

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



11 May 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0032017

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the following referral applications: [REDACTED]

[REDACTED]

[REDACTED] 100 Halsey Street (FTAA-2603-1190), Out of Scope

[REDACTED]

I am providing comment in my capacity as Minister for Economic Growth, focusing on whether the applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided.

Out of Scope



Out of Scope



100 Halsey Street, FTAA-2603-1190

The application seeks approval to construct a commercial-led mixed-use development at 100 Halsey Street, Wynyard Quarter, Auckland Central. The proposal comprises five new buildings across a site of approximately 1.7 hectares, delivering around 80,000 square metres of gross floor area. The development would provide predominantly commercial office accommodation with supporting ground-floor retail and food and beverage uses, together with publicly accessible lanes and open spaces.

Building 2 has two alternative development options within the same building envelope. Option A would provide premium office accommodation. Option B would incorporate a data centre and associated substation, alongside ongoing commercial and retail activity within the wider development.

According to the economic assessment provided by the applicant, the proposal would deliver substantial construction-phase and ongoing economic activity under both development options. Under Option A, total development costs are estimated at approximately \$634 million (excl. GST), generating around \$425 million in construction-phase GDP, \$244 million in wages, and approximately 2,715 full-time-equivalent (FTE) years of employment over an assumed seven-year development period, while under Option B, development costs are estimated at approximately \$1.17 billion (excl. GST), reflecting the inclusion of data centre and electricity infrastructure, with construction-phase impacts of approximately \$766 million in GDP, \$443 million in wages, and around 4,870 FTE-years of employment over the same period.


Once fully established, the future onsite commercial and retail activity enabled by the development is estimated to support significant ongoing economic activity, with Option A sustaining approximately 1,831 ongoing annual FTEs, generating \$463 million in annual GDP

and \$214 million in annual wages and salaries, while Option B could sustain approximately 1,701 ongoing annual FTEs, generate \$432 million in annual GDP, and \$198 million in annual wages and salaries. Under Option B, the assessment also identifies potential wider infrastructure benefits associated with the proposed substation, which could support future development within the wider Wynyard Quarter precinct.

The economic assessment also identifies a range of wider benefits, including more efficient intensification of centrally located city-centre land, support for the effectiveness of existing major public infrastructure investment (including rapid transit and public realm improvements), improved commercial market competition, and agglomeration benefits associated with strengthening employment activity in a highly accessible precinct.

On this basis, the proposal can be assessed as delivering significant regional economic benefits under section 22(2)(a)(iv) of the Fast-track Approvals Act, driven primarily by the scale of capital investment, construction-phase employment and economic activity, and substantial ongoing commercial and retail use in Auckland's city centre. The proposal is also relevant to section 22(2)(a)(ii), as the applicant states it would support the continued functioning of regionally significant infrastructure by concentrating employment in close proximity to rapid transit and established city-centre services.

Out of Scope



Out of Scope

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', with a stylized flourish at the end.

Hon Nicola Willis
Minister for Economic Growth

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



20 May 2026

By email: substantive@fasttrack.govt.nz

Tēnā koe Minister Bishop,

Invitation to comment on the 100 Halsey Street project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the 100 Halsey Street project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in Treaty settlements and in the section 18 report prepared by the Ministry for the Environment.

Nāku noa, nā

A handwritten signature in blue ink that reads 'Tama Potaka'.

Hon Tama Potaka

Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	100 Halsey Street, Auckland Central
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Auckland Council		
*First name	Russell		
*Last name	Butchers		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
<p>Thank you for the opportunity to provide comments on the referral application for the 100 Halsey Street project. This response has been compiled following an internal review by technical experts across Auckland Council and its Council-Controlled Organisations (CCOs) and Asset Owners, including Healthy Waters & Flood Resilience, Auckland Transport, Watercare Services Limited, Parks & Community Facilities, as well as assessment by the Council's economist.</p> <p>The following assessment evaluates the proposal against the criteria set out in the Fast-track Approvals Act 2024 (FTAA).</p> <p>Section 17(3)</p> <ul style="list-style-type: none"> Auckland Council confirms it is not aware of any competing applications currently lodged that would be prejudiced by a substantive application for this project. Auckland Council is not aware of any existing resource consents issued where the priority of processing or affected party provisions of sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) would apply, if the project were applied for as a resource consent under the RMA.

Section 22

Does the project have significant regional or national benefits?

- The applicant's case for regional benefit rests on construction and operational economic activity, contribution to the supply of central city office space, support for the Wynyard Precinct and the city centre rapid transit catchment, and the delivery of a substation and hyperscale data centre under Option B.
- The Council has reviewed the Economic Impact Assessment (EIA) provided in support of the application. The EIA provided does not demonstrate that the project would deliver benefits of regional significance under section 22(1)(a) of the FTAA. The key shortcomings of the assessment are:
 - o the assessment quantifies only gross construction and operational impacts. It does not estimate the net benefit against the baseline development already enabled by the AUP, nor the likely substitution effect from development that would otherwise occur elsewhere in the city centre;
 - o no net present value approach has been applied to reflect the timing of the benefits over the indicative ten-year construction programme;
 - o no cost-benefit analysis has been undertaken, no disbenefits or externalities have been quantified, and the assessment does not address the section 85(3)(b) test; and
 - o Options A and B differ materially in nature, scale and likely effects. Further clarity is needed as to how each option independently meets the section 22 criteria. This is noted further below.
- Under Option A, the proposal is a city centre commercial redevelopment of a scale broadly anticipated under the Auckland Unitary Plan (AUP). The case for regional significance therefore turns on the additional benefits associated with exceeding the AUP envelope, which have not been quantified.
- Under Option B, the proposed substation and 88MW IT-load data centre would, if built, be regionally and potentially nationally significant. The application provides limited evidence as to feasibility. No operator or purchaser has been identified, and no electricity demand or grid impact analysis has been provided. The proposed floorspace (approximately 6,900m²) appears too small to accommodate a typical hyperscale data centre. Typically for comparable facilities, an 88MW data centre would potentially require 30,000–50,000m². It is unclear how a data centre of this scale could be accommodated within the floor area proposed for Building 2.
- On the information provided, whilst there is potential benefit, the case for significant regional benefit is not clearly made. No national benefit has been asserted by the applicant or is apparent from the material provided.

Would referring the project facilitate its delivery in a more timely and cost-effective way?

- It is considered that referral may deliver the project more quickly than a standard RMA process although not necessarily in a more cost-effective manner. For completeness, under Option A a

substantial proportion of the proposed floorspace would sit within the applicable height limits, and a similar form of development may be achievable through the standard consenting framework.

Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?

- Council has no comments in this regard.

Has the project been identified as a priority in any government or sector plan or strategy?

