

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

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

Project name & number	Devonport Mixed Use Development Victoria Road, and Wynyard Street, Devonport FTAA-2602-1172
-----------------------	---

1. Contact Details			
Organisation name (if relevant)	Auckland Council		
*First name	Carly		
*Last name	Hinde		
Postal address	Private Bag 92300, Victoria Street West, Auckland 1142		
*Contact phone number	s 9(2)(a)	Alternative	N/A
*Email	s 9(2)(a)		

2. Please provide your comments on this application	
1.	This Planning Memorandum (Memorandum) sets out Auckland Council's regulatory planning assessment and comments on the Referral application for the 'Devonport Mixed Use Development' (the Application) lodged by Devonport Property Management (the Applicant) under the Fast-track Approvals Act 2024 (FTAA). This Memorandum is provided in response to the invitation to comment issued by the Minister under section 17(1) of the FTAA and has taken into account the criteria that inform the Minister's decision-making progress on referral applications at section 22.
2.	This Memorandum presents Auckland Council's response in its capacity as the relevant local authority and reflects the regulatory planning assessment of the Council officers responsible for administering the resource management functions of the Council. It is intended to assist the Minister / EPA in their consideration of the Application and should not be interpreted as representing the views of Auckland Council's governing body or other non-regulatory parts of the organisation.
3.	Council have welcomed the pre-application engagement with the applicant team to date and we look forward to reviewing the below matters with the applicant team if the Minister is minded to accept the Referral application, and as part of the Substantive pre-application engagement process.

Section 22

Does the project have significant regional or national benefits?

4. The applicant cites several regional benefits. However, the Referral application lacks sufficient evidence to substantiate that these benefits are significant in the context of the Auckland region.
5. The Economic Impact Assessment (EIA) identifies substantial construction activity and presents a plausible case for improved town centre vitality and increased tourism. However, many of the quantified operational benefits rely on scenario assumptions rather than empirical evidence, and many of the assessed economic benefits will not be net additional benefits to the Auckland region.
6. Given Auckland's large and diverse economy, it is not immediately evident that the scale of both one-off and ongoing economic benefits would, in themselves, be regionally significant, even if the EIA's position that "a significant impact, at the regional level (as identified in the Act), may more usefully be defined in terms of a smaller geography than the Regional Council boundaries – especially in Auckland" is accepted.
7. The accompanying Economic Memo (Attachment 1) provides an overview of additional details required to potentially support this assessment. Auckland Council also remain of the view that a cost benefit analysis (CBA) is the best way to weigh up the costs and benefits of an application under the FTAA and that an EIA is not appropriate because it estimates expected change in economic activity without regard to costs or benefits in an economic sense.

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

8. It is accepted that the referral of this project would likely achieve these outcomes, given that any process administered by Auckland Council would require public notification, attract considerable public interest and likely require a contested resource consent hearing.

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

9. Council have no comment in this regard.

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

10. This project has not been identified by Auckland Council, CCOs, or any relevant plans and strategies as being a priority.

Will the project deliver new or support existing regionally/nationally significant infrastructure?

11. No regionally or nationally significant infrastructure is proposed.

Will the project increase housing supply or contribute to a well-functioning urban environment?

12. The project will increase housing supply (approx. 80-90 dwellings) and is contended to contribute to a well-functioning urban environment. However, the quantum of dwellings proposed is not significant at a regional, or sub-regional scale.
13. In principle, the regeneration of a core part of Devonport Town Centre would contribute to a well-functioning urban environment. However, the potential adverse effects associated with the scale and massing of the Application is of concern.

Will the project deliver significant economic benefits?

14. The referral application lacks sufficient evidence to substantiate that any economic benefits are significant in the context of the Auckland region or nationally. Council's Economist (Attachment 3) has commented that the submitted report has not adequately demonstrated that the proposal will achieve significant economic benefits, identifying a range of concerns with the methodology used to support the economic conclusions reached in the submitted information.

Will the project support primary industries (e.g., aquaculture)?

15. No - the Application and site are urban development related.

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

16. No development of natural resources is proposed.

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

17. The Application documentation indicates that the Application will support climate change mitigation through the provision of more intensive living opportunities in a town centre and through the increased provision of local business premises and through the adaptive re-use of existing heritage buildings. While this is accepted, this is not exclusive to this form of development on the Application site.

Will the project support climate change adaptation or recovery from natural hazard events?

18. The application documentation has not at this stage demonstrated that the proposal will support climate change adaptation or recovery from natural hazards at a high level, but will incorporate measures to reduce risks on the Application from natural hazard events, particularly coastal inundation and land instability.

Will the project address significant environmental issues?

19. It does not appear likely that this proposal will address significant environmental issues, with the Application documentation noting that the localised contamination arising from historic

uses and building materials will be addressed. This is not considered to be a 'significant environmental issue' in the context of the Referral process.

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

20. The project is not considered to be consistent with local and regional planning documents, including the Auckland Unitary Plan: Operative in Part (AUP), relevant provisions within Plan Change 120 (PC120) with immediate legal effect, and the Auckland Unitary Plan Regional Policy Statement (**AUP RPS**).
21. It is noted that the Auckland Council's Future Development Strategy does not identify Devonport Town Centre as a growth node above and beyond any other town centre in the region.
22. The Referral Planning Report prepared by Tattico Consultants (the **Tattico Planning Report**) largely identifies the relevant and critical aspects of the Resource Management Act 1991 (the **RMA**) and the planning framework under the RMA, comprising relevant national direction documents and the Auckland Unitary Plan (Operative in Part) (the **AUP**). There are a couple of limited exceptions to this, but they do not impact on the overall activity status, nor the information that would be required if and when a Substantive application is considered.
23. It is agreed that the development would have an overall activity status of 'non-complying' under the RMA, which allows for all RMA effects to be in scope for consideration.
24. The key exceptions are:
 - a. The Application does not require consideration against Rule E27.4.1 (A3) regarding trip generation, as the associated Standard E27.6.1 does not apply to Town Centre locations (as provided for by Standard E27.6.1(2). However, as a non-complying activity, trip generation effects are still in scope and the Applicant is recommended to address them; and
 - b. The Tattico Planning Report has not identified any consenting requirements under E25 Noise and Vibration relating to construction noise and vibration generally, nor any specifically arising from working with basalt substrate. This will need to be addressed in any subsequent Substantive application and alongside groundwater considerations, will be of high relevance for determining effects on adjoining and nearby properties and buildings on them as well as the buildings to be retained and adaptively re-used.
25. The Application site is subject to several constraints that relate to regionally significant features and values associated with them, notably the Regionally Significant Volcanic Viewshaft and Height Sensitive Areas Overlay relating to Takuranga / Mount Victoria (which is the subject of several additional separate viewshafts that do not extend over the Application site).
26. In addition, the Application site contains a number of historic heritage buildings and their extents of place, as well as the entire site being within the Special Character Area Overlay – Business: Devonport.
27. It is appreciated that the Referral process is not required to demonstrate and detail how a project is to measure against a planning framework. However, based on the documentation provided with the Application, there are both information requirements and gaps that the Applicant will need to address in any subsequent Substantive application, as well as substantive design matters that will need to be addressed further.

28. The greatest concern identified at this preliminary stage is in relation to the overall height of the buildings proposed in the Application, and associated impacts on the immediate town centre and the amenity and values associated with it, as well as the wider locality in relation to potential effects on the significant values associated with the Maunga.
29. Further, there is potential for the Application to adversely impact on the wider roading network during construction and then once in occupation / operation. While there is potential for both aspects to be addressed through a more comprehensive process, and in particular construction effects, a preliminary concern is noted.
30. It is acknowledged that there are several different aspects to the Application that Council's specialists have assessed and not identified any specific concern with the intent or the information anticipated to be provided. The Applicant's comprehensive approach is acknowledged in that respect.

Are there any other relevant matters to consider?

