is to progress.

HWFR welcomes further engagement with the Applicant's Agents in respect of any of the matters outlined above.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Overall Position / Summary

HWFR is not opposed to the proposal proceeding to referral under the Fast-track Approvals Act. Any potential effects on existing downstream flood hazards as a result of the development should be addressed in further detail if the Application is to progress. HWFR welcomes further engagement with the Applicant's Agent as needed.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Prepared by:



Hillary Johnston

Fast-Track Lead

Growth & Development – Healthy Waters &
Flood Resilience

Date: 24 June 2026

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Brick Bay Lodge Project
Address	52 Kauri Drive Sandspit 0982
FT application number	FTAA-2603-1204

Respondent Information

Name	Douglas Sadlier
Role	Senior Parks Planner
Agency / Department	Specialist Operations Parks & Community Facilities (PCF) Community Directorate
Date	19 June 2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☒ Oppose
☐ Neutral

Agency/Department Response

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- *Does the project have significant regional or national benefits?*
Not from a Parks and Community Facilities perspective.
- *Would referring the project facilitate its delivery in a more timely and cost-effective way?*
Not from a Parks and Community Facilities perspective.
- *Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?*
Not from a Parks and Community Facilities perspective.
- *Has the project been identified as a priority in any government or sector plan or strategy?*

- No indication from a Parks and Community Facilities perspective.
- *Will the project deliver new or support existing regionally/nationally significant infrastructure?*
Not from a Parks and Community Facilities perspective.
 - *Will the project increase housing supply or contribute to a well-functioning urban environment?*
Not from a Parks and Community Facilities perspective.
 - *Will the project deliver significant economic benefits?*
Not in scope of Parks and Community Facilities to advise on.
 - *Will the project support primary industries (e.g., aquaculture)?*
Not in scope of Parks and Community Facilities to advise on.
 - *Will the project support development of natural resources (e.g., minerals, petroleum)?*
Not in scope of Parks and Community Facilities to advise on.
 - *Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?*
Not in scope Parks and Community Facilities to advise on.
 - *Will the project support climate change adaptation or recovery from natural hazard events?*
Not from a Parks and Community Facilities perspective – no information provided to support the purpose of esplanade areas under s229(a)(v) of the RMA to address mitigation of natural hazards.
 - *Will the project address significant environmental issues?*
Not from a Parks and Community Facilities perspective.
 - *Is the project consistent with local or regional planning documents (e.g., spatial strategies)?*
Not in scope of Parks and Community Facilities to advise on.
 - *Are there any other relevant matters to consider?*
See assessment below.

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- *Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?*
Not in scope of Parks and Community Facilities to advise on.
- *Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?*
Not in scope of Parks and Community Facilities to advise on .
- *Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?*
Except for the provision of connectivity and esplanade area provision, this is not in scope of Parks and Community Facilities to advise on
- *Is there the potential for significant adverse environmental effects to occur?*
Potentially, as esplanade area provisions may be triggered and assessment on this matter is lacking.

Relevant matters to consider

Preamble and key concerns

- Thank-you for your request for specialist input from the Parks Planning Team representing the wider Parks and Community Facilities Department for this referral application under the Fast-track Approvals Act 2024 (FTAA).
- The following comments are provided at a high-level only and reflect the limited detail supplied in the referral request to flag any immediate matters of concern regarding potential effects on Brick Bay Drive Puriri Place Reserve and associated Open Space Conservation zoned esplanade reserve land to the coastal edge on the eastern side of the subject site.
- It is anticipated that if the application is accepted for referral under the FTAA that more detail will be provided for substantive assessment so that Parks Planning can assess all associated potential impacts adjacent to the subject site as per **Figure 1** below.