- The project has not been identified by Auckland Council, its CCOs, or any relevant plan, strategy or central government infrastructure priority list as a priority project.

Will the project deliver new or support existing regionally/nationally significant infrastructure?

- Under Option A, no new regionally or nationally significant infrastructure is proposed. The project would support the continued functioning of infrastructure by contributing employment and commercial activity within the city centre.
- Under Option B, the proposed substation and hyperscale data centre would be regionally and potentially nationally significant infrastructure, noting its scale. As noted above, the feasibility and likelihood of this option remain uncertain on the material provided.

Will the project increase housing supply or contribute to a well-functioning urban environment?

- The project does not provide any housing supply.
- The redevelopment of a major brownfield site within the city centre, with a network of publicly accessible lanes and open spaces, would contribute to a well-functioning urban environment.

Will the project deliver significant economic benefits?

- For the reasons set out under the regional benefits criterion above, the case for significant economic benefit has not been adequately substantiated on the material provided.

Will the project support primary industries (e.g., aquaculture)?

- Not applicable. No primary industries are proposed or supported.

Will the project support development of natural resources (e.g., minerals, petroleum)?

- Not applicable. No development of natural resources is proposed.

Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?

- The site sits within the city centre rapid transit catchment. The proposal supports intensification in a location well served by walking, cycling and public transport, which is consistent with climate change mitigation outcomes.
- Council notes that the proposed parking provision of up to 533 spaces has the potential to undermine those outcomes by encouraging private vehicle travel within the Wynyard Precinct.

This will require consideration at the substantive stage against the Wynyard Quarter Transport Management Association mode share targets and Wynyard Precinct policies I214.3(34), (35) and (38).

Will the project support climate change adaptation or recovery from natural hazard events?

- The site is subject to coastal inundation under the 1% AEP plus sea level rise scenario, lies within the 1% AEP flood plain, and is affected by overland flow paths. The Council does not consider that this natural hazard exposure, of itself, precludes referral.

Will the project address significant environmental issues?

- The project is not directed at addressing existing significant environmental issues.

Is the project consistent with local or regional planning documents (e.g., spatial strategies)?

Auckland Unitary Plan (Operative in Part) ('AUP')

- The site is zoned Business – City Centre under Chapter H8 of the AUP and lies within Sub-precinct B of the Wynyard Precinct (Chapter I214). The proposal requires non-complying activity consent overall, with material exceedances of the precinct height controls under I214.6.6 (up to +21.2m at Building B4 including roof plant), site intensity under I214.6.7, and infringements of certain frontage and access controls under I214.6.11, H8.6.25 and H8.6.26.
- Wynyard Precinct objectives I214.2(3) and I214.2(6) and policies I214.3(2), (4), (5) and (26) seek high-quality public realm and pedestrian connectivity, integration of open space, and a built form that contributes to the integrated regeneration of the Precinct. Given the scale of departure from the height and intensity controls, a detailed policy assessment will be required at the substantive stage to demonstrate that the proposal remains consistent with the Precinct framework.
- The objectives and policies that will be engaged at the substantive stage include the City Centre policies H8.3(3) and H8.3(33)–(38) (public realm and built form), and the Auckland-wide rules for contaminated land (E30), land disturbance (E11/E12), noise (E25), signage (E23), and natural hazards and flooding (E36). The Council has not identified any policy issues relating to the AUP that would preclude the referral of this project.

Auckland Plan 2050, Auckland City Centre Masterplan and Waterfront Plan

- Redevelopment of a major bus depot site within the city centre and Wynyard Precinct aligns with the overall intensification direction of the Auckland Plan 2050, the City Centre Masterplan, the Waterfront Plan and the Wynyard Quarter Urban Design Framework. These instruments anticipate transformation of this part of the city centre for commercial and mixed-use development, high-quality public realm and integrated open spaces.

Future Development Strategy ('FDS') 2023–2053

- The site is within an established city centre area where intensification is anticipated under the FDS. No inconsistency with the FDS is identified.

National Policy Statement on Urban Development ('NPS-UD') 2020

- The site sits within an established urban environment in the Auckland city centre and is well served by rapid transit, which is the strategic context the NPS-UD seeks to enable growth in. The proposal aligns with Policy 1 (well-functioning urban environments) and Policy 3 (intensification in and around city centre and metropolitan centre zones). As noted under the regional benefits criterion above, the extent to which the proposal goes beyond what is already enabled under the AUP, and the corresponding net benefit, would benefit from further substantiation.

Are there any other relevant matters to consider?

Ineligible activities (section 5 of the FTAA)

- Auckland Council does not consider that the project involves an ineligible activity under section 5 of the Act. The site is held in fee simple within an urban zone in the city centre. It is not Māori land, customary marine title area, protected customary rights area, reserve land, Schedule 4 land, or an aquaculture settlement area. The project does not involve activities under the Crown Minerals Act 1991, the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or sections 15B or 15C of the RMA, and does not include a prohibited activity under the RMA.

Reasons to decline (section 21(5) of the FTAA)

- Auckland Council does not identify any of the discretionary reasons for declining a referral application in section 21(5) of the Act as clearly applicable. No Treaty settlement applies to the project area, no land has been identified to the Council as required for Treaty settlement purposes, no competing substantive application is known to the Council, the project does not include a prohibited activity under the RMA, and Auckland Council is not aware of any compliance or enforcement history affecting the applicant. The matters raised throughout this response are nonetheless relevant to the discretionary criteria under sections 21(2) and 22(2), in particular the level of substantiation of regional benefits.

Wastewater servicing

- The existing public wastewater network may have capacity to service the proposal. It is noted however that the Fanshawe Street Pump Station has no available capacity to accommodate additional flows. Accordingly, it is recommended that any wastewater generated is directed to the Wynyard Quarter Pump Station.

Stormwater and flood hazard

- The applicant intends to seek authorisation under the Council's Regionwide Network Discharge Consent (RWNDC) through a site-specific Stormwater Management Plan (SMP) at the substantive stage. As redevelopment will exceed 5,000m² of impervious area, it is classified as Brownfields Large under Schedule 4 of the RWNDC. It is at the applicant's risk to proceed without adoption of an SMP under the RWNDC, or a private diversion and discharge consent.
- Detailed flood modelling and a joint probability assessment (addressing both rainfall-induced flooding and coastal inundation, assessed against PC120) will be required at the substantive stage to demonstrate that flood hazard risk to people, property, buildings and infrastructure (including safe refuge and egress) is tolerable or acceptable.

Transport effects

- There are no regional or national transport benefits that would support the project being consented through the fast-track pathway.
- Matters that will require further work at the substantive stage include trip generation and SIDRA modelling (with the application projecting approximately 330 vehicles/hour during peaks), demonstration of compliance with the trip generation ceiling under I214.8.2(2)(ii), effects on bus services and the regional cycling network on Fanshawe Street, the proposed Halsey Street vehicle access (which was discouraged at pre-application given high pedestrian and micromobility volumes), and justification of the proposed 533 parking spaces against the Wynyard Quarter mode share targets. A comprehensive Integrated Transport Assessment will be expected at the substantive stage.

