



*Employment into the Future*

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## 1. INTRODUCTION

- 1.1 This document is to support a referral application by Knight Investments Limited (“Knight Investments” or the “applicant”) under the Fast-track Approvals Act 2024 (“FTAA”) for the “**Ardmore Business Park**” Project (hereafter referred to as “The Project”).
- 1.2 This document has been provided as a companion document (and as **Attachment 1**) to the Application Form, addressing those matters which require a detailed response and explanation, and should be read together with the Application Form.
- 1.3 Care has been taken to ensure the two documents are consistent, but if there is any inconsistency, the content in this document prevails.
- 1.4 The application is also accompanied by the following:
  - (a) Ardmore Business Park Concept Document (**Attachment 2**).
  - (b) Project Site Maps (**Attachment 3**).
  - (c) Records of Title (**Attachment 4**).
  - (d) Summary Table of Registered Interests on Records of Title (**Attachment 5**).
  - (e) Record of Engagement (**Attachment 6**).
  - (f) Planning Memorandum (**Attachment 7**).
  - (g) Economic Impact Assessment (**Attachment 8**).
  - (h) Geotechnical Assessment (**Attachment 9**).
  - (i) Archaeology Assessment (**Attachment 10**).
  - (j) Stormwater Assessment (**Attachment 11**).
  - (k) Landscape Assessment (**Attachment 12**).
  - (l) Earthworks Report (**Attachment 13**).
  - (m) Wastewater Report (**Attachment 14**).
  - (n) Water Report (**Attachment 15**).
  - (o) Transport Assessment (**Attachment 16**).
  - (p) Urban Design Statement (**Attachment 17**).
  - (q) Ecological Assessment (**Attachment 18**).
  - (r) Applicant’s Compliance and Enforcement Record (**Attachment 19**).
  - (s) Application Sites Ownership and Landowner Agreements (**Attachment 20**).

- (t) Letter from Ardmore Airport (**Attachment 21**).
- (u) Letters Of Support (**Attachment 22**).
  - (i) Papakura Marae.
  - (ii) Manurewa High.
  - (iii) Sir Barry Curtis.
  - (iv) Andy Baker (Franklin Ward Councillor).
  - (v) Te Warena Taua (Kaumātua Ngāi Tai ki Tāmaki & Te Kawerau a Maki).
- (v) Letter from Ngāi Tai ki Tāmaki (**Attachment 23**).
- (w) Letter of Authority (**Attachment 24**).

**There are no reasons to decline the project under clause 21**

- 1.5 For the purposes of clause 21 of the FTAA, there are no reasons to decline the Project:
- (a) The Project meets the criteria in section 22 of the FTAA, for the reasons outlined in Section 2;
  - (b) The project does not involve any ineligible activities – see Section 3;
  - (c) Adequate information has been provided in this application and supporting materials;
  - (d) The project is not inconsistent with any Treaty settlements – see Section 8;
  - (e) The FTAA process is the most appropriate process to acquire the necessary approvals for the project;
  - (f) As outlined in the accompanying Planning Memorandum (**Attachment 7**) and supporting technical assessments, the project is not considered to have any significant adverse effects on the environment;
  - (g) The Applicant does not have a history of poor compliance under any of the specified Acts that relate to the proposed approvals (refer **Attachment 19**);
  - (h) The project area does not include land that the Minister for Treaty of Waitangi Negotiations considers necessary for Treaty settlement purposes;
  - (i) A substantive application for this Project would not have any competing applications and there are no existing resource consents for the same activity.

## 2. PROJECT DESCRIPTION AND LOCATION

2.1. The following sections provide the required responses to the following matters:

- Section 2.2.1: Project Description.
- Section 2.2.2: Provide a description or map of the whole project that identifies its boundaries in sufficient detail to enable consideration of the referral application.

### **Project description (Referral Application Section 2.2.1)**

- 2.2. The Project is to deliver a regionally significant industrial and employment hub. The Project Area is located surrounding (and including) Ardmore Airport and comprises industrial and employment activities compatible with airport operations and the establishment and operation of a business park. The location provides accessibility to the planned Mill Road major transport connection and is proximate to the growing residential areas of Takaanini, Manurewa, Papakura and Drury. The referral application relates to consents and approvals to be sought under the Resource Management Act (“RMA”). The Planning Memorandum (**Attachment 7**) outlines the approvals to be sought under the RMA.
- 2.3. The opportunity to establish a regionally significant industrial and employment hub has a significant positive impact on economic activity, employment and innovation.
- 2.4. At a high level, the Project includes:
- (a) The construction and development of a business park across some 511 gross hectares;
  - (b) Provision for land use activities and buildings for light industry/service type activities;
    - (i) approximately 193-276 hectares available as “net” developable area (inclusive of landscaping and carparking etc);<sup>1</sup> and
    - (ii) approximately 67-136 hectares of gross floor area for future activities / buildings.
  - (c) A green / blue network providing riparian planting, stormwater management and wastewater disposal and protection of existing SEAs.
  - (d) Upgrades to existing roads and intersections, new roads and accessways.
  - (e) New roading connections to the Airport and the wider site.
  - (f) Land modification works (inclusive of freshwater works such as streamworks and works within and in proximity to wetlands) and infrastructure to service the Project.

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<sup>1</sup> The net developable area excludes significant ecological areas (“SEA”), streams, stormwater management areas and that part of the Airport either used for existing operations/runways or already under construction.

- 2.5. The Project will deliver significant employment, with an estimated:
- (a) 17,300 full-time equivalent jobs generated over the development period; and
  - (b) 4,500-5,000 full-time equivalent permanent jobs generated upon completion, through:
    - (i) the establishment of a transport / logistics / service / light industrial / trade supply hub; and
    - (ii) enabling activities such transport and logistics, workshops, light manufacturing, and related convenience retail and business premises to establish.
- 2.6. The investment by the Project in the Auckland region over the 15 year development period has been estimated to be in the order of **\$2.7 billion**, which will stimulate economic activity and employment across multiple sectors.
- 2.7. Economic and business opportunities come from the presence of the Airport, the roading connections (including the Mill Road improvements as a Road of National Significance) and the population/centres that surround it. These factors combine to enable industries and innovation where they:
- (a) have a supporting role for the Ardmore Airport;
  - (b) leverage a hub of industrial and service activities as a cluster; and,
  - (c) coalesce a variety of manufacturing, incubators and innovation with more traditional industrial activities such as logistics, warehousing and the like; - all to create a place where there is a concentration of employees, business owners and higher value activities and employment.
- 2.8. The letter from Ardmore Airport Ltd (**Attachment 21**) outlines that the parties (Ardmore Airport and Knight Investment) are working together on land development plans on and surrounding Ardmore Airport, and that there is an intention to continue to work collaboratively and to achieve an integrated development that is beneficial for both Ardmore Airport, Knight Investments and the local community.
- 2.9. The Project will provide options for its own water supply, wastewater treatment and disposal, stormwater management and roading upgrades.
- 2.10. The Project would have significant regional benefits for Auckland. It will be the largest business park/industrial project, by area and number of employees, currently seeking to utilise the FTAA.
- 2.11. Referral of the Project to the fast-track approvals process would facilitate the project by enabling it to be processed in a more timely and cost-effective way than under normal processes. It is also unlikely to materially affect the efficient operation of the fast-track approvals process (as discussed in more detail below). The Project therefore meets the criteria for referral under s 22(1) of the FTAA.
- 2.12. Consents will be sought under the RMA.

