

FTC#112: Application for referred project under the COVID-19 Recovery (Fast-track Consenting) Act – Stage 2 decisions:

Application 2021-072 The Hill – Ellerslie

Date Submitted:	3 February 2021	Tracking #: BRF-1049
Security Level	In-Confidence	MfE Priority: Urgent

	Action sought:	Response by:
To Hon David Parker, Minister for the Environment	Decisions on recommendations	TBA

Actions for Minister's Office Staff	Return the signed briefing to MfE.
Number of appendices: 6	<p>Appendices:</p> <ol style="list-style-type: none"> 1. The Hill – Ellerslie application documents and further information received 2. Stage 1 Briefing Note and decisions 3. Statutory framework for making decisions 4. Draft Notice of Decisions letter to Auckland Thoroughbred Racing Incorporated and Fletcher Residential Limited (trading as Fletcher Living). 5. Section 17 Report 6. Comments received from Ministers, Auckland Council, Auckland Transport and Watercare Services Limited.

Ministry for the Environment contacts

Position	Name	Cell phone	1 st contact
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FTC#112: Application for referred projects under the COVID-19 Recovery (Fast-track Consenting) Act – Stage 2 decisions

Key Messages

1. This briefing seeks your decisions on the application received under section 20 of the COVID-19 Recovery (Fast-track Consenting) Act 2020 (FTCA) from Auckland Thoroughbred Racing Incorporated (ATRI) and Fletcher Residential Limited (trading as Fletcher Living) (FRL) for referral of The Hill – Ellerslie project (the Project) to an expert consenting panel (a panel). A copy of the application is in Appendix 1.
2. This is the second briefing relating to this application. The first (Stage 1) briefing (BRF-886) with your initial decisions annotated is in Appendix 2.
3. The Project is located on part of the land at 100 Ascot Avenue, Greenlane, Auckland. It is to subdivide part of the Ellerslie Racecourse property that is no longer required for racecourse operation and construct a housing development consisting of approximately 370 residential units in a mix of detached, duplex and terrace houses from 1–3 storeys high and five apartment buildings 6–7 storeys high. One of the apartment buildings will be designed for the active retired market. The Project will also create open space areas, private access lots, pedestrian and cycle accessways, together with public roads intended to vest in Auckland Council. The balance of the land will remain unchanged from the current use as Ellerslie Racecourse.
4. The Project will involve activities such as:
 - a. demolition of existing buildings and structures
 - b. subdivision of land
 - c. vegetation trimming and clearance
 - d. earthworks (including disturbance of contaminated soils)
 - e. diverting groundwater and overland flow paths
 - f. discharging stormwater and contaminants to land
 - g. placing structures in an overland flow path and flood plain
 - h. construction of buildings
 - i. construction of three-waters services
 - j. construction of roads, vehicle access, parking areas and pedestrian and cycle accessways
 - k. landscaping and planting of open spaces
 - l. any other activities that are:
 - i. associated with the activities described in a to k; and
 - ii. within the Project scope.
5. The Project will require subdivision and land use consents, and water and discharge permits under the Auckland Unitary Plan (AUP), and land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS).
6. The Project site is in the Special Purpose – Major Recreation Facility Zone and the Ellerslie Racecourse Precinct under the AUP. The purpose of the Major Recreation Facility Zone is to

manage facilities within the Auckland Region capable of hosting large-scale sports, leisure, entertainment, art, recreation, or cultural activities. The Ellerslie Racecourse Precinct provisions enable a range of primary activities including horse racing, functions, conferences, concerts and recreation activities, together with a range of compatible and accessory activities.

7. Auckland Council consider a plan change would be the most appropriate process for the Project. However, we note the Project can be assessed by a panel as a discretionary activity under the AUP and considered on its merits under the FTCA process.
8. We recommend you accept the referral application under section 24 of the FTCA and refer the Project to a panel for fast-track consenting. We seek your decision on this recommendation and on our recommendations on directions to the applicants and a panel, and notification of your decisions.