Parks, adjoining public open space and designations

- The site adjoins Amey Daldy Park, is in proximity to Victoria Park, and is subject to or adjoins Designation 508 (public open space – Central Park), Designation 511 (public open space/road) and Designation 9467 (wastewater pump station, Watercare Services Limited).
- Assessment will be required at the substantive stage of the interface design with Amey Daldy Park, shading effects (including an assessment against the City Centre zone sunlight admission requirements for Victoria Park), the status and continuity of public access easements (including the 4m wide easement under Designation 508), tree protection (potentially engaging Tree Owner Approval and the Urban Ngahere Strategy), and landowner approvals for any works on or affecting reserve land.

Urban design and landscape effects

- Given the scale of the proposed building height and site intensity exceedances, a detailed urban design and landscape and visual effects assessment will be expected at the substantive stage, informed by the Wynyard Quarter Urban Design Framework. Council encourages engagement with the Auckland Urban Design Panel.

Iwi / Mana Whenua engagement

- The applicant has undertaken written engagement with relevant iwi authorities prior to lodgement, consistent with section 11 of the Act. Council encourages continued engagement should the project be referred, given the city centre and waterfront location of the site and the opportunity for Māori cultural narratives to be reflected in the public realm.

Other authorisations

- Beyond the proposed approvals under the FTAA, the project will require landowner approvals for any works on or affecting reserve land, a Tree Owner Approval where applicable, building consents and engineering plan approvals. The project is also likely to require a section 127 variation under the RMA to amend existing conditions relating to the use of the existing car parking spaces on the site.

Conclusion

Auckland Council does not consider that the project involves an ineligible activity under section 5 of the FTAA and does not identify any conclusive reason to decline the referral application under section 21(5). The Council adopts a **neutral** position on whether the project should be referred.

Council considers that the case for regional significance has not been adequately substantiated on the material provided. Detailed substantive-stage assessment will be required across transport, infrastructure servicing, stormwater and flood hazard, urban design, landscape, and effects on adjoining public open space. Auckland Council reserves its right to provide more detailed comment on these matters at the substantive application stage should the project be referred.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Attached documents:

1. Economics Memo
2. Healthy Waters Memo
3. Auckland Transport Memo
4. Watercare Memo
5. Parks & Community Facilities Memo

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	100 Halsey Street
Address	100 Halsey Street, Auckland Central
FT application number	FTAA-2603-1190

Respondent Information

Name	Rodney Yeoman
Role	Director - Economist
Agency / Department	Formative
Date	8/05/26

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

I consider that there is insufficient information in the Economic Assessment to determine whether the activity would be regionally significant under section 22(2)(a) of the FTAA, or whether the costs are disproportionate to the regional benefits under the test in section 85(3)(b) of the FTAA. Therefore, I am neutral in terms of the proposal proceeding through the fast-track.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

For this feedback I have reviewed the report *Economic Assessment of Proposed Commercial Development for Fast-track Referral* (appendix 8) conducted by Insight Economics, 25 March 2026 (Economic Assessment) and Assessment of Environmental Effects (AEE). The following response focuses on the criteria listed by Auckland Council. There may be relevant information in the other expert reports (including Infrastructure, Transport, Noise, Social, and Recreation) that could assist in understanding the

economic outcomes. However, it is beyond the scope of this initial feedback to assess the wider package of reports.

Does the project have significant regional or national benefits?

It is unclear whether the proposal would result in regionally significant economic benefits. The following issues are important:

- **Net Benefits:** the Economic Assessment has focused on gross benefits of construction and operation, which is a specifically acknowledged limitation of the report. The assessment should consider the baseline development already enabled on the site under the AUP, as well as the potential for similar development to occur elsewhere within the central city. Importantly, if approved via FTAA the proposal would enable additional activity beyond the baseline provisions of the AUP and as acknowledged in the application, some of this activity “may have occurred elsewhere in the absence of the proposal”. In summary, the economic assessment should consider the baseline counterfactual, and then compare this to the proposal to establish the net benefit.
- **Time Value:** the assessment does not adequately consider the implications of the timing of the project or apply a net present value approach to establish the present-day value of the projected benefits.
- **Optioneering:** the options presented in the economic assessment are material different. My understanding is that FTAA applications have to include a clearly identify intended activity. If the use changes, then the application must restart the process (as an example see Port of Tauranga FTAA). Option A is vanilla office development, and should be assessed as such. While Option B data centre is entirely different in nature and will generate unique and different costs and benefits. The application should focus on one or the other, as it would not be consistent with the FTAA.

As currently presented, there is insufficient information to determine whether the economic benefits from the proposal are regionally significant.

Would referring the project facilitate its delivery in a more timely and cost-effective way?

The economic assessment claims that the progress of the development will be faster through FTAA.

Potentially under option B this may be the case, as there could be significant externalities associated with operating a hyperscale data centre in this highly built-up area. For hyperscale facilities, the cooling infrastructure is often enormous because almost all electrical energy consumed by the IT equipment ultimately becomes heat that must be removed. An 88MW IT load centre could require a very large amount of cooling plant, and hence likely generate noise 24/7. I acknowledged that these externalities could result in opposition from local businesses, residents, and other NGO.

However, for Option A, it appears that the majority of the proposed floorspace would remain within the applicable height limits (as illustrated in the massing overview maximum height diagram). On this basis, it may be arguable that a similar form of development could potentially be achieved through the standard consenting framework and that the FTAA may not result in a material change in the delivery time or cost.

Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?

Outside my area of expertise, however I would expect that referral would not materially affect the efficient operation of the fast-track approvals process.

Has the project been identified as a priority in any government or sector plan or strategy?

No, there does not appear to be a dedicated national Data Centre Strategy published by the New Zealand Government in the same way that some countries (such as Australia or Singapore) have formal strategic frameworks for the sector. However, there are several related government strategies and initiatives that touch on digital infrastructure, cloud services, data governance, and energy infrastructure.

Will the project deliver new or support existing regionally/nationally significant infrastructure?

If Option B were to be developed, the proposed data centre and associated substation would be significant at both a regional and national scale. However, the Economic Assessment does not provide evidence to demonstrate that this alternative is realistically achievable.

Will the project increase housing supply or contribute to a well-functioning urban environment?

No housing supply would be provided. However, given its location and the level of employment that could be accommodated, the development could contribute to a well-functioning urban environment.

Will the project deliver significant economic benefits?