31. There are several relevant matters to consider alongside the above.
32. Watercare have identified, subsequent to earlier discussions with the Applicant, that there is a wastewater capacity issue that the Applicant will need to address before any Substantive application is considered.
33. The extent of the basalt rock below ground level needs further investigation before the Application is progressed further, as previously noted. The level of basement parking levels will be strongly influenced by the basalt rock encountered, and this is reflected in the large range of parking spaces indicated in the Application documentation (80 – 200). Equally, there will be impacts on construction methodology and foundation design and this will have an impact on mitigation measures relating to adjoining properties and may influence the overall building heights contemplated.
34. Existing ground contamination needs further investigation and the extent of this may have an impact on construction phase and ongoing mitigation measures to ensure that exposure to persons and associated human health effects, and effects on the environment and avoided, remedied or mitigated.
35. The Application documentation identifies the likely requirements under the Heritage New Zealand Pouhere Taonga Act (HNZPTA) and Council's relevant specialist has assessed this information and made recommendations for any Substantive application.
36. Finally, the appended expert reviews have identified a range of additional information that would be expected to be provided with any substantive application should the application for referral be approved. We would encourage further pre-application consultation be completed with Council prior to a substantive application being made as the proposal develops and this information becomes available. These information requirements are summarised below for completeness.

Section 17(3)

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.

37. Based on a review of Council records, we confirm that we are not aware of any competing lodged or approved applications.

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.

38. There are no existing resource consents where sections 124C(1)(c) or 165ZI of the RMA could apply.

Auckland Council's Assessment against section 22 of the FTAA

Yes	No	Unsure	Assessment Criteria (Section 22 FTAA)
☐	☐	☒	Does the project have significant regional or national benefits for the Auckland Region?
☐	☒	☐	Has it been identified as a priority project in a central government, local government, or sector plan or strategy, or a central government infrastructure priority list?
☐	☒	☐	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)?

Auckland Council overall feedback

1. Whilst Auckland Council recognise that there will be benefits associated with the development, including investment into Devonport Town Centre and employment opportunities, more information is required from the applicant to be able to fully assess this. In particular, it has not been established and demonstrated, to a sufficiently robust degree, that the Application will have significant regional or national benefits. Auckland Council are of the view that there is an absence of any such demonstration, and also that a cost benefit (CBA) should be undertaken as it is a more comprehensive measure of net gain.
2. As outlined above, Auckland Council also has preliminary concerns around the actual and potential adverse effects, and consistency with relevant objectives and policies in the AUP.
3. It is acknowledged that the use of the fast-track approvals process will enable the Application to be consented in a more timely and cost-effective manner compared to the conventional RMA process, given that any process administered by Auckland Council would likely require public notification, attract considerable interest and likely require a contested resource consent hearing with no guarantee of outcome.
4. While the regeneration of an older town centre will, in principle, bring about benefits associated with the Devonport Town Centre's contribution to a 'well-functioning urban environment', the scale and intensity of the Application may result in an inconsistency with, if not a repugnance to, the relevant provisions within the RMA planning framework applying to the Application site and Application. In particular, and without prejudice or limitation, this would relate to the objectives and policies, and associated values, pertaining to the nearby Maunga (Takuranga / Mount Victoria), the historic heritage and special character of Devonport Town Centre, traffic generation effects on local and wider network, impacts on the structural integrity of nearby and adjacent buildings, and uses / persons occupying those buildings.

Auckland Council Accompanying Feedback

The following attachments are provided to inform the Section 22 decision-making process:

Attachment 1: Economics Specialist Memo

Attachment 2: Devonport Takapuna Local Board Feedback

Attachment 3: Houkura Feedback

If the Minister is minded to refer the Application to the Substantive fast-track approvals process under the FTAA, then the Council provides the following information / requests from their specialists to inform the Applicant's Substantive application. As outlined above, Council look forward to reviewing these matters together with the applicant team.

Economics

- A clearer demonstration of net economic benefits, including the extent to which the anticipated economic activity represents genuinely additional activity rather than redistribution or displacement from elsewhere within Auckland.
- Assessment of the timing and present value of benefits.
- Additional evidence supporting the tourism assumptions, including market analysis, benchmarking against comparable urban regeneration projects, or other empirical evidence demonstrating the anticipated increase in domestic and international visitation.

- Further assessment of catalytic effects, including evidence of how the proposal may stimulate additional private investment, business establishment, redevelopment and long-term economic activity within Devonport beyond the direct effects of the project itself.
- A stronger assessment of regional significance, including why the scale of benefits should be regarded as significant in the context of the Auckland region as a whole, rather than primarily at the local or sub-regional level.

Heritage

- Clear identification of the extent of demolition for all 6 scheduled Historic Heritage places and buildings identified as ‘Character-Defining’ or ‘Character-Supporting’ under the Special Character Areas Overlay – Business: Devonport, with corresponding analysis of the history, significance and contribution of the elements to be removed
- Clear identification of restorative changes, repair methodologies and seismic strengthening proposed for all 6 scheduled Historic Heritage places.
- Details of seismic strengthening for all buildings identified as ‘Character-Defining’ or ‘Character-Supporting’.
- Details of the interface between new work and historic buildings, including section drawings and detail drawings to show the relationship between ‘old and new’
- Accurate visual simulations from a variety of vantage points to demonstrate how the proposal is viewed in relation to the Historic Heritage places and within the Special Character Areas Overlay – Business: Devonport.
- Details of materiality, colour, and finishes.
- Signage design, including any heritage interpretive signage.

Archaeology

- Applicant to consider making provision for the storage and display of an agreed sample of material at appropriate location/s within the development footprint. In addition, interpretation devices, for example, panels or digital trails, should be considered and included with any final spatial or urban design plan process to achieve cohesiveness and enhance the understanding of the new laneways and neighbourhoods.

Urban Design

The following information is necessary to properly assess the proposal’s design, heritage integration, public realm outcomes and effects on Devonport’s character and amenity and should be provided in any Substantive application:

- Floor plans need to clearly identify uses, including lobbies, lifts, refuse areas, and circulation space, necessary to understand how different activities interact.
- A plan that identifies genuinely public spaces within the site and how they will be managed, including access, security and operational arrangements, e.g. businesses operating hours, to ensure the safe use and management of these spaces.

- Additional cross sections to provide relative heights, ground levels, and illustrate the spatial qualities of spaces and outlook conditions, should be provided:
 - between Victoria Road and Wynyard Road, 4 metres south of the arcade entrance; approximately 2.5m south of 41 Victoria;
 - from Clarence Street, in the vicinity of the proposed vehicle access, running parallel to Victoria Road to Queens Parade; and
 - through both corner sites at the Clarence Street-Victoria Road intersection, taken at right angles to Clarence Street.
- Accurate photo realistic visualizations. The current masterplan renderings appear flat and do not convey likely development outcomes.
- Comprehensive information on the materials and colour palettes for all new and retained buildings. This should include restoration works to facades, verandahs and associated architectural elements to better understand the quality and visual character of the completed development.
- A signage strategy should be provided and supported by an understanding of likely pedestrian movements. Signage should be carefully integrated with the scale, composition and architectural characteristics of the building façades while contributing positively to street activity and visual interest.
- Given the visibility of the site from Takarunga / Mount Victoria, additional information showing the appearance of the roofscape, and the location, scale and screening treatment of any rooftop plant and associated structures is required.

Council's Parks and Recreation Team also provided direct feedback that additional information should be provided in relation to:

- The post-completion impact of the development on Windsor Reserve on the eastern side of Victoria Road, particularly with respect to shading and potential impacts on the park user experience;
- What impacts may be experienced, and requirement management to avoid or minimise these, during any construction period, including both Windsor Reserve and any street trees within the immediate roading network surrounding the Application site.

Landscape & Visual

- Specific consideration should be given to views from Maunga around Auckland including Pukekawa (Auckland Domain) and Maungawhau (Mt Eden). This will provide assessment of the degree of potential effect that the proposal has on the visual integrity of Takarunga (Mt Victoria) when considering the visual connections between Maunga.
- Applicant recommended to provide an overview of potential natural character effects on the coastal environment, given the proximity of the site to the coastal edge and its coastal context.
- Although construction is a temporary, necessary and unavoidable part of development, recommended that an overview of construction effects is also addressed within any Substantive application.
- A detailed landscape assessment recommended to be included as part of the ay Substantive application, inclusive of visual simulations and a more comprehensive assessment of potential effects. Specific consideration of the purpose of the Height Sensitive Area Overlay (including an

assessment of potential effects relating to the scale relationship and potential visual dominance) should be undertaken within that assessment.

Development Engineer

- Substantive application to be accompanied by an erosion and sediment control plan, in conjunction with a construction management plan that includes dewatering matters.