**Site description (Referral Application Section 2.2.1)**

2.13. The Project is located at:

Address	Legal Description	Address	Legal Description
308 Airfield Road	Lot 5 DP 20982	115 Hamlin Road	Pt Lot 1 DP 50029 Pt Lot 2 DP 50029
348 Airfield Road	Lot 1 DP 192819	120 Hamlin Road	Lot 1 DP 53384
360 Airfield Road	Lot 2 DP 192819	125 Hamlin Road	Lot 1 DP 53136
368 Airfield Road	Lot 2 DP 96780	130 Hamlin Road	Lot 2 DP 53384
371 Airfield Road	LOT 1 DP 578804	135 Hamlin Road	Lot 2 DP 53136
382 Airfield Road	Lot 1 DP 96780	140 Hamlin Road	Lot 3 DP 53384
394 Airfield Road	Lot 1 DP 198874	143 Hamlin Road	Lot 1 DP 11032
396 Airfield Road	Lot 2 DP 208957	146 Hamlin Road	Pt Lot 4 DP 53384
398 Airfield Road	Lot 1 DP 208957	151 Hamlin Road	Lot 1 DP 316491
448 Airfield Road	Lot 1 DP 336380	155 Hamlin Road	Lot 2 DP 316491
453 Airfield Road	Lot 200 DP 319290	161 Hamlin Road	Lot 6 DP 39433
457 Airfield Road	Lot 202 DP 458277	40 Mullins Road	Lot 2 DP 169281
460 Airfield Road	Lot 2 DP 336380	47 Mullins Road	Lot 2 DP 206430
463 Airfield Road	Lot 203 DP 458277	50 Mullins Road	PT ALLOT 50 PSH Papakura
469 Airfield Road	Lot 204 DP 458277	53 Mullins Road	Lot 3 DP 206430
470 Airfield Road	Lot 1 DP 92845	61 Mullins Road	Lot 1 DP 75641
473 Airfield Road	Lot 205 DP 458277	66 Mullins Road	Lot 1 DP 22687
479 Airfield Road	Lot 206 DP 458277	90 Mullins Road	LOT 2 DP 598608
487 Airfield Road	Lot 207 DP 458277	100 Mullins Road	LOT 1 DP 598608
495 Airfield Road	Lot 208 DP 458277	114 Mullins Road	Lot 1 DP 95196, Lot 1 DP 81758
499 Airfield Road	Lot 209 DP 458277	124 Mullins Road	Lot 2 DP 129748
1 Burnside Road	Lot 1 DP 165259	7 Bullens Road	Lot 1 DP 141367
37 Burnside Road	Lot 2 DP 165259	19 Bullens Road	Lot 2 DP 450259
51 Burnside Road	Lot 2 DP 112997	49 Bullens Road	Lot 2 DP 111591
61 Burnside Road	Lot 2 DP 311910	51 Bullens Road	Lot 2 DP 473510
93 Burnside Road	PT ALLOT 1 DP 94470	52 Bullens Road	Lot 1 DP 473510
133 Burnside Road	LOT 2 DP 533681	99 Corsair Lane	LOT 2 DP 578804
803 Papakura-Clevedon Road	Lot 1 DP 450259	45 Clevedon-Takanini Road	Lot 3 DP 169281
881 Papakura-Clevedon Road	Lot 1 DP 483053	61 Clevedon Takanini Road	Lot 1 DP 112997
95 Hamlin Road	Pt Lot 1 DP 50029		

- 2.14. The Project may include works on public roads including Airfield Road, Alfriston-Ardmore Road, Bullens Road, Burnside Road, Clevedon Road, Clevedon-Takanini Road, Cosgrave Road, Dominion Road, Hamlin Road, Mill Road, Mullins Road, Old Wairoa Road (including a paper road extension), Papakura-Clevedon Road, Petersons Road and Village Way for works associated with required infrastructure (including any required transport upgrades/connections).<sup>2</sup>
- 2.15. Maps of the above areas are provided in **Attachment 3**. Maps showing the location of public roading intersections are provided in the Transportation Assessment in **Attachment 16**.
- 2.16. Maps showing the zoning of the site are provided as part of the Planning Memorandum (provided in **Attachment 7**).
- 2.17. The Records of Title are attached as **Attachment 4** to the Application. There are a number of interests registered against the Records of Title. These have been outlined and summarised in **Attachment 5**. In terms of their impact on the Project, none of the matters affect the ability for the Project to be implemented.

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<sup>2</sup> Private roads (such as Corsair Lane, Harvard Lane etc) are not held separately and fall within the Records of Title held by the Ardmore Airport with the site addresses etc listed above.

**3. NO INELIGIBLE ACTIVITIES**

- 3.1. The Project does not involve any ineligible activities.

#### 4. SIGNIFICANT NATIONAL AND REGIONAL BENEFITS

4.1. The following sections provide the required responses to the following matters:

- Section 2.6.1: The criteria for accepting a referral application is that the project is an infrastructure or development project that would have significant regional or national benefits. Explain how this project satisfies that criteria.

4.2. The Project meets this criterion. It is a large-scale development initiative that will deliver significant and enduring economic, social and cultural benefits to the Auckland region. Key features include:

##### 1) Significant provision of land for industrial activities (economic and social benefits)

4.3. Providing more employment opportunities and land for industrial/service activities in this location is considered critical to fulfilling current demand and to future-proof for population growth forecasts. Put simply, a significant portion of Auckland's growth is in South Auckland, and where there is residential growth there should be a commensurate level of local employment opportunities and local provision of services.

##### Shortage of Land

4.4. South Auckland is experiencing a significant shortage of Industrial land across Auckland, and especially in locations close to the developing population in South Auckland.

4.5. The shortage will worsen without active intervention.

4.6. In 2023, Colliers projected a shortfall of **over 900 hectares** of industrial land in Auckland, with South Auckland being the most affected region.<sup>3</sup>

4.7. In early 2025, Stephen Hughes, CEO of Drury South Crossing identified that half of the second phase of their industrial development had already been sold. According to Hughes, "*large-scale manufacturing facilities require contiguous greenfield sites with close access to major transport arteries like motorways and rail. The diminishing availability of such land in Auckland is beginning to limit the options for industrial expansion.*"<sup>4</sup>

4.8. Thus, new greenfield developments such as Drury South Crossing are nearly sold out already, and large-scale sites suitable to accommodate new technologies such as automated warehousing—requiring 2+ hectares and 30-metre ceiling heights—are extremely scarce.

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<sup>3</sup> <https://www.oneroof.co.nz/news/auckland-industrial-land-supply-constrained-43388>

<sup>4</sup> <https://nzmanufacturer.co.nz/2025/02/manufacturing-bottleneck-how-aucklands-land-crunch-threatens-growth/>

- 4.9. The Economic Impact Assessment in **Attachment 8** refers to a Colliers' Auckland Industrial Essentials report<sup>5</sup>, where the authors said that the overall industrial built form vacancy rate across Auckland was 2.2% as at August 2025. Although vacancies have increased slightly over the past two years, largely reflecting the softer economic environment and reduced occupier confidence, the current rate remains well below historic levels. This indicates that even in a challenging economic environment, underlying demand for industrial space across the region remains relatively strong, consistent with the continuous growth in industrial employment across Auckland.
- 4.10. Specifically, Colliers reports that prime industrial space vacancy across Auckland is sitting at approximately 1.1%. East Tāmaki, one of the region's largest and most established industrial precincts, records an exceptionally low vacancy rate of 0.2%. Drury, currently under development, shows no remaining vacant stock. The Airport Corridor / Māngere area, which is the most comparable business cluster for the Project given its proximity to an airport, exhibits a prime vacancy rate of just 0.8% as at August 2025.
- 4.11. Collectively, these metrics highlight both the continuing tenant demand and the constrained supply environment within the regional industrial market. Even during a period of weaker economic conditions, high-quality, well-located industrial premises remain scarce and continue to lease rapidly.
- 4.12. NZ Manufacturer identifies that:
- “the industrial land shortage in Auckland has implications far beyond manufacturing. The lack of suitable sites may stymie growth in associated sectors such as logistics, warehousing, and even retail. Manufacturers unable to expand domestically might look offshore, taking jobs and investment with them.*
- As Auckland continues to grow, the competition for land will intensify.”*<sup>6</sup>
- 4.13. The implications for light industry/service activities are significant. Companies face difficulty securing sites for expansion or automation, and rising rents and land prices are increasing operational costs.
- 4.14. Additional industrial supply in an efficient and large scale business park, as facilitated by the Project, will deliver significant economic benefits to Auckland's wider industrial economy particularly by enhancing agglomeration effects, strengthening market competitiveness, and supporting regional economic resilience.

### **Supporting growth**

- 4.15. Stats NZ reported in September 2025 that Auckland's population is projected to reach two million by 2033. Under the Auckland Council's Growth Scenario (AGS23v1.1), the region's population base is projected to increase by around 218,380 people (around +12%) over the next decade to 2036.

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<sup>5</sup> Auckland Industrial Colliers Essentials 2H 2025, Colliers (Source: <https://www.colliers.co.nz/download-article?itemId=39261627-3f6b-45ab-8aa1-4cbd158496f8>)

<sup>6</sup> <https://nzmanufacturer.co.nz/2025/02/manufacturing-bottleneck-how-aucklands-land-crunch-threatens-growth/>

- 4.16. The growth planned for the “south of Manukau” area including that identified for the medium to long term is predominately residential, and any commercial is residential-focused (ie town centres and services to support residential) rather than meaningful employment areas.
- 4.17. The Project is well positioned to accommodate a meaningful share of future employment growth, ease capacity constraints in existing industrial precincts, and support the efficient functioning of Auckland’s wider industrial economy.
- 4.18. The Project will play a critical role in supporting and accommodating the business and employment needs arising from Auckland’s anticipated growth and locating those employment opportunities closer to where that growth is occurring.

