

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

Project name	Ardmore Business Park - FTAA-2512-1155
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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 Transport		
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2. Please provide your comments on this application
<p>Overall Summary of Auckland Transport (AT) Position</p> <ol style="list-style-type: none"> The proposed Ardmore Business Park development includes a large business park centred on Ardmore Airfield and to the immediate west of the proposed Sunfield Fast-Track and Mill Road Stage 2 (Takaanini Section) Notice of Requirement (lodged). The proposal seeks to provide further business land in the south of Auckland. Only high-level summaries of the project, transport and stormwater matters are available at this stage so there is no design detail to comment on. The Applicant summarises the key elements of the concept plan relevant to transport as: <ul style="list-style-type: none"> 511ha project area including airport. Net development area excluding airport and adjacent area already under development, roads, stormwater, landscaping etc of 193-260ha. Potential Gross Floor Area (GFA) of business park of approximately 136ha. The development is proposed to be predominantly warehouse/industrial GFA with a small supporting ancillary office and retail component.

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A large proportion of the development sits outside of the Special Purpose Zone – Ardmore Zone and is in the Rural – Mixed Rural Zone, outside of the Rural Urban Boundary and not included in a Future Urban Zone. Accordingly, large scale growth in this area is not currently anticipated in Auckland Council’s Future Growth Strategy (FDS).

3. AT acknowledges that the Fast Track Approvals Act (FTAA) has different criteria to the Resource Management Act consenting process and that the Applicant is entitled to pursue development not aligned with the FDS under the FTAA. However, for major development outside of areas anticipated for urbanisation under the FDS where there are no current transport network projects to address such growth, AT considers it is reasonable, should the matter progress to a substantive application, to seek an assessment of transport effects beyond the immediate confines of the development. Planned development is often subject to infrastructure triggers where particular stages/levels of occupancy cannot occur until necessary works in the wider network are completed. Where transport upgrades are needed and these are not publicly funded, developers may need to fully fund or partly fund works under Infrastructure Funding Agreements (IFAs) or other methods. Section 84A of the FTAA specifically contemplates conditions relating to infrastructure that may apply beyond the project area in this regard. AT considers that should the development be accepted for fast-track consenting, the Expert Consenting Panel needs to fully understand all of the costs and impacts on the transport network.
4. The substantive application would need to take into account both the Sunfield Fast-track development and the Mill Road Notice of Requirement (NoR). AT also has concerns over the effects of flooding, and stormwater mitigation in regard to its assets as set out later in this feedback.
5. Overall, the principal focus of these comments is setting out the high-level issues that AT considers it will be necessary to assess in a substantive application including the content of an Integrated Transport assessment (ITA), should the development be referred.

Sunfield Fast-track Development

6. The Applicant notes that the Sunfield Fast-track proposal immediately to the west is not part of the current environment, so it will only be assessed if approved at the time of a substantive application. The Expert Consenting Panel for the Sunfield Fast-track released its draft decision on 10 February 2026, which intends to grant the consent, subject to conditions. Therefore, AT anticipate that this development will be approved at the time the Ardmore Business Park application progresses should it be referred, and accordingly the effects of that development on the transport network will need to be taken into account.
7. AT notes that the draft conditions for the Sunfield Fast-track address effects on intersections remote from the development site on the wider transport network and potential upgrades where needed. The draft conditions include requirements for the preparation of additional Integrated Transport Assessments (ITA) at two stages during the development. The ITA is required to assess the traffic effects of further development on key intersections on the wider network, including intersections on Ranfurly Road, along Porchester Road and Mill Road. Given the anticipated 15-year timeframe of the proposed Ardmore Business Park, there will be some uncertainty as to the

future road network and extent of development that would occur over that time. Future assessments during build out of stages would therefore in AT's view be appropriate and would be consistent with the draft conditions for the Sunfield Fast-track.

Mill Road Stage 2 Notice of Requirement

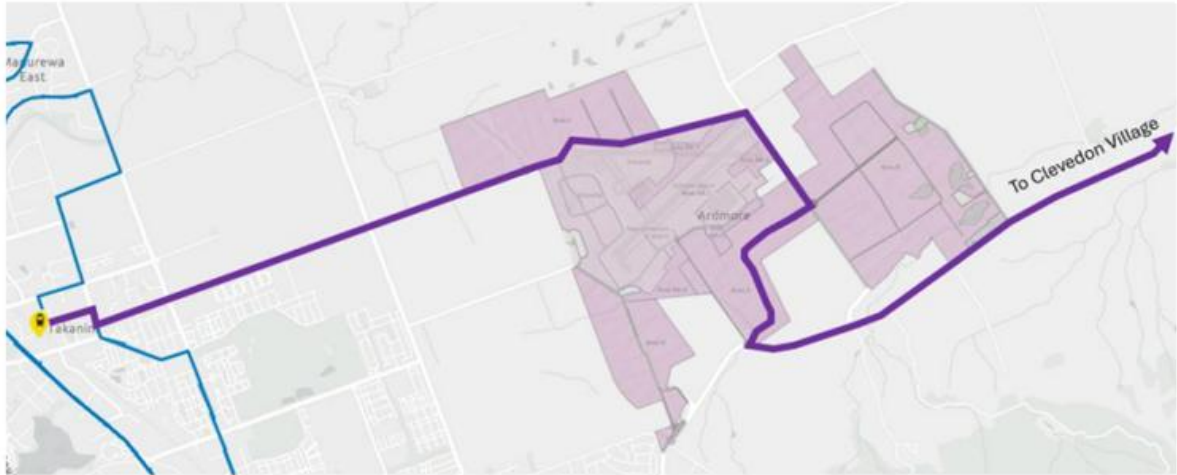
8. The New Zealand Transport Agency Waka Kotahi (NZTA) Mill Road Stage 2 Notice of Requirement (NoR) project has been lodged with Auckland Council and is in progress. Whilst there is no certainty as to when the project will be constructed, as the NoR needs to be approved and funding still needs to be secured, the Ardmore Business Park should take into consideration the potential effects of the NoR in terms of how it may affect access and trip distribution of traffic generated by the development, and the potential for changes to the overall distribution of traffic on the road network.
9. The Ardmore Business Park application should clearly set out how the development will work with the Mill Road Stage 2 project, including where this affects access, such as the severance of Hamlin Road.
10. The severance of Hamlin Road would restrict the accessibility to Ardmore Airport and the proposed Ardmore Business Park from development to the west of the Mill Road project, including Winton Sunfield. AT's preference is that a Hamlin Road link be retained through grade separation. This is subject to discussions with NZTA and through the NoR process. As there is no certainty that a Hamlin Road connection across Mill Road Stage 2 would be provided, it is necessary that the Ardmore Business Park application assess the effects of the proposed development on the wider network without Hamlin Road providing a connection across the Mill Road Stage 2 project.

Public Transport Network/Active Networks

11. Most of the Ardmore Business Park development is within 5 to 7 kilometres of Takaanini Station. This is a practical distance for a public transport service and biking from Takaanini Station.
12. AT considers that in the next ten years; Clevedon Village could reach a population of 2,000. It currently has a population of approximately 600 people. Council / AT has a policy of providing public transport services to settlements of over 2,000 people (refer page 60 of the Regional Public Transport Plan 2023-2031). Conceptually, AT envisages a future bus route that connects Clevedon Village via Ardmore to either Takaanini or Papakura station. For that to occur, it needs a strong east west road connecting through the proposed development area. This should be considered in any masterplan/ITA.
13. AT acknowledges that in response to pre-application feedback, the Applicant includes a conceptual west-east bus route that does not rely on Hamlin Road, which under the current Mill Road Stage 2 proposal, will be at grade and severed (Figure 5 in Attachment 16 Transport Overview).

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Figure 5 – Indicative bus service route



14. Initial comments on this indicative bus route from AT's public transport network specialist are:

- There may be a need to create a different frequency of bus services for the Ardmore Business Park area compared to Clevedon Village due to different demand patterns.
- There needs to be the ability to turn around bases within the development depending on staging and the road network layout, possibly at Mullins Road.
- The Bullens Road / Papakura-Clevedon Road intersection is not currently safe for bus movements.
- Bullens Road would require an early upgrade in staging to be suitable as a bus route.
- Safety for buses at the end of the runway on Mullins Road needs to be considered.
- Walking access to the bus route will need to be provided and bus stops placed at an appropriate spacing.

15. In anticipation of the Sunfield Fast-track application being approved, any bus routes will need to be properly integrated across both developments.

16. There is a need for a better connection west of Ardmore Airport between Hamlin Road and Airfield Road if Mill Road isn't available to provide such a link. This needs to be suitable for trucks and buses and not be impacted by Airport operations.

17. In any substantive application, the Applicant will need to outline what are going to be private roads (under Ardmore Airport control) and what will be public roads. Understanding the proposed staging will assist AT in seeing how it can provide public transport services to the development as the network is being built out. It is difficult to serve cul-de-sac roads, and roundabouts are generally a good solution for buses.

18. Roads to be served by buses will need to be upgraded/designed to have a suitable cross-section to accommodate buses. Roads should also be bike friendly as the proposed development area is a suitable cycle distance for nearby amenities and Takaanini Station.

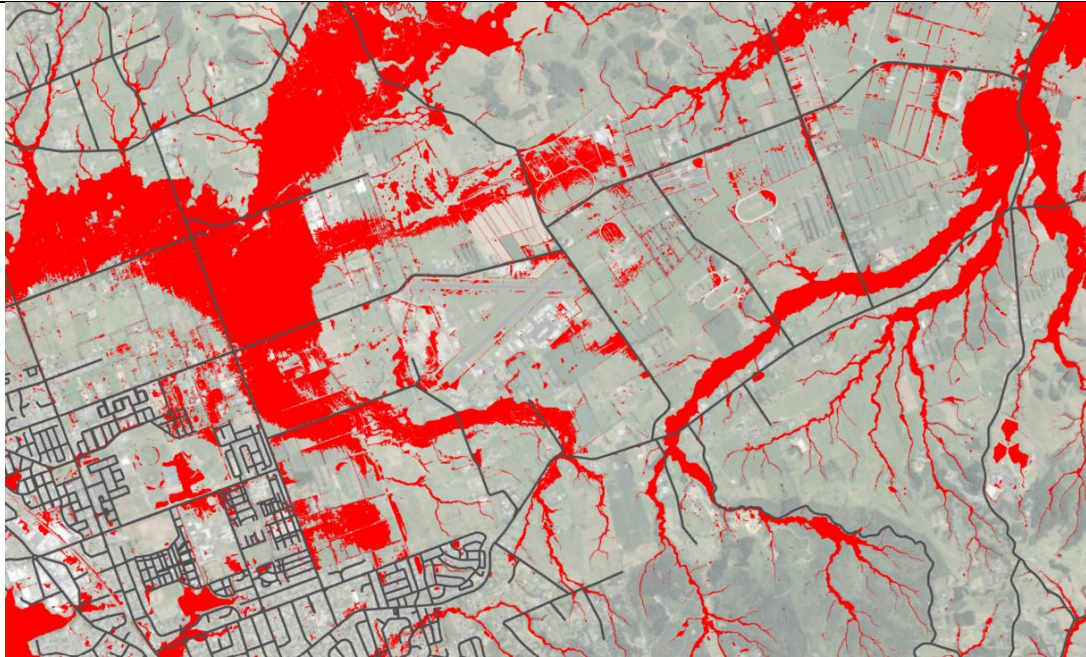
Stormwater

19. The stormwater assessment submitted with the application is brief and very high level, and as such, there is currently insufficient information to understand the potential effects that the development of the land will have on flooding in the wider catchment and the impact on AT's roading network.

20. Most of the rural roads in this area are subject to frequent flooding during rainfall events, which in severe events becomes hazardous in many areas. The flooding is slow moving, and largely backwater controlled, which makes mitigation difficult and generally requires major infrastructure assets or upgrades to manage. AT's roading assets in this area are known to become impassable due to flooding in events as low as a 2-year Average Return Interval (ARI) return period event. Collected evidence by Auckland Council staff from a storm in mid-2025, which had a return period of approximately a 2-year ARI, showed that the existing road channels on Airfield Road and the recently built flooding mitigation infrastructure within the Ardmore Airport development were overwhelmed resulting in Airfield Road becoming impassable to vehicles. The road network in this area provides a significantly lower level of service in terms of flooding than is required by AT's Transport Design Manual (TDM) for an urban area. Major roading network upgrades, drainage system upgrades and new flood mitigation infrastructure would be necessary to provide a suitable level of service to this area.

21. The below figure shows the extent of flooding that is considered to be impassable to vehicles, based on results from Auckland Council's Region-Wide Rural flood models for the 1% AEP 3.8°C climate scenario (a hazard classification of H2 or greater is used to indicate these areas, which is unsafe for light vehicles). As shown, many of the existing roads in the area are impassable in extreme storms.

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22. The Stormwater Assessment Report supplied outlines some high-level options to mitigate flooding. However, these are described in very little detail, for example “*widening existing channels and creating new channels to mitigate flood impacts within the site as well as upstream flows around the perimeter of the Airport.*”. There is no engineering assessment or feasibility analysis undertaken on these statements to demonstrate that the solutions can achieve the necessary mitigation of adverse effects from development of the land, let alone enable flooding hazards to be managed in such a way as to provide for serviceable or safe roading assets.
23. Based on the above, AT’s stormwater advisor is concerned that the application may pose a significant risk to AT in terms of:
- Potential for exacerbation of flooding hazards on AT’s road network, by both worsening existing flooding frequency and magnitude, and increasing the number of persons exposed to those hazards by way of increasing demand.
 - Potential for a significant pressure on AT to undertake unplanned investment into the surrounding road network to provide roads with a suitable level of service for flooding and drainage.
 - Uncertain and unplanned costs to upgrade and maintain road drainage and flood mitigation infrastructure to provide for the minimum level of service, in terms of whole-of-life costs of the assets.
24. Any substantive application will require a detailed assessment of the potential effects from the proposed development to understand the potential impacts to AT, how hazards will be mitigated

or avoided, and the scale of new or upgraded infrastructure that AT will need to vest or deliver to service the development.

Integrated Transport Assessment (ITA) Scope

25. Due to the limited information available at this stage the following matters are considered to be essential in an ITA to enable AT to properly understand the effects of the proposal and form a position on the appropriateness of any proposed mitigation.

Trip Rate and Distribution

26. The Transport Overview states that an overall trip rate of 0.26 trips per 100m² is to be used for the assessment. Detail on how this has been derived will need to be provided to show how it accounts for the likely range of land uses in the development.

Future Environment

27. Considerations in relation to Sunfield Fast-track, Mill Road Stage 2 NoR and the potential severance of Hamlin Road are outlined above and must be assessed in a substantive application.