Auckland Transport

- Applicant is requested to ensure that any Substantive application is supported by the intended Integrated Transport Assessment (ITA) that addresses the impact of the development on the immediate and wider transport network (critically Lake Road, given it is known to be a highly sensitive part of the wider transport network), both during and post-construction, in order to identify measures to suitably avoid, remedy and/or mitigate adverse effects on the roading environment.
- Construction traffic management will require specific assessment and consideration up front (inclusive of a draft Construction Traffic Management Plan), given the likely duration of construction activity requiring resource consent in its own right.
- Potential flooding effects of the development on the local roading network, resulting from displaced flood storage, will need to be specifically addressed.
- Operational matters will require further consideration in any Substantive application, including: vehicle crossing design and pedestrian safety, trip generation impacts (esp on the wider network), and loading and servicing (including any use of the road reserve for servicing – a draft Servicing and Loading Management Plan is recommended to be provided).

Traffic Engineer

- Applicant is recommended to provide further information around, and undertake design changes in relation to, the following: primary pedestrian access being better separated from vehicle access, internal access and parking within the building envelope / footprint, demonstration of practicability of spaces by larger service vehicles, parking provision and design for all modes, Construction Traffic Management.

Geotechnical

- Any Substantive application should include further site-specific investigations to better understand the depth and quality of basalt and East Coast Bays Formation (ECBF) soils and liquefaction matters, assessment of these investigations and detailed foundation designs that address the investigations.
- Any Substantive application should also include additional information to address the potential for construction vibration associated with basalt excavation with particular focus on the adjacent heritage buildings. The risks can be managed through additional site investigations, appropriate excavation support design, construction methodology, condition surveys, and monitoring during construction, as recommended by Applicant's geotechnical specialists.

Healthy Waters

- Information should be provided with any Substantive application to confirm that the final design of the proposal can achieve the relevant performance requirements for *Brownfields Small* developments under the Region-wide Network Discharge Consent (**RWNDC**).
- There are known capacity constraints within some of the existing stormwater networks surrounding the development. Preliminary investigations for upgrade options for the network within Victoria Street have been undertaken by Healthy Waters & Flood Resilience (**HWFR**). These constraints have been discussed with the Applicant's Agents and HWFR welcome further engagement on possible mitigation that may be able to be implemented to support the networks performance if the Application is to proceed.
- Further design information is recommended to be provided to demonstrate how basement access and any below ground structures will remain appropriately protected from flood hazard risk.

Watercare

- Following further network assessment, Watercare is unable to confirm sufficient wastewater network capacity is available to support the proposed development without an appropriate and agreed mitigation solution. Watercare acknowledge that this position varies from that outlined in the previous Consult Letter issued to the applicant.
- While the King Edward Wastewater Pumping Station may have sufficient pumping capacity to accommodate the proposed additional Peak Wet Weather Flow (PWWF) of 3.5 L/s, the upstream gravity pipeline has limited capacity and requires further detailed assessment to better understand the potential risk of surcharge or overflow and determine whether any network upgrades may be required.
- The Pumping Station is also located within the constrained Seabreeze wastewater catchment, which has existing network performance challenges. The additional flows associated with the proposed development may contribute to increased pressure on this catchment.
- While there may be an opportunity for the applicant to mitigate the potential impacts through increasing the storage capacity at the existing King Edward Drive storage tank, this option would require further investigation with the applicant and Watercare's planning team to confirm its technical feasibility and suitability.

Contamination

- Further investigate ground conditions associated with the historic use of 1-3 Wynyard Street as a service station. While remedial works involving the removal of contaminated soil appear to have subsequently been undertaken under Consent LUC60022751, the status and extent of any residual groundwater contamination have not been confirmed and remain uncertain
- Further investigate potential contamination associated with the 1988 fire at 17 Victoria Road. Particular consideration should be given to contaminants that may be associated with fire-damaged land, including per- and polyfluoroalkyl substances (PFAS) from firefighting foams, asbestos-containing materials, and lead-based paint residues.
- In the absence of further assessment, the potential for vapor intrusion into the proposed development remains uncertain. This is particularly relevant given the site's proximity to former petrol station and mechanical workshop activities, as well as the neighbouring dry-cleaning operation.

Groundwater

- Implement the Applicant's groundwater specialist recommendations, namely further site-specific investigations, detailed geotechnical assessment, detailed settlement analysis on neighbouring properties, engineering design, construction supervision, and the preparation and implementation of a Groundwater and Settlement Monitoring and Contingency Plan (GSMCP), supported by appropriate and comprehensive consent conditions.

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.

Carly Hinde

Principal Project Lead

Premium Resource Consents

Auckland Council

17 July 2026

Attachment 1: Economics Specialist Memo

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 & FTAA number	Devonport: FTAA-2602-1172
----------------------------	---------------------------

Respondent Information

Name	Derek Foy
Role	Economics consultant
Agency / Department	Formative Limited
Date	30 June 2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

Agency/Department Response

While I consider that the proposal is likely to generate positive economic effects, I am not certain that the information provided demonstrates those benefits reach the threshold of significant regional benefits contemplated by the Fast-track Approvals Act.

The Economic Impact Assessment (**EIA**) identifies substantial construction activity and presents a plausible case for improved town centre vitality and increased tourism. However, many of the quantified operational benefits rely on scenario assumptions rather than empirical evidence, and many of the assessed economic benefits will not be net additional benefits to the Auckland region.

Given Auckland's large and diverse economy, it is not immediately evident that the scale of both one-off and ongoing economic benefits would, in themselves, be regionally significant, even if the EIA 's position that "a significant impact, at the regional level (as identified in the Act), may more usefully be defined in terms of a smaller geography than the Regional Council boundaries – especially in Auckland" is accepted.

The EIA has not accounted for negative economic impacts that will arise during the construction period through disruption to existing businesses in the centre. Omission of those negative effects means the positive effects will be overstated.

My neutral position should not be interpreted as disagreement that the project has economic merit, but rather reflects some uncertainty as to whether the evidence currently presented demonstrates the level of significance required under the FTAA.

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

Does the project have significant regional or national benefits?

It is unclear. The EIA has stated that a meaningful measure of significant regional benefits is “if the development is able to generate impacts that are large in themselves, are noteworthy at the citywide scale and may be highly significant at the local level”. That is broadly consistent with recent FTAA decisions which have identified the issue that no single development can generate a significant impact in terms of contribution to Auckland’s GDP, and therefore some different (i.e. lesser) interpretation of significance must be implied by the FTAA.

If that (lesser) interpretation is preferred then the project may have significant regional benefits, but in my opinion adopting a narrow geography (the Devonport suburb) and economic sector (the Devonport centre and its economic functioning) as the EIA has done swings the interpretation too far the other way and would mean a very broad range of projects would generate significant regional benefits, which cannot be the intention of the FTAA which is meant to apply to large developments.

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

From an economic perspective, yes, although this is not addressed in the Economic Assessment. From the Referral Planning Report by Tattico, while many of the proposed activities (dwellings, visitor accommodation, commercial services, entertainment facilities, retail, and offices) are permitted under the Unitary Plan, the project would be publicly notified and subject to a local authority hearing because of other planning rules that apply to this location (height, view shafts, and heritage).

It is reasonable to conclude that referral through the Fast-track process would enable delivery of the project more quickly, allowing any economic benefits to be realised sooner than under an RMA application.

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

From an economics perspective I would expect that the referral would not 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?

Unknown, and no such identification is stated in the application.

Will the project deliver new or support existing regionally/nationally significant infrastructure?

No, in my opinion the project will not deliver new or support existing regionally/nationally significant infrastructure.

Will the project increase housing supply or contribute to a well-functioning urban environment?

Yes. The project will result in an increase in housing supply, as it will include some 80 to 90 apartments, replacing an unstated (although small, indicatively around 10) number of dwellings that already exist in the project area. From an economics perspective the up to 50 hotel rooms proposed should not be included in the assessment of increased housing supply, as visitor accommodation is a different market to residential dwelling supply.

In addition to increasing housing supply, the proposal incorporates commercial, retail and visitor accommodation uses that are expected to increase activity, support local businesses, improve the vitality of the Devonport town centre, and make more efficient use of existing infrastructure. As a long-established commercial centre, rejuvenation and densification of the centre, including an increase in the scale and types of activities provided in the centre will be a positive outcome of the project. These outcomes are consistent with the characteristics of a well-functioning urban environment.