## **2) Significant employment opportunities (economic and social benefits)**

- 4.19. The Economic Impact Assessment in **Attachment 8** identifies that the scale of employment generation is significant in the regional context. The Auckland Regional unemployment rate increased from 3.5% in 2022 to 6.1% in 2025, equating to around +12,100 additional people unemployed per annum over the last three years. Furthermore, the Auckland region unemployment rate consistently trends higher than the national New Zealand average with the current national rate at 5.2%. By 2050, Auckland’s employment need is forecast to expand by around +29%, equivalent to an average of about 11,150 additional employees per year.
- 4.20. The Project will deliver significant employment, with an estimated:
- (a) 17,300 full-time equivalent jobs generated over the development period; and
  - (b) 4,500-5,000 full-time equivalent permanent jobs generated upon completion.
- 4.21. These employment outcomes will support economic resilience and growth in the Auckland Region.

## **3) Significant economic investment and subsequent economic impacts (including significant economic and social benefits):**

- 4.22. Significant economic investments and impacts are explained in the Economic Impact Assessment (**Attachment 8**).
- 4.23. The investment in the Auckland region over the 15 year development period has been estimated to be in the order of **\$2.7 billion**, which will stimulate economic activity and employment across multiple sectors.
- 4.24. During the development period, approximately 17,300 FTEs will be employed in constructing and servicing the Project. The development will lead to an estimated 4,500-5,000 FTEs once complete and an estimated 20-30 FTEs per annum through the training programme (outlined below). These employment outcomes will support economic resilience and growth in this part of the Auckland Region.

- 4.25. In addition to these quantifiable regional contributions, the Economic Impact Assessment (**Attachment 8**) identifies that the Project is also expected to generate a wide range of qualitative economic benefits for the broader market and communities, including:
- (a) Increased business land supply to accommodate demand of business activities: Auckland's population is projected to grow by +12% by 2036, with employment reaching 1.1 million jobs and expanding by +29% by 2052. The project will help ease industrial land constraints and support future employment needs.
  - (b) Greater economies of scale and business agglomeration effects: Proximity to existing aviation and industrial operations will create efficiencies, encourage clustering, and improve business performance.
  - (c) Improved land use efficiency: The Project area is highly compatible with industrial activities, uses existing infrastructure, and offers a more efficient alternative to residential or commercial development.
  - (d) Stimulation of new industrial activity and increased market size: The Project can attract high-value, innovation-focused businesses, expanding Auckland's industrial base and strengthening economic resilience.
  - (e) Improved existing infrastructure efficiency by reducing unnecessary duplication: Potential for shared use of infrastructure lowers servicing costs, avoids duplication, and reduces long-term community infrastructure burdens.
  - (f) Enhanced business location efficiency and competitiveness: Clustering near Ardmore Airport improves logistics, supply-chain integration, and Auckland's attractiveness for industrial investment.
  - (g) Potential for mitigation of industrial land prices: Additional supply reduces upward price pressure, limits land banking, and promotes a more competitive and transparent market.
  - (h) Improved productivity through modern and fit-for-purpose industrial space: New, fit-for-purpose industrial spaces will address shortages of high-spec premises, lowering operating costs and boosting output.
  - (i) Greater industrial business location options: Strategic positioning near key transport corridors offers flexibility for logistics, aviation-related industries, and other sectors requiring rapid access.
  - (j) Increased flexibility for industrial growth and new entrants: The Project provides room for expansion and innovation, reducing barriers to entry and supporting a more diversified industrial sector.
- 4.26. The economic benefits of the Project will extend well beyond its construction phase and deliver a unique range of wider economic benefits that accumulate annually over the economic life of the assets and business park.

4.27. Economic and business opportunities come from the presence of the Airport, the roading connections (including Mill Road) and the population/centres that surround it. These factors could combine to enable industries and innovation where they:

- (a) have a supporting role for the Ardmore Airport;
- (b) leverage a hub of industrial, service and business activities as a cluster (which would not otherwise create leverage if not present together); and
- (c) coalesce a variety of manufacturing, incubators and innovation with more traditional industrial activities such as logistics, warehousing and the like - all to create a place where there is a concentration of employees, business owners and higher value activities and employment.

#### **4) Youth Construction Training Academy (economic and social benefits)**

4.28. The Project will enable a partnership between the applicant and Pacific Coast Technical Institute (which is a sister company to Knight Investments), to train rangatahi in modern construction methods while delivering live construction projects on site. This will assist in tackling the regional and national issues associated with skilled workforce shortages. It is estimated that some 20-30 FTEs per annum could be accommodated through the training programme.

4.29. Research from the Infrastructure Commission estimated that the infrastructure workforce would need to grow from around 40,000 to 97,000 over the next 30 years to fully address New Zealand's infrastructure needs (Infrastructure Commission, 2021).

4.30. According to a government study in collaboration with Deloitte and Hanga Aro Rau (November 2022), a critical skills shortage is set to grow by 38% by 2028 if immediate action is not taken. Alexander-Crawford, Hanga Aro Rau's CEO, said:

*“By 2028 we will need 463,000 workers in key regions around the country; however, based on current trends, a skills shortfall of over 40,000 is set to constrain future output”... “We need to begin work immediately to reduce barriers preventing the development of an equitable domestic workforce.”*

## 5. APPROPRIATENESS FOR FAST TRACK APPROVALS PROCESS

5.1. The following sections provide the required responses to matters raised in Section 2.6.2 which requires an explanation of how referring the project to the fast-track approval process:

- Section 2.6.2.1: Would facilitate the project, including by enabling it to be -processed in a more timely and cost-effective way than under normal processes.
- Section 2.6.2.2: Is unlikely to materially affect the efficient operation of the fast-track approvals process.
- Section 2.6.2.4: Will the project deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure
- Section 2.6.2.5: Will the project 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). If yes, explain how the project will achieve this.
- Section 2.6.2.6: Will deliver significant economic benefits, and if so how.
- Section 2.6.2.9: Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions, and if so, how?
- Section 2.6.2.11: Will the project address significant environmental issues, and if so, how?

**Referral to the fast-track process would facilitate the project, including by enabling it to proceed in a more timely and cost-effective way than under normal processes (Referral Application Section 2.6.2.1)**

5.2. The FTAA process offers a number of advantages in terms of time and cost savings over the standard RMA process.

5.3. Under a typical RMA process a rezoning via a Private Plan Change, followed by a resource consent process, would likely be required given the site's current zoning.

5.4. The RMA allows up to two years for decision-making on a private plan change from the date of public notification. Recent private plan changes in Auckland have taken eleven months from lodgement to reach the milestone of notification. This means in total Council-level plan change process in Auckland can take close to three years. The Plan Change may then subsequently be appealed to the Environment Court (including by Council and its CCOs), a process that requires in the order of a further one to two years to conclude. An example would be the Waiuku Plan Change, which despite a favourable decision by the Environment Court, was first lodged in 2021 and is still not operative (5 years later).

5.5. Subsequent to securing a plan change, resource consents for the development would then need to be obtained. At this same scale it is expected that consent would take at least 12-18 months, if not longer, to process through the Council based on previous experience by the team for recent developments of scale. As an example, securing resource consents for greenfield subdivision and development is generally taking nine months from lodgement.

- 5.6. Without a plan change, a development of this scale and in this location, would most likely be publicly notified. Comparison with the other notified activities of scale in the Auckland Region in recent years suggest that approximately 24 months from lodgement would be required to secure a hearing. Hearings are often adjourned for lengthy periods, with a total time to secure resource consents for large scale urban developments in Auckland approaching two to three years. Again, publicly or limited notified applications can be appealed by submitters to the Environment Court, adding another one to two years of process before consents are finally secured.
- 5.7. Thus, it is estimated that the processes that will be replaced by a successful FTAA referral would add up to five to eight years. By contrast, once a substantive application is received under the FTAA, the default time period for a decision on a substantive application under the FTAA is 30 working days after receiving feedback from invited parties.
- 5.8. Based on recent responses from Auckland Council and its CCOs to private plan changes seeking to urbanise rural land, it is likely that a Private Plan Change would be declined by Auckland Council simply because development of the site is out of sequence with, and does not align with, the Future Development Strategy that the Council produced pursuant to its obligations under the National Policy Statement for Urban Development 2020. This has been made clear through publicly available correspondence from the Auckland Council Mayor to its CCOs outlining that they are expected to support Auckland Council in rejecting and/or submitting in opposition to Private Plan Changes that do not conform with the Future Development Strategy.
- 5.9. The FTAA process provides different criteria to those of the RMA, assisting the Applicant to overcome the problems inherent in the policy approach taken by Auckland Council and its CCOs. In this case, the process would create an opportunity to establish a significant industrial, employment and economic hub, helping to address Auckland's shortfall in industrial land and creating employment opportunities for swiftly growing South Auckland communities.
- 5.10. The purpose of the FTAA is *"to facilitate the delivery of infrastructure and development projects with significant regional or national benefits."* This reflects a recognition that the RMA has not always enabled such developments to proceed in a timely manner, notwithstanding the policy direction provided by the National Policy Statement on Urban Development. Councils, as regulators, are not best placed to deliver business-ready land. Efforts to identify land for future urban needs and to reserve three waters services for this land may leave unused capacity in these services as owners of future urban zoned land continue to land bank or are otherwise unable to develop in accordance with the Council's envisaged timetable.
- 5.11. The Applicant is an experienced developer who is motivated to realise the lands potential and, in doing so, is able to address servicing issues that would otherwise constrain development. The landowner is prepared to invest significantly and without delay, in preparing and processing a substantive application, which provides a higher degree of certainty that development will occur.
- 5.12. The FTAA provides a mechanism to move beyond Council gatekeeping of development opportunities and enables projects to be demand-driven and progress in a way that is not possible under the RMA. By referring the project to the fast-track approval process, it can be advanced in a more timely and cost-effective way, giving confidence that the investment and development will translate into delivery of land ready for businesses, on the ground.