Scope of Assessment

28. The scale of the development proposed is not anticipated in this area in Auckland Council's zoning or FDS, given the Rural – Mixed Rural Zoning of much of the land to be developed. Therefore, the assessment of traffic effects should extend beyond the immediate surrounding area, including Porchester Road (from Subway Road to Alfriston Road), Alfriston Road / Stratford Road / Ranfurly Road intersection and Mill Road (from Airfield Road to Ranfurly Road), and effects on connections to Great South Road over the railway line (e.g. Spartan Road, Manuroa Road, Taka Street and Walters Road and taking into account the proposed Takaanini Level Crossing project which includes grade separation and closure of some of these routes).
29. In addition, given that the development is intended to focus access to the south, then effects on routes through Papakura will also need to be considered including assessment of the pavement condition on existing rural roads and the inclusion of a Pavement Impact Assessment (PIA).
30. In addition to the upgrades listed in section 5 of the Transport Overview, the Hamlin Road/Papakura-Clevedon Road intersection should also be included. Other upgrades may also be required on the network, which may be identified by the wider assessment. The assessment will need to demonstrate that any upgrades are feasible and that they can be achieved within the existing road reserve or without purchase of third-party property.
31. The assessment should consider the effects of the increased traffic, including heavy vehicle movements, on Ardmore School located on Papakura-Clevedon Road west of Burnside Road.

Staging

32. Details of how the development will be staged should be provided, and this should be taken into account in the assessment, including the staging of any transport upgrades to support the development.
33. Conditions around development triggers for certain works to be completed may be necessary and is an approach that has been used for other large developments and/or precinct plans in the Auckland Unitary Plan.

Active Modes and Public Transport

34. The development should consider how active modes and public transport would be facilitated within the site and with connections to the wider transport network to provide means for future workers to be able to travel to the site from the surrounding residential neighbourhoods and from the rail stations. This would need to take into account potential severance with the Mill Road Stage 2 project.
35. As the Sunfield Fast-track application is likely to be approved, this would significantly increase the number of potential workers within the immediate vicinity of the proposed development and active modes, and public transport connections would be important to provide employees alternatives to private vehicles.

High Traffic and Freight Volumes Concerns

36. The Transport Overview memo states that the application (not including the Sunfield Fast-track development) will generate somewhere between 2,200 and 3,350 vehicle trips per hour. To put this into context, the current two-way hourly volume (8am-9am) on Great South Road is 2,757 vehicles. Notwithstanding that an ITA is still not available, it appears on this initial analysis that without Mill Road Stage 2 NoR in place (south of the soon to commence northern section) or at least without significant network upgrades, the existing network will not have the capacity to deal with the volumes proposed, noting that there is likely to be limited capacity on the three proposed Takaanini rail overbridges, connections to Great South Road and the Takaanini Interchange even without this application going ahead.

Interim strategic freight network upgrades in the absence of Mill Road (Takaanini Section)

37. The proposed freight network to support this development in the absence of Mill Road (Takaanini Section) needs to be confirmed. AT does not support freight traffic using arterials that are heavily residential in nature including Walters Road, Airfield Road (urban section) and Clevedon Papakura Road (urban section).
38. Consideration should be given to Popes Road/Manuia Road (designated as an over dimension route) as a key east-west freight route. However, this route may require upgrades to enable this functionality. The Applicant should assess further upgrades to this route, including intersection upgrades at Airfield/Mill, Popes/Mill, Popes/Porchester, Takaanini School/Popes, Takaanini

School/Spartan, and Spartan/Oakleigh intersections. Assessment of midblock sections is also required, including edge line widths.

39. Consideration should also be given to Alfriston/Ardmore Road and Alfriston Road as another key freight route. This may require upgrades to enable this functionality, including intersection upgrades at Alfriston Road/Alfriston Ardmore Road, Mullins/Clevedon Takaanini Road. Assessment of midblock links is also required, including shoulder widths.

Urban frontage upgrades proposed

40. Proposed urban frontage upgrades should be confirmed on the following public/private roads:

Public

- Airfield Road
- Mullins Road
- Clevedon Takaanini Road
- Burnside Road
- Papakura Clevedon Road
- Bullins Road
- Hamlin Road

Private

- Harvard Lane
- Bristol Freighter Lane
- Dakota Lane
- McBride Lane
- De Havilland Lane
- Tiger Moth Lane
- Kitty Hawk Lane
- Starlet Lane
- Victa Lane
- Dauntless Lane
- Corsair Lane

Auckland Forecasting Centre

41. Traffic modelling must include input from Auckland Forecasting Centre (AFC). The Mill Road corridor should be incorporated into the traffic modelling and assessment. While the Flow summary report mentions Mill Road, level crossings, and the Sunfield Fast-track development, it does not assess their impact on network capacity. The Mill Road corridor should be incorporated into the traffic modelling and assessment.

Safe System Audit

42. A Safe System Audit must be completed in accordance with the NZTA guidance (“Safe System Audit Guidelines, August 2022”) by an independent and appropriately qualified safety audit team.

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The increased traffic volume could exacerbate safety issues on the road network. Assessment should include both the wider network and the directly adjoining roads.

Intersection treatments

43. Assessments undertaken to determine the selection of intersection treatments, such as roundabouts or traffic lights, should be included in any substantive application.

Ardmore Airport

44. While recognizing that Ardmore Airport land is part of the proposal footprint and that it is regionally significant infrastructure, the effects on and of the Airport operations should be included in the assessment for the substantive application.

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.

Managers signoff

Tessa Craig

Tessa Craig - Acting Manager Development Planning, Network Operations Planning

Date 04/03/2026

4 March 2026

Russell Butchers
Principal Project Lead, Auckland Council
Via email: s 9(2)(a)

Dear Russell,

Application for referral of the Ardmore Business Park under the Fast-Track Approvals Act 2024

308-499 Airfield Road, 1-133 Burnside Road, 803-881 Papakura-Clevedon Road, 95-161 Hamlin Road, 40-124 Mullins Road, 7-52 Bullens Road, 99 Corsair Lane, 45-61 Clevedon-Takanini Road, Ardmore 2582

Introduction

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Ardmore Business Park Fast-track referral application (**the Application**), made under section 13 of the Fast-track Approvals Act 2024 (**Act**).
2. Knight Investments Limited (**the Applicant**) proposes to deliver an industrial and employment hub covering an area of approx. 511 hectares (**the Project**) at land surrounding the Ardmore Airport (**the Project Area**). At a high level, the Project will be staged across a 15-year development period and includes:
 - (a) The construction and development of a business park.
 - (b) Provision for land use activities and buildings for light industry/service type activities.
 - (c) Approximately 193-276 hectares available as “net” developable area (inclusive of landscaping and carparking etc).
 - (d) Approximately 67-136 hectares of gross floor area from future activities / buildings.
 - (e) A green / blue network providing riparian planting, stormwater management and wastewater disposal and protection of existing SEAs.
 - (f) Upgrades to existing roads and intersections, new roads and accessways.
 - (g) New roading connections to the Airport and the wider site.
 - (h) Land modification works (inclusive of freshwater works such as streamworks and works within and in proximity to wetlands) and infrastructure to service the Project.

3. The Project is estimated by the Applicant to deliver 17,300 full-time equivalent jobs generated over the development period and 4,500-5,000 full-time equivalent permanent jobs generated upon completion. The Project, if approved and developed in accordance with the Applicant's assumptions, would become Auckland's largest business park by area and number of employees.
4. The zoning of the Project Area is the Rural – Mixed Rural Zone under the Auckland Unitary Plan – Operative in Part (**AUP-OP**). The Site is also located outside the Rural Urban Boundary (**RUB**) in the AUP-OP.
5. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
 - Attachment 1 - Ardmore Business Park Application Companion Document.
 - Attachment 3 - Project Site Maps.
 - Attachment 6 – Record of Engagement.
 - Attachment 7 – Planning Memorandum, prepared by Tollemache Consultants Ltd, dated 22 December 2025.
 - Attachment 14 – Wastewater Servicing Report, prepared by GWE Consulting Engineers, dated December 2025 (**the Wastewater Report**).
 - Attachment 15 – Drinking Water Servicing Report, prepared by GWE Consulting Engineers, dated December 2025 (**the Water Report**).
6. Any amendment to the Application will require further review from Watercare.

Watercare's purpose and statutory obligations

7. 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.
8. 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 the Auckland Future Development Strategy 2023-2053 (**FDS**).
9. 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 Zoned (**FUZ**) 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 comments

10. As noted, the Project Area is zoned Rural-Mixed Rural Zone and outside the rural-urban zone (RUB) under the operative Auckland Unitary Plan (AUP-OP).
 11. Under Watercare's Board-approved strategic direction (approved May 2015), Watercare does not provide service outside the RUB. However, the strategic direction recognises a limited exception to that position, under which Watercare may provide services outside the RUB only where formally requested to do so by Auckland Council, and on the basis that the investment required to service the area is funded by the developer and full cost recovery is achieved.
 12. No such Council request has been made as at the date of this letter, so the limited exception referred to above is not engaged. As such, Watercare has no current or long-term plan to provide public reticulated wastewater or water servicing to the Project Area.
 13. Watercare does not currently provide water supply or wastewater servicing to rural zoned land, such as the Project Area for the following reasons:
 - (a) Servicing rural zoned land is unanticipated by Watercare and in accordance with Auckland Council's Plans and Strategies, has not been provided for in Watercare's Business Plan or Asset Management Plan.
 - (b) This means that planned upgrades and projects in the network and associated treatment infrastructure do not provide capacity for servicing rural land, and therefore the provision of connections to rural land would significantly impact the available capacity for the anticipated growth of live-zoned areas and FUZ areas.
 - (c) This position is consistent with Watercare's statutory obligations to act consistently with any plan or strategy of the Council, including but not limited to, the AUP-OP, the Auckland Plan 2050, and the FDS.
 14. Notwithstanding this position, the below technical comments are provided in relation to the Project regarding water and wastewater servicing.
 15. Any infrastructure delivery dates provided in this letter are forecast dates only and are subject to change.
 16. Any comments on the proposed **private** water and/or wastewater servicing for the Project Area will be made by Auckland Council, save to note a few brief matters noted below. Additionally, Watercare notes any private servicing may be subject to regulation by Taumata Arowai as the Water Services Regulator.
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Previous consultation with Watercare

17. The Applicant has discussed the Project with members of staff from Watercare and Veolia, seeking support of the Project and to indicatively investigate options to service the Project Area with public water and wastewater service.
18. The Applicant's Record of Engagement [Attachment 6 to the Application] more specifically notes that a meeting occurred between Watercare's Head of Property and the Veolia Developments Manager. The Attachment states:

"The meeting outlined that capacity checking was being undertaken to determine if the Ardmore Business Park could connect to the public supply networks for wastewater and water, however confirmation would be unlikely to be available at the referral application stage..."

Further email correspondence occurred between the applicant and Priyan Perera (Chief Strategy and Planning officer from [Watercare]) confirming the intention of [Watercare] to work with the applicant and explore options for servicing."

19. The Water Report (at Section 6) both also state that the Applicant is working with Watercare on the availability for public supply.
20. While Watercare may endeavour to work with the Applicant to explore possibilities of public servicing if required, this statement and the associated Application material does not constitute a commitment to provide the Applicant with public water and wastewater supply, or an integrated solution. As such, the following comments provide Watercare's technical views on the Project relating to water and wastewater servicing.

Relationship between Watercare and Veolia

21. Watercare holds contractual obligations under its Service Level Agreements and wholesale arrangements with Veolia for Watercare to provide bulk water and wastewater services. These obligations are governed by operational protocols, infrastructure availability, and the terms of the relevant servicing agreements. Accordingly, Watercare is responsible for advising on the capacity of the bulk water and wastewater networks in the Veolia Service area. Veolia, as a retail provider, is responsible for managing local networks and customer connections within its service area.
22. Ardmore falls within Veolia's service area and as such, Veolia is responsible for managing local networks and customer connections within the Project Area and surrounds.
23. Comments on matters pertaining to local networks are deferred to Veolia as the local service provider for the area. However, the local networks administered by Veolia are not independent of Watercare's bulk networks and the capacity of both networks must be confirmed. Veolia determine the point of local network connections to Watercare's bulk networks, of which Watercare must approve the connection first. As such, they are guided by Watercare's Policies and network capacity information.

Bulk and local Wastewater

24. The Wastewater Report notes the following in terms of wastewater servicing to the Project Area:

- (a) The estimate of total wastewater generated is 351m³/day. The application documents imply only light industrial activities are proposed.
- (b) The Applicant is considering options to service the entire park including the following:
 - Conventional Gravity Sewer System.
 - Septic Tank Effluent Pumping/Gravity.
 - Vacuum Sewer System.
 - Low Pressure Sewer System (**LPS**).
- (c) The Applicant will evaluate options in more detail at the concept design stage and once detailed development plans are available.
- (d) The Applicant proposes a private Wastewater Treatment Plant (**WWTP**) for the Project Area to make use of the economy of scale provided by the proposal and to reduce the potential for odour effects. The discharge point has not been specified in the Application documents. Highly treated wastewater from the WWTP may be reused for non-potable purposes such as irrigation of landscaping areas, ecological restoration areas, golf courses, and for common amenity land non-potable washdown water. Remaining wastewater discharge would either be to land and/or water. No discharge locations have been determined at this stage.

25. The development is not proposing to utilise the public network and only refers to a centralised private WWTP within the site boundaries. As such, comments on private systems are deferred to Auckland Council. However, in the event private wastewater networks are constructed and Auckland Council directs Watercare to provide bulk wastewater services in accordance with the Board-approved strategic direction, Watercare strongly recommends that the networks are designed to its Code of Practice for land development and subdivision ¹.

26. For example, the Wastewater Report suggests an LPS option to service the development. It should be noted that should the applicant later seek to vest this infrastructure, the decision around accepting this option sits with Veolia. However, Watercare notes an LPS of this scale is contrary to its Code of Practice, which still applies to the Veolia service area, for the reasons below:

- (a) The Applicant must firstly provide evidence that a gravity system is not feasible.

¹ The Auckland Code of Practice for Land Development and Subdivision: Water and Wastewater Code of Practice for Land Development and Subdivision, Chapter 5: Wastewater (2019)

- (b) The Project is for approximately 1000 Dwelling Unit Equivalent (DUEs), which far exceeds the Watercare Code of Practice² upper limit of 50 DUEs for an LPS.

27. Additionally, Watercare owns and operates the Ardmore [Potable] Water Treatment Plant and reservoir, approx. 2km southeast of the Project Area. Any private wastewater discharge proposed within the vicinity should not adversely impact Watercare's drinking water treatment operations at the Ardmore Water Treatment Plant, which receives and treats approximately two thirds of Auckland's water supply³. It is recommended the Applicant addresses this matter further at the substantive application stage.

