

FTAA-2604-1216: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 1 decisions

Project Name: Awanui Links

Date submitted:	25 May 2026	Tracking #: BRF-01375	
Security level:	In-Confidence	MfE priority:	Urgent

	Action sought:	Response by:
To Hon Chris Bishop, Minister for Infrastructure	Decisions on recommendations in Table A	2 June 2026

Actions for Minister's Office staff	Return the signed briefing to: FTAreferrals@mfe.govt.nz Send email to Ministers to invite written comments
Number of appendices: 3	Appendices: 1. Statutory framework summary 2. Application documents for the Awanui Links project 3. List of the Māori groups referred to in section 18(2)

Ministry for the Environment contacts:

Position	Name	Cell phone	1 st contact
Principal Author	Rebecca Burton		
Reviewer	Ben Bunting	027 874 0050	
General Manager	Stephanie Frame	027 257 3197	✓

Project location

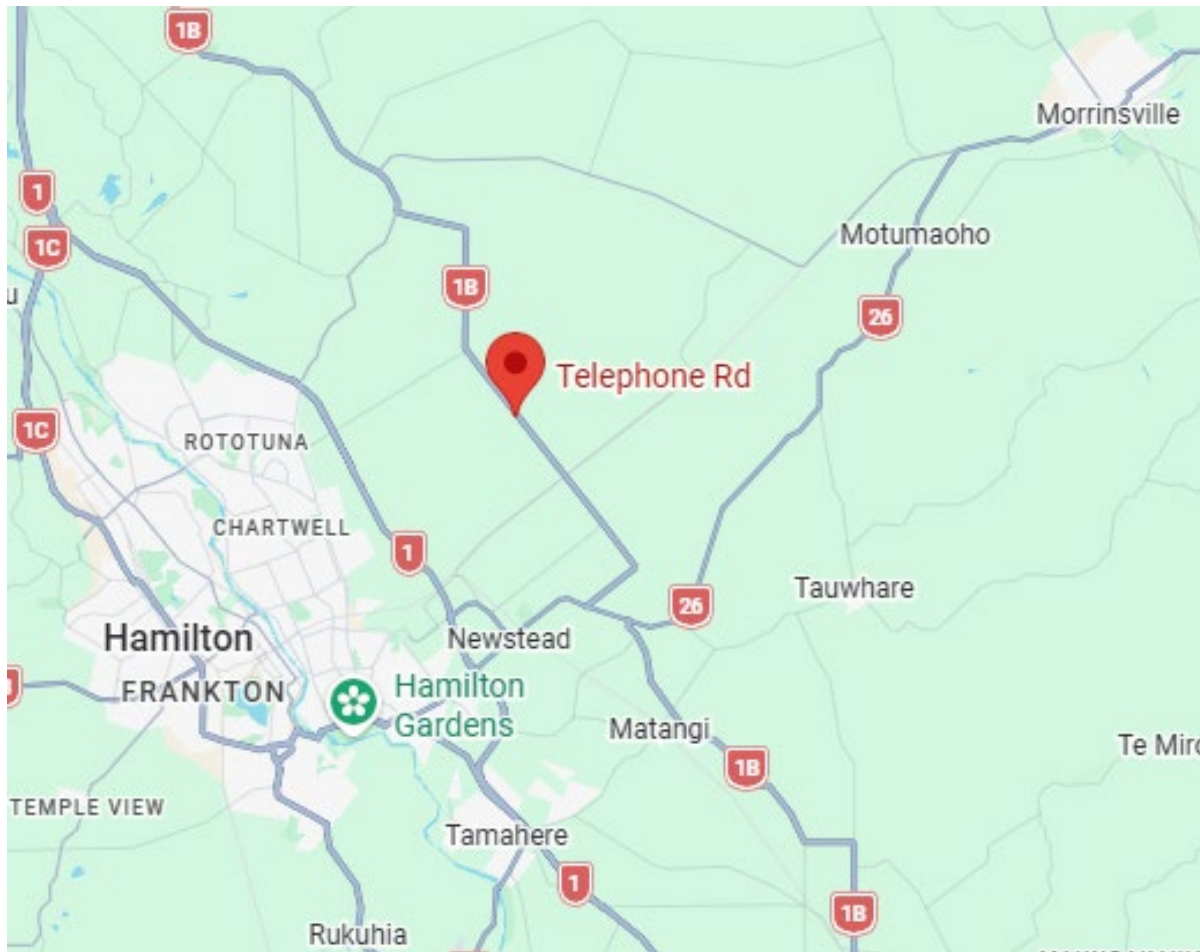


Figure 1: General location of the project (illustrated by red point).