- 5.13. Finally, use of the FTAA will allow any regional policy that seeks to avoid effects that might be occasioned by this Project to weigh in the decision-making, rather than determining its outcome. The panel appointed to consider the substantive application will be guided by the wider imperatives of schedule 5, cl 17 of the Fast-track Approvals Act 2024, enabling a more holistic approach to providing for growth to be taken.
- 5.14. The applicant is committed to managing the anticipated and known effects of the Project through the substantive application (design, mitigation measures and management plans).
- 5.15. The consenting timeframe under the fast-track process is likely to be in the order of six months from lodgement of the substantive application. This is a significant time saving, compared to a standard process and will enable the significant regional benefits (through works on the ground and employment) at least two and a half to six years ahead of a standard process. In addition, the one-step nature of the fast-track approvals process is likely to lead to significant efficiencies and cost savings, especially when compared to the scenario of a private plan change and/or applications for resource consents under the standard process, which may take up to 8 years (including the potential for appeals at multiple steps) to complete. Considering the area is not within Auckland Council's 30 year Future Development Strategy, the difference may in fact literally be, a generation.

**Referral is unlikely to materially affect the efficient operation of the fast-track approvals process (Referral Application Section 2.6.2.2)**

- 5.16. The project is not expected to materially impact the operation of the fast-track approval process.
- 5.17. The consents sought are those under the RMA which is explicitly listed in the Act, and are consistent with the purpose and design of the FTAA (as well as other similar projects which have either already been listed or referred under the FTAA). The Planning Memorandum (**Attachment 7**) outlines the approvals to be sought.
- 5.18. While regionally significant, it is not of a scale that is beyond the contemplation of the FTAA. It will not require the involvement of large numbers of commenters.
- 5.19. The applicant has been engaging with relevant Māori entities and bodies (which is ongoing). The applicant has consulted with all entities that the FTAA requires.
- 5.20. The applicant's advisors are familiar with fast-track approvals processes and will be able to meet the process requirements for applicants efficiently.

**The Project will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure (Referral Application Section 2.6.2.4)**

**Ardmore Airport**

- 5.21. Ardmore Airport plays a critical role in supporting economic activity, connectivity, and resilience within the Auckland region. The Airport provides essential facilities for flight training, freight, charter services, and aviation maintenance. In addition, Ardmore contributes to regional emergency response capability and supports tourism and specialist aviation services, making it a key asset for economic development and regional accessibility.

- 5.22. The Project includes the redeveloping parts of Ardmore Airport which are either not utilised or underutilised by the current operations. The proposed development and land uses will support the continued functioning of the airport by creating a complementary economic base to sustain aviation operations. Industrial activities such as logistics, warehousing, and aviation-related manufacturing can leverage the airport's proximity and infrastructure, generating revenue streams that help fund maintenance and future upgrades. This integration also attracts businesses that rely on air connectivity for freight or specialised services, reinforcing Ardmore's role as a regional aviation hub.
- 5.23. By clustering compatible industrial/service uses within the Project Area, the redevelopment ensures efficient land use while minimising reverse sensitivity issues, ultimately securing the airport's long-term viability and contribution to regional economic growth.
- 5.24. The letter from Ardmore Airport Ltd (**Attachment 21**) outlines that the parties (Ardmore Airport and Knight Investment) are working together on land development plans on and surrounding Ardmore Airport, and that there is an intention to continue to work collaboratively and to achieve a fully integrated development that is beneficial for both Ardmore Airport, Knight Investments, and the local community, the region and in fact New Zealand. This includes designing the Project to address the Ardmore Airport designation and the approach surfaces, transitional surfaces, horizontal surfaces and conical surface and side clearances of the Airport and also including Airport land as part of this application.

**The Project will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (Referral Application Section 2.6.2.5)**

- 5.25. The Project will significantly contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on urban development 2020 ("NPS-UD")). Consistent with Policy 1 by:
- (a) Delivering between 193-273 hectares of net developable land and providing 17,300 FTE jobs during construction and 4,500-5,000 permanent FTE jobs upon completion. This will make a significant contribution to Auckland's economic growth and employment needs. Auckland's population is projected to grow by +12% by 2036, with employment reaching 1.1 million jobs and expanding by +29% by 2052. The project will help ease industrial land constraints and support future employment needs.
  - (b) Providing for appropriate land use adjacent to the Ardmore Airport, ensuring that this regionally significant resource is not constrained in the future by the location of inappropriate, noise sensitive activities. The Project will provide a buffer between the airport and its inevitable externalities, and more sensitive residential and rural-residential development.
  - (c) Catering for a variety of business sectors through the enabled land use activities and future site sizes. It is anticipated that the substantive application will seek resource consent for activities from logistics to manufacturing and storage/warehousing (as well as supporting activities such as for these such as ancillary office spaces, trade retail etc).

- (d) Enabling good accessibility for people between housing and jobs. The Project’s strategic location ensures efficient access between residential areas (Papakura, Takaanini, Manurewa, and Drury) and the business park, significantly reducing travel times to employment and supporting integrated urban development. The Transportation Assessment (**Attachment 16**) identifies that while the introduction of employment opportunities will generate traffic, the traffic generated will predominantly be in the counter-peak direction. That is, rather than adding high traffic volumes to the current northbound peak commuter flow, traffic generated by the development will predominantly occur in the opposite direction across both morning and evening commuter periods.
  - (e) Releasing land for business opportunities, supporting the competitive operation of land and development markets. The release of new industrial land eases the already high pressure on constrained precincts, promotes market competition, and reduces upward pressure on industrial land prices. Specifically, Colliers reports that prime industrial space vacancy across Auckland is sitting at approximately 1.1%. East Tāmaki, one of the region’s largest and most established industrial precincts, records an exceptionally low vacancy rate of 0.2%. Drury, currently under development, shows no remaining vacant stock. The Airport Corridor / Māngere area, which is the most comparable business cluster for the proposed industrial park given its proximity to an airport, exhibits a prime vacancy rate of just 0.8% as at August 2025. Collectively, these metrics highlight both the continuing tenant demand and the constrained supply environment within the regional industrial market.
  - (f) Providing for new business activity and innovation, particularly associated with businesses that can leverage off logistics, road connections and airport.
  - (g) Providing land for business opportunities that can take into account the future impacts of climate change (through provision for climate change factors into the design for stormwater infrastructure).
- 5.26. Statistics NZ’s High growth scenario forecasts that the Manukau-Drury catchment will experience a population growth of approximately +50% or +280,500 additional people over the next 30 years. To support this level of growth, the catchment is estimated to require not only enhanced amenities and services but also an increase in business land provision to meet the rising demand for business expansion and employment opportunities (*where residential growth is proposed there needs to be corresponding provision of jobs*). Based on this scenario, the industrial employment in the catchment is likely to grow by an additional 72,000 employees over the next 30 years. This growth translates to an anticipated demand for approximately 1,714ha of industrial land by 2053, including the demand buffer mandated by the NPS-UD. Considering the zoned industrial land capacity estimated by the Housing and Business Development Capacity Assessment,<sup>7</sup> which includes both ‘vacant’ and ‘vacant potential’ land totalling around 1,440ha, alongside the indicative additional industrial land provision in the Drury-Opāheke Structure Plan (105ha, excluding the area flagged by the Future Development Strategy), there would be a requirement for at least an additional 166ha of developable industrial land within the catchment.

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<sup>7</sup> Housing and business development capacity assessment for the Auckland region 2023.

