

Technical Memo

To:	Emma Howie	From:	Insight Economics
Date:	Monday, 4 August 2025	Page:	4 (including this page)
Subject:	Expert Response Memo for Milldale Stages 4C and 10-13 Fast-track Application		

Emma,

Thank you for requesting an Expert Response Memo to address comments from invited parties on the Milldale Fast-track application. This memo sets out our responses to those comments.

CONTEXT

Fulton Hogan Land Development Limited (**FHLD**) is seeking resource consent for Milldale Stages 4C and 10-13 under the Fast-track Approvals Act 2024 (**FTAA**). Following a successful application to be listed under Schedule 2 of the FTAA, FHLD lodged a substantive application to be assessed by an Expert Consenting Panel on 28 March 2025. Insight Economics was engaged to prepare an economic assessment of the proposal to accompany this submission.¹

Section 53(2) of the FTAA enables the Expert Consenting Panel to invite written comments on the application from specified persons and groups.

This memorandum has been prepared in response to the technical specialist memorandums issued by Auckland Council as part of their assessment of the Milldale Fast-track Application. It specifically addresses the matters raised by Council and provides clarification, additional assessment, and updates where required.

In particular, this memo provides response to the following:

- Memorandum of Planning Matters for Auckland Council (29 July 2025)
- Annexure 1: Economic Assessment – Susan Fairgray-Mclean (14 July 2025)

Since the initial lodgement of the Substantive Application with the Environmental Protection Authority (EPA), there has been ongoing engagement between the Applicant's expert team and Auckland Council specialists through meetings, design workshops, and site discussions.

SCOPE OF THIS MEMO

This memo addresses the Section 67 Information Gap identified in Annexure 1, specifically:

- *“Clarification sought if community / social infrastructure uses are proposed within the Centre.”*

In addition, we respond to a further matter raised in Section 5.4 of Annexure 1, titled *“Applicant Calculation of Commercial Space Required Across the Development”*, which comments on our approach to estimating centre provision needs across the wider Milldale development area.

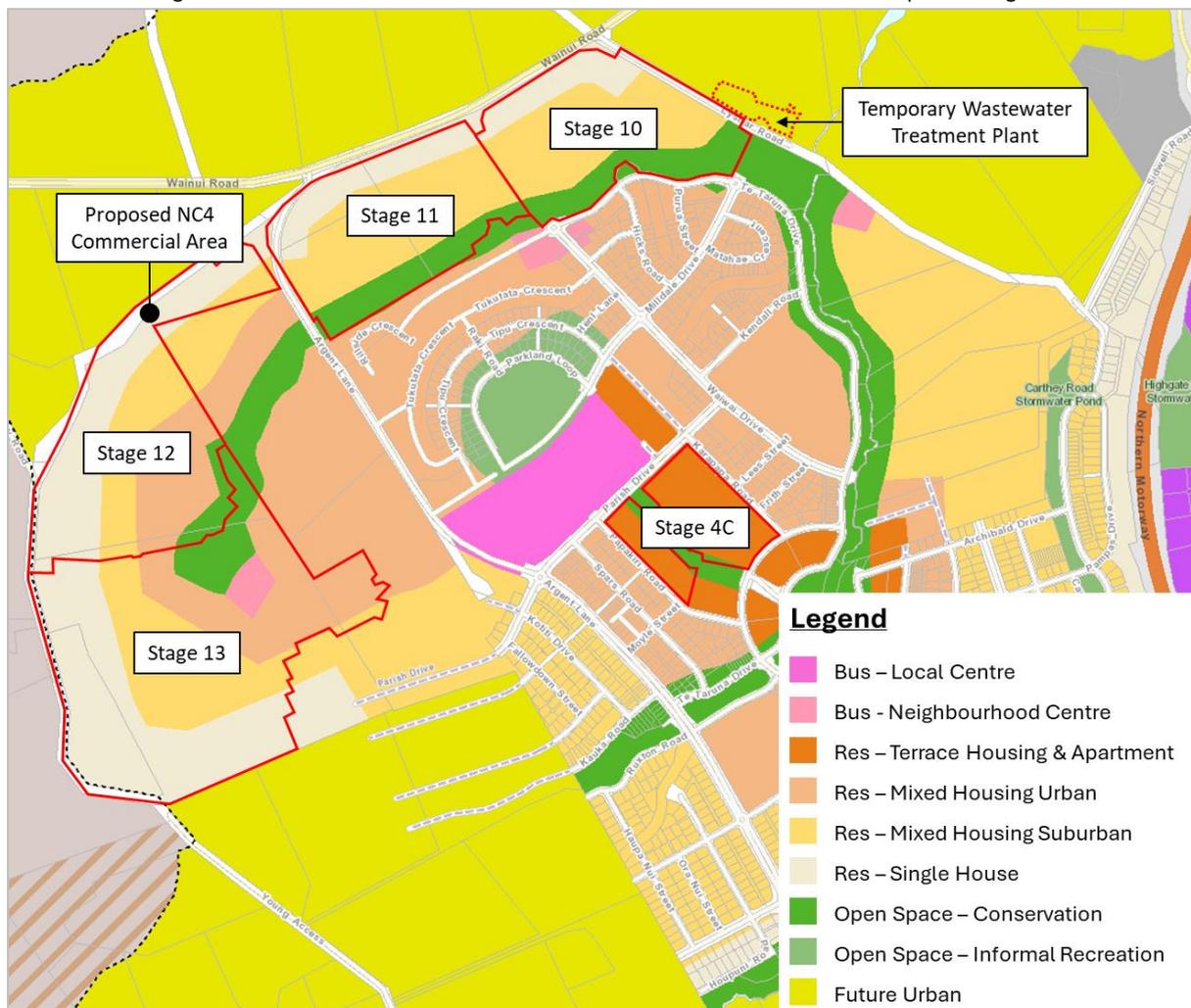
¹ Insight Economics Ltd. *Economic Assessment of Milldale Stages 4C and 10–13 Fast-track Application*, prepared for Fulton Hogan Land Development Limited, 27 March 2025.