Will the project deliver significant economic benefits?

In my opinion the proposal is likely to deliver significant local economic benefits across both the construction and operational phases. During construction, the project would generate substantial investment in Devonport local area, employment and value added, providing a short-term stimulus to the economy. However, those benefits will be offset to some degree by negative economic effects arising from disruption to the operation of businesses in the centre and the centre itself during the construction period. Those negative effects will arise through construction activity requiring large parts of the centre to be vacant for extended periods, and from the disruption caused by construction activity, including construction vehicles and access points, parking spaces being removed, and construction noise. I acknowledge that those effects would be of limited duration, but they will make the centre less attractive than it currently is for some period, and will counter some of the economic benefits assessed, and should be factored into the assessment of economic effects.

Once operational, the proposal would increase housing supply, introduce additional visitor accommodation, modernise commercial and retail premises, and support increased activity within the Devonport town centre.

These post-construction economic benefits to the Devonport town centre will be significant in the local area, and potentially induce other centre revitalisation through increased visitation, business confidence and private investment. While some of the benefits, particularly those relating to tourism and expenditure, are based on scenario assumptions and therefore indicative only, I consider there is some evidence to conclude that the project would deliver significant economic benefits overall within the local Devonport economy, although that evidence is scenario based rather than empirical. It is important to assess both the quantified economic impacts and the broader qualitative benefits associated with town

centre revitalisation, increased housing, heritage-led redevelopment and improved urban amenity, as these are likely to represent an important component of the project's overall economic contribution.

Will the project support primary industries (e.g., aquaculture)?

No.

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

No.

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

No.

Will the project support climate change adaptation or recovery from natural hazard events?

No.

Will the project address significant environmental issues?

No.

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

Broadly yes, noting this is primarily a planning matter. From an economic perspective, the proposal is generally aligned with the strategic direction of regional and local planning documents that encourage urban intensification, mixed-use development, efficient use of existing infrastructure, and the strengthening of established centres. The proposed redevelopment has the potential to contribute positively to these strategic outcomes through additional housing, commercial activity and town centre revitalisation. However, my understanding is that there are also other planning provisions that apply to this location, including height limits, view shafts, and heritage controls, with which the proposed development may not be consistent.

Are there any other relevant matters to consider?

From an economic perspective, no additional matters materially affect my conclusions. I note, however, that while the construction-related analysis is based on established economic modelling techniques and provides a reasonable indication of the scale of economic activity associated with the project, the operational impacts are necessarily more judgement-based and are not strongly evidence based. As such the operational benefits should be interpreted with caution.

Auckland Council Criteria

From an economic perspective, the application meets most of the Auckland Council assessment criteria relevant to economics. The proposal would deliver a range of positive economic outcomes, including enabling construction activity, additional housing supply and visitor accommodation, improved commercial premises, and the revitalisation of an established town centre.

Notwithstanding this, the assessment is stronger in demonstrating that the proposal will generate positive and potentially significant economic benefits in the local Devonport economy than it is in demonstrating that those benefits satisfy the higher threshold of significant regional benefits contemplated by the Fast-track Approvals Act. Many of the enduring benefits such as those relating to tourism are (necessarily) based on scenario assumptions and professional judgement rather than empirical evidence. Accordingly, some caution should be exercised in the weight placed on these quantified estimates.

While I acknowledge that EIAs have become the predominant form of economic evidence accompanying Fast-track applications, they should not necessarily be regarded as the optimal framework for assessing whether a project generates significant economic benefits. EIAs primarily measure changes in economic activity and therefore tend to emphasise gross impacts, without fully accounting for displacement, transfer effects, opportunity costs or other factors relevant to determining net benefits to society. A Cost-Benefit Analysis (**CBA**) would have enabled a more comprehensive assessment of the project's economic efficiency and the extent to which the claimed benefits represent genuine net gains. Nevertheless, given current practice and the qualitative nature of many of the project's anticipated benefits, I do not consider the absence of a CBA materially undermines the conclusions reached in the EIA.

Overall, I consider the Economic Impact Assessment provides a credible basis for concluding that the proposal is likely to generate meaningful economic benefits and make a positive contribution to housing delivery, town centre vitality and the functioning of the Devonport town centre. However, whether those benefits are of sufficient magnitude to satisfy the FTAA threshold of significant regional benefits ultimately remains a matter of planning judgement informed by, but not determined solely by, the economic evidence.

To better understand the potential economic effects against FTAA criteria, the Economic Impact Assessment would need to provide a more robust assessment of the economic costs and benefits, in order to show that the costs do not outweigh the benefits, and also to enable a conclusion as to whether the proposal will have significant regional or national benefits. If the application is referred and proceeds to the substantive phase, I recommend that an economic assessment provided at that stage should provide:

- A clearer demonstration of net economic benefits, including the extent to which the anticipated economic activity represents genuinely additional activity rather than redistribution or displacement from elsewhere within Auckland.
- Assessment of the timing and present value of benefits. The Economic Impact Assessment identifies a range of benefits occurring over different time horizons, including one-off construction impacts and ongoing operational benefits. A more comprehensive assessment would consider the time value of money by expressing future streams of costs and benefits in present value terms. This would provide a clearer understanding of the enduring economic value of the proposal and enable more meaningful comparison between short-term construction effects and longer-term operational benefits.

- Additional evidence supporting the tourism assumptions, including market analysis, benchmarking against comparable urban regeneration projects, or other empirical evidence demonstrating the anticipated increase in domestic and international visitation.
- Further assessment of catalytic effects, including evidence of how the proposal may stimulate additional private investment, business establishment, redevelopment and long-term economic activity within Devonport beyond the direct effects of the project itself.
- A stronger assessment of regional significance, including why the scale of benefits should be regarded as significant in the context of the Auckland region as a whole, rather than primarily at the local or sub-regional level. It is noted that the catchment applied in the assessment is home to only 4,315 households, which warrants some discussion as to how that geography can be used as the basis for assessing regional significance.
- I recognise that some of the effects described in this list are difficult to predict, and recommend sensitivity testing of key assumptions, particularly those relating to commercial occupancy and employment generation, to demonstrate the robustness of the conclusions under a range of plausible scenarios, as has been attempted for the visitor expenditure assessment in the Economic Impact Assessment.

Attachment 2: Devonport Takapuna Local Board Feedback

Feedback from the Devonport-Takapuna Local Board

Prepared by Trish Deans, Chairperson and Resource Consent Lead
Devonport-Takapuna Local Board

07 July 2026

Fast-track Approvals Act 2024

Project Name: Devonport Mixed Use Development

Location: 14 units in Devonport town centre, around Victoria Road and Wynyard Street

RE: DEVONPORT MIXED USE DEVELOPMENT REFERRAL APPLICATION by DEVONPORT PROPERTY MANAGEMENT LIMITED

The Devonport Takapuna Local Board (DTLB) asks Minister for Infrastructure to consider the following concerns in relation to the Fast-Track Approvals Act legislation:

1. The applicant claims incorrectly to have consulted with the Devonport-Takapuna Local Board (DTLB). No request has been made by Devonport Property Management Limited to present a petition, make a deputation or speak at a public forum. The minutes from the DTLB business meetings dating back to February 2026 until now do not record any such deputation.
2. Does this application by Devonport Property Management Limited meet the criteria for assessing a Fast-Track Referral Application? The Fast-Track Approvals Act 2024 specifies:

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

3. Specifically, is this project the kind of project to be facilitated by the Fast-Track Approvals Act (FTAA)? Does this application demonstrate that the project will generate significant regional or national benefits? [FTAA Clause 22(1)(a)].
4. The operative Auckland Unitary Plan (AUP) already permits a reasonable amount of development in Devonport Town Centre at a reasonable scale. The project's proposed gross floor area of retail and commercial space, as well as the number of apartments, is not significantly more than what could be built under the AUP.
5. Does this project make a significant contribution, over and above what the AUP already enables? Is this project addressing the serious shortfall in housing in Auckland or towards Auckland Council meeting the Government's requirement for Plan Change 120 to provide 1.4 million new homes? The development offers 80-90 apartments, and these apartments are unlikely to be affordable to the first home buyers seeking a foot on the apartment ladder. Is this sufficient to be considered by the FTAA process?
6. The ten-year consent lapse period sought for the project indicates that the project is not urgently needed. A ten-year consent lapse period is inconsistent

with the scheme of the Fast-Track process which involves limited consultation and processing timeframes because the development enabled by an application is urgently needed in terms of the supply of housing or provision of infrastructure.