- 5.27. Additional industrial provision beyond a simple reconciliation of demand and supply presents an opportunity to provide a more strategic and competitive industrial location within the Auckland Region that could contribute to additional regional growth. A significant portion of Auckland's growth is in the South, and the most efficient means to provide jobs is to locate these close to where people live.
- 5.28. Given the Drury – Opāheke Structure Plan is a longer-term proposition with significant infrastructure requirements and timing uncertainty, there remains potential for a significant industrial hub some 10km north, in Ardmore. The subject land is well-suited for the proposed industrial activities due to its close proximity to existing urban areas, the upcoming Mill Road Project, the Takaanini grade separation, and other established infrastructure in the area.
- 5.29. The Project will deliver a regionally significant employment hub with critical mass and agglomeration benefits. This will attract a diverse range of industries, including land-extensive and higher-tech sectors and supporting services, allowing for efficient servicing of the local community while offering significant local employment opportunities, without undermining the broader industrial or business land supply.
- 5.30. An important element of this proposal is the applicant has agglomerated a large landholding into a single development entity, along with the existing Airport holding. This is 511 (gross) hectares. This is a rare opportunity to coordinate and masterplan a single development, rather than the usual sporadic and ad-hoc development which occurs when multiple landowners are involved. This removes barriers associated with landowners land banking, holding land for extended periods of time or infrastructure not being coordinated between disparate and fragmented owners. These are elements which either create a burden on Council to act as the coordinator or slow the progress of development as landowners attempt to coordinate themselves, often to mixed results.
- 5.31. It is acknowledged that well-functioning urban environments anticipate urban environments that are well-supported by infrastructure and additional infrastructure. The Project supports both the provision of infrastructure (through public and private infrastructure solutions) and additional infrastructure. The applicant will fund infrastructure required for the Project, including water supply, wastewater treatment and disposal, stormwater management and the provision of new and upgraded road networks.
- 5.32. Overall, the Project will increase the provision of land available for employment and economic activities and contribute to a well-functioning urban environment.

**The Project will deliver significant economic benefits, (Referral Application Section 2.6.2.6)**

- 5.33. Significant economic investments and impacts are explained in the Economic Impact Assessment prepared by Property Economics which has been included with the application as **Attachment 8**.

**Economic benefits during construction**

- 5.34. Property Economics has assessed that this project represents a \$2.7 billion investment over the 15-year development period. It also identifies a total of 17,300 FTE years over this period. This will include jobs in the construction phase which will provide other jobs and flow-on economic benefits.
- 5.35. There will be direct benefits for construction workers and project managers, architects, engineers, landscapers, builders and health and safety consulting service providers.

### **Lifetime economic benefits**

- 5.36. The Project will provide land and commercial lease spaces for light industrial / service / trade supply activities. This will have the effect of in turn providing jobs for service professionals in the local area.
- 5.37. In addition, the Project will provide an estimated permanent 4,500-5,000 FTE jobs once completed. These employment outcomes will support economic resilience and growth across the Auckland Region.
- 5.38. New employment opportunities and the development of new business areas stimulate additional economic activity by creating a ripple effect throughout the economy. When businesses expand or new industries emerge, they generate jobs that increase household income, leading to higher consumer spending on goods and services. This increased demand encourages further production, investment, and innovation, which in turn supports growth in related sectors such as supply chains, logistics, and professional services.
- 5.39. Additionally, new businesses often attract complementary enterprises, foster competition, and drive technological advancements, all of which contribute to greater productivity and overall economic development.

### **Other Economic Benefits**

- 5.40. In addition to these quantifiable regional contributions, the Economic Impact Assessment (**Attachment 8**) identified that the Project is also expected to generate a wide range of qualitative economic benefits for the broader market and communities.
- 5.41. Mill Road, a key component of the Auckland transport strategy, is expected to significantly enhance accessibility in Auckland's southern markets by creating an additional arterial route between Auckland Airport, Manukau, Wiri and Drury. The improved transport infrastructure resulting from the Mill Road Project will (if approved) reduce transportation costs, improve the efficiency of freight movement, and attract businesses looking to capitalise on the area's strategic connectivity.
- 5.42. The Project would greatly benefit from enhanced accessibility, making it a more 'traffic-efficient' location for industrial activities and contributing positively to the creation of a 'well-functioning' urban environment. This would not only cater to the growing industrial demand in both local and regional markets but also support economic growth by creating jobs and increasing the competitiveness of the industrial economy in Auckland South.
- 5.43. Property Economics considers that there are several potential economic benefits from the proposed development including:
  - (a) Provision of sufficient industrial land to satisfy demand of industrial businesses.
  - (b) Enablement of economies of scale and business agglomeration effects.
  - (c) Improved land use efficiency.
  - (d) Increased employment and economy profile.
  - (e) Improved existing infrastructure efficiency by reducing necessary duplication.

- (f) Potential for mitigation of industrial land prices.
  - (g) Greater industrial business location options.
  - (h) Increased flexibility for industrial growth and new entrants.
- 5.44. There will also be associated development contributions for Auckland Council (which will assist in the funding of projects and potentially within a shorter timeframe than predicted by the Long Term Plan) as well as an increased ratepayer base.
- 5.45. The economic benefits of the Project would extend well beyond the construction phase of the project itself and would deliver a unique range of wider economic benefits that cumulate annually over the economic life of the assets in the business park. Property Economics has confirmed that advancing the proposed development, given its scale, would yield economic benefits for the Auckland regional economy that are significant.

**The Project will support climate change mitigation, including the reduction or removal of greenhouse gas emissions (Referral Application Section 2.6.2.9)**

- 5.46. The Project is expected to reduce the commuter distance travelled by residents in Papakura, Takaanini, Manurewa, and Drury to employment. By bringing employment opportunities closer to these communities, the Project will help decrease overall Vehicle Kilometres Travelled (VKT), which in turn will reduce congestion on key transport corridors. Notably, and as outlined in the Transportation Assessment (**Attachment 16**), the location of the site enables employment in a location to which travel which is “counter” to the current peak travel patterns (which are typically north via State Highway 1, Mill Road and Great South Road).
- 5.47. This improvement aligns with regional sustainability goals and supports a shift toward more efficient land use and transport patterns.
- 5.48. The Project’s strategic location will also enhance supply chain efficiency due to its proximity to Ardmore Airport, and other major industrial hubs and centres. The Project site is approximately 10 km north of Drury, 22 km from Auckland Airport (and its surrounding industrial precinct), and about 15 km from both the Wiri and East Tamaki industrial areas. This central positioning provides businesses with convenient access to freight and logistics networks, enabling faster movement of goods and reducing transportation costs. As a result, the Project is expected to attract industrial and commercial operators seeking improved connectivity and operational efficiency.
- 5.49. In addition, the Project will:
- (a) utilise renewable energy solutions on buildings such as solar panels and EV charging;
  - (b) utilise water reuse options as much as possible; and
  - (c) eco-source planting as far as practicable.
- 5.50. The Project will provide for active modes of transportation to access the site, and communal charging facilities for EV vehicles/bicycles/scooters etc in the car parking areas.
- 5.51. These cumulative reductions align with New Zealand’s national carbon targets and contribute to climate change mitigation.

**The project address significant environmental issues (Referral Application Section 2.6.2.11)**

- 5.52. Access to employment and a lack of land for employment activities is a significant environmental issue.
- 5.53. The letter from the Chief Executive Officer - Ngāi Tai ki Tāmaki (**Attachment 23**) and Kaumatua Te Warena Taua (**Attachment 22**) have highlighted that there has recently been over 100 acres of illegal industrial activities which have been the subject of the Auckland Council enforcement action in the Ardmore area. Both letters outline that this is the direct result of there being a shortage of available industrial land for such activities to operate from.
- 5.54. The letters provided in **Attachment 22 and 23** include common identification of the significant environmental issues that:
- (a) There has been high rate of residential growth with insufficient provision for land available from employment.
  - (b) There is high unemployment and a lack of access to employment
  - (c) These factors have direct social negative consequences for the community.
- 5.55. The Project addresses this though:
- (d) Increased business land supply: as identified above, Auckland is experiencing a significant shortage of Industrial land, and especially in locations close to the developing population in South Auckland. The shortage will worsen without active intervention.
  - (e) Provisions of Jobs: the Economic Impact Assessment in **Attachment 8** identifies that the scale of employment generation is significant in the regional context. The Auckland Regional unemployment rate increased from 3.5% in 2022 to 6.1% in 2025, equating to around +12,100 additional people unemployed per annum over the last three years. Furthermore, the Auckland region unemployment rate consistently trends higher than the national New Zealand average with the current national rate at 5.2%.
- 5.56. These employment outcomes will support economic resilience and growth in this part of the Auckland Region.

## 6. PROJECT DETAILS

6.1. The following sections provide the required responses to the following matters:

- Section 3.0: For construction activities, please state the anticipated commencement and completion dates.
- Section 3.1: Approvals Required.

### **Commencement and Completion Dates (Referral Application Section 3.0)**

6.2. The applicant has existing funding that is set aside for the delivery of this project. It therefore has strong levels of control over the timing of the Project.

6.3. The applicant will be able to carefully manage the design and quality of construction and it is experienced in these areas.

6.4. Detailed design planning will begin immediately following referral of the application into the Fast-track Approvals process. The final design and layout will be refined with technical input from a range of different expert consultancies as the substantive application is finalised for submission.

6.5. Once consents are granted, pre-start conditions and management plans will be satisfied and complied with, so that earthworks could begin in the first available construction season, or at an earlier stage if winter earthworks approvals can be obtained. Construction of buildings will then begin following completion of earthworks to align with the sequencing outlined in the response to the Referral Application Section 3.2. and 3.2.1. This is expected to begin as soon as earthworks is complete with full completion of the Project anticipated to take around 15 years.