It is unclear, as the Economic Assessment only quantifies the gross values and does not consider the implications of time. Moreover, there is no quantification of other economic benefits. As currently presented, there is insufficient information to determine whether the impacts are regionally significant.

Will the project support primary industries (e.g., aquaculture)?

No

Will the project support development of natural resources (e.g., minerals, petroleum)?

No

Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?

Unclear, the implications of the data centre would be critical to this outcome.

Will the project support climate change adaptation or recovery from natural hazard events?

No

Will the project address significant environmental issues?

No

Is the project consistent with local or regional planning documents (e.g., spatial strategies)?

Unsure, outside my area of expertise.

Are there any other relevant matters to consider?

The most significant benefit of the Project is likely to relate to the data centre in Option B. However, the Economic Assessment provides only generic information on the demand and supply of this infrastructure globally and in New Zealand, which is a major shortcoming. It contains only qualitative discussion and does not estimate the potential value of this activity, nor does it provide information that supports the feasibility or likelihood of this particular development proceeding.

I note that the scale of the data centre proposed under Option B is very large. At 88MW of IT load, the proposal would be hyperscale in nature and significantly larger than any data centre currently operating in New Zealand. I understand that New Zealand currently has approximately 50 data centres with a combined installed IT load capacity of around 104MW. On this basis, the proposal would represent a substantial increase in national computational capacity (85% increase).

Furthermore, in terms of electricity demand, the facility could consume the equivalent of approximately 12% of the Auckland region's annual electricity usage, which will have significant implications for both electricity generation, network infrastructure, and market outcomes. At this level it would likely impact the market price of power, and result in the need for additional generation, and potentially network infrastructure upgrades.

I also note that the proposal assumes approximately 6,900m² of floorspace for the centre, which appears relatively small compared to other data centres in New Zealand (even though they have materially lower IT load capacities).¹ Based on the observed floorspace ratio to MW IT load in other data centres, an 88MW would need potentially 30,000m² to 50,000m² of floorspace.² A Further explanation of how the proposed facility would accommodate the large amount of computing infrastructure, cooling systems, and associated plant within this small footprint would assist in understanding the feasibility and operational characteristics of the proposal.

The cost of constructing a data centre is generally relatively high compared to most other forms of business activity. NZTech estimates average construction costs at approximately \$15m per MW of IT load³, which is substantially higher than the assumptions adopted for Option B. In contrast, the Economic Assessment appears to assume a cost of less than \$5m per MW.⁴ I acknowledge that the NZTech estimate may largely reflect conventional low-rise data centres located in industrial areas, where construction costs are comparatively lower. As such, the \$15m per MW benchmark may not be directly applicable to this

¹ As an example, CDC Hobsonville 1 data centre which is 22MW and has a floorspace of 12,400m², which is a ratio of 600m² per MW. CDC Silverdale which is planned to reach 66MW and has a floorspace of 21,400m², which is a ratio of over 300m² per MW.

² 88MW proposed multiplied by the ratios of 600m² and 300m² per MW.

³ NZTech (2025) Empowering Aotearoa New Zealand's Digital Future Our national data centre infrastructure. An analysis of the New Zealand Data Centre sector: its impact, energy consumption and benefits for the economy and society.

⁴ i.e. \$420m of construction costs divided by 88MW, results in a construction cost of \$4.8m per MW. While there will also be some planning and civil costs attributable to the data centre, these are not likely to change the result materially.

situation. However, given that Option B involves a high-rise development within a commercial/CBD environment, I would expect construction costs to be materially higher, rather than lower, than the NZTech benchmark.

Finally, there appears to be no identified operator or purchaser for the proposed data centre. To avoid the impression that the proposal is speculative, it would be beneficial to provide further evidence demonstrating that this option is more than hypothetical and has a realistic prospect of proceeding. Given the scale of the data centre, it is not clear whether the centre would serve local, regional, national or international needs.

I consider this aspect of the project is the most important, and may meet the threshold set out in section 22(2) of the FTAA. However, whether or not this aspect of the project is speculative or real is not clear from the Economic Assessment.

I also note that the Economic Assessment does not provide any conclusion on whether the costs associated with the proposal are disproportionate to the regional benefits, as required under the FTAA test in section 85(3)(b). This omission likely reflects the fact that the Economic Assessment does not consider whether there are any costs or externalities associated with the development. I consider that it is unlikely that a development of this scale would generate no costs, and accordingly the assessment should have at least identified these costs qualitatively and quantified the more material impacts where possible. These costs could then be weighed against the benefits to determine whether there is a net benefit to society. Application of a standard cost–benefit analysis framework would provide a robust evidence base from which to assess whether section 85(3)(b) is met.

Auckland Council Criteria

I consider that the Economic Assessment prepared by Insight Economics does not specifically address the Auckland Council assessment criteria for fast-track referrals. I understand that these matters may be addressed by other experts. However, if there are effects relevant to those criteria, they could potentially influence the conclusions reached regarding the project’s economic outcomes. For example, if there is insufficient infrastructure capacity or significant environmental impacts, this may have implications for both the economic outcomes and my review.

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	100 Halsey Street, Auckland Central
Address	100 Halsey Street, Auckland Central, Auckland
FT application number	FTAA-2603-1190

Respondent Information

Name	Hillary Johnston
Role	Fast-Track Lead
Agency / Department	Healthy Waters & Flood Resilience
Date	14.05.2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

Healthy Waters & Flood Resilience (HWFR) has reviewed the Referral Application for the proposed commercial mixed-use development. The Application proposes to replace the existing bus depot activities and establish five new buildings within the *Business – City Centre Zone*.

Reasons for Consent

The Referral Application Planning Assessment has not included the diversion and discharge of stormwater runoff as a reason for consent under Chapter E8 of the AUP.

HWFR holds a Regionwide Network Discharge consent (RWNDC) which authorises the diversion into and discharge from public stormwater networks within the Auckland Region. The RWNDC is applicable to existing urban zoned land or land rezoned urban through a Plan Change process.

There is no adopted Stormwater Management Plan (SMP) for this area. The Applicant's Agent has outlined it is intended to seek authorisation of the diversion and discharge of

stormwater via the RWNDC by submitting a site-specific SMP for assessment as part of the substantive fast-track application. The SMP will need to demonstrate compliance with Schedule 4 of the RWNDC or justify a suitable alternative as the BPO.

The proposed redeveloped impervious area extent is not specified within the Application, however, is estimated to be more than 17,000m². Where redevelopment includes more than 5,000m² of impervious area it is considered Brownfields Large.

It should be clarified that it is the Applicant's risk to proceed with their application without adoption a Stormwater Management Plan under the RWNDC or without seeking a private diversion and discharge consent.

Natural Hazards

The existing site is almost completely impervious and is proposed to remain so post-development. Auckland Council's GeoMaps viewer indicates that the western extent of the site is subject to the 1% AEP floodplain and overland flow paths. Flood levels associated with rainfall events are predicted to be lower than those arising from coastal inundation.