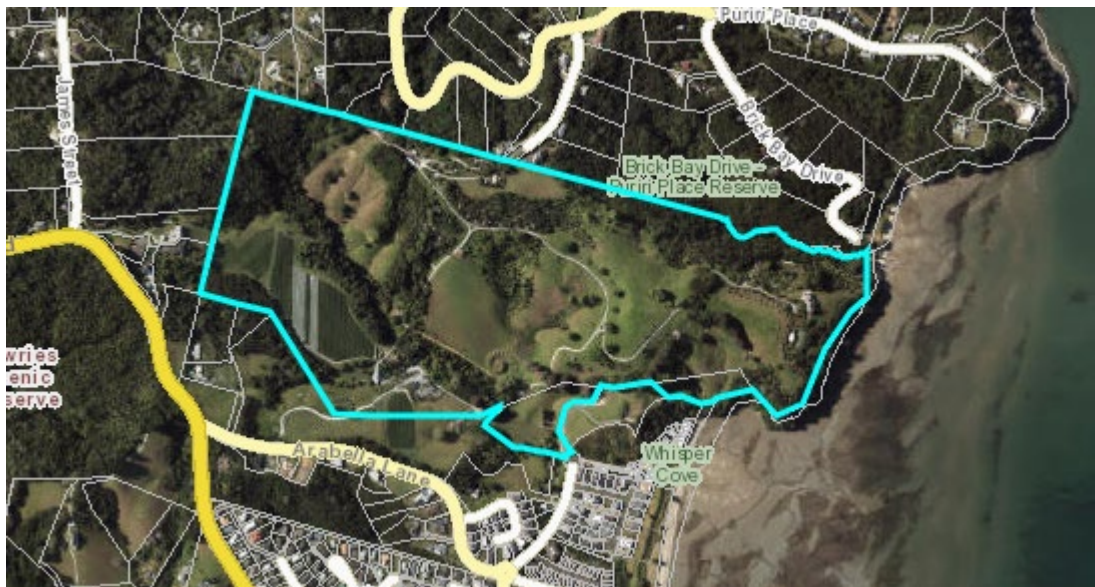


Figure 1: Brick Bay Drive Puriri Place Reserve location and Open Space Conservation Zone(s) north and east (Esplanade Reserve), adjoining subject site (in light blue) for proposed development (*Source: Geomaps Auckland Council*)

Landscaping

- It is important that the purpose, amenity and useability of adjacent reserves to the proposed development are maintained.

- Future design stages must provide detailed landscape designs, including cross-sections and visual plans showing the interface with Brick Bay Drive Puriri Places Reserve and the esplanade coastal reserve land to the east.
- The design should ensure landscape treatments maintain a coherent interface with the existing park design language and support safe, legible pedestrian movement.

Landowner matters

- The proposal is not clear on matters which may affect existing esplanade reserve coastal land.
- Therefore, any works directly on, or requiring temporary occupation of, Esplanade Reserve land will require Landowner Approval (LOA) from Auckland Council. This is a separate approvals process not part of a resource consent.
- Any future application must confirm whether any mitigation works, or temporary construction access is proposed within the existing Esplanade Reserve land.
- Suitable measures are to be employed to ensure excavation or construction activities do not create flooding, instability, or settlement risks that could adversely affect the adjoining Brick Bay Drive Puriri Place Reserve or coastal esplanade reserve land. Information to demonstrate this will be required as part of the substantive application.

Tree asset owner matters

- The proposal doesn't address specific matters affecting existing reserves and the road network.
- Any works affecting existing vegetation within Brick Bay Drive Puriri Place Reserve or the coastal esplanade reserve land or the surrounding road network may require a Tree Owner Approval (TOA).
- The proposal should identify whether shading, excavation, or construction activities may impact tree root zones, canopies, or tree health within the existing park lands or existing road tree assets. Should there be an impact, mitigation measures are to be demonstrated as part of the substantive application.
- The applicant must ensure all works comply with Council's Urban Ngahere Strategy and relevant tree protection standards.

Coastal management

- It is unclear from the application material as to how the proposed development relates to the adjacent coastal esplanade reserve area and the overall coastal environment.

- The future substantial application should be supported by a site-specific coastal hazard assessment (CHA) that informs the layout of the site to avoid risk in the first instance by ensuring appropriate setback of development.
- It is recommended that the applicant is provided with this link to Auckland Council guidance document GD010 [Coastal hazard assessment in the Auckland region - Knowledge Auckland](#).
- Coastal specialists can review the CHA once the application is lodged.

Pedestrian connectivity

- The Local Board Greenway Plans show pedestrian connections on either side of this subject site land parcel. Because the topography is very steep, the greenways are focussed on existing road corridor footpaths. For example., Arabella Lane-Kokihi Lane to the south, and Brick Bay Drive to the north, as illustrated in **Figure 2** below.
- Access to both footpaths on each road north and south are to be explored between these roads (incorporated within their development).

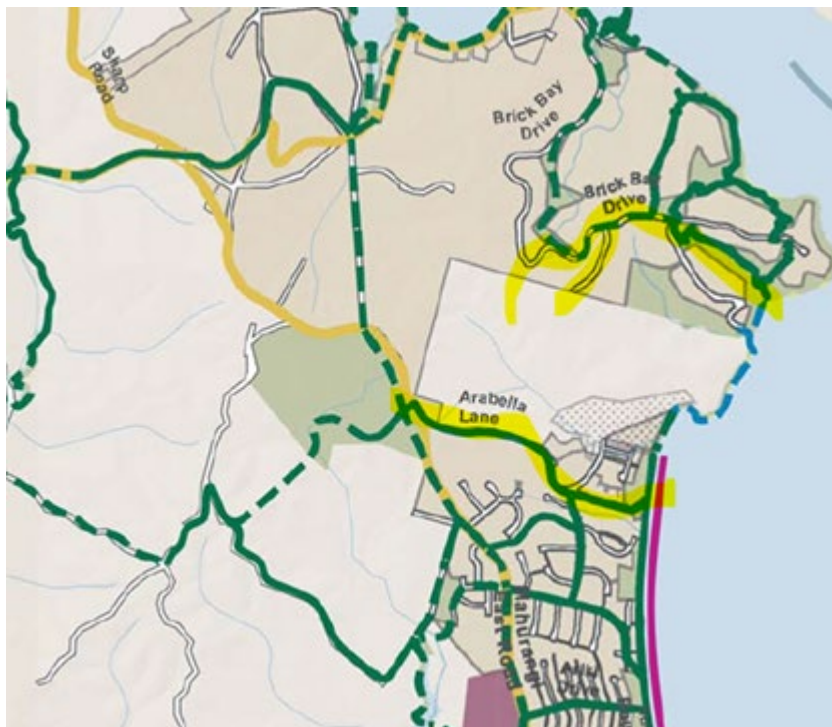


Figure 2: Existing road corridor footpath connections (Source: Local Board Greenway Plan)

- Not required as part of the consent but connectivity with Brick Bay Drive Reserve can be further explored, to also benefit the future Brick Bay Lodge visitors and residents. This connection is illustrated in **Figure 3** below.