Assessment against Statutory Framework

9. The statutory framework for your decision-making is set out in Appendix 3. You must apply this framework when you are deciding whether or not to accept the application and when deciding on any further requirements or directions associated with Project referral.
10. Before accepting the application, you must consider the application and any further information provided by the applicants (in Appendix 1), the Section 17 Report (in Appendix 5) and comments from Ministers, Auckland Council, Auckland Transport and Watercare Services Limited (Watercare) (in Appendix 6). Following that, you may accept the application if you are satisfied that it meets the referral criteria in section 18 of the FTCA. We provide our advice on these matters below.
11. We have also considered if there are any reasons for declining the Project, including the criteria in section 23(5) of the FTCA, and provide our advice on these matters to assist your decision-making.

Further information provided by applicants

12. In response to a request under section 22 of the FTCA the applicants provided further information on the following:
 - a. land interests on the Project site and confirmation that they are not expected to prevent, limit or delay Project delivery
 - b. the Project site being 'sensitive land' under the Overseas Investment Act 2005 and the requirement for FRL to obtain Overseas Investment Office (OIO) approval for the Project to proceed.
13. The applicants also separately provided further information (in Appendix 1) relating to:
 - a. stormwater management for the Project including discussions with Auckland Council
 - b. confirmation that FRL applied for OIO approval on 18 January 2022
 - c. the need for approval under the Racing Industry Act 2020 for transfer of racing club property, and confirmation that the property transfer from ATRI to FRL was approved by New Zealand Thoroughbred Racing (NZTR) under section 21 of the Racing Industry Act 2020 on 22 December 2021.
14. We have taken this information into account in our analysis and advice.

Section 17 Report

15. The Section 17 Report indicates that there are 17 iwi authorities, eight Treaty settlements and 11 Treaty settlement entities relevant to the Project area.
16. No specific cultural or commercial redress provided under the settlements would be affected by the Project, and the settlements do not create any new co-governance or co-management processes that would affect decision-making under the Resource Management Act 1991 (RMA) for the Project.

Comments received

17. Comments were received from s 9(2)(f)(ii), s 9(2)(g)(i) Auckland Council, Auckland Transport and Watercare. The key points of relevance to your decision are summarised in Table A.
18. s 9(2)(f)(ii), s 9(2)(g)(i)
[Redacted]
[Redacted]
[Redacted].
19. s 9(2)(f)(ii), s 9(2)(g)(i), Auckland Transport and Watercare did not oppose Project referral. s 9(2)(f)(ii), s 9(2)(g)(i)
[Redacted]
[Redacted]
20. s 9(2)(f)(ii), s 9(2)(g)(i)
[Redacted]
[Redacted]
[Redacted].
21. Auckland Council opposed Project referral and considered that a plan change under standard RMA process would be the most appropriate process for the Project, as residential activities are not anticipated within the Special Purpose – Major Recreation Facility Zone. Comments from the Auckland Council Healthy Waters department also raised concern with potential negative effects relating to stormwater management.
22. Auckland Council and Auckland Transport noted several reports and assessments that would normally be required for a project of this type in this area. We consider that these are generally covered by the requirements of clause 9 Schedule 6 of the FTCA but recommend you require the applicants to submit to a panel certain specific information, as detailed in Table A, to assist a panel with timely consideration of the application.
23. s 9(2)(f)(ii), s 9(2)(g)(i)
[Redacted]
[Redacted]

Section 18 referral criteria

24. You may accept the application for Project referral if you are satisfied that the Project does not include ineligible activities (section 18(3)) and will help to achieve the purpose of the FTCA (section 18(2)).
25. The Project does not include any ineligible activities, as explained in Table A.
26. The matters that you may consider when deciding if a project will help achieve the purpose of the FTCA are in Section 19 of the FTCA. Our assessment of these matters is summarised in Table A. We consider the Project will help achieve the purpose of the FTCA, and thus meet the requirements of section 18(2), as it has the potential to:

- a. have positive effects on social well-being by generating employment and providing a diverse range of housing types, including terraced housing (which has the potential to be a lower-priced housing option)
 - b. generate employment by providing approximately 61 direct full-time equivalent (FTE) jobs in planning, design and consenting during years 1–3 and approximately 1,051 direct FTE jobs in construction during years 3–7
 - c. increase housing supply through the provision of approximately 370 residential units
 - d. progress faster than would otherwise be the case under standard RMA process.
27. We consider that any actual and potential effects arising from the Project, together with any measures to avoid, remedy, mitigate, offset or compensate for adverse effects, could be tested by a panel against Part 2 of the RMA and the purpose of the FTCA.