Bulk and local Water Supply

28. The Applicant's Water Report notes the following in terms of drinking water supply for the Project Area:

- (a) Water demand for the development has been calculated at 230m³/day for an estimated 5,000 employees once the Project is completed. The Water Report states that drinking water would be exclusively sourced from rainwater harvesting.
- (b) A centralised Water Treatment Plant (**WTP**) will be located within the Project Area. The system would be scaled or staged to match development growth. Raw water storage has been based on a 30-day security period to accommodate rainfall variability and ensure continuous supply to the WTP. The required capacity for this allowance is approximately 5,600m³. Treated water storage has been based on a 3-day operational reserve to provide resilience during WTP downtime, maintenance events, or short-term fluctuations in system demand. The indicative treated water storage requirement is approximately 560m³. Compartmentalised tanks are recommended in the Water Report to maintain supply continuity during cleaning and inspection.
- (c) Water for firefighting storage will be evaluated at the time of the substantive application.
- (d) Infrastructure ownership and management options include a private utility management or a body corporate structure. This would be confirmed at the substantive application stage.

29. In the event private water networks are constructed and Auckland Council directs Watercare to provide bulk wastewater services in accordance with the Board-approved strategic direction, Watercare strongly recommended that the networks are designed to its Code of Practice, to facilitate eventual incorporation into the metropolitan network.

30. While Watercare largely defers comments on private servicing to Auckland Council, concerns are raised at a high-level to the feasibility of servicing the proposed industrial and employment precinct via rainwater harvesting alone, particularly during drier periods of the year. Further demonstration would be expected from the Applicant that the Project can reasonably be privately

² Section 5.3.12.3 - The Auckland Code of Practice for Land Development and Subdivision: Water and Wastewater Code of Practice for Land Development and Subdivision, Chapter 5: Wastewater (2019)

³ Watercare Services Limited (2019) – Ardmore Water Treatment Plant Community safety information. Accessed: https://wslpwstoreprd.blob.core.windows.net/kentico-media-libraries-prod/watercarepublicweb/media/watercare-media-library/reports-and-publications/watercare_chlorine_info_leaflet_2019.pdf

serviced from a water supply perspective, in perpetuity, and without creating any dependency on, or impacts towards Watercare's existing and planned operations.

Conclusion

31. Watercare plans for and supports areas of urban growth identified by the Council, which excludes rural-zoned land and land outside the RUB.
32. The Project Area would not be serviced by Watercare unless directed by Council to do so, and at the cost of the developer.
33. Watercare also recommends that any private scheme be designed in accordance with the relevant codes of practice for infrastructure⁴, and be subject to robust long-term governance arrangements that provide for long-term maintenance and ensure safety, reliability and financial sustainability for the community served.
34. Any comments on, or assessment of, the proposed private water and/or wastewater servicing for the Project Area will be made by Auckland Council.
35. If the application is referred, Watercare encourages the applicant to discuss technical options for servicing the site with Watercare and Veolia.

Yours faithfully,



Helen Shaw

Head of Strategy and Consenting
Watercare Services Limited

⁴ The Auckland Code of Practice for Land Development and Subdivision
<https://www.aucklanddesignmanual.co.nz/en/developing-infrastructure/infrastructure-codes-of-practice.html>

Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport



06 MAR 2026

JMITC-36

Hon Chris Bishop
Minister for Infrastructure

By email: Infrastructure.Portfolio@parliament.govt.nz

Dear Chris,

Thank you for your invitation to comment, as the Associate Minister of Transport, on the referral application for Ardmore Business Park [FTAA-2512-1155].

I consider this project has significant regional benefits. It aims to deliver an industrial and employment hub compatible with airport operations surrounding and including Ardmore Airport. The completed project would also benefit from the Takanini Level Crossings and Mill Road Stage 2 planned projects, which would further connect the site with the broader transport network.

I therefore support the Ardmore Business Park application being referred to the Fast-track Approvals Act process.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'James Meager', written over a large, faint watermark of the signature.

Hon James Meager
Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



05 MAR 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0027670

Dear Chris

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

- Out of Scope
- [Redacted]
- [Redacted]
- Ardmore Business Park, FTAA-2512-1155.

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Out of Scope

[Redacted]

Out of Scope



Out of Scope

Ardmore Business Park, FTAA-2512-1155

This is a proposal to establish a 511-hectare light-industrial and service business park surrounding Ardmore Airport in South Auckland. The development is expected to enable around 193 to 276 hectares of developable land and between 670,000 and 1,360,000m² of gross floor area for industrial buildings and associated yard space. The proposal also includes related infrastructure works such as roading, wastewater disposal and enabling works to support the release of serviced industrial lots.

According to the economic assessment provided by the applicant, the proposal is estimated to involve \$2.68 billion in total construction and development costs over the fifteen-year delivery period. Employment generated is estimated at around 1,800 FTEs in the peak construction year, and approximately 17,300 total FTE years over the total 15-year development period. The development is also expected to contribute a total value-add of around \$1.86 billion to the Auckland economy. Once fully occupied, the business park is projected to support approximately 4,500 to 5,000 ongoing FTEs.

The substantial economic benefit of this proposal is from the scale of direct expenditure and employment generated during its development and construction period. In the longer term, the large-scale provision of serviced business and industrial land and floorspace has the potential to support business and retail activity, attract further private investment and contribute to sustained urban economic growth, which is critical in a growing economy.

Sincerely



Hon Nicola Willis
Minister for Economic Growth

Feedback Details

Feedback ID	* FDB001891M4L6
Title	* Comments from the Minister for Māori Development / Minister for Māori Crown Relations
Regarding	Draft section 18 report for Minister comment
Comments	I support the application progressing to the Expert Panel for Substantive consideration.



6 March 2026

Ministry for the Environment
Attention: Helen Willis
referral@fasttrack.govt.nz
Cc: s 9(2)(a)

Comments on the application for referral of the Ardmore Business Park project under the Fast-track Approvals Act 2024

Ko Te Mānukanuka o Hoturoa te moana

Ko Tainui te waka

Ko Mangatangi, Whātāpaka me Ngā Hau e Whā ngā marae

Introduction

1. These comments have been prepared by the Ngāti Tamaoho Settlement Trust. As the post-settlement governance entity for Ngāti Tamaoho, the Settlement Trust was established to advocate for the rights and interests of Ngāti Tamaoho. We welcome the opportunity to make comments on the application for referral of the Ardmore Business Park project (the Project). The application is by Knight Investments Limited (the Applicant).

Background to Ngāti Tamaoho

2. Ngāti Tamaoho descend from the first peoples of Tāmaki Makaurau. And, since the arrival of our tūpuna – the earliest inhabitants of this land who formed groups, including Te Tini o Toi, Ngā Oho, Ngā Iwi, Ngā Ririki – we have exercised rangatiratanga across our takiwā. Our tūpuna also included members of the Tainui waka, including Taikehu, Poutūteka and Rakataura. We are the descendants of the union of these great peoples, brought together under the leadership of our eponymous tupuna, Tamaoho. And the whenua, including Te Mānukanuka o Hoturoa (Manukau Harbour), Āwhitu and Te Pūaha o Waikato, is our takiwā.
3. Our tūpuna never ceded sovereignty. Our people were once prosperous. Since prior to 1840, our tūpuna sought to develop commercial relationships with Pākehā settlers by entering into land transactions with them and the Crown. However, in 1863, Ngāti

Tamaoho were unfairly labelled as ‘rebels’; their homes were burned and looted, they were evicted from their settlements, and their remaining land was confiscated. By 1900, our tūpuna were virtually landless, leading to generations of Ngāti Tamaoho suffering severe deprivation, which was further compounded by calamitous environmental degradation to serve Auckland’s growth that Ngāti Tamaoho had no control over.

4. Our tūpuna never gave up on re-establishing our mana, within ourselves and across our takiwā. Since the middle of the 19th century, Ngāti Tamaoho has sought redress for its historical grievances with the Crown. The responsibility for seeking redress passed down through generations of Ngāti Tamaoho, and this journey saw our people engage in successive attempts to address the hurt of the past and to find a pathway forward for our people. This journey culminated in the realisation of:
 - 4.1. the Waikato Raupatu Claims Settlement Act 1995;
 - 4.2. the Waikato River Settlement Act 2010;
 - 4.3. the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014; and
 - 4.4. the Ngāti Tamaoho Claims Settlement Act 2018 (the Act).

Relevant Provisions of the Ngāti Tamaoho Claims Settlement Act 2018

5. The Deed of Settlement reflects on the historical relationship of the Crown and Ngāti Tamaoho, which we have developed into the following principles to guide decision-making on the Project:
 - 5.1. Ngāti Tamaoho’s customary interests, including those across the takutai, should be adequately considered (cl.3.2.1);
 - 5.2. Ngāti Tamaoho retains adequate reserves for their own use (cl. 3.4);
 - 5.3. Provision for and protection of the special relationship of Ngāti Tamaoho with wāhi tapu, culturally significant sites and environmental reserves in their rohe (cl.3.14.3);
 - 5.4. The Crown honours its obligations to Ngāti Tamaoho under te Tiriti o Waitangi/the Treaty of Waitangi and recognising that not doing so would be harmful to successive generations of Ngāti Tamaoho (cl.3.31);
 - 5.5. The Crown’s honour should be restored, relieving Ngāti Tamaoho of its justified sense of grievance, and a new relationship with Ngāti Tamaoho based on cooperation, mutual trust and respect for te Tiriti o Waitangi/the Treaty of Waitangi (cl.3.35).

6. Our relationship with the project area should not be viewed as constrained by the Deed of Settlement; rather, the Deed of Settlement should constitute a starting point for a conversation. We retain the expertise required to articulate our association with the project area and the impacts that the project may have on that relationship.

Comments

Anticipated effects on the environment

7. As mana whenua with longstanding cultural, historical, and spiritual connections to Ardmore and its surrounding area, we approach our engagement with the Project through a commitment to ensuring that development occurs in a manner that protects the mauri of te taiao and the relationship of our iwi with te taiao.
8. We anticipate that the Project, if placed on to the fast-track and subsequently approved, will interact with an already sensitive environment characterised by poorly drained soils, extensive artificial drainage networks, shallow flooding, degraded tributaries of Papakura Stream and Taitaia Stream, and areas identified as putative wetlands. The environmental pressures within its landscape are longstanding, and further intensification poses significant risks to te taiao and to our relationship with te taiao.
9. Our interests in the Project centre on three matters:
 - 9.1. stormwater discharge;
 - 9.2. wastewater infrastructure;
 - 9.3. sediment and erosion.

Stormwater discharge

10. Stormwater management is integral to achieving Ngāti Tamaoho's aspirations for te taiao. Within the Ardmore Business Park footprint, stormwater currently moves through a network of farm drains, modified channels, and naturalised reaches of the Papakura and Taitaia tributaries, many of which are already at or above capacity during storm events. Flooding during 1% AEP events is widespread across all areas of the Project, and much of this flooding is shallow but persistent, reflecting the low-gradient topography and peat and alluvial soils that drain poorly. These conditions heighten the risk of stormwater carrying contaminants and sediments into downstream receiving environments, including the Papakura Stream, Wairoa River system, and ultimately the Manukau Harbour and Tāmaki Strait.
11. For Ngāti Tamaoho, these receiving environments are not abstractions: their mauri directly underpins our kaitiakitanga responsibilities and ability to exercise cultural

practices. Inadequate stormwater treatment or insufficient attenuation will exacerbate existing pressures on aquatic ecosystems already compromised by historical drainage and land-use change. Although the Project proposes constructed wetlands, detention basins, raingardens, and hydrology mitigation in accordance with GD01, these must not merely offset the effects of impervious surfaces; they must actively restore the health of the waterways and wetlands present within and downstream of the site.

12. Our expectation is that stormwater management for the Project goes beyond minimum compliance and reflects best-practice, climate-resilient infrastructure. Given the scale of land modification proposed and the high flood susceptibility across all sub-areas, robust design will be required to ensure post-development peak flows do not worsen flooding, scouring, or downstream sedimentation. This includes:
 - 12.1. treatment devices capable of significantly improving discharge quality;
 - 12.2. extended detention and retention to support groundwater recharge of peat soils;
 - 12.3. design that maintains and enhances overland flow paths;
 - 12.4. stormwater features that also support habitat creation and cultural outcomes.
13. In short, stormwater should be managed as a taonga – not simply a hazard – to uphold the ecological integrity and cultural significance of the receiving environments.

Wastewater discharge

14. Wastewater management is another critical area where Ngāti Tamaoho requires the Project to demonstrate cultural and environmental responsibility. The Project relies on a centralised Membrane Bioreactor (MBR) or hybrid MABR/MBR system, capable of high levels of nutrient, solids, and pathogen removal. While we acknowledge the technical capability of these systems, the risks associated with any discharge – whether to land or water – remain significant in this sensitive setting.
15. The soils across the site are characterised by deep peat deposits, seasonal high groundwater, and low permeability. These conditions inherently challenge the long-term performance of land-based disposal systems, particularly during winter months or prolonged wet periods. Inadequately managed discharges risk mobilising nutrients, pathogens, or contaminants into surface waterways and groundwater, compromising downstream water quality and cultural values.
16. Where land disposal is proposed, the design must demonstrate that irrigation fields or PCDI systems:
 - 16.1. are sized using conservative loading rates;

- 16.2. avoid winter saturation, seepage, or runoff;
 - 16.3. protect wetland remnants, watercourses, and groundwater from contamination;
 - 16.4. are resilient during extreme rainfall events, which are increasing under climate change.
17. If wastewater must be discharged to water, the use of polishing wetlands or land contact devices must be co-designed with mana whenua to ensure that both cultural and ecological functions are met. For Ngāti Tamaoho, the presence of constructed wetlands alone is not sufficient; their form, planting, operation, and monitoring must reflect tikanga, mātauranga, and long-term commitments to restoring and enhancing mauri.
 18. We expect that wastewater management for this Project not only avoids adverse effects but demonstrates leadership: infrastructure that is resilient, future-proofed, and aligned with iwi expectations for upholding the health of waterways.

Expectations for how Ngāti Tamaoho's views should inform the project

19. Our expectations for how the Project incorporates Ngāti Tamaoho's views are guided by the principles of partnership, recognition of cultural values, and active kaitiakitanga. Engagement cannot be peripheral or retrospective. It must ensure that the voice of Ngāti Tamaoho is embedded in decision-making, design, and implementation; not simply acknowledged.
20. Our views on stormwater, wastewater, and sediment/erosion management must directly shape the plans and technical designs that accompany this Project. This includes:
 - 20.1. best-practice standards that exceed minimum compliance;
 - 20.2. integration of mātauranga Māori into stormwater and wetland design;
 - 20.3. real-time monitoring, transparent reporting, and adaptive management;
 - 20.4. meaningful iwi oversight of construction, discharge performance, and environmental monitoring.
21. Finally, the relationship between Ngāti Tamaoho and the Applicant must extend beyond construction. Long-term stewardship is essential to uphold the health of te taiao. We expect enduring collaboration in monitoring, maintenance, restoration, and in addressing any unforeseen impacts. This Project must embody continuous improvement and uphold the mauri of the waterways, wetlands, and landscapes it affects.