Key messages

1. This briefing seeks your initial decisions on an application from Swordfish Projects Limited (the applicant) to refer the Awanui Links project (the project) under the Fast-track Approvals Act 2024 (the Act) to the fast-track approvals process.
2. At this stage you can either decline an application for the reasons set out section 21, or provide the application to, and invite comments from, the parties identified in section 17. If you do not decline the application, you will receive a further briefing following receipt of comments, to support your final decision on whether to refer the project.
3. The project is to establish a new mixed-use development over approximately 123 hectares of rural land located at Telephone Road, Puketaha, within the Waikato District.
4. The project involves:
 - a. high-end tourism involving an 18-hole-golf course, which will be centred around a contemporary clubhouse, pro-shop, driving range, wellness centre, fine dining restaurant, and boutique hotel with associated event and conference facilities.
 - b. lifestyle living, 70 rural-residential lots of approximately 3,000 square metres.
 - c. retirement facilities - 137 retirement living units, a mix of independent living villas, a central care facility (50 beds), healthcare and community facilities.
 - d. light-industrial activity –nine lots ranging from 2300 – 5700 square metres.

- e. a 3,000sqm solar farm is also proposed adjacent to the industrial area.
 - f. extensive planting, ecological restoration, and integrated water features.
5. The applicant seeks the following approvals under the fast-track approvals process to authorise the project:
 - a. resource consents under the Resource Management Act 1991 (RMA)
 - b. wildlife authority under the Wildlife Act 1953.
 6. The project involves a prohibited activity under both the *Operative* and *Operative in Part* versions of the Waikato District Plan – specifically, the subdivision of high-class soil.
 7. If you agree to progress the project to our Stage 2 analysis, the next briefing will require you to consider whether to decline the referral application on the basis that it involves a prohibited activity. This is a potential reason you may decline a referral application under section 21(5) of the Act. However, we note section 21(7) of the Act explicitly states that the presence of a prohibited activity does not, in itself, prevent you from accepting a referral application.
 8. We have undertaken initial analysis of the referral application, and this is presented along with our considerations and recommendations in Table A.
 9. We have decided the application is complete and complies with section 14 of the Act, as the application complies with section 13 requirements, may be capable of satisfying the criteria in section 22 and does not appear to involve an ineligible activity. The applicable fee and levy have been paid.
 10. We recommend you progress consideration of the referral application to the next stage of analysis (Stage 2) and invite written comments from the parties prescribed in section 17(1) of the Act being:
 - a. Waikato District Council and Waikato Regional Council as the relevant local authorities
 - b. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
 - c. the Minister of Conservation, the Minister for Sport and Recreation, the Minister for Tourism and Hospitality, the Minister for Energy and the Associate Minister of Housing as the relevant portfolio Ministers
 - d. the Department of Conservation as the relevant administering agency
 - e. the identified Māori groups as listed in Appendix 3.
 11. We recommend that you invite written comments from the following parties as additional persons under section 17(5) of the Act:
 - a. the Chief Executive of NZ Transport Agency Waka Kotahi (NZTA), as the project area adjoins State Highway 1B
 - b. the Minister for Regional Development
 - c. the Minister for Economic Growth.

Action sought

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

Signature

A handwritten signature in black ink, appearing to read 'S. Frame', is centered within a light gray rectangular box.