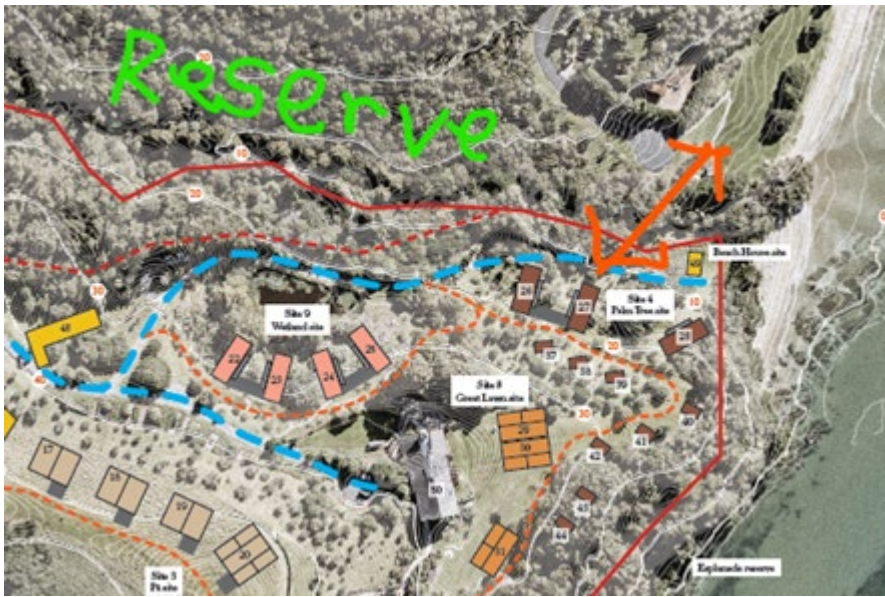


Figure 3: Orange arrow indicates potential access between the subject site, Brick Bay Drive Puriri Place Reserve and Snells Beach (*Source: Applicant Master Plan and PCF notations*)

- Engagement with Auckland Council’s Land Advisory team regarding a potential connection over Brick Bay Drive Puriri Place Reserve will be required. This would be a matter that could be likely relied upon as part of the proposal but not be established through the resource consent.

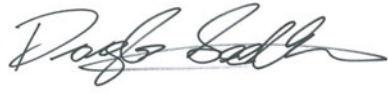
Unit title subdivision

- Unit title subdivision can trigger the requirement for esplanade reserves or esplanade strips under s.230(3)(4) of the Resource Management Act 1991 (RMA) to the adjoining eastern coastal edge of the subject site.
- Please note that the esplanade area where relevant should receive a CHA for those parts on the coastline impacted.
- Also, an assessment on streams within the development is required to determine whether s.230(3)(4) of the RMA is triggered.

Final conclusions

- PCF is not supportive of the proposal as currently submitted, as there is not enough information to form a professional opinion on its effects on the adjoining open space environments and whether it is consistent with local and regional planning documents.

Prepared by:

A handwritten signature in black ink, appearing to read "Doug Sadlier", written over a horizontal line.

Douglas Sadlier
Senior Parks Planner
Parks Planning Team
Parks and Community Facilities

Date: 16 June 2026

Accepted for release by:

A handwritten signature in black ink, appearing to read "Hester Gerber", written over a horizontal line.

Hester Gerber – Manager Parks Planning, Agency Lead for Parks and Community Facilities

Date: 19 June 2026

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Brick Bay Lodge Project
Address	52 Kauri Drive Sandspit 0982
FT application number	FTAA-2603-1204

Respondent Information

Name	Shane Martin
Role	Consulting Economist
Agency / Department	
Date	24 June 2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☒ Oppose
☐ Neutral

Agency/Department Response

This is primarily a review of the Brick Bay Lodge Development FTAA Referral Economic Assessment (the “report”) prepared in accordance with the Fast-track Approvals Act 2024 (FTAA). The analysis was prepared by Market Economics for the applicants – Christine and Richard Didsbury – and is dated 30 March 2026.

Context

Section 21(1)(a) of the FTAA states that “the criteria for accepting a referring application are that the project is an infrastructure or development project that would have significant regional or national benefits...”

I take “regional” to have the same definition as in Section 5(1) of the Local Government Act 2002 (LGA) as it is not explicitly defined in the FTAA. That is, “the region of a regional council and includes the district of a territorial authority, if the territorial authority is a unitary authority.” This definition is consistent with that in Section 2(1) of the Resource Management Act 1991 (RMA).

Section 22(2)(a)(iv) of the FTAA states that “the Minister may consider whether the project will deliver significant economic benefits.”