7. The project is not identified as a priority project in a central government, local government, or sector plan or strategy [FTAA Clause 22(2)(a)(i)].
8. The DTLB recognises the economic benefits that the project and the construction will deliver. During the first year where 1,198 construction workers and a wide range of sectors will be employed. We note that there will also be widespread disruption, as well as traffic flows on Lake Road, will be severe and sustained over a very long period, which will significantly affect the economic well-being of the local community (see 19).
9. The applicant's states that the project will increase international visitors by as much as 35,000 per year should be treated by the Panel with caution.

This matter needs consideration. Visitors, both overseas and across NZ, travel to Devonport to enjoy the integrity and distinct visual qualities of its heritage features, both built and natural, as a collective whole. Devonport is promoted as a destination worth visiting by travel guides. Devonport has a national identity as an authentic historic village. Our Devonport community will ask – what will be the economic impact on the value of historic integrity of the village, given the bulk and scale of the development?
10. The project is not consistent with local or regional planning documents, including spatial strategies [FTAA Clause 22(2)(a)(x)]. The project is non-complying and infringes key planning rules, to a significant degree. These infringements will fundamentally change the character, quality and amenity of Devonport Town Centre with their significant adverse effects (see para 13-19).
11. The applicant concedes that the project is considered to be a non-complying activity overall (Tattico Report, p41). The applicant agrees that this project under the RMA would be publicly notified and subject to a local authority hearing.
12. The question that must be asked and satisfied – is Auckland Council better placed to consider the application? Given that the current zoning and its restrictions were arrived at after robust public processes to establish the most appropriate rules to apply to this designated Special Character Area (Business). Overlays have been set to accommodate all of the diverse objectives. Are these matters considered in the FTAA process?

Devonport-Takapuna Local Board raises the following local concerns:

The applicant has listed the following Auckland Unitary Plan Overlays that apply to the subject property: Height and Building Sensitive Area, Historic Heritage Extent of Place and Special Character Area – Business Devonport. These are the concerns to consider:

13. The existing Height Sensitive Area overlaid on Devonport Village maintains Takarunga / Mt Victoria's overall contribution as a regionally significant volcanic maunga and outstanding natural feature to the landscape of Auckland.

14. The project infringes the 13 metres Height Sensitive Areas standard as set out on Figure D14.10.1 by up to 17 metres. Buildings exceeding 9 metres require resource consent under this rule as a non-complying activity.
15. By infringing the Height Sensitive Areas Overlay, to a very significant degree, the project will diminish the status of the maunga in the wider landscape (regionally significant), and block local views of the maunga, including from the water and arrival at Devonport Wharf (locally significant). Takarunga/ Mt. Victoria is scheduled as an Outstanding Natural Feature (ONF). The project will create a new foreground view of tall buildings which compromises the planned intimate relationship between maunga and town centre.
16. The proposed seven to eight storey-built form will also have significant adverse effects on the heritage values of the main street and overall character of the town centre. The scale and height of the project overwhelm the main street, which is recognised throughout New Zealand as an historic site with a coherent, and almost unparalleled, streetscape of scheduled Category A and B historic heritage buildings within the Historic Heritage Extent of Place Overlay.
17. The applicant's proposal to "adaptively re-use" six scheduled historic heritage buildings on Victoria Road is confusing and unclear. The question becomes - which specific elements of the proposal are considered to trigger the non-complying activity status? Many of these buildings' unsympathetic additions and alterations should be removed but the applicant's planner states that the intention is to demolish over 70% of six scheduled Category A and B Historic Heritage buildings recognised in the AUP.
18. The applicant says that this project represents good urban design. We note that re-development of the Britomart precinct in Central Auckland, which the applicant has referred to as a positive precedent and benchmark for its Devonport project, was subject to a public masterplan process prepared by Auckland City Council in the late 1990's/early 2000's. This process was only begun after a developer-led proposal, which was abandoned. A new developer agreed to conform to the Council's masterplan which protected and enhanced the heritage buildings while enabling complementary-scaled new buildings adjacent to them. The developer has faithfully executed the Britomart masterplan over the past twenty years, with the approval and support of all stakeholders. The Britomart precinct project is recognised as a successful outcome for Auckland.
19. The construction time to complete the whole project will realistically occupy the most part of a decade. The disruption to Devonport Town Centre, as well as traffic flows on Lake Road, will be severe and sustained over a very long period, which will significantly affect the economic well-being of the local community. If the project is staged, then the Board considers that only the initial stage should be considered as part of claimed project economic benefits.
20. The Board considers the more realistic completion time of ten years is why the applicant seeks a ten-year consent lapse period (see also para 6). This much longer consent lapse period could only be supported if the applicant agreed to an alternative masterplan process with the full involvement of Auckland Council,

Devonport-Takapuna Local Board and the local community, who are significantly affected.

21. The Board notes that the Watercare assessment report indicates problems with Devonport's wastewater capacity. Watercare states "this letter doesn't constitute a pre-approval' and does not guarantee that capacity will be available at any time in the future'.
22. **In summary:**
 - a) **The DTLB questions whether this application meets the criteria set out in the FTAA legislation for assessing a Fast-track Referral Application.**
 - b) **In particular, the DTLB asks whether this application meets the criteria set out for regional and national significance**
 - c) **The DTLB asks should this application be progressed under the standard Resource Management Act (RMA) pathway? Is Auckland Council is better placed to consider the application?**

Trish Deans

Chairperson and Resource Consent Lead
Devonport Takapuna Local Board

Trish Deans contact: s 9(2)(a)

Attachment 3: Houkura Feedback

Houkura

At this stage, the engagement to date shows limited engagement with Ngāti Whātua Ōrakei in late 2025/early 2026. They have deferred to Ngāti Paoa. Engagement with Ngāti Paoa has been more fulsome, though still limited in time and duration. Ngāti Paoa are supportive of this project proceeding to the next step. However, there has been very limited to no engagement with other iwi (outlined below).

The documentation for the overall project is clear, though the evidence of engagement and consideration of issues raised by Tūpuna Maunga Authority are not evident in the information provided by the applicant. Based on this, the Secretariat is not supportive of this request at this stage until further information and engagement is provided.

We note that the applicant has also contacted the following (though no evidence of responses has been provided in the documentation):

Ngāti te Ata, Ngāti Whanuanga, Te Akitai Waiohū, Te Patukirikiri, Ngāti Whatua o Kaipara, Ngāti Maru, Ngāti Tamatera, Te Kawerau a Maki, Ngai Tai ki Tamaki, and Te Runanga o Ngāti Whatua.

Tūpuna Maunga Authority have been engaged but have reservations about the impact of the project on:

- The extent of adverse impact from the sea and wharf as you arrive in Devonport. The magnitude of this effect is difficult to assess without clear heights (Reduced Levels not just storeys), visualisations and materiality.
- The lack of photomontages of the proposed development with accurate heights from Viewpoints 1-4 and Viewpoint 7 to provide clarity around the impact from the coastal edge and water, and from Takarunga to the coastal edge.
- The extent of adverse impact on understanding the overall unique form of Takarunga from the lower end of the eastern side Victoria Road, up to and including the Devonport Library.
- The cumulative effect of such an infringement/height of buildings if the scale of the buildings were to form part of the existing environment. This may result in an erosion of the purpose and objective of the Height Sensitive Area around the Devonport Town Centre and adjacent area.
- A detailed assessment of Maunga to Maunga connections has not been undertaken.
- A detailed assessment maunga to moana connection.