6.6. Funding is available to meet the timelines that are outlined, as identified above.

### **Approvals Required (Referral Application Sections 3.1, 3.1.1, 3.1.3, 3.1.4, 3.1.6)**

#### **Approvals sought under the Resource Management Act 1991**

6.7. The Project requires consents under the following sections of the RMA:

- (a) Section 9: Land Use.
- (b) Section 11: Subdivision.
- (c) Section 13: River and lake beds.
- (d) Section 14: Water.
- (e) Section 15: Discharges.

6.8. A fuller assessment of the individual consents sought under the Auckland Unitary Plan and relevant National Environmental Standards is contained in the Planning Memorandum in **Attachment 7**.

## Other Approvals

- 6.9. For the avoidance of doubt this Application does not seek any approvals under the Heritage New Zealand Pouhere Taonga Act 2014 or the Wildlife Act 1953.

## Other types of consents, certificates, designations, concessions, and other legal authorisations.

### Mill Road Stage 2 NoR

- 6.10. New Zealand Transport Agency / Waka Kotahi (“NZTA”) has a Notice of Requirement (“NoR”) lodged with Auckland Council for Mill Road. The NoR has not yet been notified.
- 6.11. The Project site includes land subject to the NoR (although notably the Project does not rely on the approval of the designation nor does it rely on the construction of the Mill Road project). Any works within the NoR area that may prevent or hinder the public work, will require authorisations from NZTA under Section 176 or 178 of the RMA (depending on the progression of the NoR comparative to the Project).
- 6.12. The NOR affects an area of approximately 14.69ha, which represents only 2.94% of the total Project Area. This demonstrates that the NOR footprint is a very small proportion of the overall development land. The Project is able to proceed in a manner which would not prevent or hinder the public work. Where the NoR overlaps with land identified for industrial activities the NoR corridor is able to “as a worst case scenario” be left untouched. In this instance, the Project can proceed without hindering the designation or requiring any notable redesign.
- 6.13. This does not affect the ability of the applicant to undertake the Project.
- 6.14. Roading and/or intersection upgrades may occur within the NoR corridor. The applicant has undertaken initial consultation with NZTA regarding the overall nature of the Project and the potential for integration with the Mill Road corridor (this is outlined in further detail in the Record of Engagement in **Attachment 6**). The applicant is confident that any works within the NoR footprint would be able to be designed in a manner that would “tie into” the future Mill Road corridor and will not hinder or prevent Mill Road to the extent that s 178 approval could be withheld.

### Ardmore Airport Requiring Authority

- 6.15. The Project works fall within the Ardmore Airport designation and within areas identified as being subject to approach surfaces, transitional surfaces, horizontal surfaces and conical surface and side clearances (for which approval from Ardmore Airport is required).
- 6.16. The applicant has consulted with Ardmore Airport in respect of these items and as identified in the letter provided in **Attachment 21**, there is a commitment to continue to work collaboratively and to achieve development that is beneficial for both Ardmore Airport and Knight Investments. This includes the issue of approvals pursuant to s176.

### Other

- 6.17. Registration with Taumata Arowai (Water Services Act 2021 and Drinking Water Quality Assurance Rules 2022) is required. Registration will be sought directly through Taumata Arowai.

- 6.18. A licence to have private infrastructure (water and wastewater pipes) within the road reserve is required under section 357(1) of the Local Government Act 1974 and Part 3 of the Auckland Transport Activities in the Road Corridor Bylaw 2022. This authorisation will be sought directly through Auckland Transport and the applicant is well-versed in this process, having undertaken such processes for its water supply infrastructure at Beachlands.

## 7. PROJECT STAGES

7.1. The following sections provide the required responses to the following matters:

- 3.2 Project Stages
- 3.2.1 If the Project is planned to proceed in stages, provide:

*A statement of either the project is planned to proceed in in stages, including:*

*a. an outline of the nature, scale and timing of the stages; and*

*b. a statement of whether you intend to lodge a separate substantive application for each of the stages*

*i. If a substantive application is intended to be lodged for each stage, address the questions under the section (Appropriateness for fast track approvals process) for each stage of the project.*

7.2. The Project is to be consented in a single stage (and via one substantive application).

7.3. However, construction and the release of titles for subdivision will be “sequenced”.

7.4. Sequencing will be based on detailed technical assessments, infrastructure investigations, and further design refinement as part of any substantive application. Final sequencing will be confirmed and determined through the substantive application process.

7.5. As only one substantive application will be lodged, there is no requirement to assess each delivery sequence against the questions identified under the section titled *Appropriateness for fast track approvals process* in the standard form template.

## 8. PERSONS AFFECTED

8.1. The following sections provide the required responses to the following matters:

- 3.5.1 Provide a list of persons, groups and/or entities who you consider are likely to be affected by the project;
- 3.5.2 Provide a summary of consultation undertaken with the above persons and/or groups who you consider are likely to be affected by the project, and any other groups required to be consulted with under section 11 of the Act and how the consultation has informed the project
- 3.5.3 List any Treaty settlements that apply to the project area and provide a summary of the relevant principles and provisions in those settlements

### **Persons, Group, Entities likely to be affected (Referral Application Section 3.5.1)**

8.2. The persons likely to be affected are as follows:

- (a) The iwi authorities<sup>8</sup> whose area of interest includes the area in which the project is located are:
- (i) Ngāti Tamaoho Trust, representing Ngāti Tamaoho iwi;
  - (ii) Te Ākitai Waiohua Iwi Authority, representing Te Ākitai - Waiohua iwi;
  - (iii) Ngāi Tai ki Tāmaki Trust, representing Ngāi Tai ki Tāmaki iwi;
  - (iv) Ngāti Maru Rūnanga Trust, representing Ngāti Maru iwi;
  - (v) Ngāti Pāoa Iwi Trust, representing Ngāti Pāoa iwi;
  - (vi) Ngāti Tamaterā Treaty Settlement Trust, representing Ngāti Tamaterā iwi;
  - (vii) Ngaati Whanaunga Incorporated Society, representing Ngāti Whanaunga iwi;
  - (viii) Hako Tūpuna Trust, representing Hako iwi;
  - (ix) Te Ara Rangatu o Te Iwi o Ngaati Te Ata Waiohua, representing Ngaati Te Ata iwi;
  - (x) Te Whakakitenga o Waikato Inc, representing Waikato Tainui iwi.
- (b) Auckland Council governing body and Franklin Local Board.
- (c) Auckland Transport (as owners of land vested as road).

### **Summary of Consultation (Referral Application Section 3.5.2)**

8.3. **Attachment 6** contains a Record of Engagement summarising all consultation undertaken.

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<sup>8</sup> <https://www.tkm.govt.nz/>

- 8.4. The applicant has contacted all relevant iwi authorities (identified above), and those additional iwi groups identified on Auckland Council’s website as having an interest in the project area.<sup>9</sup>
- 8.5. The applicant has also been in contact with Auckland Council and Franklin Local Board in respect of its aspiration for the Project.
- 8.6. The applicant has also engaged with the following administering agencies:
- (a) Heritage New Zealand Pouhere Taonga (“Heritage NZ”).
  - (b) Ministry for the Environment (“MfE”).

**How consultation has informed the Project (Referral Application Section 3.5.2)**

- 8.7. Various feedback received through consultation has shaped the project so far. These include:

**Mana Whenua**

- (a) The letter from the Chief Executive Officer - Ngāi Tai ki Tāmaki (**Attachment 23**) identifies that there has been an ongoing working relationship with the over an extended period to address widespread illegal and unmanaged industrial activities in and around Ardmore.

The discussions on how to effectively manage and stop further illegal activities has led the applicant to undertake its own market research into the shortage of available land supply for activities to occur in a lawful manner. Simply put, this Referral has been directly shaped by the applicant’s working relationship with Ngāi Tai ki Tāmaki as a means to addresses an underlying problem.

- (b) The letter from the Chief Executive Officer - Ngāi Tai ki Tāmaki (**Attachment 23**) also confirms that the Project is “*an example of how mana whenua, applicants, and local government can work together to achieve enduring, mutually beneficial outcomes*”.

**Auckland Council and CCO’s**

- (c) Early discussions with the Healthy Waters department of Auckland Council directly led to the development of the stormwater strategy outlined in the Stormwater Assessment (**Attachment 11**).
- (d) From consultation with Auckland Transport various updates were incorporated into the Transport Assessment (**Attachment 16**), including matters relating to future public transport options/routes.
- (e) Potential provision for either public or private wastewater solutions and water supply solutions (based on consultation with Watercare/Veolia).