I take “significant” to have the same definition as in Section 5(1) of the LGA as it is not explicitly defined in the FTAA nor the RMA. That is, “the issue, proposal, decision, or other matter has a high degree of significance.” “Significance” is defined, in the same section of the LGA, as “the degree of importance of the issue, proposal, decision, or matter, as assessed by the local authority, in terms of its likely impact on, and likely consequences for, the current and future social, economic, environmental, or cultural well-being of the district or regions; any persons who are likely to be particularly affected by, or interested in, the issue, proposal, decision, or matter; the capacity of the local authority to perform its role, and the financial and other costs of doing so.”

In the context of economics, it must be determined whether the project will deliver significant economic benefits regionally or nationally, considering the above definitions of “significant” and “regional”.

Economic benefits are not the same as economic impacts. This is a point well made in economic literature^{1,2,3} and is a significant point given the wording of the legislation. It is intentional that the FTAA refers to economic *benefits* whereas the Resource Management Act 1991 (RMA) refers to economic *effects* (though even the RMA specifies that it means “benefits and costs of the economic effects”).

The FTAA specifically allows the Minister to consider whether the project will deliver significant economic *benefits* which is not the same as whether the project has significant economic *impacts*. That is, a project being big does not necessarily mean that it delivers significant economic benefits. While this may seem a pedantic point, it is important and necessary to make the distinction.

Project Specifics

Brick Bay Lodge (the “project”) is a proposed luxury accommodation development in Snells Beach. Snells beach is in the north of Auckland, on the coast, and near Matakana, Warkworth, and Sandspit.

The project is proposed to consist of 45 accommodation units (22 large villas, 15 cottages, and 8 treehouses) as well as more than 4,000m² of central and resort facilities. The proposed site already contains a winery and sculpture trail which act as a draw for visitors.

Report Overview

The report suggests that there are four categories of economic benefits:

- Scale of capital investment / construction
- Sustained operational expenditure / employment
- Tourism export revenue
- Non-monetised spillover benefits

As stated in the “context” section above – just because a project is large does not necessarily mean that it is beneficial. In that context, the scale of the investment and the sustained operation expenditure are not necessarily proof of economic benefit, though they are indicative of it.

¹ <https://doi.org/10.3138/cjpe.3.004>

² <https://doi.org/10.1080/14615517.2020.1767954>

³ <https://doi.org/10.1108/14777830710725867>

In my view, a key point made by the report is that the project is greenfield foreign direct investment. I could not find any explicit definition of this in the reports provided by the applicant, though it is cited as an important reason the application is appropriate for Fast Track. For clarity, foreign direct investment (FDI) is when controlling ownership of an asset in a country is held by a person / company based in another country⁴. Greenfield FDI means that a “new investment [is] made by setting up a new foreign affiliate (as opposed to acquiring or leasing existing facilities).”⁵ Essentially, foreigners are bringing their money to New Zealand to start a business from scratch in New Zealand.

This means that, unlike with other economic activity, this economic activity is not likely to take place otherwise. For example, if some new townhouses are proposed to be developed by a local developer, one cannot assume that that activity would not take place if that development did not happen. It is likely that the developer would instead develop a different site. However, with FDI, the money is external to New Zealand, and it is likely that this development would not take place elsewhere in the economy if this development was not permitted.

Additionally, the report claims that “the project is directly aligned with multiple Government economic priorities. It advances the Going for Growth agenda's target of doubling New Zealand's exports within a decade. It supports Tourism New Zealand's objective of growing the value of tourism exports and is consistent with the Government Tourism Strategy's emphasis on increasing the unit value of tourism (growing value faster than volume).”

The report goes on to say that this development would result in quantified economic benefits of between \$630 million and \$767 million over the 30-year analysis period. On its face, this seems like a large number. It is made up of approximately half from construction (~\$350 million), one-third from operational spending, and the rest from GST and rates.

The report is silent about any profits going off shore to the foreign owners which would attenuate some of the benefit of the business.

The annex of the report breaks down the impact of spending (on construction and operations) into direct, indirect, and induced, which is not shown in the main body of the report. In general, direct impacts are more defensible than indirect impacts which are themselves more defensible than induced impacts. I would have preferred to see an estimate of estimated GDP impacts and employment from only the direct impacts. For a sense of scale, the main report suggests a GDP impact of between \$317 and \$376 million. The direct impact is roughly one-quarter of this at between \$81 and \$88 million.

Similarly, construction is claimed to produce between approximately 3,800 and 4,100 employment years. However, only approximately 1,100 of these employment years are direct effects. The same effect can be observed for estimated operational expenditures.

⁴ The UN Conference on Trade and Development defines Foreign Direct Investment as “an investment involving a long-term relationship and reflecting a lasting interest and control of a resident entity in one economy (foreign direct investor or parent enterprise) in an enterprise resident in an economy other than that of the foreign direct investor (FDI enterprise or affiliate enterprise or foreign affiliate). Foreign direct investment implies that the investor exerts a significant degree of influence on the management of the enterprise resident in the other economy.” https://unctad.org/system/files/official-document/wir1997_en.pdf

⁵ <https://sdgpulse.unctad.org/glossary/greenfield/index.html>

The main issue with using multiplier effects to obtain indirect and induced impacts is that, if you did this for every activity in the economy, they would sum to a multiple of the entire economy. That is, the summation of the sectors of the economy would be larger than the entire economy is.

