Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure S:

Growth Infrastructure Funding and Finance

Brigid Duffield

10 September 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo – Growth Infrastructure Funding and Finance

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
From:	Brigid Duffield
Qualifications & Relevant Experience:	I am employed as Chief Advisor Growth Infrastructure Funding and Finance within the Policy, Planning & Governance directorate at Council. I have been working in this role for 5+ years. I support Council group with expertise in funding and financing aspects for the alignment of significant infrastructure programmes. This is achieved through working with Crown and Crown entities, and other significant stakeholder groups to align strategic infrastructure investment for growth in the Auckland region. Prior to my current position, I have held senior global commercial and consulting roles including Commercial Manager for Tāmaki Regeneration focusing on development and its financing and funding (2015 to 2019). I have a Masters in Land Economy from Cambridge University (1991) and have held executive roles focusing on the commercial implications of choices and decisions (1999 to 2004). I have been a Strategic Consultant and Director at PwC (and independently) and have worked with many businesses to achieve successful commercial planning (1994 to 1999, 2004 to 2015). These roles have been predominantly private sector based but have more recently moved into the public sector in both local and central government.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:	*Brigid Duffield*
Date:	10 Sept 2026

3.0 Executive Summary / Principal Issues

Beachlands South proposes a significant urban development comprising approximately 2,000 dwellings together with commercial, employment, educational, open space and supporting infrastructure. The proposal includes substantial transport, water, wastewater, stormwater and utility infrastructure required to support the future community

The proposal should demonstrate that supporting infrastructure can be funded, financed, delivered, operated, maintained and renewed over the long term, and that it will support a well-functioning urban environment for future residents.

The application relies on a combination of developer-delivered infrastructure, private servicing arrangements and wider network improvements. Further information is required regarding infrastructure funding responsibilities, ownership arrangements, long-term operational obligations, reliance on future public investment and residual risks.

Particular consideration should be given to the proposed private water and wastewater servicing model, including whether the current legislative and regulatory framework provides sufficient oversight, governance, customer protection, service continuity and long-term stewardship arrangements for infrastructure of this scale.

This memorandum focuses on infrastructure funding, servicing and long-term stewardship matters. It does not seek to weigh the broader strategic, economic, recreational or other considerations that may also be relevant to decision-making on the proposal.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Fast Track Approval Application documents

5.0	Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

N/A

6.0	Specialist Assessment

1. Beachlands South proposes a significant urban development comprising approximately 2,000 dwellings together with commercial, employment, educational, open space and supporting infrastructure. The proposal includes substantial transport, water, wastewater, stormwater and utility infrastructure required to support the future community.
2. The proposal should demonstrate that the infrastructure required to support this growth can be funded, financed, delivered, operated, maintained and renewed over the long term. Assessment should consider whether the proposed infrastructure arrangements will support a well-functioning urban environment, including reliable access to essential services and supporting infrastructure for future residents, businesses and visitors, while clearly identifying and appropriately allocating any financial exposure or long-term obligations that may arise for Auckland Council, Auckland Transport, Watercare, future ratepayers and the wider community.
3. The application relies on a combination of developer-delivered infrastructure, private servicing arrangements and wider network improvements. Further information is required regarding infrastructure funding responsibilities, reliance on future public investment, ownership arrangements, operational responsibilities, long-term renewal obligations, and the extent to which future costs, liabilities or infrastructure risks may ultimately fall to the public sector or future residents.
4. Particular attention should be given to the proposed private water and wastewater servicing model. A full understanding of the legislative and regulatory position applying to private water and wastewater services is recommended, noting that much of New Zealand's framework has evolved around publicly owned network utilities. Assessment should consider whether the current framework provides adequate oversight, governance, customer protection, service continuity and long-term stewardship arrangements for infrastructure of this scale. Any shortcomings may create residual risks for future residents, property owners, environmental and public health outcomes and, in some circumstances, Auckland Council and future ratepayers. Consideration should also be given to whether effective mechanisms exist to intervene and resolve issues should service, governance or financial failures occur, or whether there are circumstances where risks may exist without a clear pathway for remediation.
5. Assessment should also consider whether identified risks can realistically be managed through consent conditions. Ongoing requirements for monitoring, reporting or compliance certification do not necessarily address underlying issues relating to governance, ownership, financial sustainability, service continuity or future asset performance. Where the effectiveness of a servicing model relies on long-term oversight or intervention, consideration should be given to whether a clear legislative pathway, responsible agency, funding mechanism and practical ability exist to identify and resolve problems if they arise. Particular caution should be exercised where the proposed mitigation approach relies on ongoing monitoring by Auckland Council or other

public agencies where the powers, responsibilities or practical ability to remedy issues may be uncertain.