The Applicant's Engineer has assessed that the site is not expected to experience rainfall-induced or catchment flooding under current climate conditions. Under a future 3.8°C climate change scenario, some inundation may occur within the south-western corner of the site.

The proposed development represents a more intensive and sensitive use of the site than the existing bus depot and is expected to introduce an increased level of potential flood hazard risk exposure that will need to be carefully managed.

As part of the Substantive Application and/or preparation of a SMP for authorisation under the RWNDC, HWFR expects that sufficient information will be provided to demonstrate that:

- The proposed works will not increase flood hazard risk to the surrounding environment.
- The proposed activity can be managed in a way that the flood hazard risk to people, property, buildings and infrastructure is tolerable or acceptable, including consideration of safe refuge and egress.

The Substantive Application is expected to include an assessment of natural hazard effects against PC120 for both coastal inundation and surface flooding. Separate assessments may be required in this context, in addition to a joint probability assessment.

Consent Conditions

Consent conditions have not yet been provided. HWFR recommend the following condition of consent and associated advice note are included where an application proceeds without a private diversion and discharge consent or adoption under the RWNDC.

Stormwater Management Plan (SMP)

Prior to the lodgement of any Engineering Plan Approval (EPA) relating to the public stormwater network, the Consent Holder must ensure that a Stormwater Management Plan (SMP) has been prepared and formally adopted under Auckland Council Regionwide Network Discharge Consent (RWNDC).

The adopted SMP must demonstrate compliance with the relevant requirements of Schedule 4 of the RWNDC and must apply to all stormwater discharges to the public stormwater network associated with the development.

Advice Note:

The consent holder is advised that as they have not sought a private diversion and discharge consent as part of their FTAA application, and as their FTAA application stipulates that they will rely on the RWNDC, it is at the Applicant's risk to proceed at this point without adoption an SMP or a private consent.

HWFR welcomes further engagement with the Applicant's Agents in respect of any of the matters outlined above.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Overall Position / Summary

HWFR is not opposed to the proposal proceeding to referral under the Fast-track Approvals Act. While a Stormwater Management Plan has not yet been adopted at this stage, HWFR considers that flood hazard effects will likely be appropriately addressed through subsequent SMP approval under the Regionwide Network Discharge Consent and associated conditions, and welcomes further engagement with the Applicant's Agent as the proposal progresses.

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	100 Halsey Street, Auckland Central
Address	100 Halsey Street, Auckland Central, Auckland
FT application number	FTAA-2603-1190

Respondent Information

Name	Vignesh Divakar
Role	Senior Development Planner
Agency / Department	Auckland Transport
Date	14 May 2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

1. Introduction

Thank you for the opportunity to comment on this fast-track referral for the proposed commercial-led mixed-use development at 100 Halsey Street, Auckland Central. Auckland Transport (AT) hasn't identified any national or regional transport benefits that would support the project being consented through the fast-track pathway.

AT requests that the applicant submit a comprehensive Integrated Transport Assessment (ITA) to determine whether the proposed development may create adverse effects on road user safety and road network operations. For avoidance of doubt, A Traffic Impact Assessment (TIA) evaluates how a development affects the surrounding road network, typically analyzing vehicle trip generation, intersection capacity, queuing, and parking demand to ensure the network can accommodate additional traffic. In contrast, an ITA adopts a broader, effects-based approach that considers the full transport system, including walking, cycling, public transport, safety, accessibility, and travel demand, alongside

vehicle impacts. ITAs therefore seek to integrate land use and transport outcomes and support a safe, efficient, and sustainable multi-modal network, rather than focusing solely on vehicle capacity.

AT is neutral to the proposal proceeding through the fast-track consenting process, but request that if the project is accepted for fast-track consenting, an ITA report be provided for AT's review and feedback as part of the substantive application. Due to the limited material available at this stage, AT has not been able to determine the degree of impact on the transport network resulting from the proposed development.

The high-level issues outlined below specify the effects AT recommends addressing in any future application. AT remains available for pre-lodgment discussions with the applicant either directly or via Auckland Council, should this be required.

2. Initial Comments

2.1. Trip generation and modelling

Section 6.1 of the Transport Assessment Report (TAR) indicates that the proposed development is projected to generate approximately 330 vehicle movements per hour, based on an overall Gross Floor Area (GFA) of 80,000m². This equates to roughly 5.5 vehicles per minute utilizing Fanshawe Street for access to and from Halsey Street, particularly during peak network hours. Section 8.3 of the TAR notes that *"Fanshawe Street should no longer be thought of as a major through route and instead is just one of the ways for people to enter the City Centre and associated precincts."* In contrast, AT Future Connect identifies Fanshawe Street as a primary walking route, a regional cycling route, an interim rapid transit network, and a primary arterial. Accordingly, Fanshawe Street continues to function as a key corridor for both bus services and private vehicles within the city centre.

The applicant has not submitted any SIDRA modelling to evaluate potential adverse impacts on the surrounding road network, specifically regarding vehicle delays, queueing, and possible reductions in Level of Service (LOS) on Fanshawe Street. Given the significant projected trip generation, it is critical to identify and appropriately mitigate any potential negative effects on road network operations.

Accordingly, AT recommends that comprehensive traffic modelling be undertaken for the proposed development to assess any potential adverse effects on the surrounding transport network. The applicant is also advised to clarify whether the proposal adheres to the trip generation ceiling targets specified in section I214.8.2 (2)(ii) of the Wynyard precinct, in order to determine if peak hour vehicle trips may cause queueing or delays within the road network. Should any adverse effects be identified, the applicant is requested to provide an updated assessment outlining how these impacts will be avoided or mitigated.

2.2. Impacts on public transport services

AT notes that multiple bus services currently operate on Fanshawe Street, as illustrated in Figure 1 below, with plans to introduce further bus services in the future within both the Fanshawe Street and Wynyard precincts. The applicant has not provided an assessment of trip distribution from the proposed accesses off Gaunt Street and Halsey Street or its potential impact on existing bus services around the site and Fanshawe Street in the TAR provided.

Figure 9 of the TAR indicates that traffic volumes on Fanshawe Street declined between 2004 and 2020 following the opening of the Northern Motorway and acknowledges a corresponding change in the street's function. It is recommended that the data presented in Figure 9 be updated to reflect current traffic volumes on Fanshawe Street. AT also advises that the observed reduction in general traffic volumes should not be construed as evidence of available capacity for additional vehicle movements, given that the corridor continues to serve as a frequent bus route and that the proposed trip generation may adversely affect bus network operations. Accordingly, the applicant should provide an assessment of the proposal's potential effects on bus network performance and identify measures to avoid, remedy, or mitigate those effects.

