

**26 May 2026**

Attn: Lachlan Muldowney, North West Rapid Transit Expert Panel Chair  
*North West Rapid Transit Fast-track Application*  
FTAA-2511-1146  
*Environmental Protection Authority*  
*Private Bag 63002*  
*Waterloo Quay*  
*Wellington 6140*

By Email: [substantive@fasttrack.govt.nz](mailto:substantive@fasttrack.govt.nz)

**KĀINGA ORA – HOMES AND COMMUNITIES COMMENTS ON A FAST-TRACK APPLICATION FOR THE NORTH WEST RAPID TRANSIT UNDER THE FAST-TRACK APPROVALS ACT 2024 (THE ACT)**

Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) at the address for service set out below provides the following feedback on the North West Rapid Transit Under The Fast-Track Approvals Act 2024 (The Act).

**Background**

1. Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
  - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
  - b) Support good access to jobs, amenities and services; and
  - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Kāinga Ora has a shared interest in the community as a key stakeholder, alongside local authorities. This interest lies in the provision of public housing to persons who are unable to be sustainably housed in private sector accommodation, and in leading and co-ordinating residential and urban development projects. Kāinga Ora works with local

authorities, requiring authorities and infrastructure providers to ensure that appropriate services and infrastructure are delivered for the benefit of the communities it serves.

3. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing and access to services and amenities. These include the provision of services and infrastructure and how this may impact on Kāinga Ora existing and planned housing, community development and Community Group Housing (“CGH”) suppliers.
4. Kāinga Ora owns land near to and within the designation boundary. If the designation is granted Kāinga Ora requests that the requiring authority work closely and early on sequencing land acquisition programmes to provide sufficient time for Kāinga Ora to meet its obligations under the Residential Tenancy Act alongside the delivery programme for the works.

**The comments are:**

5. Kāinga Ora **generally supports** the North West Rapid Transit, which involves the construction, operation and maintenance of new bus rapid transit facilities alongside State Highway 16. The project also includes seven rapid transit stations, one Park and Ride facility at Brigham Creek Rarawaru and connections to the local bus and road network. While Kāinga Ora supports the project there are some specific matters raised in its comments where changes to the conditions are sought as outlined below.
6. In Particular but without limiting the generality of the above:
  - a. Kāinga Ora generally supports the proposed North West Rapid Transit, particularly as it relates to the delivery of regionally significant transportation infrastructure that will support the provision of an efficient and reliable rapid public transport network to the western suburbs of Auckland, in addition to improving accessibility and connection between housing, employment and services.
  - b. Kāinga Ora considers the designation process is appropriate due to the regional significance of the infrastructure proposed and the ability of the designation process to avoid unreasonable delay.
  - c. Kāinga Ora generally supports the proposed conditions set out in the Notice of Requirement and the use of the mechanisms outlined to avoid, remedy, or mitigate potential adverse effects, including but not limited to: Construction Traffic Management Plan (**CTMP**), Contaminated Land Management Plan (**CLMP**),

Construction Noise and Vibration Management Plan (**CNVMP**), Construction Noise and Vibration Management Schedule (**CNVMS**).

*General*

7. Kāinga Ora seeks the addition of a new Condition 1 to the set of condition which specifically outlines that relevant plans and reports that the project is to be carried out in accordance with. This condition would provide greater clarity and certainty for all parties by explicitly outlining the approved documentation that governs the design, construction, and implementation of the development. In doing so, it helps to ensure consistency across the project and reduces the risk of ambiguity or misinterpretation regarding which plans and reports are to be adhered to throughout the project lifecycle
8. While Kāinga Ora support the inclusion of a lapse condition, Kāinga Ora proposes the incorporation of a periodic review condition where the extent of the designation boundary is reviewed every 12 months following lodgement of OPW(s) to ensure this is being refined continually, and that any land no longer required for construction and operation as a result of the refinement exercise shall be uplifted from the designation.