Using only direct effects yields a total discounted value added estimate of approximately \$145 million over the next 30 years (i.e., approximately \$5 million per year) with an associated 150 jobs (approximately) per year.

Ultimately, my professional opinion is that the report is generally well-done. It follows the same steps as an Economic Impact Assessment (EIA) without relying exclusively on the results of the EIA to justify the project's benefit to New Zealand (though I would have liked to see the direct impacts explicitly called out in the summary and tables). That said, it is a question as to whether the project is likely to have *significant* economic benefits to Auckland or New Zealand.

For scale, Auckland's GDP in 2025 is estimated to be approximately \$165 billion⁶. That is, this project would have a direct impact on GDP over the next 30 years equivalent to 0.09% of one year's GDP. At \$5 million per year, the impact on Auckland's annual GDP is approximately 0.003% of Auckland's total GDP.

Similarly, Auckland was estimated to have approximately 977,000 jobs in 2025⁷. The ongoing employment of approximately 150 people represents approximately 0.015% of Auckland's employment.

In terms of the accommodation sector, the data cited in the report⁸ shows that Auckland has 34% of New Zealand's room supply (approximately 14,000 rooms based on their graphs). Of these, nearly 20% are shown to be in the "Upper Upscale" and "Luxury" categories. In fact, Auckland has a higher share of Luxury rooms than any other region discussed (including Queenstown). While this data source does not report the actual numbers (only graphs), it appears that, of the full room stock in Auckland, approximately 9% are Luxury rooms and 10% Upper Upscale rooms. Consequently, there is an estimate of approximately 1,260 Luxury rooms and 1,400 Upper Upscale rooms in Auckland. The addition of 45 Luxury rooms at the proposed project site would increase the Luxury capacity in Auckland by 3.5% and the Upper Upscale + Luxury capacity by 1.7%. The overall room capacity would increase by 0.3%.

Recommendation

While there are some things in the report that I would have liked to have seen presented differently, ultimately the question is not "is this a worthwhile project?" but instead "is this project appropriate for Fast Track?". Given the assessment criteria, the relevant criteria in the FTAA that can be judged by this report (primarily section 22(2)(a)(i) and 22(2)(a)(iv)) are:

- The project is an infrastructure or development project that would have significant regional or national benefits, judged by whether the project:
 - has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy

⁶ <https://regions.infometrics.co.nz/auckland/economy/growth>

⁷ <https://regions.infometrics.co.nz/auckland/employment/growth>

⁸ https://horwathhtl.com/wp-content/uploads/2024/10/New-Zealand_Chains-Report-2023.pdf

statement or spatial strategy), or a central government infrastructure priority list

- will deliver significant economic benefits

In my view, the report has demonstrated that government has exports and export tourism as one of their priorities for growing the New Zealand economy. However, this particular project has not been specifically identified as a priority project and it appears that the FTAA requires that to be the case to satisfy that criteria.

In terms of significant economic benefits, this relies exclusively on the threshold for “significant” which is not set in the Act. The addition of 45 rooms does not appear to be a particularly significant addition to the Auckland or New Zealand stock of rooms, even when considering only the Luxury segment defined by the data cited. The number of ongoing jobs and the addition to GDP are, likewise, not particularly large in the regional or national context.

None of this is to say that there are not economic benefits to this proposal or that it should not be considered for consent. However, in my professional opinion, it has not met the criteria defined in the FTAA for accepting a referral application, and I cannot recommend that it be accepted.

19 June 2026

Rodney Local Board feedback

FAST-TRACK: Referral application – Brick Bay Lodge, 52 Kauri Drive, Sandspit - PRR00044213

Prepared by Deputy Chairperson Ivan Wagstaff.

The Rodney Local Board provides this feedback in fulfilment of its statutory role under local government frameworks to represent the views, priorities, and aspirations of its local communities. Under the Fast-track Approvals Act 2024 (FTAA) referral process, the Local Board evaluates applications based on their alignment with the strategic directions of the Rodney Local Board Plan, localised infrastructure capacity, and long-term socio-economic outcomes for our residents.

Local Board Feedback:

The Rodney Local Board has reviewed the Brick Bay Lodge proposal and is in support of it. While the Board acknowledges the significant strategic and economic benefits outlined by the applicant, this support is carefully balanced against the distinct infrastructure deficits and localised challenges identified in the Rodney Local Board Plan 2023.

1. Economic Development and Tourism Alignment

The proposal to establish a luxury visitor accommodation facility directly addresses an identified regional gap in high-value, low-impact luxury accommodation supply. This aligns closely with the Rodney Local Board Plan 2023 priority "Our Places" (Ō Tātou Wāhi), which seeks to leverage Rodney's status as a premier visitor destination to build a vibrant, prosperous, and resilient local economy.

The applicant's economic assessment forecasts the creation of approximately 140 operational jobs per year and 185–190 direct construction positions. This directly advances the Board's objective to create "more local jobs for local people" and retain economic prosperity within our geographically dispersed communities.

The concentration of high-spending international visitors supports the Ministry of Business, Innovation & Employment's (MBIE) Going for Growth agenda and the 2025 Tourism Growth Roadmap by driving direct export revenues rather than simply increasing raw visitor volume.