Stephanie Frame
Manager – Fast-track Operations

Table A: Stage 1 analysis

	Project Name	Applicant	Project Location			
Project details	Awanui Links (the project)	Swordfish Projects Limited (the applicant)	An area of approximately 123 hectares at Telephone Road, Puketaha, within the Waikato District, in the Waikato Region. The project area encompasses of 27 Record of Titles. An overview of the restrictions present on each is provided under section 1.3 of the Planning Memorandum submitted with the application.			
Project description	The project is to establish a new residential development over approximately 123 hectares of rural land located in Puketaha within the Waikato District. The project involves: a. high-end tourism involving an 18-hole-golf course, which will be centred around a contemporary clubhouse, pro-shop, driving range, wellness centre, fine dining restaurant, and boutique hotel with associated event and conference facilities. b. lifestyle living, 70 rural-residential lots of approximately 3,000 square metres. c. Retirement facilities - 137 retirement living units, a mix of independent living villas, a central care facility (50 beds), healthcare and community facilities. d. light-industrial activity –nine lots ranging from 2300 – 5700 square metres. e. A 3,000 sqm solar farm is proposed adjacent to the industrial area. f. extensive planting, ecological restoration, and integrated water features. The applicant seeks the following approvals under the fast-track approvals process to authorise the project: a. resource consents under the Resource Management Act 1991 (RMA), including prohibited activities under the <i>Operative</i> and <i>Operative in Part</i> versions of the Waikato District Plan for the subdivision of high class soil b. wildlife authority under the Wildlife Act 1953.					
Consultation undertaken	As required by section 11, the applicant has consulted with:					
	Relevant local authorities	Relevant iwi authorities, hapū and Treaty settlement entities	Relevant MACA groups	Ngā hapū o Ngāti Porou	Relevant administering agencies	Holder of land to be exchanged
	- Waikato District Council - Waikato Regional Council	- Ngāti Haua - Ngāti Wairere - Waikato Tainui	Not applicable to the project area	Not applicable to the project area	Department of Conservation	Not applicable
Section 22 assessment criteria						
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	You may consider any of the following matters, or any other matters the Minister considers relevant: The applicant considers the project will have significant regional benefits for the reasons outlined below. <i>The project has been identified as a priority project in a central or local government, or sector plan or strategy or a central government infrastructure priority list [s22(2)(a)(i)]</i> The applicant states that whilst the project is not explicitly listed as a priority by central or local government or within a plan or strategy, the project aligns with the strategic intent of the need to increase housing supply. The applicant considered that the project therefore aligns with the Acts purpose of accelerating projects that deliver significant regional benefits. <i>Will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020) [s22(2)(a)(iii)]</i> The applicant has outlined that the project will deliver 70 houses and a retirement facility this improving the housing market, particularly by enabling older residents to transition to purpose-built accommodation suited to their needs. <i>Will deliver significant economic benefits [s22(2)(a)(iv)]</i> The economic assessment provided by the applicant states that the project will provide the following economic benefits: - a onetime boost in GDP of approximately \$189 million. - full time employment for 260 people over a 5-year period during design, consenting and construction. - the non-residential component of the project could sustain 228 FTE with an annual GDP of \$29 million and more than \$17 million in income. The applicant has stated that the provision of nine industrial lots enabling approximately 12,800sqm of industrial floor space will boost industrial land supply. The applicant considers that the golf course would add depth and variety to the established golf tourism network which supports more than 2,000 jobs nationwide and contributes more than \$1 billion per annum to GDP. Combining this with tourism accommodation, dining and a wellness facility will boost the attraction of Waikato to both domestic and international golfers.					