Caleb Hamilton
Pouārahi | Principal Advisor
Ngāti Raukawa ki te Tonga, Kai Tahu

s 9(2)(a)

W www.houkura.nz



Houkura
Independent Māori
Statutory Board

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



20 July 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0035054

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the following referral applications:

Out of Scope

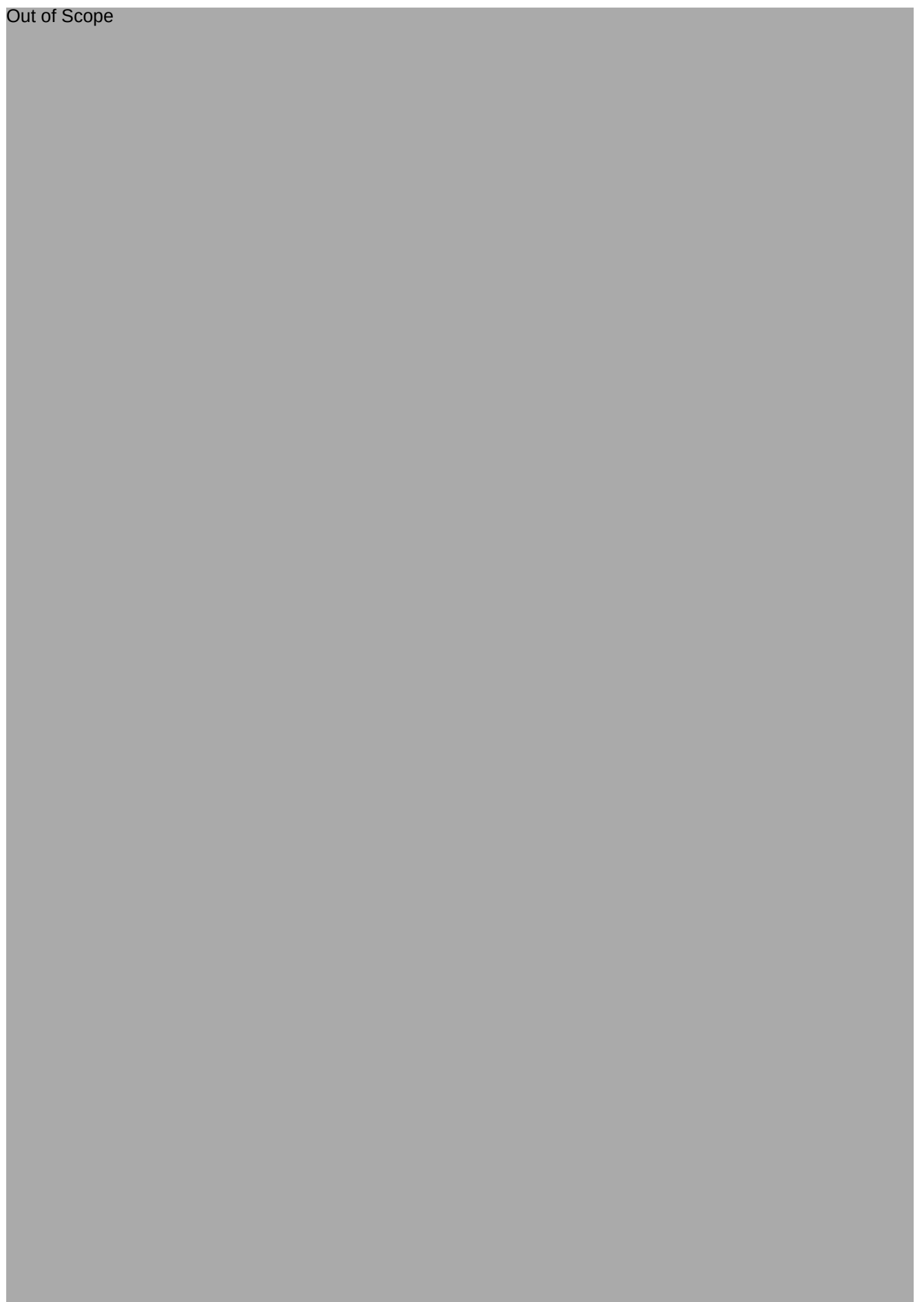
- Devonport Mixed Use Development, FTAA-2602-1172

Out of Scope

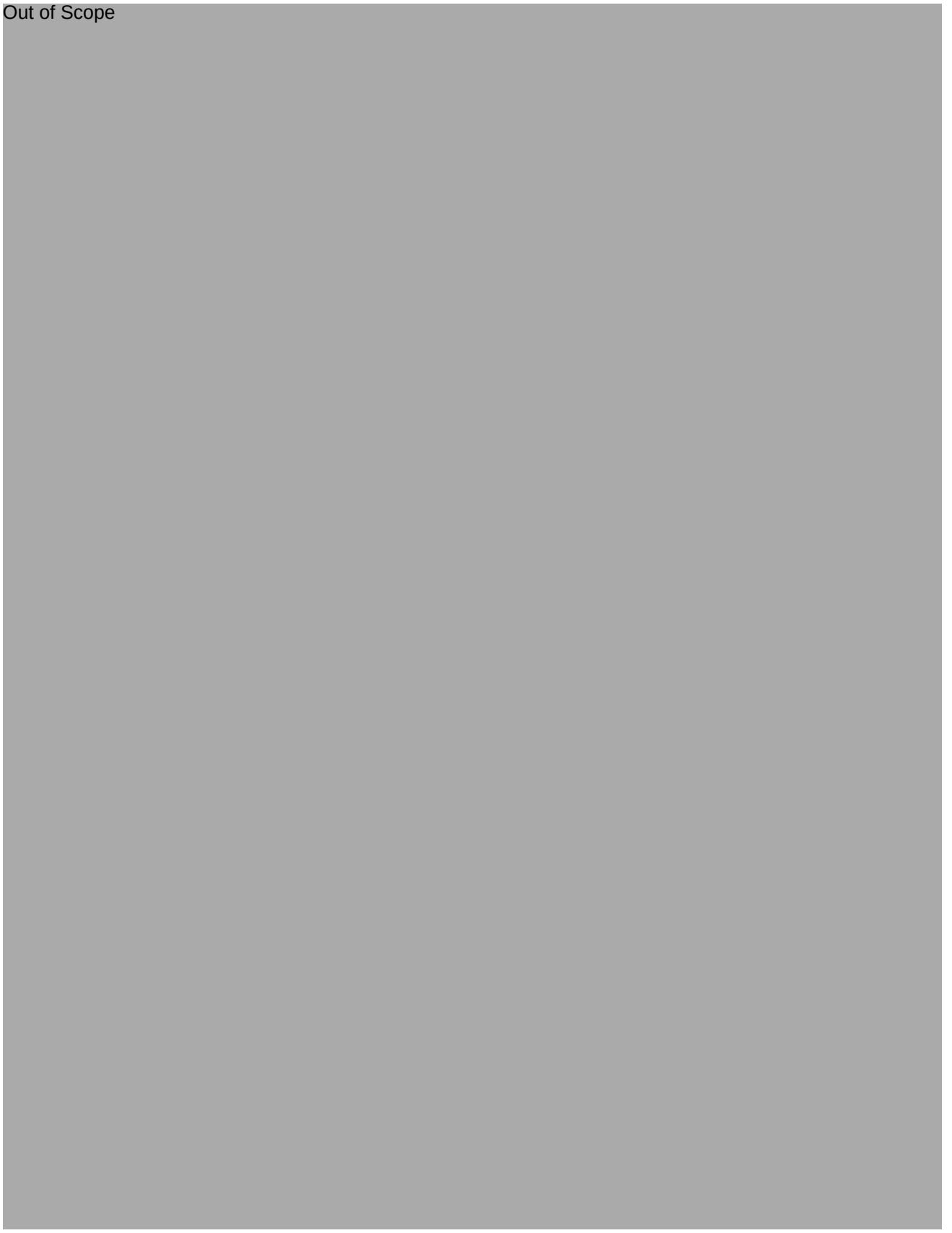
I am providing comment in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided in their referral applications.

Out of Scope

Out of Scope



Out of Scope



Devonport Mixed Use Development, FTAA-2602-1172

The proposal is for a comprehensive, mixed-use urban town centre development in Devonport, Auckland, comprising five new buildings, delivering approximately 50 hotel rooms and 80 to

90 residential apartments, alongside the refurbishment of six heritage-listed buildings and supporting infrastructure including laneways, a central courtyard, parking and water and wastewater services.

According to the independent economic assessment provided by the applicant, the five-year construction period is expected to generate a direct GDP value-add of \$111 million in Auckland, rising to \$402 million once indirect and induced impacts are included. During this period, 240 FTEs are expected to be sustained annually over five years, with peak employment of 524 FTEs in year 4 of its construction. Total project expenditure is estimated at \$398m. Once operational, the development is expected to support 40 to 58 FTEs, with the revitalisation of Devonport's urban area and increased visitor spend of \$7.5m to \$16.6m per annum.