2. Mana Whenua Collaboration and Māori Outcomes

The Board strongly supports the applicants' active collaboration with Ngāti Manuhiri as mana whenua for the rohe. This alignment fulfils the core directives of "Ngā huanga Māori" (Māori Outcomes) within the Local Board Plan, specifically Kia ora te ahurea (Māori identity and culture) and Kia ora te umanga (Māori business, tourism, and employment).

3. Infrastructure, Transport, and Environmental Conditions

While the economic metrics are robust, the Rodney area faces acute pressures that the final layout must strictly account for:

Transport Infrastructure Deficit: As highlighted in "Our Transport" (Tā Tātou Pūnaha Waka), Rodney suffers from an ongoing infrastructure deficit and high congestion rates. While the project is positioned to build on the recent connectivity of the Ara Tūhono motorway extension, any substantive fast-track approval must include conditions requiring a localised Traffic Impact Assessment to prevent adverse strain on secondary arterial corridors like Snells Beach and Matakana.

Environmental Stewardship and Climate Adaptation: The project is located on the coastal side of Snells Beach. The Rodney Local Board Plan 2023 places a heavy emphasis on "Our Environment" (Tō Tātou Taiao), emphasising coastal protection, flood mitigation, and water-sensitive design practice. Although the applicant states that no fundamental misalignments exist with national environmental standards, the Board expects the substantive design phase to integrate low-carbon construction methodologies, stormwater treatment systems to capture sediment run-off, and sustainable waste minimisation structures.

Section 3: Conclusion

Local Board Position: Supports the application, subject to conditions.

The Rodney Local Board supports the referral of the Brick Bay Lodge project to the fast-track approvals framework under the FTAA. The streamlined framework will successfully facilitate complex interrelated agency processing and pull forward substantial GDP value-add contributions and high-quality employment options years ahead of standard consenting pathways.

However, this support is contingent upon the delivery of the following localised conditions during the substantive application phase:

Implementation of strict conditions to avoid, remedy, or mitigate all localised environmental and landscape impacts.

Ensuring that localised transport, wastewater, and ecological impacts are thoroughly aligned with Auckland Council guidelines, without compounding the existing infrastructure shortfalls of the wider Warkworth/Snells Beach growth node.

From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: CORPG4889 / Invitation to comment on Fast-track referral application for the Brick Bay Lodge under the Fast-track Approvals Act 2024 – FTAA-2603-1204
Date: Monday, 15 June 2026 4:46:44 pm

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Sent: Monday, 15 June 2026 4:39 PM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: CORPG4889 / Invitation to comment on Fast-track referral application for the Brick Bay Lodge under the Fast-track Approvals Act 2024 – FTAA-2603-1204

Good afternoon,

Confirming Hon Paul Goldsmith, Minister for Arts, Culture and Heritage has no comment.

Kind regards,



Office of Hon Paul Goldsmith

Minister for Arts Culture and Heritage | Minister of Justice
Minister for Media and Communications | Minister for Pacific Peoples
Minister for the Public Service and Digitising Government
Minister for Treaty of Waitangi Negotiations

Email p.goldsmith@ministers.govt.nz | www.beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Tuesday, 9 June 2026 8:37 am
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Nicola Grigg (MIN) <N.Grigg@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Simon Watts (MIN) <S.Watts@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>; Louise Upston (MIN) <L.Upston@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: CORPG4889 / Invitation to comment on Fast-track referral application for the Brick Bay Lodge under the Fast-track Approvals Act 2024 – FTAA-2603-1204

To:

- Minister for Economic Growth
- Minister for Regional Development
- Minister for the Environment
- Minister for Māori Crown Relations: Te Arawhiti
- Minister for Māori Development
- Minister of Conservation
- Minister for Auckland
- Minister for Arts, Culture and Heritage
- Minister for Tourism and Hospitality

NOTE - This project lodged an application after 31 March 2026, therefore a 15-day comment period applies.

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Brick Bay Wines Limited for referral of Brick Bay Lodge project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2603-1204).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **15 working days** of receipt of this email, being **30 June 2026**. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Brick Bay Lodge
Applicant	Brick Bay Wines Limited
Location	Snells Beach, Auckland
Project description	The project is to construct and operate a luxury visitor accommodation lodge comprising approximately 45 visitor accommodation suites (villas, cottages

and treehouses) and associated facilities (reception, restaurant, recreation and wellness amenities) on approximately 62.5 hectares at 15 Arabella Lane and 52 Kauri Drive, Snells Beach, Auckland Region. The project includes ancillary activities and infrastructure that will comprise:

- a. helicopter movements
- b. parking, access and manoeuvring areas
- c. earthworks and civil works (for building platforms, roading, landscaping, services and infrastructure)
- d. vegetation removal and modification
- e. temporary construction activities including sediment control measures
- f. wastewater treatment and disposal.

Kind regards,



Office of Hon Chris Bishop

Attorney-General | Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | MP for Hutt South

Office: 04 817 6802 | EW 6.3

Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



29 June 2026

By email: infrastructure.portfolio@parliament.govt.nz

Tēnā koe Minister Bishop,

Invitation to comment on the Brick Bay Lodge project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the **Brick Bay Lodge** project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report prepared by the Ministry for the Environment.