Issues and Risks

28. Even if the Project meets the referral criteria in section 18 of the FTCA, section 23(2) of the FTCA permits you to decline to refer the Project for any other reason.

Section 23 FTCA matters

29. Section 23(5) of the FTCA provides further guidance on reasons to decline an application, and our analysis of these matters is summarised in Table A. Note that you may accept an application even if one or more of those reasons apply.
30. Auckland Council considered it would be more appropriate for the Project to go through a plan change under standard RMA process, as residential activities are not anticipated within the Special Purpose – Major Recreation Facility Zone. However, the Project has discretionary activity status under the AUP and the applicants consider that the AUP policy framework enables the Project, subject to ensuring that the Ellerslie Racecourse can safely operate and will be protected from reverse sensitivity effects.
31. The Auckland Council Healthy Waters department considered that the development has the potential to cause significant stormwater runoff issues and that there are potential flooding issues downstream of the application site. However, the applicants advised they are working with Healthy Waters to develop detailed design and the applicants' stormwater specialists consider there are no significant impediments with respect to stormwater matters. We note that any adverse effects resulting from the Project and alignment with the AUP policy framework are matters that can be considered by a panel in a merits-based assessment under the FTCA process. Therefore, we do not consider that you should decline the referral application on the basis that it would be more appropriate for the Project to go through the standard consenting process under the RMA (section 23(5)(b)).

Other matters

32. There is a small risk that if you decide to refer the Project and the necessary resource consents are granted by a panel, FRL may not be able to exercise them because the necessary OIO approval is not in place. FRL has advised it is confident it can obtain the required OIO approval by July 2022 at the latest, and overall, we do not consider this matter presents a high risk to Project delivery or timing.

Conclusions

33. We do not consider there are any significant reasons for you to decline to refer the Project. You could accept the application under section 24 of the FTCA and all of the Project could

be referred to a panel.

34. If you decide to refer the Project, we consider that you should specify under section 24(2)(d) of the FTCA (as requested in comments) that the applicants must provide the following information, additional to the requirements of clause 9 of Schedule 6 of the FTCA, in an application submitted to a panel:
 - a. a three-waters infrastructure capacity assessment
 - b. a stormwater assessment and draft stormwater management plan
 - c. an ecological assessment related to increased stormwater flows
 - d. an integrated transport assessment
 - e. a contaminated soils assessment
35. The above information is required to assist a panel in assessing the adverse effects of the Project.
36. If you decide to refer the Project, we consider that you should specify under section 24(2)(e) of the FTCA that a panel must invite comments on a consent application from the following:
 - a. Ngāti Kōheriki Claims Committee
 - b. Auckland Transport
 - c. Watercare Services Limited
 - d. Minister for Racing
 - e. Minister for Seniors
37. The Minister for Seniors may have a relevant interest in the Project as the applicant intends to design part of it specifically for retired people.
38. Our recommendations for your decisions follow.

Next Steps

39. You must give notice of your decisions on the referral application, and the reasons for them, to the applicants and the persons, entities and groups listed in section 25 of the FTCA.
40. We consider that if you decide to refer the Project, the application and notice of decisions should be copied to the Minister for Seniors and the Ngāti Kōheriki Claims Committee, as they do not automatically qualify for receipt of the notice of decisions under section 25 of the FTCA.
41. We have attached a notice of decisions letter to the applicants based on these requirements and our recommendations (refer Appendix 4). We will assist your office to give copies to all relevant parties.
42. To refer the Project, you must recommend that a referral order be made by way of an Order in Council (OiC).
43. Cabinet has agreed that you can issue drafting instructions to the Parliamentary Counsel Office without the need for a policy decision to be taken by Cabinet in the first instance.¹

¹ Following the first OiC, the Minister for the Environment (and Minister of Conservation for projects in the Coastal Marine Area) can issue drafting instructions directly to the Parliamentary Counsel Office. Cabinet has also agreed that a Regulatory Impact Assessment is not required for an OiC relating to projects to be referred to a panel [ENV-20-MIN-0033 and CAB-20-MIN-0353 refer].