6. The application should demonstrate that supporting infrastructure can be funded, delivered and sustained over the long term, that future residents will be supported by a well-functioning urban environment, and that the proposal will not create inappropriate financial exposure, unfunded obligations or pressure to accelerate infrastructure investment by Auckland Council, Auckland Transport or Watercare. Based on the information currently available, further information is required to fully understand these matters and the residual risks associated with the proposal.
7. Assessment should also consider the extent to which the proposal relies on future infrastructure, services or investment that are outside the Applicant's control. This includes transport infrastructure, public transport services, community facilities, parks, open space, utility infrastructure and other public services that may be assumed to support the development over time. The proposal should demonstrate that it remains viable and capable of supporting a well-functioning urban environment if these investments, services or facilities are delayed, reprioritised or do not eventuate. The assessment should not assume that future public infrastructure, public funding, public ownership or public sector intervention will occur unless there is a clear and committed pathway for delivery.
8. The matters raised above are consistent with issues currently being considered by Auckland Council through its work programme on responding to unanticipated development, including infrastructure sequencing, funding responsibilities, ownership models, servicing arrangements, infrastructure affordability and residual public sector risk. These matters should be adequately understood and assessed as part of the Panel's consideration of the proposal. See 8 September Policy, Planning and Development Committee Report and Minutes on Responding to Unanticipated Development.

7.0 Section 67 Information Gap			
Information gap	**Nature of deficiency**	**Decision-making impact**	**Risk / uncertainty created**
Infrastructure funding and delivery responsibilities	Insufficient information regarding who will fund, finance, deliver, operate, maintain and renew all infrastructure required to support the development over its full lifecycle.	Limits the ability to assess whether infrastructure can be sustainably provided and maintained over time.	Uncertainty as to whether essential infrastructure will remain available, functional and adequately funded throughout the life of the development, potentially affecting the ability of future residents to access reliable services.

Infrastructure dependencies and sequencing	Insufficient clarity regarding the timing, funding status and delivery responsibility for wider transport and infrastructure dependencies relied upon by the development.	Limits assessment of whether development can occur in a coordinated manner and whether infrastructure will be available when required.	Risk that development occurs ahead of infrastructure capacity, resulting in reduced levels of service, poorer resident outcomes and an urban environment that does not function as intended.
Long-term ownership and governance arrangements	Limited information on ownership, governance and accountability arrangements for infrastructure intended to remain in private ownership.	Reduces confidence that infrastructure will be appropriately managed over the long term.	Uncertainty regarding whether infrastructure will continue to be effectively governed, maintained and renewed throughout its lifecycle, particularly as ownership and governance arrangements evolve over time.
Private water and wastewater servicing model	Insufficient information regarding the proposed ownership, governance, operational and financial arrangements for private water and wastewater services.	Limits assessment of whether the servicing model is appropriate and sustainable for a development of this scale.	Uncertainty regarding the long-term ability of the proposed servicing model to deliver safe, reliable and resilient water and wastewater services for present and future residents.
Legislative and regulatory framework for private water and wastewater	Limited assessment of whether existing legislative and regulatory settings provide adequate oversight, governance, customer protection, service continuity and long-term stewardship arrangements.	Limits understanding of how risks associated with the proposed servicing model will be managed over time.	Uncertainty regarding whether adequate oversight and intervention mechanisms exist to ensure essential services continue to operate effectively throughout the life of the development.

Service continuity, failure management and intervention pathways	Insufficient information regarding how operational, governance or financial failures would be managed and who would be responsible for intervention and remediation.	Limits the ability to assess resilience of the proposed servicing model and consequences of failure scenarios.	Risk that water or wastewater services could deteriorate or fail without a clear or practical pathway to restore service levels, potentially resulting in adverse public health, environmental and community outcomes.
Long-term maintenance, renewal and asset replacement funding	Insufficient information regarding funding mechanisms for ongoing maintenance, renewals and eventual replacement of infrastructure assets.	Limits understanding of the long-term sustainability of the infrastructure model.	Uncertainty regarding whether infrastructure will be appropriately maintained and renewed over time, creating a risk of declining service performance, asset failure and reduced resilience.
Residual public sector and community exposure	Limited assessment of the extent to which future risks, liabilities or obligations may ultimately fall to residents, property owners, infrastructure providers, Auckland Council, Watercare, Auckland Transport or future ratepayers.	Limits the ability to understand the full consequences and risk allocation associated with the proposal.	Uncertainty regarding who bears responsibility if the servicing model becomes unsustainable or fails to perform as intended, and whether sufficient mechanisms exist to protect essential services and community outcomes over the long term
Adequacy of the legislative and regulatory framework for long-term oversight and remediation	The application does not demonstrate that the current legislative and regulatory framework provides sufficient oversight, monitoring, enforcement and intervention mechanisms for privately operated water and wastewater infrastructure serving a community of this scale.	Limits confidence that identified risks can be appropriately managed through conditions or ongoing oversight arrangements.	Risk that governance, operational, financial or service failures arise without a clear, effective or timely pathway for intervention and remediation, potentially affecting continuity of essential services and resulting in adverse public health, environmental and community outcomes.