Nāku noa, nā

A handwritten signature in blue ink, reading 'Tama Potaka'.

Hon Tama Potaka

Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Brick Bay Lodge FTAA 2603-1204
1. Contact Details	
Please ensure that you have authority to comment on the application on behalf of those named on this form.	
*Portfolio	Tourism and Hospitality
*First name	Andrew
*Last name	Lim

2. Please provide your comments on this application

We have been asked to provide comments on behalf of the Minister of Tourism and Hospitality on Christine and Richard Didsbury (Brick Bay Wines Limited)'s application to use the fast-track process for the Brick Bay Lodge development. We have therefore commented only from a Tourism and Hospitality portfolio perspective.

If fully realised, the project has the potential to support regional tourism activity on the Matakana Coast through the provision of 45 high-end accommodation units and associated amenities (eg wellness offering). It is expected to support around 140 ongoing operational roles and generate annual economic contributions of \$4.5 million to \$16.2 million in net present value (derived from international visitor expenditure, GST, and local government rates).

In addition to these potential tourism-related economic impacts, the development may generate other benefits. These include enabling staff members to upskill to international luxury standards, strengthening supply chains for premium local goods and services, and broader cultural and branding effects—such as showcasing New Zealand artists' work to a wider international audience.

The proposal broadly aligns with identified regional needs for increased accommodation capacity, greater diversity, and higher-quality offerings. Its integration with existing attractions, such as the Brick Bay Wines and Sculpture Trail, may further enhance the visitor experience and support increased visitation in the Auckland region.

Overall, the project appears to support higher-quality accommodation supply and aligns with Government priorities to grow tourism exports and employment in tourism and hospitality.

Minister's signoff



Hon Louise Upston

Minister for Tourism and Hospitality

Date

20260628

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Brick Bay Lodge
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Department of Conservation ('DOC')		
*First name	David		
*Last name	Greaves		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ;		

2. Please provide your comments on this application
Comments follow overleaf.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff

Jenni Fitzgerald

29th of June 2026

Director-General of Conservation s17 comments

Project name	Brick Bay Lodge
Applicant name	Christine and Richard Didsbury
Application number	FTAA-2603-1204
Project summary details	The Applicant is proposing to construct and operate luxury visitor accommodation comprising approximately 45 accommodation suites and associated lodge amenities on the property at Snells Beach, which is adjacent to the Brick Bay Wines & Sculpture Trail.

1. General comment

- 1.1. As the Project includes an approval under a specified Act for which DOC is the administering agency (being the Wildlife Act 1953), the Applicant was required to notify DOC in accordance with section 11 of the Fast Track Approvals Act 2024 (the 'FTAA' or the 'Act').
- 1.2. In relation to this application, the Applicant took steps to engage with DOC prior to lodging. An application for consultation with DOC was made on the 23rd of February 2026 (deposit paid 6th of March 2026). A meeting with the Applicant was held on the 24th of March 2026 where the Applicant provided a high-level ecological assessment and plans for the proposed development.
- 1.3. DOC provided a comprehensive response to the Applicant on the 10th of April 2026.
- 1.4. While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels.

2. Minister's decision on referral application

- 2.1. FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.
- 2.2. DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.
- 2.3. For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should take into account that has not already been acknowledged by the Applicant in its referral application.

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2.4. Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	DOC has considered section 5(1) (f), (h), (i), (j) and (k) of the Act. DOC has not identified any aspect of the Project that would be ineligible under these sections.
21(3)(c)	Is there adequate information to inform a decision	DOC considers that there is adequate information to evaluate the Project in terms of a referral decision. It is noted that there are records of threatened (inanga) and At-Risk (longfin eel, giant bully, banded kōkopu) species directly adjacent to the Project Site, which may also be present in the wetlands. Bats may also be present in the vicinity of the Site. If the Project is referred, the substantive application should be supported by a comprehensive ecological assessment that specifically addresses the potential effects on these species and other wildlife.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the Project should not be referred.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	DOC has not identified any inconsistency with any relevant settlement or other obligation. Relevant Treaty Settlement Acts are: • Ngāti Manuhiri Claims Settlement Act 2012; • Te Kawerau ā Maki Claims Settlement Act 2015; • Ngāti Pāoa Claims Settlement Act 2025; • Ngāi Tai ki Tāmaki Claims Settlement Act 2018. Treaty settlements under negotiation It is noted that there are Treaty settlements under negotiation including: • Ngāti Whatua remaining claims; • Ngāti Maru (Hauraki); • Ngāti Tamaterā;and • Ngāti Whanaunga. It is not yet clear what impact this Treaty settlement may have, however, the indicated area of interest includes the Project Site.

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Section	Criteria	Comments
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why the Wildlife Act approval should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on our knowledge of the existing environment and species expected to occur on the Site, our understanding of the Project, and our experience of the kinds of design measures and conditions that could be implemented, DOC considers that once more detailed information is available, it would be possible to achieve a project with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, as and where required), that does not have significant adverse effects on the environment.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the Applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	No competing applications have been identified.