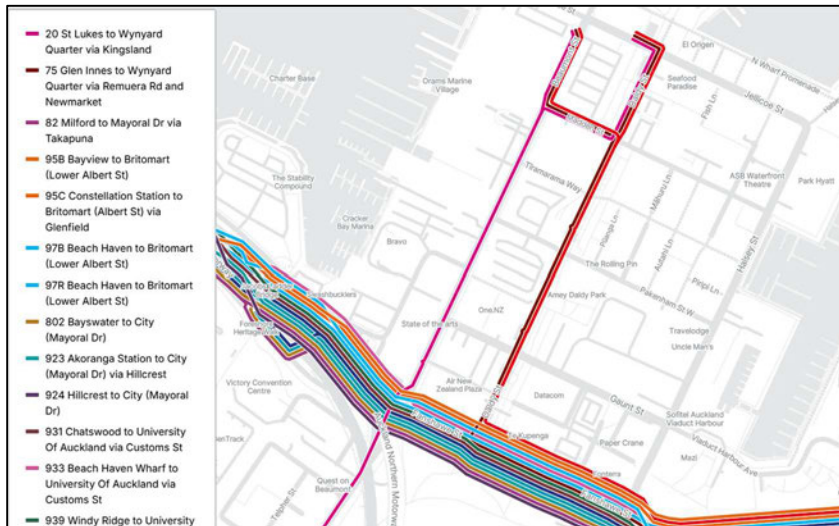


Figure 1: Existing bus services on Fanshawe Street and Wynyard Precinct.

2.3. Encouraging active modes within the Wynyard Precinct

The applicant has proposed a total of 533 parking spaces for the development, complying with the ratio of one parking space per 150m² GFA as specified in Table I214.6.1.1 of the Wynyard precinct. AT notes that the application does not address how patrons accessing the development will be encouraged to utilize active modes of transportation, such as walking, cycling, and public transport, in accordance with the Wynyard Precinct Policy I214.3 (35).

Section 7.1 of the TAR indicates that individuals working in Wynyard are four times more likely to commute by bus than by car, and only 45% of arrivals use private vehicles. AT is concerned that the provision of 533 car parking spaces may influence travel behavior, potentially encouraging greater use of private vehicles over sustainable active modes. This could contribute to increased congestion within the Wynyard precinct and negatively impact both road network operations and pedestrian amenity.

Furthermore, AT highlights that the Wynyard Quarter Transport Management Association has established mode share targets of 70:30 (sustainable travel vs. private vehicles) by 2020 and 80:20 by 2030. In alignment with Policies I214.3 (34), (35), and (38), the applicant is therefore requested to provide an assessment outlining how the development intends to manage private vehicle travel within the Wynyard precinct and promote sustainable travel choices, ensuring that any adverse effects on the road network are minimized.

2.4. Access Design

The architecture plans have noted that two accesses will be provided on Gaunt Street and one access fronting Halsey Street. However, no further details about the vehicle crossing design have been provided at this stage for review. The applicant is requested to provide a detailed assessment of the proposed vehicle crossing designs, assess any potential adverse effects to road users and pedestrian safety, and how those adverse effects could be avoided or mitigated.

2.4.1. Access on Halsey Street

Section 5.4 of the TAR states that exit-only access will be provided on Halsey Street, infringing the standard I214.6.11 (3) of the Wynyard precinct. Halsey Street is classified by AT Future Connect as a primary walking route, a local supporting cycling route, and a collector road. During the pre-application meeting (reference PRR00043684) held on 28 January 2026, AT and AC advised the applicant to avoid vehicle crossings onto Halsey Street due to high pedestrian and micromobility volumes. With an estimated trip generation of 330 vehicles per hour and a daily traffic volume of 8,026 vehicles on Halsey Street, AT considers that drivers exiting the site may experience difficulty finding adequate gaps for turning, which could lead to unsafe exiting maneuvers and internal site queuing. These issues have the potential to adversely impact road user safety. The applicant is therefore encouraged to consider providing access via Pakenham Street West (which is a local road and secondary walking route), assess any potential adverse effects on pedestrian and road user safety and outline measures for avoiding or mitigating those effects.

2.5. Construction traffic effects

The applicant has yet to confirm the extent of earthworks required for the proposed development. Section 4.7 of the Assessment of Environmental Effects (AEE) indicates that consent is sought for a duration of 10 years to facilitate the construction of all five buildings. Given this timeframe, AT notes the potential for

disruptions to the road network due to heavy vehicles accessing major bus routes, which may result in congestion and delays to bus services for a relatively longer duration.

Additionally, specific details regarding the volume of earthworks, proposed transport routes, and anticipated number of heavy vehicle movements during both the earthworks and construction phases have not been provided. AT requests that the applicant provide comprehensive information regarding the projected number of heavy vehicle trips and assess their potential impact on the relevant roadways, including pavement conditions and any possible safety risks. Should the anticipated volume of heavy vehicles be sufficient to cause pavement damage, the applicant is requested to provide mitigation measures to address such outcomes. It is recommended that a Pavement Impact Assessment be conducted, incorporating video surveys and provisions for pavement reinstatement as necessary. Additionally, a Construction Traffic Management Plan (CTMP) should be submitted to evaluate and address any road user safety concerns during both the earthworks and construction stages.

15th May 2026.

Masato Nakamura
Consultant Planner, Colab Planning

s 9(2)(a)

Russell Butchers
Principal Project Lead, Auckland Council

s 9(2)(a)

Dear Masato/Russell,

Re: Fast Track Referral: 100 Halsey Street, Auckland Central - FTAA-2603-1190

Introduction

1. Watercare Services Limited (Watercare) welcomes the opportunity to provide comments on the Fast-track referral application (FTAA-2603-1190), made under section 13 of the Fast-track Approvals Act 2024 (Act).
2. Barker & Associates, on behalf of RP Financial (the 'Applicant') proposes a comprehensive redevelopment of 100 Halsey Street, Wynyard Quarter, Auckland CBD. The existing bus depot activities will be removed and replaced with a commercial-led mixed-use development comprising five new buildings (Buildings B1 to B5) arranged around a network of lanes and publicly-accessible spaces that improve mid-block permeability and connections within the Wynyard Precinct. The existing Travelodge building at the north-eastern corner of the block is proposed to remain and is outside the primary scope of the Project works, although it is within the legal boundaries of the Site. There is potential that additional plant may be required to be constructed on the Travelodge building, which will be confirmed in a future substantive application.
3. Site is located within the Business – City Centre zone under AUP and is located within sub-precinct B of the Wynyard Precinct.
4. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
 - 100 Halsey Street Infrastructure Assessment, prepared by Tonkin & Taylor Ltd Date March 2026 Job Number 1101937 v1
 - 100 Halsey Street, Auckland Central Referral Application Planning Assessment, prepared by Barker & Associates dated 27 March 2026;
 - Fast Track Referral Application Revision H 26.03.2026, Prepared By Georgia Ganley, Emanuele Lisci, Cameron Pattullo, Manuel Diaz.