*Flood Hazard*

9. Kainga Ora opposes the proposed designation condition which allows the requiring authority to increase flood levels on properties beyond the designation. The outcome of this condition appears to allow the Requiring Authority to worsen flooding effects on neighbouring sites, meaning they are not adequately avoiding, remediating or mitigating the effects on the environment as a result of their construction activities.
10. Kāinga Ora request that the flood hazard condition is amended so that simply put, the Requiring Authority doesn't worsen any flooding effects onto neighbouring properties and appropriately avoids, remediates and/or mitigates the effects of their construction activities. Therefore, Kāinga Ora request that condition 9 is amended as follows:
  9. *"The Project shall be designed, constructed and operated so that beyond the Operational Designation boundaries:*
    - (i) there is no increase in Danger Rating for land or buildings; and*
    - (ii) any changes in flood levels do not result in more than a 50mm increase in flood level on any land parcel; and*
    - (iii) no new, or additional, habitable floor level flooding is to occur to buildings existing or consented at the date of construction commencement for the designation stage"*

## *Operational Noise and Vibration*

11. The Assessment of Construction Noise and Vibration Effects, prepared by Siiri Wilkening, dated 15 December 2025, notes that external noise level of up to 65dB would result in conversations becoming strained, particularly over longer period of time. Kāinga Ora is concerned with the ongoing effects the operational noise levels will have on people overtime. Kāinga Ora is interested to understand why the Construction Noise and Vibration Effects Report doesn't include the effects for 50dB L to 65dB L, given that these levels are included in the Noise standards noted in condition 17 to be complied with on a "as far as practicable" basis.
12. Condition 32(a)(ii) enables the Requiring Authority to dispense with condition 30 if access is not provided by a tenant despite an owner agreeing to access. Kāinga Ora consider that this condition is not reasonable as issues relating to obstruction of access by a tenant can and should be addressed through the Residential Tenancy Act processes. There is no practical reason to deem compliance with condition 30 for tenant related access constraints. Kāinga Ora seeks that sub clause (ii) is removed from the condition, as below.

*For each Category C Building identified, the Requiring Authority is deemed to have complied with Condition 30 above if:*

- (a) (i) *the Requiring Authority's Suitably Qualified Person has visited the building and assessed the noise reduction performance of the building envelope; or*
  - (ii) ~~*the building owner agreed to entry, but the Requiring Authority could not gain entry for some reason (such as entry denied by a tenant); or*~~
  - (iii) *the building owner did not agree to entry within 12 months of the date of the Requiring Authority's letter sent in accordance with Condition 30 above (including where the owner did not respond within that period); or*
  - (iv) *the building owner cannot, after reasonable enquiry, be found prior to Completion of Construction of the project.*
- (b) ~~*If any of (ii) to (iv) above apply to a Category C Building, the Requiring Authority is not required to offer to implement Building-Modification Mitigation to that building.*~~
- (c) Kāinga ora generally supports an asphaltic mix surface for all road surfaces within this designation. However, Kāinga Ora consider that the asphalt should be maintained in perpetuity, and therefore suggest the following wording:

*"The Requiring Authority shall implement and maintain on an ongoing basis an asphalt surface or similar low noise road surface throughout the Project."*

## Relief sought

- (d) The provision of a new condition listing all the relevant plans and reports that the project will be carried out in accordance with.
- (e) The flood hazard condition is amended so that requires that the requiring authority doesn't worsen any flooding effects onto neighbouring properties and appropriately avoids, remediates and/or mitigates the effects of their construction and operational activities.
- (f) The amendment of the asphaltic surface condition to specifically require the construction of low noise road surfaces, such as an Asphaltic mix surface, for all road surfaces within this designation, with the requirement to maintain the road surface on an ongoing basis.
- (g) Any other alternative or consequential relief to give effect to the comments stated in this letter.
- (h) Kāinga Ora does not consider it can gain an advantage in trade competition in making these comments.
- (i) If the panel is to hold a hearing on this project Kāinga Ora wishes to be heard in support of its comments.



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**Brendon Liggett**  
**Manager - Development Planning**  
**Kāinga Ora – Homes and Communities**

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