Conclusion

22. In the interest of creating the space for engaging further with the Applicant on that assessment, we have intended to set out the elements above that we anticipate will need to be considered as part of our ongoing engagement with the Project. These comments do not seek to constrain the scope of that engagement.

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

Project name	Ardmore Business Park (FTAA-2512-1155) 308 Airfield Road, Ardmore
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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	Private Bag 92300, Victoria Street West, Auckland 1142			
*Contact phone number	<table border="1"> <tr> <td>s 9(2)(a)</td> <td>Alternative</td> <td>-</td> </tr> </table>	s 9(2)(a)	Alternative	-
s 9(2)(a)	Alternative	-		
*Email	s 9(2)(a)			

2. Please provide your comments on this application
<p>Overview</p> <p>Thank you for the opportunity to provide comments on the referral application for Ardmore Business Park (FTAA-2512-1155) by Knight Investments Limited. We provide feedback below from the various relevant departments and Council-Controlled Organisations (CCOs) that comprise Auckland Council.</p> <p>Overall, Auckland Council opposes the project proceeding through the fast-track consenting process. Whilst the proposal is likely to have localised benefits (and may have significant regional and national benefits), the development is out of sequence with the Council's Future Development Strategy (FDS), does not give effect to a number of growth and infrastructure-related objectives and policies in the Regional Policy Statement (RPS), has the potential to have significant impacts on infrastructure, and has not proven there will be significant regional or national benefits.</p> <p>In the invitation letter, it has been requested that Auckland Council provide input on two questions pertaining to s17(3) of the Fast-track Approvals Act 2024 (FTAA). We respond below:</p> <ol style="list-style-type: none"> 1. <i>Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.</i>

We are not aware of any applications that have been lodged with the Council that would represent a competing project. The Council notes that there is an application (ref. BUN60439539) currently being considered by the Council that was lodged by Ardmore Airport to establish 22.08 hectares business / industrial activities across the airport site.

2. *In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.*

Our understanding is that s42(4)(a) does not apply in this case for a referral. We are not aware of existing consents issued under s124C(1)(c) or s165ZI of the RMA that apply in this case.

Auckland Council Resource Consents and Planning Department

The Ardmore Business Park project is an industrial and employment hub that seeks to capitalise on its location surrounding (and including) the Ardmore Airport and its accessibility to the planned Mill Road major transport connection and the growing residential areas of Takaanini, Manurewa, Papakura and Drury. The Project includes:

- The construction and development of a business park for light industry/service type activities (511ha project area including the airport with a net development area [excluding airport and adjacent area already under development], roads, stormwater, landscaping etc of 193-260ha; Potential Gross Floor Area (GFA) of business park of approximately 136ha).
- A green / blue network providing riparian planting, stormwater management and wastewater disposal and protection of existing SEAs.
- Upgrades to existing roads and intersections.
- New roading connections to the Airport and the wider site.
- Land modification works and infrastructure.

The information presented within the application documents is consistent with our understanding of the project and its overall scope. Regarding section 22 of the FTAA, we provide our preliminary views:

Does the project have significant regional or national benefits?

While the project may have significant regional and national benefits, Auckland Council is not satisfied that this has been demonstrated. The Council's Chief Economist Unit has identified limitations in the Economic Impact Analysis as there is no clear assessment of whether regional or national economic benefits are likely to be realised by the project.

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

Referral may facilitate the delivery of the project in a timelier and more cost-effective way; however, it is noted that:

- The Airport land could be progressed as a consent application under the existing precinct and zoning provisions, with the referral of this part of the project not necessarily resulting in any significant time or cost advantage. The Council notes that is currently considering an application by Ardmore Airport for a business/commercial development.
- In considering the development of the remaining Rural -Mixed Rural land, it is possible that referring the project would facilitate its delivery in a more timely and cost-effective way than pursuing a plan change and the necessary consents to develop the land.
- However, given the anticipated timeframes for development, it is unclear whether referring the project facilitates a timelier delivery than if the stages went through respective resource consent and plan change processes.

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

In the council's view, the economic benefits of the proposal have not been adequately demonstrated, and there are unresolved concerns regarding the delivery of supporting infrastructure (particularly roading and stormwater), and the development of highly productive land. Accepting the project into the fast-track process could place additional demands on the Environmental Protection Authority (EPA), potentially reducing its capacity and affecting timeframes for future fast-track applications that have clearly demonstrated regional or national benefits.

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

No. For the avoidance of doubt, the council's Future Development Strategy, prepared under the National Policy Statement on Urban Development, does not envisage the development of the land zoned Rural – Mixed Rural between 2023-2053.

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

No regionally or nationally significant infrastructure is proposed.

AT have noted that the cost of transport infrastructure to support this development has not been assessed and costed in the context of wider cumulative growth impacting the area.

The proposal will be privately serviced for water and wastewater, and does not contribute to any regionally significant infrastructure upgrades for Watercare.

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

The proposal will not increase housing supply.

The proposal has the potential to contribute to a well-functioning urban environment, being a master planned business park and comprehensive design of industrial buildings, open space, and infrastructure within the project area.

Will the project deliver significant economic benefits?

As noted above and in the assessment from the Council's Chief Economist Unit, the proposal has not proven the delivery of significant economic benefits.

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

The project will not directly support primary industries. To the contrary, the Council notes that the proposal would result in the loss of highly productive land due to development taking place on LUC Class 2 soils. This is further discussed as an 'other matter' below.

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

The project will not directly support the development of natural resources.

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

There is no evidence in the proposal that the project will support climate change mitigation. The ecological restoration is however reasonably expected to have some ecological benefits.

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

It is reasonably expected that infrastructure to support the proposal (particularly stormwater infrastructure) will be designed to adapt to climate change. Primarily the natural hazard risks relate to flooding and instability, and would be addressed in the detailed assessment of the project.

Will the project address significant environmental issues?

The proposed development will not address any significant environmental issues.

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

The primary statutory planning document governing development on the site is the Auckland Unitary Plan (Operative in Part) (**AUP**).

With respect to the Airport site, the land is zoned for urban development under the AUP and is located within the Airport Precinct, where aviation and industrial activities are anticipated. In this sense, urbanisation of the Airport (while maintaining the viability of Airport operations into the future) aligns with the zoning framework and the strategic intent for the land.

The proposal therefore has the potential to generate transport demands beyond the capacity of the existing and currently planned network, and may necessitate upgrades or interventions beyond the site boundary to maintain safety and network efficiency.

With respect to the remaining land outside of the Airport, the proposal is inconsistent with the strategic growth management framework established under the AUP. Specifically, the development constitutes unanticipated urbanisation of land currently zoned for rural purposes, contrary to Regional Policy Statement (RPS) Chapter 2 provisions that require urban development to be contained within the Rural Urban Boundary, towns, and rural and coastal towns and villages; and development to be integrated with the provision of appropriate infrastructure.

In addition, the project is likely to require significant transport infrastructure upgrades beyond the site, and is potentially contrary to RPS Chapter B3 (Infrastructure, Transport and Energy).

On this basis, the proposal has not demonstrated that it will provide for integrated planning outcomes sought by the AUP and does not represent sustainable or efficient use of natural and physical resources.

As the FTAA does not provide for a plan change, the land will remain zoned Mixed Rural, and any future development would therefore be fundamentally at odds with the objectives and policies for the zone, creating a high likelihood of consenting challenges arising from the clear policy conflict between rural land use and urban development outcomes.

Are there any other relevant matters to consider?

National Policy Statement Highly Productive Land (NPS:HPL)

The NPS:HPL requires consideration. Whilst industrial development is provided in the Airport via the Precinct and Special Purpose – Airports and Airfields zone provisions, the remaining land is rurally zoned, and the land is identified as meeting the definition of highly productive land (Class LUC 2).

The Council considers that the proposal does not meet any of the exceptions for subdivision or development of highly productive land in the NPS:HPL, and the applicant has not demonstrated that there is a permanent or long-term constraint that means that the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years.

Moreover, the project has not demonstrated that the environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production. In particular:

- Economic benefits have not been proven in the application.
- The project does not demonstrate that enabling development within the rural zoned land will support the loss of ‘more productive’ highly productive land within the district.

- The existing precinct is identified for growth (as it is currently underdeveloped, noting that the Airport has obtained and is currently seeking resource consents for further development under the RMA), however there is not direct support in the council's strategies and plans for the proposed development on the rural-zoned land.
- Whilst there are anticipated to be benefits of ecological restoration, it is unclear if these will be regionally significant.

Inputs from Auckland Council Departments and Organisations

Inputs from various Auckland Council Departments and CCOs are appended to these comments as Appendix 1. An overview/summary of the inputs is provided below:

Auckland Council CCO: Auckland Transport (AT) (Development Planning)

Overall, AT are **neutral** on the application for referral.

AT comments note that a large proportion of the development sits outside of the Special Purpose Zone – Ardmore Zone and is in the Rural – Mixed Rural Zone, outside of the Rural Urban Boundary and not included in a Future Urban Zone. Accordingly, large scale growth in this area is not currently anticipated in Auckland Council's FDS.

AT acknowledges that the FTAA has different criteria to the Resource Management Act 1991 consenting process and that the Applicant is entitled to pursue development not aligned with the FDS under the FTAA. However, for major development outside of areas anticipated for urbanisation under the FDS where there are no current transport network projects to address such growth, AT considers it is reasonable, should the matter progress to a substantive application, to seek an assessment of transport effects beyond the immediate confines of the development.

Planned development is often subject to infrastructure triggers where particular stages/levels of occupancy cannot occur until necessary works in the wider network are completed. Where transport upgrades are needed and these are not publicly funded, developers may need to fully fund or partly fund works under Infrastructure Funding Agreements (IFAs) or other methods. Section 84A of the FTAA specifically contemplates conditions relating to infrastructure that may apply beyond the project area in this regard. AT considers that should the development be accepted for fast-track consenting, the Expert Consenting Panel needs to fully understand all of the costs and impacts on the transport network.

The substantive application would need to take into account both the Sunfield Fast-track development and the Mill Road Notice of Requirement. AT also has concerns over the effects of flooding, and stormwater mitigation in regard to its assets as set out in the AT feedback.

Overall, the principal focus of these comments is setting out the high-level issues that AT considers it will be necessary to assess in a substantive application including the content of an Integrated Transport assessment, including the provision of active modes, public transportation, urban frontage upgrades and safe system audits, should the development be referred.

Auckland Council CCO - Watercare Services Limited

Watercare plans for and supports areas of urban growth identified by the Council, which excludes rural-zoned land and land outside the RUB. The Project Area includes land that would not be serviced by Watercare unless directed by Council to do so, and at the cost of the developer.

Watercare also recommends that any private scheme be designed in accordance with the relevant codes of practice for infrastructure, and be subject to robust long-term governance arrangements that provide for long-term maintenance and ensure safety, reliability and financial sustainability for the community served.

Any comments on, or assessment of, the proposed private water and/or wastewater servicing for the Project Area will be made by Auckland Council. If the application is referred, Watercare encourages the applicant to discuss technical options for servicing the site with Watercare and Veolia.

Auckland Council- Healthy Waters and Flood Resilience (HWFR)

HWFR **opposes** the project being referred for fast-tracking.

HWFR supports the intent to develop the Ardmore area; however, the current stormwater approach does not yet meet the requirements for safe, resilient, urban development under the FTAA or Auckland Council criteria.

An integrated catchment-wide stormwater and transport solution is required to:

- Reduce existing road flood hazards,
- Ensure key access roads are safe and passable in a 10-year ARI storm,
- Provide a high-capacity conveyance channel to Papakura Stream, and
- Ensure development levels align with upgraded road elevations.

If the application is successfully referred for fast-tracking, HWFR recommends that these issues be addressed before the project proceeds through the fast-track process and would encourage further discussion prior to the further development of the substantive design, and prior to the lodgement of the Substantive Application.

Auckland Council – Parks and Community Facilities

Parks and Community Facilities is **neutral** on the application for referral.

At this referral stage, Parks and Community Facilities does not identify matters that elevate the proposal to regional or national significance in relation to:

- Recreation reserve provision or supply;
- Strategic park acquisition;
- Loss or modification of regionally significant public open space assets.

Specifically:

- The applicable zoning and precinct provisions do not establish open space requirements.
- The site is outside identified growth areas under the FDS.
- No acquisition funding or programme applies.
- No existing Council reserve land is affected.

Should the application proceed beyond referral stage, further detailed assessment would be appropriate in relation to:

- Esplanade reserve triggers;
- Blue-green integration with Parks outcomes;
- Safeguarding future connectivity corridors;
- Lifecycle implications (i.e. ongoing operational, renewal and maintenance liabilities) of any assets proposed to be vested.

Auckland Council – Chief Economist Unit – Consulting Economist

The Chief Economist Unit is **neutral** on the application for referral.

Of note is that the Chief Economist Unit has identified limitations in the analysis provided, and no clear assessment of whether regional or national economic benefits are likely to be realised by the project. A summary of their comments is provided below:

The analysis provided is a standard EIA that clearly follows EIA best practices. However, EIAs do not allow for economic benefits to be assessed. A cost-benefit (or similar) approach should be employed as these measure costs and benefits rather than economic activity. Consequently, these methods can help to answer whether an activity is likely to have significant economic benefits. This approach is recommended by NZ Treasury as well as many other agencies both domestically and abroad.

Based on the information provided, we cannot say nor make a recommendation on whether the proposed business park is likely to have significant economic benefits or if it is otherwise nationally or regionally significant. There is simply not enough information in the EIA to demonstrate that the project is regionally significant.

The most compelling evidence that this project is regionally significant was not included in the EIA. According to the 2023 Housing and Business Development Capacity Assessment for the Auckland Region (HBA), there are approximately 4,500 ha of light industrial zoned land in Auckland. The addition of 276 additional ha of industrial land would increase the total supply of industrial land by approximately 6%. In a region with low vacancy rates in existing built-up industrial sites and relatively few truly vacant (i.e., non built-up) sites, this could be quite impactful. In fact, according to the HBA, this project would increase available light industrial land in the region by nearly 60%. This could potentially be relevant to Section 22(2)(a)(iii) of the FTAA, though Policy 1 of the National Policy Statement on Urban Development 2020 is relatively narrow on how business land is considered within well-functioning urban environments.