Recommendations

1. We recommend that you:

- a. **Note** section 23(1) of the COVID-19 Recovery (Fast-track Consenting) Act 2020 (FTCA) requires you to decline this application for referral unless you are satisfied that the Project meets the referral criteria in section 18 of the FTCA including that it would help to achieve the FTCA's purpose.
- b. **Note** when assessing whether the Project would achieve the FTCA's purpose, you may consider a number of matters under section 19, including the Project's economic benefits and costs, and effects on social or cultural well-being; whether it may result in a public benefit (such as generating employment or increasing housing supply); and whether it could have significant adverse effects.
- c. **Note** before deciding to accept the application for Project referral under section 24(1) of the FTCA you must consider:
 - i. the application
 - ii. the report obtained under section 17 of the FTCA
 - iii. any comments and further information sought and provided within the required timeframe.
- d. **Note** if you are satisfied that all or part of the Project meets the referral criteria in section 18 of the FTCA you may:
 - i. refer all or part of the Project to an expert consenting panel (a panel)
 - ii. refer the initial stages of the Project to a panel while deferring decisions about the Project's remaining stages
 - iii. still decline the referral application for any reason under section 23(2) of the FTCA.
- e. **Note** if you do refer all or part of the Project you may:
 - i. specify restrictions that apply to the Project
 - ii. specify the information that must be submitted to a panel
 - iii. specify the persons or groups from whom a panel must invite comments
 - iv. set specific timeframes for a panel to complete their process.
- f. **Agree** the Project meets the referral criteria in section 18 (3) of the FTCA.

Yes/No

- g. **Agree** the Project will help achieve the purpose of the FTCA (and therefore meets the referral criteria in section 18(2) of the FTCA) as it has the potential to:
 - i. have positive effects on social well-being by generating employment and providing a diverse range of housing types, including terraced housing (which has the potential to be a lower-priced housing option)
 - ii. generate employment by providing approximately 61 direct full-time equivalent (FTE) jobs in planning, design and consenting during years 1–3 and approximately 1,051 direct FTE jobs in construction during years 3–7
 - iii. increase housing supply through the provision of approximately 370 residential units
 - iv. progress faster than would otherwise be the case under standard Resource

Management Act 1991 process.

Yes/No

- h. **Agree** to refer all of the Project to a panel.

Yes/No

- i. **Agree** to specify under section 24(2)(d) of the FTCA the following additional information that the applicants must submit with any resource consent application lodged with the Environmental Protection Authority:

- i. a detailed assessment of –

1. the capacity of the existing infrastructure for three-waters services to service the completed Project
2. what upgrading is required to that infrastructure to service the completed Project
3. how any upgrading is to be funded

- ii. a stormwater assessment and a draft stormwater management plan along with information about discussions held and any agreements made with the Auckland Council Healthy Waters department regarding stormwater management

- iii. an ecological assessment which addresses the effects of increased stormwater flows from the Project site on the Waiatarua Reserve wetland

- iv. an integrated transport assessment, including –

1. an assessment of how the Project will support both public modes of transport and active modes of transport such as cycling and walking
2. an assessment of the impact of the Project on the area surrounding the Project site and the local transport network, including traffic safety issues that may arise during or after the construction phase

- v. in relation to the land in the Project site, a report on a preliminary site investigation and, if required, on a detailed site investigation, within the meaning of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, that shows how the requirements of those regulations will be met.

Yes/No

- j. **Agree** to specify under section 24(2)(e) of the FTCA that a panel must invite comments from the following additional persons or groups:

- i. Ngāti Kōheriki Claims Committee

- ii. Auckland Transport

- iii. Watercare Services Limited

- iv. Minister for Racing

- v. Minister for Seniors

Yes/No

- k. **Agree** to the Ministry for the Environment issuing drafting instructions to the Parliamentary Counsel Office for an Order in Council to refer The Hill – Ellerslie project to a panel in accordance with your decisions recorded herein.