5. Any amendment to the Application will require further review from Watercare.

Watercare's purpose and statutory obligations

6. Watercare is New Zealand's largest provider of water and wastewater services, operating as a substantive council-controlled organisation owned by Auckland Council with the purpose embodied in the Māori whakatauki "Ki te ora te wai, ka ora te whenua, ka ora te tangata" (When the water is healthy, the land and the people are healthy), reflecting the connection between its services and the wellbeing of the community and local environment.
7. Watercare is required to manage its operations efficiently with a view to keeping overall costs at minimum levels while maintaining long-term asset integrity, subject to economic regulation under the Watercare Charter with oversight by the Commerce Commission as the appointed Crown Monitor, and must give effect to relevant aspects of Council's Long-Term Plan and act consistently with other Council plans and strategies including the Auckland Plan 2050 and Future Development Strategy (FDS).
8. Through its annual Statement of Intent responding to Council's Letter of Expectation, Watercare commits to contributing to Auckland Plan 2050 outcomes by collaborating with the wider Council group to support areas of growth identified by Council, acting consistently with Council's FDS for major infrastructure development for future urban areas, ensuring alignment of infrastructure projects with other utilities, fully recovering growth costs so that growth pays for growth, and abiding by the Statement of Expectations of Substantive CCOs which requires working with Council and other CCOs to achieve the outcomes and objectives set out in the Auckland Plan 2050.

Watercare's Comment

Bulk and local Wastewater

9. As per the reports reviewed, the site is serviced by existing public wastewater infrastructure, with connections discharging to the wider network associated with the Amey Daldy Park Pump Station (Wynyard Quarter Pump Station) and the Fanshawe Street Pump Station catchments.
10. Based on the 100 Halsey Street Infrastructure Assessment, the proposed wastewater discharge has been estimated as follows:
 - Average Dry Weather Flow (ADWF): 3.65 L/s
 - Peak Dry Weather Flow (PDWF): 7.30 L/s
 - Peak Wet Weather Flow (PWWF): 19.36 L/s
11. At a high level, existing public wastewater infrastructure may be able to service the proposed 12-storey residential development at 100 Halsey Street (48 units), subject to further detailed assessment.
12. It is noted that the Fanshawe Street Pump Station does not have available capacity to accommodate additional flows. Accordingly, the wastewater servicing strategy for this site will need to ensure that all proposed discharges are directed to the Wynyard Quarter Pump Station, with no increase in flows to the Fanshawe Street catchment.

13. Accordingly, the current assessment should not be relied upon as confirmation of wastewater servicing capacity. The assessment remains preliminary and subject to further detailed investigation.

Wastewater Infrastructure Information Required to Support Watercare's Assessment

14. Confirmation of proposed wastewater connection points, noting that there shall be no increase in flows to the Fanshawe Street catchment.
15. Hydraulic assessment confirming available downstream capacity, surcharge risk, wet weather performance, and impacts on the wider network.

Watercare Position – Wastewater

16. At this stage, Watercare does not identify any wastewater servicing matters that would preclude the proposal from proceeding through the Fast-track process in principle.
17. However, Watercare is unable to conclusively confirm available wastewater servicing capacity or infrastructure impacts until detailed design and supporting servicing assessments have been provided and reviewed.

Bulk and local Water Supply

18. As per the reports reviewed, the site is serviced by an established reticulated potable water network, including 150 mm, 200 mm, and 300 mm water mains located within Halsey Street, Gaunt Street, and Pakenham Street West.
19. The proposed development demand has been estimated as follows:
 - Average Daily Demand (ADD): 3.65 L/s;
 - Peak Daily Demand (PDD): 7.30 L/s; and
 - Peak Hour Demand (PHD): 18.26 L/s.
20. While the post-development water demand has been summarised in the report, potable water demand associated with the data centre and substation options has not been assessed at this stage and will require further evaluation in subsequent design stages.
21. At a desktop level, the surrounding water network appears likely to have sufficient capacity to accommodate the proposed development demand.
22. However, the assessment documentation does not confirm whether the existing network can achieve the required firefighting flows and residual pressures associated with the proposed sprinkler system and FW2 firefighting classification. No hydrant flow or pressure testing has been undertaken as part of the assessment.

23. Accordingly, firefighting compliance remains unverified; available residual pressure performance has not been confirmed; and final firefighting supply requirements remain unresolved.
24. Confirmation of the firefighting approach will require detailed assessment and coordination with Watercare during the detailed design stage.
25. At later stages of the project, opportunities to establish multiple connection points and/or customer meters from different parts of the network may be explored to better balance system demand.
26. Watercare acknowledges that, based on the information provided to date, the surrounding trunk water network may have sufficient bulk capacity to accommodate the proposed development demand.
27. However, key uncertainties remain, including unassessed demand components (such as the data centre and substation) and unresolved firefighting flow and residual pressure requirements.

Water Infrastructure Information Required to Support Watercare's Assessment

28. Hydrant flow and pressure testing;
29. Confirmation of firefighting supply strategy, specifically, sprinkler flow requirements;
30. Identification of any infrastructure upgrades required to service the development.

Watercare Position – Potable Water

31. Subject to the above, Watercare does not identify any potable water servicing matters that would, in principle, prevent the proposal from progressing.
32. All proposed connections and any required infrastructure upgrades will be subject to detailed design review and approval in accordance with Watercare Engineering Standards.

Conclusion

33. Based on the information provided and reviewed to date, Watercare acknowledges that, at a high level, the existing water supply and wastewater networks may have the potential to service the proposed development.
34. However, the current assessments remain preliminary and do not provide sufficient information to confirm servicing availability or network performance with certainty. In particular, key constraints and uncertainties remain in relation to wastewater servicing, including capacity limitations associated with the Fanshawe Street Pump Station and the condition and adequacy of existing local wastewater connections.

35. In relation to potable water supply, while the surrounding trunk network appears likely to have sufficient bulk capacity, critical information gaps remain. These include unassessed demand components (such as the data centre and substation), unresolved firefighting flow requirements, and the absence of confirmed hydraulic and pressure performance data.
36. Accordingly, both wastewater and potable water servicing will require further detailed design and supporting technical assessment.
37. Subject to the matters outlined above, Watercare does not identify any water or wastewater servicing matters that would, in principle, prevent the proposal from progressing at this stage.
38. All servicing arrangements, network connections, and any required infrastructure upgrades will remain subject to detailed design review and formal approval in accordance with Watercare Engineering Standards and applicable approval processes.
39. Watercare welcomes the opportunity to engage with the applicant and to review any proposed conditions at the substantive stage.

