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18 September 2025

Environmental Protection Authority
via email substantive@fasttrack.govt.nz

Dear Expert Consenting Panel,

MILLDALE - STAGES 4C AND 10 TO 13 - FTAA-2503-1038

Thank you for the opportunity to provide comments on the Draft Conditions for the Milldale Stages 4C and 10 to 13 Fast Track Application.

Having reviewed the Draft Conditions, Auckland Transport (**AT**) suggests amendments are necessary to Stages 10-13 Land Use Conditions of Consent LUC 201 Conditions 54 (Pine Valley Road/dairy Flat Highway Upgrade), 55 (Wainui Road Upgrade), and Stages 10-13 Subdivision Conditions of Consent SUB 201 Condition 97 (Public Roads). AT also recommends the inclusion of an additional condition relating to pedestrian bridges, described below.

Amendments to Proposed Draft Conditions

Stages 10-13 Land Use Conditions of Consent LUC 201

Condition 54: Pine Valley Road / Dairy Flat Highway Upgrade

Condition 54 was proposed by AT in the memo to Auckland Council titled 'BUN60446761 / FTAA-2503-1038 - Milldale FT - Updated Documents', dated the 15th of August 2025. Upon further review, AT finds that the condition needs to be refined to reflect the upgrade required, which is not only to upgrade the existing intersection to a signalised intersection, but to also change its layout. The additional wording suggested below includes reference to the approved consent with the approved upgrade drawings.

Current wording:

No more than a total of 2800 residential dwellings may be occupied in Milldale (Wainui Precinct) until the Pine Valley Road / Dairy Flat Highway give-way control is upgraded to a signalised intersection.

Recommended revision:

No more than a total of 2800 residential dwellings may be occupied in Milldale (Wainui Precinct) until the Pine Valley Road / Dairy Flat Highway give-way control is upgraded to a signalised intersection, *in general accordance with the plans authored by Mott MacDonald (Drawing No. 402828-MM-DWG-02-CV-RD-1101, dated 2021 – BUN60366520).*

Advice Note:

The final detailed design of the intersection must be agreed with Auckland Transport as part of the Engineering Approval process.



Condition 55: Wainui Road Upgrade

AT recommends that the Wainui Road upgrade condition apply specifically to the stages that front Wainui Road, as residents in these stages are most likely to use Wainui Road for walking, cycling, and accessing future bus routes and therefore be reliant on the upgrades.

Current wording:

Prior to the occupation of any residential dwellings in Stages 10D or 11AC, whichever comes first, the Wainui Road upgrades approved under LUC60393114 shall be constructed and operational.

Recommended revision:

Prior to the occupation of any residential dwellings in *Stages 10D or 11A-C*, whichever comes first, the Wainui Road upgrades approved under LUC60393114 shall be constructed and operational.

Stages 10-13 Subdivision Conditions of Consent SUB 201

Condition 97: Public Roads

Tracking for all intersections and roads has not been provided with the substantive application. The revised advice note serves as a reminder that appropriate tracking must be submitted at Engineering Approval stage. Additionally, a variation may be necessary if additional road reserve is required to meet tracking requirements.

Current wording:

The Consent Holder must design and construct new public roads and pedestrian accessways in general accordance with the requirements of Auckland Transport and in general accordance with the approved plans referenced in Condition 1. Confirmation from Council that the works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.

Advice Note:

- Acceptable forms of evidence include Engineering Approval Completion Certificates.
- Construction of public roading requires an Engineering Approval. Departure from Standards may be required where designs do not comply with AT standards.
- Design of public roads must include (but is not limited to), road pavement, pedestrian footpaths, cycle ways, street lighting, street furniture, road marking, traffic calming devices, road stormwater drainage, raingardens, etc. where required.
- Plans approved under Resource Consent do not constitute an Engineering Approval and should not be used for the purposes of constructing public works in the absence of that approval.
- The Consent Holder is advised that the New Zealand Addressing Standard (AS/NZS 4819:2011) requires all new public roads and all extensions to existing roads to have a road name. All road names must be approved by the Council. In order to minimise disruption to construction and survey works, the Consent Holder is advised to obtain any road name approval before applying for a section 223 certificate.

Recommended revision:

The Consent Holder must design and construct new public roads and pedestrian accessways in general accordance with Auckland Transport's requirements and the approved plans referenced in Condition 1. Confirmation from Council that the works have been satisfactorily undertaken must be provided when applying for a certificate under section 224(c) of the RMA.



Advice Note:

- Acceptable forms of evidence include Engineering Approval Completion Certificates.
- Construction of public roading requires an Engineering Approval. Departures from standards may be required where designs do not comply with AT standards.
- Design of public roads must include (but is not limited to): *appropriate tracking in accordance with Auckland Transport's Transport Design Manual*, road pavement, pedestrian footpaths, cycleways, street lighting, street furniture, road marking, traffic calming devices, road stormwater drainage, raingardens, etc., where required.
- Plans approved under Resource Consent do not constitute Engineering Approval and should not be used for constructing public works without that approval.
- The Consent Holder is advised that the New Zealand Addressing Standard (AS/NZS 4819:2011) requires all new public roads and extensions to existing roads to have a road name. All road names must be approved by the Council. To minimise disruption to construction and survey works, the Consent Holder is advised to obtain road name approval before applying for a section 223 certificate.
- *A variation to the resource consent may be required if the design of the roads is not accepted at the Engineering Approval stage.*

Proposed New Condition – Pedestrian Bridges

Three of the five proposed pedestrian bridges in Stages 10-13 are intended to be vested to AT as assets, despite their location within reserves. None of the current proposed conditions reference AT's requirements for accepting these bridges as assets. To ensure clarity and alignment with AT's asset acceptance standards, the following condition is recommended.

Pedestrian Bridges

The consent holder must ensure that Pedestrian Bridges 2, 3, and 4 (as shown on Engineering Drawing P24-128-00-2080-RD, authored by Woods, dated February 2025), and their interfaces, are designed in accordance with Auckland Transport's requirements.

Advice Note:

For any bridges with a dual function (e.g. Bridge 4, which includes a stormwater pipe), the responsibility for maintaining the utility must be clearly defined. Auckland Transport is not responsible for the non-transport functions of the bridges.

Should you have any queries regarding the comments above, please feel free to contact me.

Ngā mihi | Kind regards,

Shahriar Tehrani

Senior Development Planner

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