Reliance on future public infrastructure, services and investment	Limited information regarding the extent to which the development relies on future transport infrastructure, public transport services, parks, community facilities, utility infrastructure or other public investment and services that are not currently committed.	Limits the ability to assess whether the proposal can provide a well-functioning urban environment independently of future public investment decisions.	Risk that anticipated infrastructure, services or facilities do not eventuate, resulting in reduced levels of service, poorer resident outcomes and a development that does not function as intended over the long term.

8.0 Recommendation

1. Further information should be provided regarding infrastructure funding, financing, delivery, ownership and long-term operational responsibilities.
2. The applicant should demonstrate that infrastructure can be delivered and sustained in a manner that supports a well-functioning urban environment for future residents.
3. Further assessment should be undertaken of the proposed private water and wastewater servicing model, including governance arrangements, customer protections, service continuity, long-term stewardship and the adequacy of the legislative and regulatory framework.
4. The applicant should demonstrate that effective mechanisms exist to identify, manage and resolve service, governance, operational or financial failures should they occur.
5. The proposal should demonstrate that it will not create inappropriate financial exposure, unfunded obligations or pressure to accelerate infrastructure investment by Auckland Council, Auckland Transport or Watercare.
6. The Applicant should identify all assumptions regarding future public infrastructure, public services, public funding and public investment that underpin the proposal and demonstrate that the development can continue to function appropriately if those assumptions do not eventuate.

9.0 Proposed Conditions

1. **Infrastructure Funding and Delivery:**
   Require the Applicant to demonstrate, prior to each stage of development, that infrastructure necessary to service that stage, including cumulative infrastructure demands arising from previous stages of development, is funded, available and capable of supporting the proposed level of development.

2. **Infrastructure Dependencies and Staging:**
   Require development to be staged so that occupation and development are aligned with the delivery and availability of supporting transport, water, wastewater, stormwater and other necessary infrastructure.
3. **Reliance on Future Public Infrastructure and Services**
   Require the Applicant to identify all assumptions regarding future public infrastructure, public transport services, parks, community facilities, utility infrastructure, public funding, public ownership, network integration or public sector intervention that underpin the proposed development. Where development outcomes rely on such assumptions, the Applicant should demonstrate that appropriate levels of service and functionality can still be achieved if those assumptions are delayed, reprioritised or do not eventuate.
4. **Private Water and Wastewater Servicing:**
   Require the Applicant to demonstrate that proposed private water and wastewater infrastructure has appropriate ownership, governance, operational, maintenance, renewal and funding arrangements in place for the life of the development.
5. **Service Continuity and Failure Management:**
   Require documented arrangements identifying how service interruptions, infrastructure failures, governance failures, financial distress or operator failures will be managed, including responsibilities for corrective actions and continuity of essential services.
6. **Long-Term Stewardship and Asset Management:**
   Require demonstration that privately owned infrastructure assets will be appropriately maintained, renewed and replaced over time, and that adequate governance and funding mechanisms exist to support these activities throughout the life of the assets.
7. **Ownership and Responsibility:**
   Require clear identification of ownership, operational, governance and funding responsibilities for all major infrastructure assets, including any assets intended to remain in private ownership.
8. **Resident Disclosure:**
   Require future residents and property owners to be informed of any privately owned or operated infrastructure, including ownership arrangements, service obligations, charging mechanisms and any ongoing responsibilities attached to those services.
9. **Review of Servicing Arrangements:**
   Require review of servicing arrangements where there are material changes to infrastructure ownership, governance, operation, funding arrangements or servicing assumptions.
10. **Monitoring, Oversight and Remediation Framework:**
    Require the Applicant to demonstrate that effective mechanisms exist to monitor, oversee and, where necessary, remedy issues associated with privately owned water and wastewater infrastructure. This should include clear identification of:

    a. monitoring and reporting requirements;
    b. organisations responsible for oversight;
    c. statutory powers available to those organisations;
    d. mechanisms available to address non-compliance, governance failure, operational failure or financial distress;

e. responsibility for funding corrective actions; and

f. practical pathways for remediation should material service issues arise.

The arrangements should demonstrate not only that issues can be identified through monitoring and reporting, but that there are effective mechanisms, powers and responsibilities in place to address those issues should they occur.

Note

Conditions may assist in managing some infrastructure risks. However, conditions alone may not adequately address risks associated with the long-term governance, financial sustainability, service continuity and stewardship of privately owned essential infrastructure. Particular consideration should be given to whether effective oversight, intervention and remediation mechanisms exist within the current legislative and regulatory framework, and whether residual risks may remain with future residents, property owners, public health and environmental outcomes, infrastructure providers, Auckland Council or future ratepayers. These matters should be adequately understood and assessed as part of the Panel's consideration of the proposal.

10.0 Supporting Documents