



22 November 2021

Stephanie Frame
Manager | Kaitātari Kaupapa Here Matua
Fast-track Consenting
Ministry for the Environment | Manatū Mō Te Taiao

1. My name is Aaron Ghee, and I am one of the directors of Sanctum Projects Limited, who is proposing to undertake a residential development located at 43A and 45 Waimarie Street and 819 Riddell Road, St Heliers, Auckland ("Project").
2. In broad terms, the proposed fast track Project consists of 58 terraced units. It is intended to provide a high quality residential development, comprising a wide variety of typologies and configurations to offer choice to the market. Included in the project is also a new vehicle crossing.
3. Sanctum Projects Limited ("Sanctum") has been set up to project manage the development (including obtaining necessary consents) and is the entity applying for consent under the Covid-19 Recovery (Fast-Track Consenting) Act 2020. My other company, Mainstone Properties Limited has the contracts to buy the land, s 9(2)(b)(ii) s 9(2)(b)(ii). However Sanctum is the management company which is responsible for obtaining all consents and supervising construction of the buildings and so it is appropriate that Sanctum is the entity which applies to ha

Funding

4. In my capacity as director of the applicant company, I am confident that we have, and will be able to access, more than sufficient funding to be able to undertake the Project.
5. We are established and highly experienced property developers, and our business model is structured to undertake multiple projects at any one time. We presently have multiple projects currently in progress under different development entities, and completion dates of those projects will coincide with the forecast commencement dates of this Project. We pre-sell the units of our development, which ensures sufficient reliable cashflow to enable us to commence the next development.
6. In the case of this Project, I currently have the following projects in progress under various related project entities:
 - (a) 30-32 Dudley Road, Mission Bay, (19 Units) which is projected to be completed in January/February 2023, the value of which is s 9(2)(b)(ii) with an

equity release of s 9(2)(b)(ii) The website for this project is here:
<https://www.dudleyheights.co.nz/>

- (b) 28 Upland Road, Remuera, (4 Units) which is projected to be completed in March/April 2022, the value of which is s 9(2)(b)(ii) with an equity release of s 9(2)(b)(ii) House1/28 Upland Road, Remuera, Auckland City 1072 - Sold House - Ray White Epsom (rwepsom.co.nz)
- (c) 35 Mainston Road, Remuera, (15 Units) which is project to be completed August/September 2022, the value of which is s 9(2)(b)(ii) with an equity release of s 9(2)(b)(ii) Home (mainstonrise.co.nz)

7. To the extent that there is any shortfall, our second source of funding is bank funding, or funding through second tier funders. Our borrowing level is around s 9(2)(b)(ii)

8. I am confident that our funding model is sufficiently reliable and is an operating model that we have been using to fund our developments for over 15 years, and is sufficient to fund this project initially. Should there be any shortfall, then we will be able to secure additional funding through bank lending.

Relationship of entities

9. As identified above, Sanctum Projects Limited is a development entity which has been incorporated specifically to obtain all necessary consents and permissions to undertake the Waimarie development. The above projects which are involved in our funding structure are being managed and developed by separate entities. However, all development entities are ultimately controlled by me.
10. To establish this relationship and demonstrate that I am the director of these developments, I have prepared a document showing the relationship of these entities. This is included at Annexure "A" to my letter.
11. As is provided in further detail in the fast track application for referral, Sanctum Projects Limited has been set up specifically for the purposes of managing this project. However, the purchaser for the three properties is currently Mainston Properties Limited. Mainston Properties Limited currently has a management contract with Sanctum Projects Limited, for Sanctum to obtain the necessary consents. s 9(2)(b)(ii)
s 9(2)(b)(ii)

Enforcement and compliance action

12. Sanctum Projects Limited was incorporated on 9 March 2021 and therefore have not completed any prior developments as a company before.

13. However, I am an experienced developer and have undertaken numerous other developments throughout Auckland, which includes:

- (a) 28 Upland Road, Remuera (4 units);
- (b) 35 Mainston Road, Remuera (15 units);
- (c) 30-32 Dudley Road, Mission Bay (19 units);
- (d) 26 Apirana Avenue and 2 Castledine Avenue, Glen Innes (29 units);
- (e) 96 and 98 Melanesia Road, St Heliers (4 units);
- (f) 5 Gunson Street, Freemans Bay (3 units) and 9 Gunson. The quality of development delivered can be seen in the current marketing of 9 Gunson, which is available here:

<https://www.kellands.co.nz/property/view/property-for-sale-auckland-city-freemans-bay-gunson-street-00737>

14. The majority of our projects are externally managed through professional project managers and consultants, and as such, I am personally unaware of any enforcement and compliance action issued against any of the developments we have undertaken.

15. s 9(2)(h)

16. Sanctum Projects Limited has never been prosecuted for any non-compliance with resource consent conditions or adverse environmental effects.

Conclusion

17. I hope the above information is of assistance to the Ministry for the Environment with respect to funding capability and enforcement and compliance action in considering Sanctum Project Limited's application for referral for the Project.

18. Thank you for your consideration.

Yours sincerely

Aaron Gree

Director of Sanctum Projects Limited

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Annexure "A"

Development entities structure

Released under the provision of
the Official Information Act 1982

s 9(2)(b)(ii)

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the Official Information Act 1982