Yes/No

- l. **Sign the attached (Appendix 4)** notice of decisions to Auckland Thoroughbred Racing Incorporated and Fletcher Residential Limited (trading as Fletcher Living).


Yes/No

- m. **Agree** to copy the application and notice of decisions to the Minister for Seniors and the Ngāti Kōheriki Claims Committee.

Yes/No

- n. **Note** to comply with section 25(3) of the FTCA, you must ensure that the decisions, the reasons, and the Section 17 Report are published on the Ministry for the Environment's website. We will work with your office to complete this task.

Signatures



Stephanie Frame
Manager – Fast-track Consenting

Date: 2 February 2022

Hon David Parker
Minister for the Environment

Date

Table A: Stage 2 - Project Summary and Section 24 Assessment

Project details	Project description	Does all or part of the Project meet the referral criteria in section 18?		Summary of comments received	Section 23 assessment – potential reasons for declining	Referral conclusions & recommendations
		Project eligibility for referral (section 18(3a - d))	Section 18(2) - Does the Project help achieve the purpose of the FTCA (as per section 19)?			
Project name The Hill – Ellerslie Applicant Auckland Thoroughbred Racing Incorporated (ATRI) and Fletcher Residential Limited (trading as Fletcher Living) (FRL). c/-Russell McVeagh Location 100 Ascot Avenue, Greenlane, Auckland (Ellerslie Racecourse)	The Hill - Ellerslie project is to subdivide part of the Ellerslie Racecourse property and construct a housing development consisting of approximately 370 residential units in a mix of detached, duplex and terrace houses from 1–3 storeys high and five apartment buildings 6–7 storeys high. One of the apartment buildings will be designed for the active retired market. The Project will also create open space areas, private access lots, pedestrian and cycle accessways, together with public roads intended to vest in Auckland Council. The Project will involve activities such as: a. demolishing existing buildings and structures b. subdivision c. vegetation trimming and clearance d. earthworks (including disturbance of contaminated soils)	The Project is eligible under section 18(3)(a-d) as: <ul style="list-style-type: none"> it does not include any prohibited activities it does not include activities on land returned under a Treaty settlement it does not include activities in a customary marine title area under the Marine and Coastal Area (Takutai Moana) Act 2011 it does not include activities in protected customary rights area under the Marine and Coastal Area 	Economic benefits for people or industries affected by COVID-19 (19(a)) The applicants estimate the Project will provide: <ul style="list-style-type: none"> approximately 61 direct full-time equivalent (FTE) jobs in planning, design and consenting during years 1–3 approximately 1,051 direct FTE jobs in construction during years 3–7 approximately \$65 million direct value contribution to GDP. Economic costs for people or industries affected by COVID-19 (19(a)) N/A Effect on the social and cultural well-being of current and future generations (19(b)) The applicants consider the Project will provide for the social wellbeing of current and future generations as it will: <ul style="list-style-type: none"> provide additional housing in a range of typologies, including apartment living targeted towards active retirees provide opportunities for improved social outcomes by providing quality open spaces provide for employment opportunities. Is the Project likely to progress faster by using this Act? (19(c)) The applicants consider the fast-track process will allow the Project to progress up to 24 months faster than under standard RMA	Ministers s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i)	Section 23(5) matters: Insufficient information (23(5)(a)) The applicants have provided sufficient information for you to determine whether the Project meets the criteria in section 18 of the FTCA. More appropriate to go through standard RMA process (23(5)(b)) Despite the comments from Auckland Council, we do not consider it would be more appropriate for all or part of the Project to proceed through the standard consenting processes under the RMA. Inconsistency with a national policy statement (23(5)(c)) We do not consider the Project is inconsistent with any relevant national policy statements. Inconsistent with a Treaty settlement (23(5)(d)) The Project does not directly affect any Treaty settlement redress. Involves land needed for Treaty settlements (23(5)(e)) The Project site does not include any land needed for Treaty settlement purposes. Applicant has poor regulatory compliance (23(5)(f)) Auckland Council has not identified any specific details or history of poor regulatory compliance by the applicants.	In response to Ministers' comments: <ul style="list-style-type: none"> s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i) s 9(2)(f)(ii), s 9(2)(g)(i)