Franklin Local Board

The Franklin Local Board have advised that they are generally supportive of a plan change to allow development of industrial, commercial and light industrial land as it creates employment for the wider area and there is currently a shortage of such land. The situation of the proposed development surrounding the Ardmore Airport and near the proposed Mill Road upgrade, with its connections to SH1, is suitable for such use.

However, the Local Board has the following concerns about the proposed plan change area:

- The land proposed is extensive. There will be concerns about defensible boundaries.
- The land extends into land zoned as highly productive
- There are streams, bush areas, flood zones and flood prone areas within the proposed zone and there are concerns about environmental protection of these areas
- The Ardmore Primary School is situated within the proposed zone
- Given the land is generally flat, with flood prone areas, there are concerns about the cumulative effects on drains on surrounding farmland
- Reverse sensitivity issues
- Concerns about the lack of infrastructure in the wider area.

The Local Board would like to see careful mitigation for all our concerns. In particular, it would request consideration for:

- staged development to line up with the development of the Mill Road corridor to ensure good connections to SH1
- good public transport connections to the train stations
- connections to Papakura, Takaanini and Clevedon, including public transport and share pathways
- a comprehensive plan, agreed by Council appointed specialists, to deal with all the stormwater and environmental issues identified for the area.

Houkura – Independent Māori Statutory Board

The application for referral was sent to Houkura for comment. At the time of drafting this response no formal comments have been received.

CONCLUSION

Overall, Auckland Council **oppose** the project proceeding through the fast-track consenting process. Whilst the proposal is likely to have localised benefits, the development is out of sequence with the Council's Future Development Strategy, has the potential to have significant impacts on infrastructure, and the application has not proven that the project will have a significant regional or national benefits.

If the application is successfully referred for fast-tracking, as highlighted above, there are a considerable number of infrastructure-related and other matters that would require further discussions with Auckland Council, Auckland Transport and Watercare.

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.

Comments prepared by:



Brooke Dales

Consultant Planner (DCS)

For Resource Consents

Date: 6 March 2026

**Comments reviewed by:
Russell Butchers**



Principal Project Lead

Premium Unit

Auckland Council

Date: 6 March 2026

List of appendices:

1. **Auckland Transport Comments**
2. **Watercare Comments**
3. **Healthy Waters & Flood Resilience Comments**
4. **Parks & Community Facilities Comments**
5. **Chief Economist Unit Comments**
6. **Franklin Local Board Comments**

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

Project name	Ardmore Business Park - FTAA-2512-1155
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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 Transport		
*Name	Hedré Dednam		
*Role	Team Leader - Development Planning South, Auckland Transport		
Postal address	20 Viaduct Harbour, 1010		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
<p>Overall Summary of Auckland Transport (AT) Position</p> <ol style="list-style-type: none"> The proposed Ardmore Business Park development includes a large business park centred on Ardmore Airfield and to the immediate west of the proposed Sunfield Fast-Track and Mill Road Stage 2 (Takaanini Section) Notice of Requirement (lodged). The proposal seeks to provide further business land in the south of Auckland. Only high-level summaries of the project, transport and stormwater matters are available at this stage so there is no design detail to comment on. The Applicant summarises the key elements of the concept plan relevant to transport as: <ul style="list-style-type: none"> 511ha project area including airport. Net development area excluding airport and adjacent area already under development, roads, stormwater, landscaping etc of 193-260ha. Potential Gross Floor Area (GFA) of business park of approximately 136ha. The development is proposed to be predominantly warehouse/industrial GFA with a small supporting ancillary office and retail component.

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A large proportion of the development sits outside of the Special Purpose Zone – Ardmore Zone and is in the Rural – Mixed Rural Zone, outside of the Rural Urban Boundary and not included in a Future Urban Zone. Accordingly, large scale growth in this area is not currently anticipated in Auckland Council’s Future Growth Strategy (FDS).

3. AT acknowledges that the Fast Track Approvals Act (FTAA) has different criteria to the Resource Management Act consenting process and that the Applicant is entitled to pursue development not aligned with the FDS under the FTAA. However, for major development outside of areas anticipated for urbanisation under the FDS where there are no current transport network projects to address such growth, AT considers it is reasonable, should the matter progress to a substantive application, to seek an assessment of transport effects beyond the immediate confines of the development. Planned development is often subject to infrastructure triggers where particular stages/levels of occupancy cannot occur until necessary works in the wider network are completed. Where transport upgrades are needed and these are not publicly funded, developers may need to fully fund or partly fund works under Infrastructure Funding Agreements (IFAs) or other methods. Section 84A of the FTAA specifically contemplates conditions relating to infrastructure that may apply beyond the project area in this regard. AT considers that should the development be accepted for fast-track consenting, the Expert Consenting Panel needs to fully understand all of the costs and impacts on the transport network.
4. The substantive application would need to take into account both the Sunfield Fast-track development and the Mill Road Notice of Requirement (NoR). AT also has concerns over the effects of flooding, and stormwater mitigation in regard to its assets as set out later in this feedback.
5. Overall, the principal focus of these comments is setting out the high-level issues that AT considers it will be necessary to assess in a substantive application including the content of an Integrated Transport assessment (ITA), should the development be referred.

Sunfield Fast-track Development

6. The Applicant notes that the Sunfield Fast-track proposal immediately to the west is not part of the current environment, so it will only be assessed if approved at the time of a substantive application. The Expert Consenting Panel for the Sunfield Fast-track released its draft decision on 10 February 2026, which intends to grant the consent, subject to conditions. Therefore, AT anticipate that this development will be approved at the time the Ardmore Business Park application progresses should it be referred, and accordingly the effects of that development on the transport network will need to be taken into account.
7. AT notes that the draft conditions for the Sunfield Fast-track address effects on intersections remote from the development site on the wider transport network and potential upgrades where needed. The draft conditions include requirements for the preparation of additional Integrated Transport Assessments (ITA) at two stages during the development. The ITA is required to assess the traffic effects of further development on key intersections on the wider network, including intersections on Ranfurly Road, along Porchester Road and Mill Road. Given the anticipated 15-year timeframe of the proposed Ardmore Business Park, there will be some uncertainty as to the

future road network and extent of development that would occur over that time. Future assessments during build out of stages would therefore in AT's view be appropriate and would be consistent with the draft conditions for the Sunfield Fast-track.

Mill Road Stage 2 Notice of Requirement

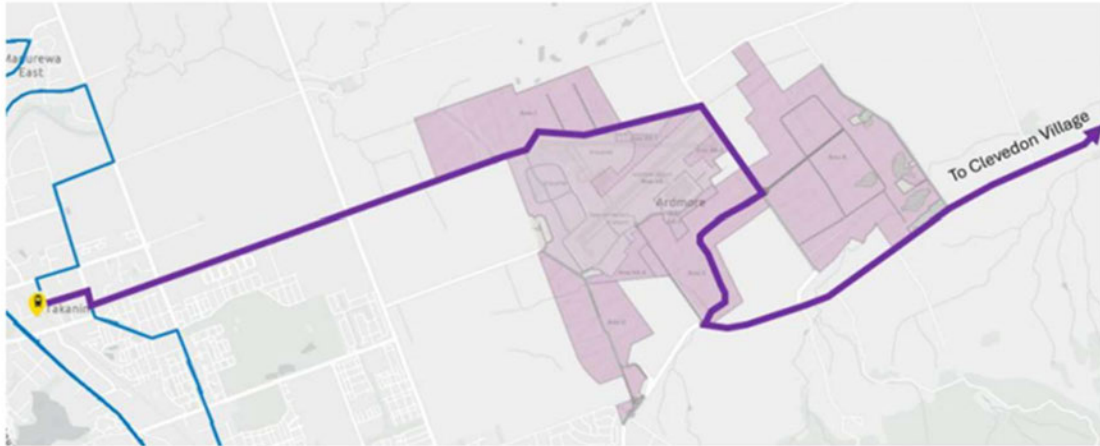
8. The New Zealand Transport Agency Waka Kotahi (NZTA) Mill Road Stage 2 Notice of Requirement (NoR) project has been lodged with Auckland Council and is in progress. Whilst there is no certainty as to when the project will be constructed, as the NoR needs to be approved and funding still needs to be secured, the Ardmore Business Park should take into consideration the potential effects of the NoR in terms of how it may affect access and trip distribution of traffic generated by the development, and the potential for changes to the overall distribution of traffic on the road network.
9. The Ardmore Business Park application should clearly set out how the development will work with the Mill Road Stage 2 project, including where this affects access, such as the severance of Hamlin Road.
10. The severance of Hamlin Road would restrict the accessibility to Ardmore Airport and the proposed Ardmore Business Park from development to the west of the Mill Road project, including Winton Sunfield. AT's preference is that a Hamlin Road link be retained through grade separation. This is subject to discussions with NZTA and through the NoR process. As there is no certainty that a Hamlin Road connection across Mill Road Stage 2 would be provided, it is necessary that the Ardmore Business Park application assess the effects of the proposed development on the wider network without Hamlin Road providing a connection across the Mill Road Stage 2 project.

Public Transport Network/Active Networks

11. Most of the Ardmore Business Park development is within 5 to 7 kilometres of Takaanini Station. This is a practical distance for a public transport service and biking from Takaanini Station.
12. AT considers that in the next ten years; Clevedon Village could reach a population of 2,000. It currently has a population of approximately 600 people. Council / AT has a policy of providing public transport services to settlements of over 2,000 people (refer page 60 of the Regional Public Transport Plan 2023-2031). Conceptually, AT envisages a future bus route that connects Clevedon Village via Ardmore to either Takaanini or Papakura station. For that to occur, it needs a strong east west road connecting through the proposed development area. This should be considered in any masterplan/ITA.
13. AT acknowledges that in response to pre-application feedback, the Applicant includes a conceptual west-east bus route that does not rely on Hamlin Road, which under the current Mill Road Stage 2 proposal, will be at grade and severed (Figure 5 in Attachment 16 Transport Overview).

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Figure 5 – Indicative bus service route



14. Initial comments on this indicative bus route from AT's public transport network specialist are:

- There may be a need to create a different frequency of bus services for the Ardmore Business Park area compared to Clevedon Village due to different demand patterns.
- There needs to be the ability to turn around buses within the development depending on staging and the road network layout, possibly at Mullins Road.
- The Bullens Road / Papakura-Clevedon Road intersection is not currently safe for bus movements.
- Bullens Road would require an early upgrade in staging to be suitable as a bus route.
- Safety for buses at the end of the runway on Mullins Road needs to be considered.
- Walking access to the bus route will need to be provided and bus stops placed at an appropriate spacing.

15. In anticipation of the Sunfield Fast-track application being approved, any bus routes will need to be properly integrated across both developments.

16. There is a need for a better connection west of Ardmore Airport between Hamlin Road and Airfield Road if Mill Road isn't available to provide such a link. This needs to be suitable for trucks and buses and not be impacted by Airport operations.

17. In any substantive application, the Applicant will need to outline what are going to be private roads (under Ardmore Airport control) and what will be public roads. Understanding the proposed staging will assist AT in seeing how it can provide public transport services to the development as the network is being built out. It is difficult to serve cul-de-sac roads, and roundabouts are generally a good solution for buses.

18. Roads to be served by buses will need to be upgraded/ designed to have a suitable cross-section to accommodate buses. Roads should also be bike friendly as the proposed development area is a suitable cycle distance for nearby amenities and Takaanini Station.

Stormwater

19. The stormwater assessment submitted with the application is brief and very high level, and as such, there is currently insufficient information to understand the potential effects that the development of the land will have on flooding in the wider catchment and the impact on AT's roading network.

20. Most of the rural roads in this area are subject to frequent flooding during rainfall events, which in severe events becomes hazardous in many areas. The flooding is slow moving, and largely backwater controlled, which makes mitigation difficult and generally requires major infrastructure assets or upgrades to manage. AT's roading assets in this area are known to become impassable due to flooding in events as low as a 2-year Average Return Interval (ARI) return period event. Collected evidence by Auckland Council staff from a storm in mid-2025, which had a return period of approximately a 2-year ARI, showed that the existing road channels on Airfield Road and the recently built flooding mitigation infrastructure within the Ardmore Airport development were overwhelmed resulting in Airfield Road becoming impassable to vehicles. The road network in this area provides a significantly lower level of service in terms of flooding than is required by AT's Transport Design Manual (TDM) for an urban area. Major roading network upgrades, drainage system upgrades and new flood mitigation infrastructure would be necessary to provide a suitable level of service to this area.

21. The below figure shows the extent of flooding that is considered to be impassable to vehicles, based on results from Auckland Council's Region-Wide Rural flood models for the 1% AEP 3.8°C climate scenario (a hazard classification of H2 or greater is used to indicate these areas, which is unsafe for light vehicles). As shown, many of the existing roads in the area are impassable in extreme storms.

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22. The Stormwater Assessment Report supplied outlines some high-level options to mitigate flooding. However, these are described in very little detail, for example “*widening existing channels and creating new channels to mitigate flood impacts within the site as well as upstream flows around the perimeter of the Airport.*”. There is no engineering assessment or feasibility analysis undertaken on these statements to demonstrate that the solutions can achieve the necessary mitigation of adverse effects from development of the land, let alone enable flooding hazards to be managed in such a way as to provide for serviceable or safe roading assets.
23. Based on the above, AT’s stormwater advisor is concerned that the application may pose a significant risk to AT in terms of:
- Potential for exacerbation of flooding hazards on AT’s road network, by both worsening existing flooding frequency and magnitude, and increasing the number of persons exposed to those hazards by way of increasing demand.
 - Potential for a significant pressure on AT to undertake unplanned investment into the surrounding road network to provide roads with a suitable level of service for flooding and drainage.
 - Uncertain and unplanned costs to upgrade and maintain road drainage and flood mitigation infrastructure to provide for the minimum level of service, in terms of whole-of-life costs of the assets.
24. Any substantive application will require a detailed assessment of the potential effects from the proposed development to understand the potential impacts to AT, how hazards will be mitigated

or avoided, and the scale of new or upgraded infrastructure that AT will need to vest or deliver to service the development.

Integrated Transport Assessment (ITA) Scope

25. Due to the limited information available at this stage the following matters are considered to be essential in an ITA to enable AT to properly understand the effects of the proposal and form a position on the appropriateness of any proposed mitigation.

Trip Rate and Distribution

26. The Transport Overview states that an overall trip rate of 0.26 trips per 100m² is to be used for the assessment. Detail on how this has been derived will need to be provided to show how it accounts for the likely range of land uses in the development.

Future Environment

27. Considerations in relation to Sunfield Fast-track, Mill Road Stage 2 NoR and the potential severance of Hamlin Road are outlined above and must be assessed in a substantive application.