	<i>Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]</i> The applicant has stated that the project will be designed to minimise greenhouse gas emissions where possible through construction and within the masterplan design. During construction, greenhouse gas emissions are proposed to be reduced through the following measures: • minimising the number of truck movements required to manage earthworks material by retaining as much as possible within the site; and • a staged construction approach that allows for the appropriate management of effects on the environment. Following construction, the ongoing reduction of greenhouse gas emissions are intended to be supported by: • enabling mixed use development, including provision for services and amenities within the new rural residential development to reduce the need for vehicle travel • connectivity to existing centres within the vicinity • the development of block and lot layouts which encourage energy efficiencies, including through optimising passive solar gain and natural light. • the proposal includes the establishment of a small solar farm to enhance resilience by off-setting onsite energy demand. Overall, the applicant considers that the project will contribute to efforts to mitigate climate change and reduce net emissions of greenhouse gases. <i>Will address significant environmental issues [s22(2)(a)(ix)]</i> The applicant states that the project will assist with addressing the significant housing shortage and housing affordability issues seen within the Waikato Districts. The applicant considers the provision of 815 houses within a well-designed and functioning urban environment will have positive flow on effects to the social, economic, aesthetic and cultural environments of the Waikato community. <i>Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)].</i> The applicant states the project is consistent with the key objectives and principles of Future Proof 2024 as it: • supports integrated planning by combining tourism, residential, retirement, and light industrial activities within a single master-planned development • has connection to SH1B (Telephone Road) and proximity to Hamilton City (10 km) thereby enhancing regional accessibility, linking visitors and residents to key transport routes and services • will complement existing nearby towns by attracting visitors, supporting local employment, and reinforcing a unique identity centered on recreation, wellness, and tourism • concentrates development rather than allowing ad hoc rural subdivision • caters to lifestyle, retirement, and tourism-related housing needs, supporting different life stages and preferences • actively enhances the natural environment. The applicant has provided an assessment of the following strategies, policies and plans. • <i>Waikato 2070 Growth & Economic Development Strategy (Waikato 2070)</i> This outlines a 50-year vision for sustainable and strategic growth across the Waikato district. The project is strongly aligned with the focus areas identified under Waikato 2070. It reflects the strategy's core vision of creating liveable, thriving, and connected communities and contributes to all four focus areas outlined in the strategy • <i>Waikato District Housing Strategy (2024)</i> Awanui Links is particularly aligned with the Strategy with respect to increasing housing supply and diversity and contributing to the provision of safe, healthy, and affordable homes to the community particularly providing for elderly. The project helps to address core issues such as housing supply, infrastructure integration, and community connectivity. • <i>Waikato Regional Policy Statement</i> The applicant considers that the application aligns with the majority of the objectives and policy framework, with the exception of the objectives and policies that manage and protect highly productive land. • <i>Hamilton & Waikato Tourism - Destination Management Plan 2022</i> The plan has the goal of ensuring the visitor economy positively contributes to thriving Waikato communities – people, culture and the environment. The applicant considers that the proposal is able to support and meets the principles of this statement.		
Referring the project to the fast-track approvals process [section 22(1)(b)]	<i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i> The applicant considers the fast-track approvals process would facilitate the project as the ability to apply for a comprehensive range of consenting requirements within one application, to be considered by one panel, offers significant efficiencies in planning and specialist inputs. The applicant also states that the project is only able to progress through the fast-track approvals process as it involves prohibited activities for the subdivision of high-class soils and land under the RMA. They note other aspects of the project would be subject to a challenging and complex consenting requirement that would test the current Waikato District Plan provisions. <i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i> The applicant states that referring the project is unlikely to materially affect the efficient operation of the fast-track approvals process, as this process is considered the right instrument for the scale of the project. The applicant further notes that referral would reinforce the value and opportunity that the fast-track approvals process presents for regionally and nationally significant projects.		
Minister invites comments	<i>You must copy the application to, and invite written comments from [s17(1)]:</i> a. Relevant local authorities:	<i>You may copy the application to, and invite written comments from, any other person [s17(5)]:</i>	<i>The Minister may request further information about a referral application from the applicant, the relevant local authorities, or the</i>