Project details	Project description	Does all or part of the Project meet the referral criteria in section 18?		Summary of comments received	Section 23 assessment – potential reasons for declining	Referral conclusions & recommendations
		Project eligibility for referral (section 18(3a - d))	Section 18(2) - Does the Project help achieve the purpose of the FTCA (as per section 19)?			
	Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS).		<ul style="list-style-type: none"> • effects relating to construction phase and operational phase traffic • stormwater and sediment discharge effects on water quality • effects related to disturbance of contaminated land • effects relating to groundwater diversion (dewatering) • reverse sensitivity effects on the racecourse operation • potential effects on historic heritage. <p>The applicants consider that any adverse effects can be avoided, remedied or mitigated by employing industry best practice, standard techniques or appropriate conditions of resource consent.</p> <p>Other relevant matters (19(f))</p> <p>The applicants have provided an archaeological assessment and will be applying to Heritage NZ Pouhere Taonga (HNZPT) for an archaeological authority for the development. The archaeological assessment concludes that there are no major constraints on the development on archaeological grounds and we do not consider this will prevent Project delivery or delay Project timing.</p>	<p>process for the Project as residential activities are not anticipated within the Special Purpose – Major Recreation Facility Zone. Auckland Council also provided comments from the Orakei Local Board who considered the Project should go through standard process to provide for community submission and a broader evidence pool.</p> <p>Auckland Council noted the Project would provide an additional 370 dwellings in a variety of housing typologies, which would positively contribute to Auckland's housing stock. They also noted that the application site is within walking and/or cycling distance of Ellerslie and Greenlane train stations, and local bus connections.</p> <p>Auckland Council's most significant concern in terms of adverse effects relates to the management of stormwater runoff. Auckland Council's Healthy Waters department highlighted that the development has the potential to cause significant stormwater runoff issues and that there are potential flooding issues downstream of the application site. The Council is concerned that if the application goes through the fast-track consenting process, without the stormwater management matters having been resolved, that there is the potential that stormwater outcomes will be compromised and/or that significant redesign may be required at a later date.</p> <p>Auckland Council noted several reports which would normally be required for an application of this nature in this area, including on: transport, stormwater, flood hazard, cultural values, urban design, landscape and visual, arboriculture, civil design and infrastructure, geotechnical, ecology, contaminated land and archaeology. We consider that these are generally covered by the requirements of clause 9 Schedule 6 of the FTCA but have taken this list into account in our referral conclusions and recommendations.</p> <p>Other Parties</p> <p>Auckland Transport raised no concerns with the Project being referred under the FTCA, however requested that an integrated transport assessment and a stormwater management plan accompany any application to a panel.</p> <p>Watercare Services Limited identified a number of sections of water and wastewater network requiring upgrade in order to support the Project and advised that they have discussed these with the applicants and agreed to do further investigation/study.</p> <p>All responses received by parties invited to comment are attached at Appendix 6.</p>		<ul style="list-style-type: none"> • a stormwater assessment and a draft stormwater management plan along with information about discussions held and any agreements made with the Auckland Council Healthy Waters department regarding stormwater management • an ecological assessment which addresses the effects of increased stormwater flows from the Project site on the Waiaatarua Reserve wetland • an integrated transport assessment, including – <ul style="list-style-type: none"> i. an assessment of how the Project will support both public modes of transport and active modes of transport such as cycling and walking ii. an assessment of the impact of the Project on the area surrounding the Project site and the local transport network, including traffic safety issues that may arise during or after the construction phase • in relation to the land in the Project site, a report on a preliminary site investigation and, if required, on a detailed site investigation, within the meaning of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, that shows how the requirements of those regulations will be met. <p>We also recommend you direct a panel to invite comments on any resource consent applications for the Project from:</p> <ul style="list-style-type: none"> • Ngāti Koheriki Claims Committee • Auckland Transport • Watercare Services Limited • Minister for Racing • Minister for Seniors <p>We have recommended the inclusion of the Minister for Seniors as one of the proposed apartment buildings will be designed for the active retired market.</p>