In the short to medium term, the primary benefit of the proposal is the direct value-add to GDP and employment generated during its construction and development phase. Over the longer term, the primary benefit is increased housing supply, alongside potential support for the local tourism economy. This proposal may therefore be considered under s22(2)(a)(iii) of the Fast-track Approvals Act, to the extent that it would increase housing supply, address housing needs and contribute to a well-functioning urban environment in Devonport.

Out of Scope



Out of Scope

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', with a large, sweeping initial 'N'.

Hon Nicola Willis
Minister for Economic Growth

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



20 July 2026

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

Tēnā koe Minister Bishop,

Invitation to comment on the Devonport Mixed Use Development Project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the **Devonport Mixed Use Development 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	Devonport Mixed Use Development
---------------------	---------------------------------

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.			
*Portfolio	Tourism and Hospitality		
*First name	Ella		
*Last name	Stephens		
Contact person (if different from above)			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application

We have been asked to provide comments on behalf of the Minister for Tourism and Hospitality on Devonport Property Management Limited's application to use the fast-track process for the Devonport Mixed Use Development. Accordingly, our comments focus solely on tourism and hospitality considerations.

According to the developer's economic analysis report, the project has the potential to support regional tourism activity in Devonport through the provision of new accommodation and hospitality offerings. The report indicates that the development could increase visitation and tourism expenditure, including through additional domestic and international visitors, day visitor spending, and hotel guest expenditure. However, the projected increase in visitation is recognised as having a level of uncertainty, particularly for international tourism.

While tourism and hospitality comprise only a small part of the overall development, we consider the proposal may help generate economic, visitor, and employment benefits for Devonport, supporting the Government's goal of doubling tourism exports by 2034, and contributing to workforce outcomes.

Minister's signoff



Hon Louise Upston

Minister for Tourism and Hospitality

22/6/15 Date

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

Project name	Devonport: FTAA-2602-1172
--------------	---------------------------

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)	Auckland Transport		
*First name	Matthew		
*Last name	Richards		
Postal address	20 Viaduct Harbour Avenue, Westhaven, Auckland 1010		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

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.

Managers signoff

Matthew Richards

Date: 14/7/2026

1 Introduction

- 1.1 Thank you for the opportunity for Auckland Transport (“**AT**”) to comment on this referral application for consideration under the Fast Track Approvals Act (“**FTAA**”), involving the comprehensive redevelopment of a substantial proportion of the Devonport Town Centre (“**DTC**”). It is understood that the scope of the proposal involves the adaptive re-use of six existing historic heritage buildings, alongside the construction, and use, of five new buildings towards the rear of the scheduled historic heritage buildings ranging between five – eight storeys in height accommodating a range of different activities.
- 1.2 AT remain neutral on whether this referral application should be accepted for further consideration under the FTAA. The development site is located within a busy town centre environment, frequented by a considerable number of visitors with high rates of pedestrian foot traffic, and is solely accessible for vehicles and buses via Lake Road, which is known to be a highly sensitive part of the wider transport network. As such, a comprehensive assessment by way of a detailed Traffic Impact Assessment (“**TIA**”) is necessary to establish any resulting impacts upon the transport network, both during and post-construction, in order to identify any mitigation measures that might be needed to suitably avoid, remedy, or mitigate any adverse impacts as appropriate.
- 1.3 AT remains available for pre-lodgement discussions with the Applicant either directly or via Auckland Council, should this be required, and welcome an opportunity to discuss the application further.

2 Initial Comments

2.1 Construction Traffic Related Impacts

- (a) As part of AT’s prior involvement at pre-application stage, it was understood that Applicant’s construction duration would be up to a period of five years (approx.). Details surrounding the length of construction and supporting assessment of construction related impacts upon the transport network have not been provided at this stage. However, this is an aspect of the application that will require resource consent under Section E40 – “*Temporary Activities*” of the Auckland Unitary Plan (Operative in Part) (“**AUP(OP)**”), to exceed the maximum 24 month duration provided for as a permitted activity for any

construction related activity(ies) under Rule E40.4.1(A20). As such, resource consent would be required as a restricted discretionary activity under Rule E40.4.1(A24) of the AUP(OP).

- (b) Based on the duration of construction, the sensitivity of the wider transport, and lack of a suitable alternative route for construction vehicles, there is a potential for significant transport related impacts to occur, even with appropriate management. The nature of impacts that could arise from any related construction activities associated with the redevelopment relate to both safety and operational (congestion / delay) upon the immediately surrounding and wider transport network, including nearby properties.
- (c) A detailed assessment of any construction traffic related impacts is required at the time of the Applicant's substantive application. This should include (but not be limited to), a draft construction traffic management plan that includes details of any necessary temporary traffic management measures, a high-level programme of works detailing key stages of the construction programme (which should include details of key construction routes and indicative locations of any construction staging area / road closure(s), where required), and a construction focused TIA that establishes how any construction vehicle(s) can be accommodated within the adjacent and wider transport networks. As part of the construction focused TIA, the Applicant should provide an assessment of (but not be limited to) the types and frequencies of any construction vehicles required based on the high-level programme of works; including the distribution of average vehicles per hour / daily throughout a typical workday; tracking for any construction vehicle to identify whether any permanent / temporary kerb modifications are required to enable movements for any heavy construction vehicles to suitably access the subject site / any construction staging area(s).

2.2 Flooding Effects Upon Adjacent Transport Network

- (a) The subject site is identified by Council's GIS Viewer as being subject to multiple flooding hazards, which include the 1 per cent Annual Exceedance Probability ("AEP") Floodplain; overland flow path(s); and flood prone area. Whilst acknowledging that a high-level flood assessment has been provided as part of this referral application, at substantive stage AT request further information to establish whether the potential displacement of on-site flood

storage would influence the characteristics, in terms of depth and velocity, of any flooding experienced by any road user(s) within the surrounding roads post-construction.

2.3 Operational Transport Effects

(a) *Vehicle Crossing & Safety Impacts Upon Pedestrians*

- (i) The subject site is located within the DTC, which has high numbers of pedestrians within and surrounding the development site. Therefore, the design of the proposed vehicle crossing and potential conflict(s) with pedestrians is key area of concern to AT to ensure that the outcome is safe and does not detract from the anticipated amenity for the DTC.
- (ii) Section 3.2 of the traffic memorandum prepared by Commute, dated 18th May 2026, identifies that the proposal would have a primary vehicle access of Wynyard Street with a secondary access off Clarence Street. The existing vehicle crossings to the development site are intended to be either removed or reinstated as pedestrian only. AT supports the conversion of the existing vehicle access onto Victoria Road as pedestrian only, which will be a significant improvement to pedestrian safety along this road. Similarly, the approach to securing vehicle access onto Wynyard Street essentially involves the consolidation of several vehicle accessways into one. This is a supported outcome and would similarly serve to reduce the number of conflict points and improve pedestrian safety.
- (iii) Instead of the Victoria Road vehicle access, part of the development site is intended to gain access directly from Clarence Street, which does not currently maintain a vehicle crossing onto this road. While Victoria Road and Clarence Street are both subject to Key Retail Frontages (“**KRF**”) under the Plan, AT are of the view that Victoria Road is the more critical of the two and note that the new access onto Clarence Street would incorporate visibility splays, which the Applicant intends to provide further details around.
- (iv) Further information is required on both proposed vehicle crossings to assess the degree of safety that will be achieved for both pedestrians

and other road users at these locations. The information required includes, but is not limited to, whether each vehicle crossing(s) can be designed to comply with the 1 in 20 / 5% gradient included in Standard E27.6.4.4(3) of Section E27 – “*Transport*” under the Auckland Unitary Plan (Operative in Part) (“**AUP(OP)**”); the exact dimensions of the required visibility splays; traffic calming, such as vehicle humps, to achieve a low speed environment; and the number of vehicle movements at each vehicle crossing. Non-compliances to Standard E27.6.4.4(3) are not considered to be a supported outcome in this context, noting the anticipated frequency of use for each proposed vehicle crossing and anticipated number of pedestrians that will be present within the DTC.