Scope of Assessment

28. The scale of the development proposed is not anticipated in this area in Auckland Council's zoning or FDS, given the Rural – Mixed Rural Zoning of much of the land to be developed. Therefore, the assessment of traffic effects should extend beyond the immediate surrounding area, including Porchester Road (from Subway Road to Alfriston Road), Alfriston Road / Stratford Road / Ranfurly Road intersection and Mill Road (from Airfield Road to Ranfurly Road), and effects on connections to Great South Road over the railway line (e.g. Spartan Road, Manuroa Road, Taka Street and Walters Road and taking into account the proposed Takaanini Level Crossing project which includes grade separation and closure of some of these routes).
29. In addition, given that the development is intended to focus access to the south, then effects on routes through Papakura will also need to be considered including assessment of the pavement condition on existing rural roads and the inclusion of a Pavement Impact Assessment (PIA).
30. In addition to the upgrades listed in section 5 of the Transport Overview, the Hamlin Road/Papakura-Clevedon Road intersection should also be included. Other upgrades may also be required on the network, which may be identified by the wider assessment. The assessment will need to demonstrate that any upgrades are feasible and that they can be achieved within the existing road reserve or without purchase of third-party property.
31. The assessment should consider the effects of the increased traffic, including heavy vehicle movements, on Ardmore School located on Papakura-Clevedon Road west of Burnside Road.

Staging

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32. Details of how the development will be staged should be provided, and this should be taken into account in the assessment, including the staging of any transport upgrades to support the development.
33. Conditions around development triggers for certain works to be completed may be necessary and is an approach that has been used for other large developments and/or precinct plans in the Auckland Unitary Plan.

Active Modes and Public Transport

34. The development should consider how active modes and public transport would be facilitated within the site and with connections to the wider transport network to provide means for future workers to be able to travel to the site from the surrounding residential neighbourhoods and from the rail stations. This would need to take into account potential severance with the Mill Road Stage 2 project.
35. As the Sunfield Fast-track application is likely to be approved, this would significantly increase the number of potential workers within the immediate vicinity of the proposed development and active modes, and public transport connections would be important to provide employees alternatives to private vehicles.

High Traffic and Freight Volumes Concerns

36. The Transport Overview memo states that the application (not including the Sunfield Fast-track development) will generate somewhere between 2,200 and 3,350 vehicle trips per hour. To put this into context, the current two-way hourly volume (8am-9am) on Great South Road is 2,757 vehicles. Notwithstanding that an ITA is still not available, it appears on this initial analysis that without Mill Road Stage 2 NoR in place (south of the soon to commence northern section) or at least without significant network upgrades, the existing network will not have the capacity to deal with the volumes proposed, noting that there is likely to be limited capacity on the three proposed Takaanini rail overbridges, connections to Great South Road and the Takaanini Interchange even without this application going ahead.

Interim strategic freight network upgrades in the absence of Mill Road (Takaanini Section)

37. The proposed freight network to support this development in the absence of Mill Road (Takaanini Section) needs to be confirmed. AT does not support freight traffic using arterials that are heavily residential in nature including Walters Road, Airfield Road (urban section) and Clevedon Papakura Road (urban section).
38. Consideration should be given to Popes Road/Manuia Road (designated as an over dimension route) as a key east-west freight route. However, this route may require upgrades to enable this functionality. The Applicant should assess further upgrades to this route, including intersection upgrades at Airfield/Mill, Popes/Mill, Popes/Porchester, Takaanini School/Popes, Takaanini School/Spartan, and Spartan/Oakleigh intersections. Assessment of midblock sections is also required, including edge line widths.

39. Consideration should also be given to Alfriston/Ardmore Road and Alfriston Road as another key freight route. This may require upgrades to enable this functionality, including intersection upgrades at Alfriston Road/Alfriston Ardmore Road, Mullins/Clevedon Takaanini Road. Assessment of midblock links is also required, including shoulder widths.

Urban frontage upgrades proposed

40. Proposed urban frontage upgrades should be confirmed on the following public/private roads:

Public

- Airfield Road
- Mullins Road
- Clevedon Takaanini Road
- Burnside Road
- Papakura Clevedon Road
- Bullins Road
- Hamlin Road

Private

- Harvard Lane
- Bristol Freighter Lane
- Dakota Lane
- McBride Lane
- De Havilland Lane
- Tiger Moth Lane
- Kitty Hawk Lane
- Starlet Lane
- Victa Lane
- Dauntless Lane
- Corsair Lane

Auckland Forecasting Centre

41. Traffic modelling must include input from Auckland Forecasting Centre (AFC). The Mill Road corridor should be incorporated into the traffic modelling and assessment. While the Flow summary report mentions Mill Road, level crossings, and the Sunfield Fast-track development, it does not assess their impact on network capacity. The Mill Road corridor should be incorporated into the traffic modelling and assessment.

Safe System Audit

42. A Safe System Audit must be completed in accordance with the NZTA guidance (“Safe System Audit Guidelines, August 2022”) by an independent and appropriately qualified safety audit team. The increased traffic volume could exacerbate safety issues on the road network. Assessment should include both the wider network and the directly adjoining roads.

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Intersection treatments

43. Assessments undertaken to determine the selection of intersection treatments, such as roundabouts or traffic lights, should be included in any substantive application.

Ardmore Airport

44. While recognizing that Ardmore Airport land is part of the proposal footprint and that it is regionally significant infrastructure, the effects on and of the Airport operations should be included in the assessment for the substantive application.

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.

Managers signoff

Tessa Craig - Acting Manager Development Planning, Network Operations Planning

Date 25/02/2026

4 March 2026

Russell Butchers
Principal Project Lead, Auckland Council
Via email: s 9(2)(a)

Dear Russell,

Application for referral of the Ardmore Business Park under the Fast-Track Approvals Act 2024

308-499 Airfield Road, 1-133 Burnside Road, 803-881 Papakura-Clevedon Road, 95-161 Hamlin Road, 40-124 Mullins Road, 7-52 Bullens Road, 99 Corsair Lane, 45-61 Clevedon-Takanini Road, Ardmore 2582

Introduction

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Ardmore Business Park Fast-track referral application (**the Application**), made under section 13 of the Fast-track Approvals Act 2024 (**Act**).
2. Knight Investments Limited (**the Applicant**) proposes to deliver an industrial and employment hub covering an area of approx. 511 hectares (**the Project**) at land surrounding the Ardmore Airport (**the Project Area**). At a high level, the Project will be staged across a 15-year development period and includes:
 - (a) The construction and development of a business park.
 - (b) Provision for land use activities and buildings for light industry/service type activities.
 - (c) Approximately 193-276 hectares available as “net” developable area (inclusive of landscaping and carparking etc).
 - (d) Approximately 67-136 hectares of gross floor area from future activities / buildings.
 - (e) A green / blue network providing riparian planting, stormwater management and wastewater disposal and protection of existing SEAs.
 - (f) Upgrades to existing roads and intersections, new roads and accessways.
 - (g) New roading connections to the Airport and the wider site.
 - (h) Land modification works (inclusive of freshwater works such as streamworks and works within and in proximity to wetlands) and infrastructure to service the Project.

3. The Project is estimated by the Applicant to deliver 17,300 full-time equivalent jobs generated over the development period and 4,500-5,000 full-time equivalent permanent jobs generated upon completion. The Project, if approved and developed in accordance with the Applicant's assumptions, would become Auckland's largest business park by area and number of employees.
4. The zoning of the Project Area is the Rural – Mixed Rural Zone under the Auckland Unitary Plan – Operative in Part (**AUP-OP**). The Site is also located outside the Rural Urban Boundary (**RUB**) in the AUP-OP.
5. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
 - Attachment 1 - Ardmore Business Park Application Companion Document.
 - Attachment 3 - Project Site Maps.
 - Attachment 6 – Record of Engagement.
 - Attachment 7 – Planning Memorandum, prepared by Tollemache Consultants Ltd, dated 22 December 2025.
 - Attachment 14 – Wastewater Servicing Report, prepared by GWE Consulting Engineers, dated December 2025 (**the Wastewater Report**).
 - Attachment 15 – Drinking Water Servicing Report, prepared by GWE Consulting Engineers, dated December 2025 (**the Water Report**).
6. Any amendment to the Application will require further review from Watercare.

Watercare's purpose and statutory obligations

7. 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.
8. 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 the Auckland Future Development Strategy 2023-2053 (**FDS**).
9. 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 Zoned (**FUZ**) 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 comments

10. As noted, the Project Area is zoned Rural-Mixed Rural Zone and outside the rural-urban zone (RUB) under the operative Auckland Unitary Plan (AUP-OP).
 11. Under Watercare's Board-approved strategic direction (approved May 2015), Watercare does not provide service outside the RUB. However, the strategic direction recognises a limited exception to that position, under which Watercare may provide services outside the RUB only where formally requested to do so by Auckland Council, and on the basis that the investment required to service the area is funded by the developer and full cost recovery is achieved.
 12. No such Council request has been made as at the date of this letter, so the limited exception referred to above is not engaged. As such, Watercare has no current or long-term plan to provide public reticulated wastewater or water servicing to the Project Area.
 13. Watercare does not currently provide water supply or wastewater servicing to rural zoned land, such as the Project Area for the following reasons:
 - (a) Servicing rural zoned land is unanticipated by Watercare and in accordance with Auckland Council's Plans and Strategies, has not been provided for in Watercare's Business Plan or Asset Management Plan.
 - (b) This means that planned upgrades and projects in the network and associated treatment infrastructure do not provide capacity for servicing rural land, and therefore the provision of connections to rural land would significantly impact the available capacity for the anticipated growth of live-zoned areas and FUZ areas.
 - (c) This position is consistent with Watercare's statutory obligations to act consistently with any plan or strategy of the Council, including but not limited to, the AUP-OP, the Auckland Plan 2050, and the FDS.
 14. Notwithstanding this position, the below technical comments are provided in relation to the Project regarding water and wastewater servicing.
 15. Any infrastructure delivery dates provided in this letter are forecast dates only and are subject to change.
 16. Any comments on the proposed **private** water and/or wastewater servicing for the Project Area will be made by Auckland Council, save to note a few brief matters noted below. Additionally, Watercare notes any private servicing may be subject to regulation by Taumata Arowai as the Water Services Regulator.
-

Previous consultation with Watercare

17. The Applicant has discussed the Project with members of staff from Watercare and Veolia, seeking support of the Project and to indicatively investigate options to service the Project Area with public water and wastewater service.
18. The Applicant's Record of Engagement [Attachment 6 to the Application] more specifically notes that a meeting occurred between Watercare's Head of Property and the Veolia Developments Manager. The Attachment states:

"The meeting outlined that capacity checking was being undertaken to determine if the Ardmore Business Park could connect to the public supply networks for wastewater and water, however confirmation would be unlikely to be available at the referral application stage..."

Further email correspondence occurred between the applicant and Priyan Perera (Chief Strategy and Planning officer from [Watercare]) confirming the intention of [Watercare] to work with the applicant and explore options for servicing."

19. The Water Report (at Section 6) both also state that the Applicant is working with Watercare on the availability for public supply.
20. While Watercare may endeavour to work with the Applicant to explore possibilities of public servicing if required, this statement and the associated Application material does not constitute a commitment to provide the Applicant with public water and wastewater supply, or an integrated solution. As such, the following comments provide Watercare's technical views on the Project relating to water and wastewater servicing.

Relationship between Watercare and Veolia

21. Watercare holds contractual obligations under its Service Level Agreements and wholesale arrangements with Veolia for Watercare to provide bulk water and wastewater services. These obligations are governed by operational protocols, infrastructure availability, and the terms of the relevant servicing agreements. Accordingly, Watercare is responsible for advising on the capacity of the bulk water and wastewater networks in the Veolia Service area. Veolia, as a retail provider, is responsible for managing local networks and customer connections within its service area.
22. Ardmore falls within Veolia's service area and as such, Veolia is responsible for managing local networks and customer connections within the Project Area and surrounds.
23. Comments on matters pertaining to local networks are deferred to Veolia as the local service provider for the area. However, the local networks administered by Veolia are not independent of Watercare's bulk networks and the capacity of both networks must be confirmed. Veolia determine the point of local network connections to Watercare's bulk networks, of which Watercare must approve the connection first. As such, they are guided by Watercare's Policies and network capacity information.

Bulk and local Wastewater

24. The Wastewater Report notes the following in terms of wastewater servicing to the Project Area:

- (a) The estimate of total wastewater generated is 351m³/day. The application documents imply only light industrial activities are proposed.
- (b) The Applicant is considering options to service the entire park including the following:
 - Conventional Gravity Sewer System.
 - Septic Tank Effluent Pumping/Gravity.
 - Vacuum Sewer System.
 - Low Pressure Sewer System (**LPS**).
- (c) The Applicant will evaluate options in more detail at the concept design stage and once detailed development plans are available.
- (d) The Applicant proposes a private Wastewater Treatment Plant (**WWTP**) for the Project Area to make use of the economy of scale provided by the proposal and to reduce the potential for odour effects. The discharge point has not been specified in the Application documents. Highly treated wastewater from the WWTP may be reused for non-potable purposes such as irrigation of landscaping areas, ecological restoration areas, golf courses, and for common amenity land non-potable washdown water. Remaining wastewater discharge would either be to land and/or water. No discharge locations have been determined at this stage.

25. The development is not proposing to utilise the public network and only refers to a centralised private WWTP within the site boundaries. As such, comments on private systems are deferred to Auckland Council. However, in the event private wastewater networks are constructed and Auckland Council directs Watercare to provide bulk wastewater services in accordance with the Board-approved strategic direction, Watercare strongly recommends that the networks are designed to its Code of Practice for land development and subdivision ¹.

26. For example, the Wastewater Report suggests an LPS option to service the development. It should be noted that should the applicant later seek to vest this infrastructure, the decision around accepting this option sits with Veolia. However, Watercare notes an LPS of this scale is contrary to its Code of Practice, which still applies to the Veolia service area, for the reasons below:

- (a) The Applicant must firstly provide evidence that a gravity system is not feasible.

¹ The Auckland Code of Practice for Land Development and Subdivision: Water and Wastewater Code of Practice for Land Development and Subdivision, Chapter 5: Wastewater (2019)

- (b) The Project is for approximately 1000 Dwelling Unit Equivalent (DUEs), which far exceeds the Watercare Code of Practice² upper limit of 50 DUEs for an LPS.

27. Additionally, Watercare owns and operates the Ardmore [Potable] Water Treatment Plant and reservoir, approx. 2km southeast of the Project Area. Any private wastewater discharge proposed within the vicinity should not adversely impact Watercare's drinking water treatment operations at the Ardmore Water Treatment Plant, which receives and treats approximately two thirds of Auckland's water supply³. It is recommended the Applicant addresses this matter further at the substantive application stage.