2.5. Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

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Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	A Wildlife Act approval would generally take approximately three-four months to process, which is not significantly longer than the FTAA process is expected to take. However, there may be benefits for the Applicant in terms of consideration being combined with RMA approvals (rather than being advanced by a separate process) and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	No.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The following DOC Statutory Planning documents are relevant to the Proposal: • Conservation General Policy 2005 ('CGP'); • Auckland Conservation Management Strategy 2014. The application is not inconsistent with the relevant statutory planning provisions. However, consideration needs to be given to: • the relevant provisions in the Hauraki Marine Park Act 2000 relating to the catchments of the Hauraki Gulf; • protecting and restoring relevant indigenous ecosystems; • ensuring the persistence and preservation of threatened species; • protecting freshwater fish habitat and fish passage; • protecting, restoring and interpreting historic and cultural heritage sites.

22(b)	Any other matters the Minister may consider as relevant?	• Whilst there is no Public Conservation Land directly impacted by the Project, the development is adjacent to the coastal environment with recorded archaeological sites present, including midden, ovens and a nearby recorded pā site. The Applicant will need an adequate heritage assessment and to consider Treaty settlement issues. • A Wildlife Approval is required if there is protected wildlife on the 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). • DOC understands that demonstrating 'best practice methods' through documents such as management plans can't be deferred to a subsequent Lizard Management Plan. 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. • DOC notes that kororā/little penguin are known to nest in the general vicinity of the Site. It is recommended that further investigations be undertaken to determine if any nest sites are present near the proposed building works. If works will interfere with nest sites, a Wildlife Approval will be necessary. • To obtain a Wildlife Approval DOC strongly recommends that the Applicant undertakes a baseline survey and, if lizards are found to be present, develop a Lizard Management Plan which documents: • 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. • Actual and potential effect on any lizard species found to be present. • Details of avoidance and mitigation methods. • 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
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		specific consideration should be given to providing appropriate relocation sites). • Duration – DOC would anticipate a wildlife approval, if necessary, will be required for activities for the duration of the construction phase. • Further investigation should be undertaken with regard to bat habitat and the potential effects resulting from the removal of habitat. A bat management plan, tree felling protocol and lighting controls may be necessary. • Further investigations should also be undertaken regarding the ecological values of the identified pond and wetland on the Site and if the Proposal will result in adverse effects on these values.
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3. Other considerations

- 3.1. DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. DOC has provided input to a number of fast-track projects to-date where additional conservation approvals that would have been available under the FTAA have not been included in an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the 'one stop shop' approach the FTAA was designed to deliver.
- 3.2. DOC recommends the Applicant consider whether it should seek to include additional approvals that may be required for the project and suggests the Minister should consider whether further information should be sought from the Applicant.
- 3.3. Given the lack of specific detail in the referral application, DOC considers it would be highly beneficial for the Applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.

4. Matters for the Minister to specify (s27)

- 4.1. None identified.

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A handwritten signature in blue ink, appearing to read 'JF', with a stylized flourish at the end.

Jenni Fitzgerald

Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 29th of June 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011



Comments on referral application under the Fast Track Approvals Act 2024

Brick Bay Lodge, FTAA-2603-1204

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	HNZPT Fast-track Team
Contact Number	s 9(2)(a)
Email	fasttrack@heritage.org.nz

General Comments

1. Richard and Christine Didsbury (Applicants) have lodged an application for referral of the Brick Bay Lodge (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has been provided application documents that are relevant to the archaeological authority application. These have been assessed and HNZPT comments as follows:

Consultation and Engagement

4. HNZPT had a meeting with the applicant, the applicant's planner and the applicant's consultant archaeologist on 4 March 2026. HNZPT noted the applicant's commitment to avoiding pā site R09/169 and encouraged further site avoidance once the archaeological landscape within the project area is better assessed.

Archaeological Authority Application

5. The Applicants have since provided a preliminary archaeological assessment that identifies 7 recorded archaeological sites within the project area. The works proposed as part of the project may modify or destroy 3 of those recorded sites, and there is potential to encounter further archaeological material or sites. As such, an archaeological authority is required prior to those works commencing.
6. The application area falls within the Matakana River statutory acknowledgement area under the Ngāti Manuhiri Claims Settlement Act 2012, which HNZPT is required to have regard to.
7. HNZPT notes that an MOU developed with Ngāti Manuhiri establishes a solid foundation for the applicants to work in close collaboration with Ngāti Manuhiri as the project develops, to ensure that the cultural values of Ngāti Manuhiri are properly understood and incorporated



into the design, construction and operation of the lodge. The applicants have also sought responses from other relevant tangata whenua entities.

8. HNPZT notes that no Cultural Impact Assessment has been provided with this application. The Applicants should explore commissioning a report to understand the cultural impacts of this development and how these can be mitigated.

Effects on Archaeological Values

9. In order to mitigate the adverse effects on archaeological values, a suite of conditions will be required.
10. This has been discussed with the Applicants and will continue through the application process.

Conclusion

11. If the project is referred, HNZPT anticipates further engagement with the Applicants to ensure all relevant documentation is provided with a substantive application, including:

- A fulsome archaeological assessment;
- Appropriate methodologies and strategies proposed;
- Appropriate draft management plan and research strategy;
- Evidence of appropriate consultation with tangata whenua; and
- Appropriate draft conditions.