Yours faithfully,



Anna Jennings

Manager Major Developments

Watercare Services Limited

Address for correspondence:

Shabneez Hussain

Development Programme Lead

Phone: s 9(2)(a) [REDACTED]

Email: fasttrack@water.co.nz

Parks Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	100 Halsey Street
Address	100 Halsey Street, Auckland Central
FT application number	(PRR00043956)

Respondent Information

Name	Cas Hannink
Role	Senior Parks Planner
Agency / Department	Specialist Operations Parks & Community Facilities Community Directorate
Date	12/05/2026

Do you support the proposal proceeding through fast-track?

- Support
- Oppose
- Neutral

Agency/Department Response

<p>Preamble and key concerns</p> <ul style="list-style-type: none"> Thank-you for your request for specialist input from the Parks Planning Team representing the wider Parks and Community Facilities Department for this referral application under the Fast-track Approvals Act 2024 (FTAA). The following comments are provided at a high-level only and reflect the limited detail supplied in the referral request to flag any immediate matters of concern regarding potential effects on Amey Daldy Park and associated Parks and Community Facilities (PC) assets. It is anticipated that if the application is accepted for referral under the FTAA that more detail will be provided for substantive assessment so Parks

- Suitable measures are to be employed to ensure excavation or construction activities do not create flooding, instability, or settlement risks that could adversely affect the adjacent park. Information to demonstrate this will be required as part of the substantive application.

Tree asset owner matters

- The proposal doesn't address specific matters affecting existing reserves and the road network.
- Any works affecting existing vegetation within Amey Daldy Park or the surrounding road network may require a Tree Owner Approval (TOA).
- The proposal should identify whether shading, excavation, or construction activities may impact tree root zones, canopies, or tree health within the existing park or existing road tree assets. Should there be an impact, mitigation measures are to be demonstrated as part of the substantive application.
- The applicant must ensure all works comply with Council's Urban Ngahere Strategy and relevant tree protection standards.

Development on the boundary with a reserve

- It is unclear from the application material as to how the proposed development relates to the adjacent reserve areas.
- The proposal must include specific details to assess the interface between the proposed development and Amey Daldy Park, ensuring it maintains passive surveillance, visual openness, and public safety.
- A comprehensive permitted versus additional shading on Amey Daldy Park and the Linear Park connection has not yet been provided. Limited shading models are provided within the Appendix 9 Urban Design Assessment.
- Depending on the extent of shading effects, it is recommended the applicant undertake a public space audit that assesses both low and high usage areas, including associated heat-mapping analysis relative to shaded areas for Amey Daldy Park.
- The proposal should avoid any design outcomes that create dominance, overshadowing, or privatisation effects on the park. The proposal is to ensure compliance with relevant precinct setbacks, and public realm policies.

Park outcomes and considerations

- The proposal is to comment on and provide evidence confirming that no additional shading will occur over Victoria Park, pending final height confirmations, as illustrated in Figure 2 below.

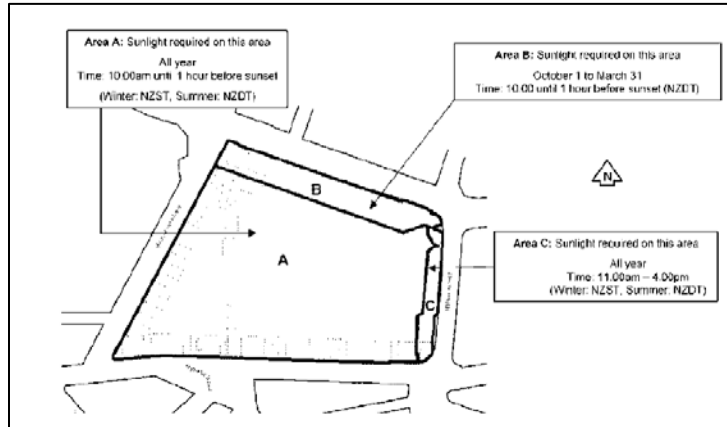


Figure 2: Admission of sunlight to Victoria Park.

Source: Appendix 11 Business – City Centre Zone sunlight admission into public places.

Property specific matters

- The applicant should consider the following designations:
 - Designation 508 – Public open space (Central Park), Auckland Council.
 - Designation 511 – Public open space / road, Auckland Council.
 - Designation 9467 – Wastewater pump station, Watercare Services Ltd.
- The applicant is advised to engage with Auckland Council’s Land Advisory team regarding the potential relinquishment of existing easements that currently ensure public access. This is a matter that is likely to be relied upon as part of the proposal but not be established through the resource consent.
- The applicant is to clarify how public access will continue to be ensured along the periphery of the park and through the relevant easements. The proposal must advise on any implications of the 4m wide easement under Designation 508.

Other matters the proposal must address:

Relevant AUP Objectives and Policies

- The following relevant objectives and policies are identified as they guide expectations for public realm quality, pedestrian connectivity, and built form integration within the Wynyard Precinct and City Centre Zone.

Wynyard Precinct (I214)

- The applicant is to consider I214.10.6 (indicative lanes, viewshafts, and public access easements).
- The applicant is to consider objectives I214.2(3) and I214.2(6) relating to high-quality public realm and pedestrian connectivity.
- The applicant is to consider policies I214.3(2), (4), (5), and (26) relating to open space integration, built form, and public access.

Business – City Centre Zone

- The applicant is to consider policy H8.3(3) regarding high-quality built form and public realm outcomes.
- The applicant is to consider public realm policies H8.3(33)–(38) relating to pedestrian amenity, open space integration, and urban design quality.

Asset ownership and coordination

- Amey Dalby Park and its associated assets are currently recorded in Auckland Transport’s Fixed Asset Register (FAR) and have been in the process of transferring to Auckland Council’s FAR. It is recommended to approach Auckland Transport noting the associated designations and existing asset ownership.
- The applicant is to consider opportunities for storytelling associated with Amey Dalby Park, noting the existing storyboard wall and potential collaboration with Council

RMA s239 matters

- The applicant is to clarify the status of all public access easements, including the 4m-wide easement under Designation 508, and confirm whether amendments are required.
- The applicant is to ensure any new structures do not encroach into public open space without appropriate approvals.
- The applicant is to confirm that no transformer relocation is proposed onto Amey Dalby Park, as this would introduce an inappropriate encumbrance on public land.

- The applicant is to identify any covenants or encumbrances that may affect long-term public access or park operations.

Prepared by:



Cas Hannink
Senior Parks Planner
Parks Planning Team
Parks and Community Facilities

Date: 12 May 2026

Accepted for release by:



Hester Gerber- Manager Parks Planning
Agency Lead for Parks and Community Facilities

Date: 12 May 2026