Bulk and local Water Supply

28. The Applicant's Water Report notes the following in terms of drinking water supply for the Project Area:

- (a) Water demand for the development has been calculated at 230m³/day for an estimated 5,000 employees once the Project is completed. The Water Report states that drinking water would be exclusively sourced from rainwater harvesting.
- (b) A centralised Water Treatment Plant (**WTP**) will be located within the Project Area. The system would be scaled or staged to match development growth. Raw water storage has been based on a 30-day security period to accommodate rainfall variability and ensure continuous supply to the WTP. The required capacity for this allowance is approximately 5,600m³. Treated water storage has been based on a 3-day operational reserve to provide resilience during WTP downtime, maintenance events, or short-term fluctuations in system demand. The indicative treated water storage requirement is approximately 560m³. Compartmentalised tanks are recommended in the Water Report to maintain supply continuity during cleaning and inspection.
- (c) Water for firefighting storage will be evaluated at the time of the substantive application.
- (d) Infrastructure ownership and management options include a private utility management or a body corporate structure. This would be confirmed at the substantive application stage.

29. In the event private water networks are constructed and Auckland Council directs Watercare to provide bulk wastewater services in accordance with the Board-approved strategic direction, Watercare strongly recommended that the networks are designed to its Code of Practice, to facilitate eventual incorporation into the metropolitan network.

30. While Watercare largely defers comments on private servicing to Auckland Council, concerns are raised at a high-level to the feasibility of servicing the proposed industrial and employment precinct via rainwater harvesting alone, particularly during drier periods of the year. Further demonstration would be expected from the Applicant that the Project can reasonably be privately

² Section 5.3.12.3 - The Auckland Code of Practice for Land Development and Subdivision: Water and Wastewater Code of Practice for Land Development and Subdivision, Chapter 5: Wastewater (2019)

³ Watercare Services Limited (2019) – Ardmore Water Treatment Plant Community safety information. Accessed: https://wslpwstoreprd.blob.core.windows.net/kentico-media-libraries-prod/watercarepublicweb/media/watercare-media-library/reports-and-publications/watercare_chlorine_info_leaflet_2019.pdf

serviced from a water supply perspective, in perpetuity, and without creating any dependency on, or impacts towards Watercare's existing and planned operations.

Conclusion

31. Watercare plans for and supports areas of urban growth identified by the Council, which excludes rural-zoned land and land outside the RUB.
32. The Project Area would not be serviced by Watercare unless directed by Council to do so, and at the cost of the developer.
33. Watercare also recommends that any private scheme be designed in accordance with the relevant codes of practice for infrastructure⁴, and be subject to robust long-term governance arrangements that provide for long-term maintenance and ensure safety, reliability and financial sustainability for the community served.
34. Any comments on, or assessment of, the proposed private water and/or wastewater servicing for the Project Area will be made by Auckland Council.
35. If the application is referred, Watercare encourages the applicant to discuss technical options for servicing the site with Watercare and Veolia.

Yours faithfully,



Helen Shaw

Head of Strategy and Consenting
Watercare Services Limited

⁴ The Auckland Code of Practice for Land Development and Subdivision
<https://www.aucklanddesignmanual.co.nz/en/developing-infrastructure/infrastructure-codes-of-practice.html>

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	Ardmore Business Park
Address	308 Airfield Road, Ardmore
FT application number	FTAA-2512-1155 (PRR00043673)

Respondent Information

Name	Andrew Chin
Role	Head of Healthy Waters Strategic Initiatives
Agency / Department	Healthy Waters & Flood Resilience (HWFR)
Date	24.02.2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

General Comments on the Application

Authorisation

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 only applicable to existing urban zoned land or land rezoned urban through a Plan Change process.

The proposed development is primarily located within the *Rural – Mixed Rural* zone and *Special Purpose – Airports and Airfields* zone. The Applicant's Agents have acknowledged that the proposed development is unable to be authorised by Healthy Waters RWNDC, and has sought a private diversion and discharge consent as part of the Fast Track approvals.

Existing Flood Hazards

Urban development within rural zones is not anticipated by the Auckland Unitary Plan (AUP) and the impacts of development will not be accounted for within the published catchment flood hazard mapping.

Healthy Waters has reviewed the stormwater approach for the proposed Ardmore Business Park. The application proposes that post-development peak flow will be less than or equal to pre-development peak flow, and that flood risk is not exacerbated for upstream and downstream properties during the 50%, 10%, 1% AEP + climate change storm events. While this general approach is supported, the proposal does not address significant existing flood hazards in the surrounding transport network and relies heavily on private farm drains for stormwater conveyance. These issues create long term safety, resilience, and infrastructure performance risks.

Key road corridors in the area including Airfield Road, Hamlin Road, Alfriston-Ardmore Road, and Papakura-Clevedon Road already experience flooding in smaller rainfall events. The Stormwater Assessment outlines that the results of the preliminary modelling, including the predevelopment modelling, indicate that portions of the existing farm drain network and roadside drainage networks are at or slightly above capacity. The proposal does not clearly demonstrate a reduction of these hazards, and in combination with the proposed Sunfield development will increase the number of residents and road users exposed to high flood risk. Safe and accessible road connections in at least a 10-year ARI storm event are essential for an urban area of this scale.

An integrated, catchment wide solution is required to support both Ardmore Business Park and Sunfield. This should include a high capacity conveyance corridor to the Papakura Stream, upgrades to ensure road passability in a 10year ARI storm event, and development platforms designed to tie into any required road level changes. Longterm reliance on private rural drains is not suitable for urban development.

Further information on the modelling (including a model build report, and the model in full) should be provided at the Substantive Application Stage. HWFR remain available to discuss the model and information to be submitted prior to lodgement of Substantive Application should the Applicant's Agents desire so.

Stormwater Infrastructure Ownership

There is currently no Council-planned stormwater network or infrastructure provision in the location of the proposed Referral Application.

In urban areas, for a development of this scale elements of the proposed stormwater network, specifically any large-scale communal devices and their associated networks that service multiple residential lots and public roads that are proposed and have been accepted by Auckland Transport, are typically vested as public assets.

HWFR seek further information on the proposed stormwater assets, together with clarification of the intended ownership so that there is opportunity to comment on long-term operation and maintenance requirements. Further information should be provided at the Substantive Application stage on stormwater management that may have the potential to be vested to HWFR in future as public assets.

Although indicative scheme plans have not been provided as part of this Application, it should be noted that HWFR typically does not support the vesting of stream corridors or natural wetlands where the stormwater function does not require public ownership and can

be adequately secured through private ownership with protective mechanisms. This is to avoid vesting of land that would result in an ongoing financial maintenance burden to Council without generating public land and infrastructure benefit. As part of the Substantive Application the extent and location of any land proposed for vesting should be accompanied by evidence that the land delivers essential stormwater function as well as wider public benefit.

Consent Conditions

Consent conditions have not yet been provided. If stormwater management assets are intended to be vested at future stages of development, the conditions of consent should be drafted in a way that would enable the adoption of any private diversion and discharge consent by HWFR at some point in the future. HWFR would seek input into such conditions and welcomes ongoing discussion with the Applicant's Agents in this respect.

Assessment Against FTAA Section 22 Criteria

Significant regional or national benefits

In HWFR view, potential economic benefits are constrained by the unresolved flood hazards on key access roads, which pose risks to public safety and transport reliability.

Timely and cost-effective delivery

While the fast-track process may accelerate delivery, failure to address integrated drainage and road access issues upfront could result in costly future retrofits and reduced long-term efficiency.

Efficient operation of the fast-track approvals process

The complexity of stormwater constraints may require additional assessment unless integrated catchment solutions are incorporated early.

Support for regionally/nationally significant infrastructure

The proposal does not support safe operation of key transport corridors, which already experience frequent flooding.

Contribution to a well-functioning urban environment

Not achieved. Safe road access in at least a 10-year ARI storm event is a fundamental requirement and is not provided.

Climate change adaptation / natural hazard mitigation

The proposal maintains existing flooding but does not reduce hazard exposure. This is despite introducing or exposing a significant more number of persons to the existing hazards. No climate-resilient access solution is currently included.

Addressing significant environmental issues

Blue-green areas are positive; however, unresolved road flooding, reliance on private drains, and lack of catchment integration represent significant issues.

Auckland Council Fast-Track Assessment Criteria

Consistency with AUP and Auckland Plan 2050

The application is not considered to be fully aligned with the AUP or Auckland Plan 2050. The proposal does not deliver a resilient, safe, well-functioning urban environment and does not integrate land-use, stormwater, and transport infrastructure.

Development sequencing

The proposed development is out of sequence.

Infrastructure sufficiency

The stormwater infrastructure put forward to support the development is considered insufficient. Significant upgrades to stormwater conveyance and road levels are needed to support the development. Reliance on private farm drains is not appropriate for long-term urban drainage.

Significant adverse environmental effects

The proposed development will result in increased exposure of residents and road users to flood hazards, including risk of vehicle-related injury or death during flooding.

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

Overall Position / Summary

Healthy Waters supports the intent to develop the Ardmore area; however, the current stormwater approach does not yet meet the requirements for safe, resilient, urban development under the FTAA or Auckland Council criteria.

An integrated catchment-wide stormwater and transport solution is required to:

- Reduce existing road flood hazards,
- Ensure key access roads are safe and passable in a 10-year ARI storm,
- Provide a high-capacity conveyance channel to Papakura Stream, and
- Ensure development levels align with upgraded road elevations.

Healthy Waters recommends that these issues be addressed before the project proceeds through the fast-track process and would encourage further discussion prior to the further development of the substantive design, and prior to the lodgement of the Substantive Application.

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	Ardmore Business Park
Address	308 Airfield Road, Ardmore
FT application number	FTAA-2512-1155 (PRR00043673)

Respondent Information

Name	Roja Tafaraji
Role	Senior Parks Planner
Agency / Department	Parks and Community Facilities
Date	20/02/2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Has the project been identified as a priority in any government or sector plan or strategy?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Will the project increase housing supply or contribute to a well-functioning urban environment?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Will the project deliver significant economic benefits?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*

- Will the project support primary industries (e.g., aquaculture)?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Will the project support development of natural resources (e.g., minerals, petroleum)?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Will the project support climate change adaptation or recovery from natural hazard events?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Will the project address significant environmental issues?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
 - *Parks and Community Facilities have no relevant matters to advise on in this regard.*
- Are there any other relevant matters to consider?
 - *Yes. Further comments are provided below from Parks and Community Facilities.*

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
 - *From a Parks asset owner perspective, no clear inconsistency is identified. The applicable zoning and precinct provisions do not require open space provision, and the proposal does not generate recreation reserve demand.*
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
 - *The site is outside Future Development Strategy growth areas; however, as the proposal is business-focused and does not create residential demand, no sequencing issue arises in relation to open space provision.*
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
 - *From a Parks perspective, no Council-owned reserve land is affected and no new recreation reserve infrastructure is required; therefore, no significant parks infrastructure impact is identified at referral stage.*
- Is there the potential for significant adverse environmental effects to occur?
 - *From a Parks asset owner perspective, no significant adverse effects on Council-owned open space assets are identified at referral stage, noting that esplanade reserve triggers (if applicable) would require further assessment.*

Agency/Department Response

Thank you for the opportunity to provide Parks & Community Facilities (PCF) specialist and asset owner feedback on the Fast Track referral application for Ardmore Business Park.

At this referral stage, our comments are intentionally high-level and focused on whether the proposal raises matters of regional or national significance from a parks, open space, and green infrastructure perspective.

1. Zoning Context and Open Space Expectations

The subject site comprises parcels within:

- Rural – Mixed Rural Zone; and
- Special Purpose – Airports and Airfields Zone, including the Ardmore Airport Sub-Precinct.

Special Purpose – Airports and Airfields Zone (Ardmore Airport Sub-Precinct)

Under the Auckland Unitary Plan (AUP), the Special Purpose – Airports and Airfields Zone refers to the applicable precinct provisions for Ardmore Airport.

The purpose of the Ardmore Airport Sub-Precinct is to enable the efficient use and development of the land and its operational facilities.

The precinct provisions:

- Do not include objectives, policies or rules requiring open space provision;
- Do not identify recreation reserve outcomes;
- Do not address pedestrian or cycling connectivity requirements within the precinct.

The proposed business park is owned by Ardmore Airport Limited. No public park is proposed as part of the development. Roads, accessways and upgrades to existing roads are proposed.

From a Parks asset owner perspective, the zoning and precinct framework do not establish any statutory expectation for recreation reserve provision within this land.

Rural – Mixed Rural Zone

The Mixed Rural Zone provides flexibility for rural production activities and associated non-residential activities while ensuring appropriate amenity levels for rural lifestyle residents.

The proposed activities are consistent with the underlying zoning intent.

Importantly:

- The site is outside the extent of the Future Development Strategy.
- No growth-based park acquisition programme applies to this location.

- The proposal does not trigger open space provision requirements under current strategic planning frameworks.

Accordingly, from an open space supply perspective, no formal recreation reserve acquisition is identified.

2. Recreation Reserve Demand and Acquisition

From both Parks Planning and Property Provision perspectives:

- We do not support or seek provision of neighbourhood or suburb parks within this site.
- The development does not introduce additional resident population and therefore does not generate recreation reserve demand.
- There is no funding captured for park acquisition in this location due to alignment with the AUP zoning and the Future Development Strategy.

The industrial/business fabric does not warrant a level of service equivalent to residential zoning. This approach is consistent with Council's treatment of other industrial corridors.

At referral stage, no recreation reserve supply issue of regional or national significance is identified.

3. Existing Public Open Space Assets

There is no Council-owned reserve land within the subject site.

Accordingly:

- No existing public open space asset is directly affected by the proposal.
- No regionally significant parks asset is reduced, fragmented, or displaced.

4. Esplanade Reserve and Blue-Green Considerations

Esplanade reserve requirements may be triggered under the Resource Management framework, regardless of zoning.

Where applicable, Parks supports the provision of esplanade reserves to:

- Protect riparian margins;
- Safeguard ecological corridors;
- Enable future public access;
- Support long-term connectivity to the wider open space network.

The application references blue-green networks. From a Parks perspective, these should be considered not solely as stormwater infrastructure (in conjunction with Healthy Waters), but also in terms of long-term open space and connectivity outcomes and in line with the purpose of s229 where esplanade areas are to be provided.

At referral stage, no regionally significant open space issue is identified. However, should the proposal proceed, further assessment would be required to ensure that potential esplanade triggers and connectivity opportunities are appropriately considered and addressed.

5. Connectivity and Amenity within Business Context

While the proposal is business-focused, amenity provision remains appropriate in the form of:

- Streetscape planting;
- Canopy cover;
- Riparian planting;
- Informal walking circuits.

This is distinct from the provision of flat functional recreation land for playgrounds or organised sport.

Strategic connectivity opportunities, including potential east-west links toward the wider Papakura area (Papakura), should not be precluded.