	- Waikato District Council - Waikato Regional Council b. The Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development c. Other relevant portfolio Ministers (and their relevance to the project): - Minister of Conservation – as the project requires wildlife approval under the Wildlife Act 1953 - Associate Minister of Housing – as the project involves a housing development resulting in approximately 70 rural residential lots, a new retirement facility with 137 retirement units and a 50 bed care facility in the Waikato District. - Minister for Sport and Recreation – as the project involves the establishment of a high-end golf course facility - Minister for Tourism and Hospitality - as the project involves a tourism accommodation and supporting activities. - Minister for Energy – as the project involves the construction of a new solar farm. d. Relevant administering agencies: - Department of Conservation – as the project requires wildlife approval under the Wildlife Act 1953 e. The Māori groups identified in Appendix 3	- The Chief Executive of New Zealand Transport Agency Waka Kotahi (NZTA) – as State Highway 1B adjoins the boundary of the site - The Minister for Regional Development - The Minister for Economic Growth	<i>relevant administering agencies to be provided within the time frame specified in the request.</i> We have not identified any further information to be sought, at this stage.
Recommendations			Minister's decision
a.	Note that section 25 of the Act permits you to decline the referral application without inviting comments from the relevant local authorities, the Minister for the Environment, any relevant Ministers, any relevant administering agencies and the Māori groups identified in the list provided.		Noted
b.	Note that you have not yet provided the application to, nor sought any written comments on it from, the parties listed in section 17(1) but that you are required to do so if you do not decline the application under section 21 of the Act.		Noted
c.	Note that section 17(5) of the Act permits you to forward an application to, and invite written comments from, any other person.		Noted
d.	Note that if comments have been sought and provided within the required time frame you are required to consider it, along with the referral application, before deciding to decline the application.		Noted
e.	Note that section 20 of the Act permits you to request further information from the applicant or relevant local authorities or relevant administering agencies at any time before you decide whether to accept or decline an application.		Noted
f.	Agree to progress the Awanui Links project to our Stage 2 analysis (invite written comments and request section 18 Treaty report).		Yes / No
g.	Agree to provide the application to, and invite written comments from:		
i.	Waikato District Council and Waikato Regional Council as the relevant local authorities under section 17(1)(a)		Yes / No
ii.	The Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development under section 17(1)(b)		Yes / No
iii.	The Minister of Conservation, the Minister for Sport and Recreation, the Minister for Tourism and Hospitality, the Minister for Energy and the Associate Minister of Housing as the relevant portfolio Ministers under section 17(1)(b)		Yes / No
iv.	The Department of Conservation as the relevant administering agency under section 17(1)(c)		Yes / No
v.	The parties in Appendix 3 as the Māori groups under section 17(1)(d)		Yes / No
vi.	Any parties you are required to invite comments from under section 17(1)(d) and (e) who may be subsequently identified		Yes / No
h.	Agree to provide the application to and invite written comments from the following additional persons under section 17(5):		
i.	The Chief Executive of NZ Transport Agency Waka Kotahi		Yes / No
ii.	The Minister for Regional Development		Yes / No

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

Signed:

Hon Chris Bishop
Minister for Infrastructure

Date:

Appendix 1: Statutory framework summary

1. You are the sole decision maker for referral applications. If you accept a referral application, then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
 - a. give the document the same or equivalent effect through this process as it would have under any specified Act; and
 - b. comply with any applicable procedural requirements.
3. You must decline a referral application if:
 - a. you are satisfied the project does not meet the referral criteria in s22
 - b. you are satisfied the project involves an ineligible activity (s5)
 - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in s21(5) and even if the application meets the s22 referral criteria.
5. You can decline an application before or after inviting comments under s17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at this initial stage you must copy the application to, and invite written comments from:
 - a. the relevant local authorities,
 - b. the Minister for the Environment, Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
 - c. the relevant portfolio Ministers
 - d. the relevant administering agencies
 - e. the Māori groups identified by the responsible agency
 - f. the owners of Māori land in the project area:
 - g. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.

Appendix 2: Application documents for the Awanui Links project

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

Name of group	Type of group (section of Act)
Te Whakakitenga o Waikato	Iwi authority (s18(2)(a); Treaty settlement entity – Waikato Raupatu Claims Settlement Act 1995 and the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 (s18(2)(a)); negotiating mandate (s18(2)(d))
Ngāti Hauā Iwi Trust	Iwi authority (s18(2)(a); Treaty settlement entity – Ngāti Hauā Claims Settlement Act 2014 (s18(2)(a))
Waikato Raupatu River Trust	Treaty settlement entity – Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 (s18(2)(a))
Te Haa o te Whenua o Kirikiriroa (THaWK)	Any other Māori groups with relevant interests (s18(2)(k))
Ngāti Wairere	Any other Māori groups with relevant interests (s18(2)(k))