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<sup>9</sup> (<https://www.aucklandcouncil.govt.nz/building-and-consents/resource-consents/prepare-resource-consent-application/Pages/find-hapu-iwi-contacts-for-your-area.aspx>)

### **Treaty Settlements (Referral Application Section 3.5.3)**

- 8.8. There are no Treaty Settlement Statutory Acknowledgement areas identified by Auckland Council over the Project Area or the surrounding area.
- 8.9. The application falls within areas of interest covered by the following Treaty Settlements:
- (a) Ngāti Tamaoho Settlement Act 2018. The related iwi authority is Ngāti Tamaoho Settlement Trust.
  - (b) Ngāi Tai ki Tāmaki Claims Settlement Act 2018. The related iwi authority is Ngāi Tai ki Tāmaki Trust.
  - (c) Te Ākitai Waiohua Deed of Settlement 2021 (signed on 12 November 2021). The related iwi authority is Te Ākitai Waiohua Iwi Authority.
  - (d) Ngāti Paoa Deed of settlement 2021 (signed on March 2021). The related iwi authority is Ngāti Paoa Iwi Trust.
- 8.10. The relevant principles and provisions of these settlements are set out below.

#### **Ngāti Tamaoho Deed of Settlement (signed 30 April 2017)**

- 8.11. The Deed of Settlement acknowledges that Ngāti Tamaoho suffered injustices that impaired the economic, social and cultural development of Ngāti Tamaoho and recorded the matters required to give effect to a settlement of all the historical claims of Ngāti Tamaoho.
- 8.12. The Settlement seeks to provide redress to Ngāti Tamaoho in the form of land and money, an agreed historical account, statutory acknowledgements, a deed of recognition, name changes to certain sites of interest, relationship agreements with government agencies, and an apology from the Crown.
- 8.13. There are a number of protocols and relationship agreements provided for by the Deed, including:
- (a) A Crown Minerals protocol, the subject matter of which is not relevant to the application.
  - (b) A taonga tūturu protocol.

- (c) A relationship agreement with the Minister of Conservation and the Director-General of Conservation. This states that in administering the conservation legislation Te Papa Atawhai (the Department of Conservation) must give effect to the principles of Te Tiriti o Waitangi in accordance with section 4 of the Conservation Act, which is deemed to include involving Ngāti Tamaoho in conservation decision making in matters of importance to them, ensuring Ngāti Tamaoho interests are fairly reflected. That will involve Ngāti Tamaoho and Te Papa Atawhai identifying the types of decisions that Ngāti Tamaoho will be involved in; Ngāti Tamaoho and Te Papa Atawhai maintaining open exchanges of information; Te Papa Atawhai providing Ngāti Tamaoho sufficient information and time for Ngāti Tamaoho to identify the nature and extent of their interest in an issue, while taking into account the importance of timely and efficient decision-making; and Te Papa Atawhai providing feedback on how Ngāti Tamaoho interests have been reflected in particular decisions (clause 1.7). The deed states that Ngāti Tamaoho is particularly interested in exploring and increasing opportunities to work more closely with Te Papa Atawhai in relation to range of management activities including reserves management; statutory authorisations and marine mammals.
- (d) A relationship agreement with the Ministry for the Environment. This applies to all functions, powers, responsibilities and actions of the Secretary for the Environment that are exercised in relation to managing the use, development and protection of natural and physical resources within, or that affect, the Ngāti Tamaoho Area of Interest. It sets out ways in which to establish and maintain effective and efficient communication; including provision for an annual relationship meeting.

8.14. This Treaty settlement contains protocols and relationship agreements with the following agencies/Ministers that may be relevant to the project site: Ministry for Culture and Heritage (via Taonga Tūturu protocol), Department of Conservation, Ministry for the Environment and Minister for Energy and Resources.

8.15. There are no deeds of recognition or statutory acknowledgements over the Project Area.

#### **Ngāi Tai ki Tāmaki Claims Settlement Act 2018**

8.16. The Ngāi Tai ki Tāmaki Claims Settlement Act 2018 gave effect to certain provisions of the deed of settlement signed on 7 November 2015. Amendment deeds were signed in June 2016, July 2017 and June 2018. The Deed of Settlement acknowledges that Ngāi Tai ki Tāmaki suffered injustices that impaired the economic, social and cultural development of Ngāi Tai ki Tāmaki and records the matters required to give effect to a settlement of all the historical claims of Ngāi Tai ki Tāmaki.

8.17. The Land Settlement provides redress to Ngāi Tai ki Tāmaki in the form of land, money, the right of first refusal of Crown lands, an agreed historical account, statutory acknowledgements/deeds of recognition placed over land sites recognising their interest, relationship agreements with government agencies, place name changes and an apology from the Crown.

- 8.18. The Deed includes provision for protocols between Ngāi Tai ki Tāmaki and the Ministry for Primary Industries and the Ministry for Culture and Heritage. The protocols set out how their respective agency will interact with and consult the Ngāi Tai ki Tāmaki governance entity when carrying out statutory duties and functions. The Project Area is within the protocol area. The primary industries protocol only applies to functions and duties relating to agriculture, forestry, fisheries, biosecurity, and food safety and is therefore unlikely to be relevant to the application. The protocol with the Ministry for Culture and Heritage relates to taonga tūturu. We refer to our comments above in relation to taonga tūturu.
- 8.19. The Deed includes provision for a relationship agreement to be prepared between the Minister of Conservation and the Director General of Conservation and Ngāi Tai ki Tāmaki. A conservation relationship agreement is included as Document 4 to the deed. The agreement records that Ngāi Tai ki Tamaki and the Department share aspirations for conservation of Tikapa Moana/the Hauraki Gulf (and other marine areas in their rohe) and will look for opportunities to promote those aspirations (clause 11.1). Clause 12.1 concerns wāhi tapu and other areas of cultural significance to Ngāi Tai ki Tamaki within public conservation lands.
- 8.20. There are no deeds of recognition over the Project Area.
- 8.21. Ngāi Tai ki Tāmaki have provided correspondence in support of the Project in Attachment 23.

**Te Ākitai Waiohua Deed of Settlement 2021 (signed on 12 November 2021)**

- 8.22. The Te Ākitai Waiohua Deed of Settlement was initialled on 23 December 2020 and was signed on 12 November 2021. The Deed is conditional on the enactment of settlement legislation. The Deed acknowledges that Te Ākitai Waiohua suffered injustices that impaired the economic, social and cultural development of Te Ākitai Waiohua and records the matters required to give effect to a settlement of all the historical claims of Te Ākitai Waiohua.
- 8.23. The Land Settlement provides redress to Te Ākitai Waiohua in the form of land, money, the right of first refusal of Crown lands, leaseback agreements, statutory acknowledgements, letters of introduction to certain Ministers/crown agencies, organisations and the Auckland Council, an agreed historical account, agreements with MPI with respect to fisheries, statements of association, relationship agreements with government agencies, and an apology from the Crown. The settlement does not provide for redress in relation to the Manukau or Waitemata Harbours. Agreement has been reached to address this relationship in the future.

- 8.24. The statements of association set out in the documents attached to the Deed explains that the shores of Hikurangi (Waitakere Ranges) and the Hauraki Gulf (Tikapa Moana) through to the Manukau and Waitematā Harbours, are vital coastal areas to Te Ākitai Waiohū. Te Ākitai Waiohū maintains an enduring association with the coastal marine area, incorporating the western coast of Hikurangi from Woodhill in the north, to Whatipu in the south, through to the Manukau Harbour in its entirety, across to the Waitematā Harbour and out to the Hauraki Gulf, from Whangaparaoa in the north to Orere Point in the south ('the Coastal Area'). The statement of association states that the Coastal Area was the primary means of obtaining fresh kaimoana. It also refers to various species of migratory birds that nest along the shores of the coastal area. The Coastal Area was a crucial means of transportation by waka throughout the region and it was and continues to be a vital transport route facilitating travel, exploration, communication and trade throughout Tāmaki Makaurau. The waters of the Coastal Area are seen as a living entity with its own mauri and mana, representative of the iwi associated with these waters. The various bodies of water have their own taniwha or spiritual guardians associated with them. The Coastal Area is seen as a taonga of great cultural and spiritual significance to Te Akitai Waiohū.
- 8.25. We note that this coastal statutory acknowledgement area is not yet identified on the Auckland Unitary Plan maps, as the deed is conditional on the enactment of settlement legislation and no settlement legislation appears to have been passed.
- 8.26. There are a number of protocols and relationship agreements provided for by the deed, including:
- (a) A Crown Minerals protocol (not relevant to the application).
  - (b) A taonga tūturu protocol.
  - (c) A relationship agreement with the Minister of Conservation and the Director General of Conservation. This states that in giving effect to section 4 of the Conservation Act the Department will seek to involve Te Ākitai Waiohū in conservation decision making of importance to them, ensuring Te Ākitai Waiohū interests are considered.
  - (d) A relationship agreement with the Ministry for the Environment. This applies to all functions, powers, responsibilities and actions of the Secretary for the Environment that are exercised in relation to managing the use, development and protection of natural and physical resources within, or that affect, the Te Ākitai Waiohū Area of Interest. It sets out ways in which to establish and maintain effective and efficient communication; including provision for an annual relationship meeting.

**Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014. The Post Settlement Governance Entity is the Tūpuna Taonga o Tāmaki Makaurau Trust/Whenua Haumi Roroa o Tāmaki Makaurau Limited Partnership.**

- 8.27. The Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 and its associated deed provide collective redress for the shared interests of the 13 iwi and hapū of Tāmaki Collective in maunga, motu and lands within Tāmaki Makaurau (Auckland). These provisions do not settle any historical Treaty claims, which are addressed through specific settlements with each iwi/hapū. The redress provided through the Act is provided 'on account' of those individual Treaty settlements.

- 8.28. A significant part of the collective redress is concerned with governance and management arrangements over the maunga of central Auckland and some of the islands of Tikapa Moana (Hauraki Gulf). Tūpuna Maunga are vested in the Tūpuna Taonga o Tāmaki Makaurau Trust and the Maunga Authority is responsible for their day-to-day administration and management. The Project Area does not include any of these maunga nor does it include any islands in the Hauraki Gulf.
- 8.29. Some commercial redress is also included in the Tāmaki Collective arrangements, in the form of rights of first refusal (RFR) over Crown properties over a wide area of Auckland, and second rights to purchase deferred selection properties not selected or acquired by iwi/hapū under their individual settlements.
- 8.30. Although the proposed project site lies within the RFR area, none of the land within it is Crown-owned or subject to RFRs. Therefore, the project would not affect any commercial redress available to Ngā Mana Whenua o Tāmaki Makaurau under the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014, which is managed by the Whenua Haumi Roroa o Tāmaki Makaurau Limited Partnership.

### **Unsettled Claims**

- 8.31. The claims of Waikato-Tainui (within the Auckland region) and Ngaati Te Ata are yet to be settled. Information from Te Kāhui Mangai confirms the Project Area is within the area of interest for these groups (although the areas of interest may be refined and confirmed throughout the course of treaty settlement negotiations).
- 8.32. Waikato-Tainui is an iwi whose remaining area of interest (which excludes those already settled) includes the project site based on the areas of interest for the remaining historical Treaty of Waitangi claims of the March 2020 Waikato-Tainui Remaining Claims mandate. Waikato-Tainui and the Crown signed this Terms of Negotiation on 14 December 2020 to begin negotiations to settle remaining historical Treaty of Waitangi claims on behalf of Waikato-Tainui. These negotiations are ongoing, the area of interest for the remaining claims includes the Project Area.
- 8.33. With respect to Ngaati Te Ata, available information suggests the proposed project location may be within the area of interest for Ngaati Te Ata who have a Terms of Negotiation with the Crown (Ngaati Te Ata 2010 Terms of Negotiation). They are yet to settle their historical Treaty of Waitangi claims and so the area of interest of the group is not confirmed through a Treaty settlement. Note this area of interest may be refined and confirmed throughout the course of Treaty settlement negotiations.
- 8.34. A public announcement was made on 5 November 2025 that 500 members of Ngāti Paoa had travelled to Parliament to witness the third reading of the Ngāti Pāoa Claims Settlement Bill. Ngāti Paoa is not identified on the Te Puni Kokiri website as an iwi with an interest over the site, however Auckland Council identifies them as a mana whenua with interests in this location. The Minister for Treaty of Waitangi Negotiations said in the settlement that the Crown acknowledged the effects of its actions including raupatu (confiscation), the impact of the Native Land Courts and Crown purchasing which left Ngāti Pāoa virtually landless. The settlement includes \$23.5 million in financial redress, the opportunity to purchase seven commercial properties and the return of 12 cultural sites of significance, including sites for a marae and papakainga development in Point England (Auckland). The passing of the third reading will enable this settlement bill to be enacted.
- 8.35. Note until settlements are recognised in legislation, an area of interest may be refined and confirmed throughout the course of Treaty settlement negotiations.

## 9. LEGAL INTERESTS

9.1. The following sections provide the required responses to the following matters:

- 3.6.1 Provide a description of any legal interests you or any others applying, have in the land on which the project will occur, including and statement of how that affects your ability to undertake the work.

### Project Sites

9.2. The applicant (or its affiliate companies) owns or has agreements with the owners of the properties listed in **Attachment 20**, alongside confirmation from the applicant's lawyers of agreements and ownership. This confirms that ownership will not affect the ability to deliver the Project.

9.3. Not all landholdings identified in the Project Sites section (paragraph 2.13 above) are owned by the applicant (or its affiliate companies) or have either landowner approval or sale and purchase agreements at this time. The applicant is working with these landowners. Should agreements not be finalised, the following is confirmed:

- (a) The total gross site area of the Project is 511 hectares. Of this total § 9(2)(b)(ii) of the land is subject to current agreements with the applicant or applicant owned. The difference has been factored into the project scoping and Project Description in Section 2 which has indicated an area range for gross developable areas and expected gross floor areas for future activities
- (b) The economics assessment and the measurement of regional significance (including economic benefits) was based on the most conservative development areas/gross floor areas (ie. 193 ha net developable area and 67 ha of GFA for buildings) – and thus the absence of these sites does not alter the commentary in Sections 2.5 and 2.6, or Sections 4 regarding regional significance, or any other matter identified in Section 5.
- (c) No critical infrastructure is required on any of these sites. These sites are not required to locate necessary roading, three waters infrastructure or utilities to service the Project.<sup>10</sup>

9.4. For these reasons should the further agreements not be finalised for a substantive application this will not affect the ability to deliver the Project.

9.5. For the avoidance of doubt, it is confirmed that the assessment of effects (refer to the Planning Memorandum in Attachment 7) and the technical assessments in Attachments 8-18 utilised the upper limits of the range for gross developable areas and expected gross floor areas for future activities, thus anticipating effects related to 511 gross hectares of Project Area. The assessment of effects confirms *“that the Project can appropriately manage its adverse effects on the environment so that these are not significant.”*

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<sup>10</sup> The exception is 881 Papakura Clevedon Road which is identified in the Transport Assessment (Attachment 16) to accommodating a new roading intersection. However, this is one of two options for the intersection, and a viable solution is also identified in the Transport Assessment (Attachment 16) which is entirely located within legal road reserve and thus there is no sole reliance on the use of 881 Papakura Clevedon Road to achieve the necessary infrastructure.

**Waka Kotahi**

- 9.6. See paragraphs 6.10 to 6.14 above.

**Ardmore Airport**

- 9.7. See paragraphs 6.15 to 6.16 above and Attachment 21.

## 10. OTHER MATTERS

10.1. The following sections provide the required responses to the following matters:

- Section 3.7.1: Have the activities included in the project, or any that are substantially the same as those involved in the project, previously been the subject of an application or a decision under a specified Act?
- Section 3.7.4 Provide a description of whether and how the project would be affected by climate change and natural hazards

### **Previous Applications / Decisions (Referral Application Section 3.7.1)**

10.2. Ardmore Airport is currently undertaking works associated with approved land use and subdivision consent Reference SUB 60387768 for 22.2692 hectares. This relates to the industrial, commercial and retail land development and generally located at 371 Airfield Road. This area of work has been termed "Stage 2" by Ardmore Airport. The Project will not "compete" with the approved works but may tie onto and add to various aspects related to traffic upgrades and utilising the private road berms for additional infrastructure.

10.3. Ardmore Airport has also lodged with the Auckland Council an application for "Stage 3" or works which includes establishing business and industrial development for both aviation and non-aviation activities on land at 371 Airfield Road which has been referenced as LUC 60439570 and SUB 60439571 by the Auckland Council. The application is on hold pending responses to the further information requested under s 92 under the RMA. The timing of issue of the resource consent will influence whether the Project will include the above works. Should consent be forthcoming, then the Project will not "compete" with the approved works but may tie onto and add to various aspects related to traffic upgrades and utilising the private road berms for additional infrastructure. Should consent not be forthcoming the proposed works will be added into the overall project as part of the substantive application, and these have been considered as part of the overall assessment of the Project.

10.4. None of the other proposed activities identified in this application/planning memorandum have previously been subject of an application or a decision under a specified Act.

### **How the project would be affected by climate change and natural hazards (Referral Application Section 3.7.4)**

10.5. The Geotechnical Assessment (**Attachment 9**) addresses the risk of geotechnical hazards. Specifically, earthworks and future development works would be undertaken to ensure that potential effects on land stability are minimised.

10.6. Climate change effects have been accounted for in the modelling of floodplains.

10.7. The risk of on-site flooding can be managed via a comprehensive Stormwater Management Plan (as detailed in **Attachment 11**). Provision for overland flow paths will be accounted for in the final design. All engineering infrastructure will be sized and designed to allow for the impacts of climate change on natural hazards.