Overall Parks Asset Owner Position – Referral Stage

At this referral stage, Parks & Community Facilities does not identify matters that elevate the proposal to regional or national significance in relation to:

- Recreation reserve provision or supply;
- Strategic park acquisition;
- Loss or modification of regionally significant public open space assets.

Specifically:

- The applicable zoning and precinct provisions do not establish open space requirements.
- The site is outside identified growth areas under the Future Development Strategy.
- No acquisition funding or programme applies.
- No existing Council reserve land is affected.

Should the application proceed beyond referral stage, further detailed assessment would be appropriate in relation to:

- Esplanade reserve triggers;
- Blue-green integration with Parks outcomes;
- Safeguarding future connectivity corridors;
- Lifecycle implications (i.e. ongoing operational, renewal and maintenance liabilities) of any assets proposed to be vested.

Prepared by:



Roja Tafaraji
Senior Parks Planner
Parks Planning Team
Parks and Community Facilities

Date: 20 February 2026

Reviewed by:



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

Date: 20 February 2026

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	Ardmore Business Park
Address	308 Airfield Road, Ardmore
FT application number	FTAA-2512-1155 (PRR00043673)

Respondent Information

Name	Dr Shane Martin
Role	Consulting Economist
Agency / Department	Auckland Council
Date	25 February 2026

Do you support the proposal proceeding through fast-track?

- Support
 Oppose
 Neutral

Agency/Department Response

This is primarily a review of the Economic Impact Assessment (EIA) for the Ardmore Business Park Fast-Track Application prepared in accordance with the Fast-track Approvals Act 2024 (FTAA). The EIA was prepared by Property Economics for Knight Investments Ltd and is dated December 2005.

Context

Section 21(1)(a) of the FTAA states that “the criteria for accepting a referring application are that the project is an infrastructure or development project that would have significant regional or national benefits...”

We take “regional” to have the same definition as in Section 5(1) of the Local Government Act 2002 (LGA) as it is not explicitly defined in the FTAA. That is, “the region of a regional council and includes the district of a territorial authority, if the territorial authority is a unitary authority.” This definition is consistent with that in Section 2(1) of the Resource Management Act 1991 (RMA).

Section 22(2)(a)(iv) of the FTAA states that “the Minister may consider whether the project will deliver significant economic benefits.”

We take “significant” to have the same definition as in Section 5(1) of the LGA as it is not explicitly defined in the FTAA nor the RMA. That is, “the issue, proposal, decision, or other matter has a high degree of significance.” “Significance” is defined, in the same section of the LGA, as “the degree of importance of the issue, proposal, decision, or matter, as assessed by the local authority, in terms of its likely impact on, and likely consequences for, the current and future social, economic, environmental, or cultural well-being of the district or regions; any persons who are likely to be particularly affected by, or interested in, the issue, proposal, decision, or matter; the capacity of the local authority to perform its role, and the financial and other costs of doing so.”

In the context of economics, we must determine whether the project will deliver significant economic benefits regionally or nationally, considering the above definitions of “significant” and “regional”.

Economic benefits are not the same as economic impacts. This is a point well made in economic literature^{1,2,3} and is not an insignificant point given the wording of the legislation.

The FTAA specifically allows the Minister to consider whether the project will deliver significant economic *benefits* which is not the same as whether the project has significant economic *impacts*. While this may seem trivial, within the field of economics, it is important.

By way of example, the 2011 Canterbury earthquakes had a massive economic impact as many construction jobs flowed into the region and there were billions of dollars spent on rebuilding. However, it is not clear that the earthquakes had economic benefit to the region (or country) as these impacts (more jobs, more construction spending, etc.) do not consider costs.

Project Specifics

The project, as described in Sections 1 and 2 of the EIA, is a business park in Ardmore. It sits on approximately 511 hectares (ha) of land. It is anticipated that 193-276 ha are developable and would be built out with between 67 and 136 ha of floor space plus outdoor yards, landscaping, parking, etc. It is further anticipated that this business park would house light industry and service-type activities.

Review of the Section 5 of the EIA (Total Economic Activity)

Given that an EIA was prepared, it is impossible to say whether the project will deliver significant economic benefits on either a regional or national scale. This is for several reasons (some of which have been described briefly above).

- 1) EIAs use input-output modelling and (generally) estimate economic activity in terms of Gross Domestic Product (GDP) and employment. In this EIA, GDP is not directly reported, but construction and development costs (approximately \$2.7 billion) are implicitly counted as benefit. That is, economic activity is reported rather than economic benefit.
 - a. The EIA states that over 15 years, the project will result in present value \$1.68 billion of total value added. Value added is analogous to GDP (with the exception of taxes and subsidies). This is likely a mis-statement in the EIA as the number appears to refer to economic activity rather than value added.

¹ <https://doi.org/10.3138/cjpe.3.004>

² <https://doi.org/10.1080/14615517.2020.1767954>

³ <https://doi.org/10.1108/14777830710725867>

And if it were, in fact, value added, neither value added nor GDP is a measure of economic well-being and/or benefit.

- 2) The EIA essentially counts costs as economic benefit. That is, construction costs are costs. And while they are undoubtedly economic *activity*, it is unstated how much these expenses benefit the economy.
- 3) The EIA omits costs (benefits) such as environmental or social costs (benefits).
- 4) The EIA (and EIAs in general) treat all economic activity as *additional* economic activity, which ignores scarcity of labour and other resources. For instance, the contribution to jobs of this project implicitly assumes that none of those jobs would exist elsewhere in the economy if this project did not exist.

The EIA rightfully and consistently refers to “economic activity” and “economic impacts” rather than “economic benefits”. It is also careful in discussing jobs - never stating the jobs are additional jobs to the economy. However, the FTAA allows the Minister to consider whether the project will deliver significant economic benefits and makes no mention of economic activity or economic impacts. Importantly, only activity / impacts are quantified, and nowhere are benefits quantified.

Note: The numbers in Table 1 are very difficult to interrogate as there are missing years in the table (2032, 2033, 2034, 2037, 2038, 2039). This means it is impossible to verify the calculations for the totals or when calculating the present value.

Review of Section 6 of the EIA (Auckland Industrial Market Overview)

The EIA helpfully provides context of the industrial land/premises market in Auckland. Data from Colliers shows that, across Auckland, industrial vacancy rates are very low – and especially low in East Tāmaki, Māngere, Manukau, and Drury. This likely indicates a need for more industrial space availability in the southern part of the Auckland region.

The EIA, based on the above, then claims that “the Project has the potential to address a significant environment issue under s 22(2)(ix), being the scarcity of prime industrial land available to support people to provide for their own economic and social wellbeing.” It is unclear how economic and social wellbeing is an environmental issue under the FTAA. Nor how low industrial vacancy rates create a significant environmental issue.

The business park is estimated to accommodate 4,500 to 5,000 ongoing employees once fully developed. Based on numbers provided by the EIA for 2025, there are approximately 260,000 employees in industrial employment in Auckland. If employment were to remain at the same levels as 2025, employment at this business park would represent approximately 1.9% of Auckland’s industrial employment at the high-end estimate.

In our estimation, the range of likely ongoing employment provided by the EIA is quite tight (and optimistic). Without further specific information on the types of employment expected at the business park, we estimate the ongoing jobs to be in the range of 2,500 – 5,000 based on the floorspace per employee across several types of industrial sectors. This puts the share of Auckland’s industrial employment at this site at approximately 1% to 1.9%. If industrial employment grows at the same rate as total employment from now to 2040⁴ (which is unlikely given past trends), the share of Auckland industrial employment at this site would be approximately 0.8% to 1.6%. That is, given a range from quite pessimistic to quite optimistic, we estimate the employment at this centre (given the information received in the EIA) to be

⁴ https://www.knowledgeauckland.org.nz/media/gplj1kc1/agsv1_1_20240819_release_values.xlsx

between 0.8% and 1.9% of Auckland's total industrial sector employment. The question is then whether this is regionally significant and if its location at this specific site is an economic benefit. Neither of these are addressed in the EIA.

Review of Section 7 of the EIA (Other Non-Monetised Economic Benefits)

This section of the EIA identifies at least 10 non-monetised benefits of the project. Each of these is a potential benefit and, unlike GDP or jobs, are *benefits* rather than *activity*. However, no sense of scale is given to help determine if these benefits are likely to be significant under the FTAA.

Recommendations

The analysis provided is a standard EIA that clearly follows EIA best practices. However, EIAs do not allow for economic *benefits* to be assessed. A cost-benefit (or similar) approach should be employed as these measure costs and benefits rather than economic activity. Consequently, these methods can help to answer whether an activity is likely to have significant economic benefits. This approach is recommended by NZ Treasury⁵ as well as many other agencies both domestically and abroad.

Based on the information provided, we cannot say nor make a recommendation on whether the proposed business park is likely to have significant economic benefits or if it is otherwise nationally or regionally significant. There is simply not enough information in the EIA to demonstrate that the project is regionally significant.

The most compelling evidence that this project is regionally significant was not included in the EIA. According to the 2023 Housing and Business Development Capacity Assessment for the Auckland Region⁶ (HBA), there are approximately 4,500 ha of light industrial zoned land in Auckland. The addition of 276 additional ha of industrial land would increase the total supply of industrial land by approximately 6%. In a region with low vacancy rates in existing built-up industrial sites and relatively few truly vacant (i.e., non built-up) sites, this could be quite impactful. In fact, according to the HBA, this project would increase available light industrial land in the region by nearly 60%. This could potentially be relevant to Section 22(2)(a)(iii) of the FTAA, though Policy 1 of the National Policy Statement on Urban Development 2020 is relatively narrow on how business land is considered within well-functioning urban environments.

⁵ <https://www.treasury.govt.nz/publications/guide/guide-social-cost-benefit-analysis>

⁶ https://knowledgeauckland.org.nz/media/1crh3gnf/auckland-council-hba-oct-2023_final_print-part-2.pdf

Appendix 6 - Franklin Local Board Comments

Comments from the Franklin Local Board in respect to the Fast Track Referral Application - Ardmore Business Park, PRR00043673, by Knight Investments Limited under the Fast Track Approvals Act 2024.

20 February 2026

Comments:

The Franklin Local Board is generally supportive of a plan change to allow development of industrial, commercial and light industrial land as it creates employment for the wider area and there is currently a shortage of such land.

The situation of the proposed development surrounding the Ardmore Airport and near the proposed Mill Road upgrade, with its connections to SH1, is suitable for such use.

However, the Local Board has the following concerns about the proposed plan change area:

- The land proposed is extensive. There will be concerns about defensible boundaries.
- The land extends into land zoned as highly productive
- There are streams, bush areas, flood zones and flood prone areas within the proposed zone and there are concerns about environmental protection of these areas
- The Ardmore Primary School is situated within the proposed zone
- Given the land is generally flat, with flood prone areas, there are concerns about the cumulative effects on drains on surrounding farmland
- Reverse sensitivity issues
- Concerns about the lack of infrastructure in the wider area.

The Local Board would like to see careful mitigation for all our concerns. In particular, it would request consideration for:

- staged development to line up with the development of the Mill Road corridor to ensure good connections to SH1
- good public transport connections to the train stations
- connections to Papakura, Takaanini and Clevedon, including public transport and share pathways
- a comprehensive plan, agreed by Council appointed specialists, to deal with all the stormwater and environmental issues identified for the area.

Amanda Hopkins
Fast Track Approvals Lead – Wairoa Subdivision
Franklin Local Board

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

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).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

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

Project name	Ardmore Business Park
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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)	NZ Transport Agency		
*First name	Nicola		
*Last name	Foran		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application
<p>NZTA thanks the Minister for the opportunity to comment on the referral of this application in to the fast-track approvals process.</p> <p>NZTA has had limited pre-application engagement with the Applicant regarding the proposed Ardmore Business Park project ('the Project'). Daniel Nakhle of Knight Investments Limited met with NZTA representatives on the 5th of December 2025 to discuss the general details of the Project, including its interface with the Mill Road Road of National Significance (RoNS) corridor and the Notice of Requirement (NoR) lodged on 13 June 2025 for the Mill Road Stage 2 (Takaanini Section).</p> <p>The construction and operation of the Project will influence traffic volumes in the vicinity of Mill Road, which will have potential effects on the Mill Road RoNS. NZTA would need to review the substantive application to fully understand the potential adverse effects the Project may have on the Mill Road RoNS, as well as any mitigation measures required to address those effects. NZTA recommends the following matters are specifically addressed in any substantive application for the Project.</p>

Scope of proposal and traffic generation

The Integrated Transport Assessment (ITA) excludes future traffic generated by the adjacent Sunfield development. As such, there is a significant risk of underestimating the cumulative pressure on the Mill Road RoNS. The MSM outputs and the Saturn models require updating. NZTA is more than willing to work with the applicant to provide the relevant data to inform an updated ITA to accompany any subsequent substantive application for the Project.

As part of the Project, several localised upgrades and intersection treatments are proposed. However, detailed capacity analysis and design have been deferred to a future ITA for the substantive application. This poses a risk that the conceptual upgrades may not provide the sufficient operational capacity to maintain reliable network performance for the Mill Road RoNS, or that the Applicant's expectations and assumptions around access may not be met.

Any substantive application should provide the necessary level of detail around factors including (but not limited to) trip distribution analysis, origin-destination modelling, the influence of imminent strategic updates on traffic assumptions and future network performance, dependence on future upgrades and/or services for mitigation of traffic effects. The Applicant should engage with NZTA and Auckland Transport to undertake a comprehensive assessment of potential transportation effects in a subsequent ITA. A robust assessment of actual and potential effects generated during the construction of the Project—noting that this is proposed to occur over a 15-year period—should also form part of any substantive application, along with proposed measures to manage effects on the adjacent road network during works and the management of noise and reverse sensitivity effects from the operation of the Mill Road RoNS.

Stormwater management

The scale and nature of the land use change proposed by the Applicant represents a significant deviation from the predominantly rural existing environment, much of which is identified as subject to flood hazards. NZTA has been engaging with various parties, including Auckland Transport, Auckland Council Healthy Waters, and the Sunfield developers to understand potential cumulative impacts and opportunities to integrate stormwater management solutions.

Any substantive application should ensure that interactions between planned development in the area are understood, stormwater effects of the Project—both in isolation and alongside other projects—are assessed adequately, and proposed solutions consider the collective long-term management of stormwater regardless of construction timeframes for planned infrastructure and development.

Conclusion

NZTA has no concerns with this project, Ardmore Business Park, being referred to the fast-track approvals process.

NZTA would welcome the opportunity to discuss the proposal further with the Applicant and provide comments on any substantive application in due course.

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.

Managers signoff

A handwritten signature in black ink, appearing to be the name 'Rory Power', written in a cursive style.

Rory Power, Team Lead – Environmental Planning

Date: 06/03/26