(b) *Trip Generation Impacts (Local Network Performance & Safety)*

- (i) At substantive application the stage, the Applicant will need to provide further assessment of any trip generation related effects to confirm that the proposal will not result in any unacceptable congestion or delay issues to the surrounding transport network. Within Section 3.1 of the traffic memorandum, three intersections surrounding the subject site have been identified for further SIDRA modelling to be undertaken at substantive application stage. AT considers that these three intersections are reasonable, however modelling should be extended to include consideration of the Victoria Road and Queens Parade intersection. AT are particularly interested in establishing any resulting impacts that the proposal may have on buses, as reliable travel times for buses connecting to the ferry terminal are important to maintain viable public transport alternatives. Modelling should cover both AM and PM weekday commuter peaks as well as the Saturday morning peak. Scenarios modelled should include a base scenario (pre-existing situation), a base plus development traffic scenario, and a sensitivity check base + 120% of development traffic scenario.

(c) *Trip Generation Impacts (Wider Network)*

- (i) The focus of the Applicant’s transport memorandum appears to be centred on the local network and does not appear to provide any intention of considering any wider transport network effects beyond the

adjacent intersections / immediately surrounding. However, AT considers that any assessment of related trip generation impacts, such as the potential congestion and/or delay to the operation of the network, must be broadened in scope to include the wider transport network, particularly Lake Road. Modelling must be undertaken at key intersection along Lake Road, which must include:

- (A) Lake Road / Albert Road;
- (B) Lake Road / Bayswater Avenue;
- (C) Lake Road / Bardia Street;
- (D) Lake Road / Jutland Road;
- (E) Lake Road / Esmonde Road;

- (ii) Whilst it is not expected that all 128 vehicle trips generated by the site to all travel the full length of Lake Road, there will be some that do. The Applicant should provide a clear rationale for any reductions in the number of new trips along the Lake Road route. The same peaks and scenarios should be used for this modelling as for the modelling undertaken at intersections adjacent to the site. This should include any trips resulting from any known unimplemented resource consents, which form part of the receiving environment, including (but not limited to) the Bayswater Marina redevelopment authorised in the consent decision described by the Council as BUN60373319.
- (iii) AT's Auckland Forecasting Centre ("AFC") maintains a current model, last updated in 2025, between the intersections of Lake Road / Esmonde Road through to Lake Road / Albert Road. AFC have confirmed that there is a process in place to allow the Applicant's team to use part of AT's existing model, with any cost to be met by the Applicant for obtaining the use of this model.

(d) *Loading & Servicing Impacts*

- (i) During earlier engagement with the Applicant, the Applicant had requested clarification on whether on-street loading can be secured for use by the site within the surrounding transport network. This was propositioned on the basis that the requirements for loading under the AUP(OP) will be met, whereas the on-street loading space was to be in addition to which was intended to be accommodated within the basement floor(s). However, Section 3.1 of the transport memorandum

states that on-site loading will be provided with access from Wynyard Street. No mention is made of any on-street loading sought within this memorandum, and it is unclear whether the intent is still to secure on-street loading either by way of Clarence Street or Wynyard Street. However, within the architectural plan set, there is a notation for on-street loading. No dimensions or tracking have been provided for this loading space to understand if it is suitably sized or how the facility is intended to be utilised, which would be anticipated to be provided at substantive application stage.

- (ii) Further to the above, noting that the proposal involves a hotel component, consideration should be held around whether the hotel requires any dedicated spaces for the undertaking of picking up or dropping off hotel guests. As part of this, the Applicant is advised to consider the type of vehicle(s) required to service the hotel, whether it be via a coach or a van with supporting luggage compartments, to determine the demand for any hotel picking up and/or dropping off facilities alongside the suitability of any dimensions that may be necessary to park such a vehicle(s). If coach facilities are required to service the hotel, the Applicant is requested to provide tracking diagrams to demonstrate whether suitable manoeuvring can be undertaken to enter into any loading space(s).
- (iii) In relation to the provision of on-site loading, it is recommended that a draft Servicing and Loading Management Plan ("SLMP") is provided at the time of the substantive application to help establish how the requirements for loading, particularly acknowledging the number of tenancies proposed, by the wider proposal can be managed to mitigate any resulting impacts upon the surrounding transport network.



Comments on a referral application under the Fast Track Approvals Act 2024

Devonport Mixed Use Development, FTAA-2602-1172

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. Devonport Property Management Limited (Applicant) has lodged an application for referral of the Devonport Mixed Use Development project (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 and the resource consent application, insofar as it affects historic heritage. These have been assessed and HNZPT comments as follows:

Consultation and Engagement

4. A Site visit with the developer was undertaken on the 13 Nov 2025 during which the project and the archaeological authority were discussed.

Archaeological Authority Application

5. The Applicant has provided a preliminary archaeological assessment- *Archaeological Assessment of Effects- memo: Devonport Mixed Use Project completed by Archaeology Solutions Ltd in May 2026*. The assessment sets out that the project is located within an archaeological and heritage rich area and that there are several unrecorded archaeological sites, including a possible shell midden and the remains of several 19th century buildings, within the project area. Thus, the works proposed will modify or destroy archaeological sites and has the potential to encounter further subsurface archaeological evidence during earthworks. As such, an archaeological authority is required prior to those works commencing.
6. The project area is situated within a landscape of cultural significance to tangata whenua. In their feedback to the Applicant, Ngāti Pāoa identify spiritual, historical, cultural and environmental values associated with the locality. The Tūpuna Maunga Authority has also



confirmed an interest in the proposal, specifically in relation to potential effects on maunga viewshafts.

7. HNZPT notes that relevant tangata whenua has been consulted with. Should the project be referred, appropriate consultation with tangata whenua must be provided with a substantive application.
8. HNZPT notes that no Cultural Impact Assessment has been provided with this application. The applicant should explore commissioning a report from relevant Mana Whenua entities to understand the cultural impacts of this development and how these can be best 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 not been discussed with the Applicant at this stage.

Resource Consent Application

11. The Applicant is also applying for a resource consent application which will generate adverse effects on historic heritage.
12. There are no places listed on the New Zealand Heritage List/ Rārangī Kōrero within the project. The proposal includes several buildings with historic heritage value that are included in Schedule 14.1 Historic Heritage of the of the AUP.
13. If referred, HNZPT could assist with developing alternatives or conditions that will avoid, remedy, or mitigate any possible adverse effects on the historic heritage values.

Conclusion

14. If the project is referred, HNZPT anticipates further engagement with the Applicant 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 proposed conditions.

Hon Tama Potaka

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



21 July 2026
Hon. Chris Bishop
Minister for Infrastructure
Infrastructure.portfolio@parliament.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

CORTP-8461

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the **Devonport Mixed Use Development in Devonport**, Auckland. The proposal comprises a mixed-use town centre development including approximately 80–90 residential apartments, visitor accommodation, commercial and retail activities, and the refurbishment of six heritage-listed buildings within the Devonport town centre.

There are currently 99 households on the Housing Register in the wider Devonport-Takapuna Local Board area, with most seeking one-bedroom homes. While the application does not identify an affordable housing component, it would increase housing supply and housing choice in a highly accessible location with good access to public transport, services, retail and open space. The site is zoned Business – Town Centre and is located within the established Devonport town centre. Devonport is a well-serviced centre with frequent ferry services to Auckland city centre, regular bus services, and a range of amenities within walking distance. The proposal would increase housing capacity in an area that has experienced relatively little growth due to planning constraints and would contribute to a well-functioning urban environment. The proposal also includes the adaptive reuse of six scheduled heritage buildings and new publicly accessible laneways and courtyard spaces.

The proposed scale of development may raise concerns regarding effects on heritage and special character values, the existing village streetscape, and the appropriateness of more intensive development in an area that is subject to flooding and coastal inundation risks. These matters would benefit from further consideration through the detailed consenting process.

The proposal is expected to deliver positive housing and urban development benefits through increased housing capacity, investment in an existing town centre, and the adaptive reuse of heritage buildings. While there are planning considerations associated with heritage, character and natural hazard risks, these matters can be worked through at the detailed consenting stage. From the perspective of the Housing Portfolio, I have no objection to this application being referred to the next stage of the fast-track process.

Mauriora,

Hon Tama Potaka
Associate Minister of Housing