Before addressing these matters, we briefly summarise the proposed changes to Neighbourhood Centre 4 (NC4) for context.

PROPOSED CHANGES TO NC4

The centres network within Milldale (also known as the **Wainui Precinct**) comprises a large Local Centre (LC), plus a series of smaller Neighbourhood Centres (including the proposed NC4). Under the proposal, NC4 would be relocated to the intersection of the Cemetery Road Link within Stage 12 and reduced in size to approximately 1,289 m² of gross land area. This replaces its previously zoned location in Stage 13, which had a gross land area of approximately 7,520 m². Figure 1 below provides additional context.

Figure 1: Location of Relocated NC4 Commercial Area within Fast-track Development Stages



RESPONSE TO SECTION 67 INFORMATION GAP

Annexure 1 identifies a Section 67 Information Gap, specifically requesting clarification on whether any community or social infrastructure uses (e.g., education, health, or civic functions) are proposed within NC4. As specified in the AEE,² NC4 could accommodate approximately 855 m² of commercial

² Wood & Partners Consultants Ltd and Barker & Associates Ltd. *Milldale Stages 10–13: Substantive Fast-track Application – Volume 2: Assessment of Environmental Effects*, Final Revision 1, 28 March 2025.

floorspace. This is consistent with the site's small land area and the intended role of NC4 as a minor convenience hub.

The NCZ enables a range of activities and it would be feasible for smaller-scale community services to establish within NC4 - for example, a general practitioner or dentist could potentially occupy a unit above ground-floor retail, provided the activity mix remains consistent with the zone's purpose. However, we acknowledge that given the size of the super lot it would likely support small-scale commercial activities only, such as a dairy, café, or takeaway outlet, serving the day-to-day convenience needs of nearby residents.

This reflects the centre's position in the Milldale commercial hierarchy, where the significant community and social functions are expected to be concentrated in the much larger LC, which comprises approximately 7.25 hectares of zoned land. The LC is centrally located within the Wainui Precinct and intended to serve as the main centre of gravity for the Milldale development, accommodating a broad range of activities and tenants, including those that fulfil a community and social role.

This approach aligns with how centre networks are typically structured in other urban environments, where neighbourhood centres are generally limited to convenience-based retail and service activities, while larger centres accommodate more space-intensive functions such as health clinics, early childhood centres, and civic or community facilities. These functions tend to rely on greater floorspace, higher accessibility, and larger catchments than smaller neighbourhood centres are designed to support. The planned distribution of roles across the Milldale centre hierarchy reflects these typical planning principles.

RESPONSE TO SECTION 5.4 - COMMERCIAL CATCHMENT SIZE AND CENTRE PROVISION

Section 5.4 of Annexure 1 notes that our economic assessment benchmarks centre provision against a base assumption of 4,500 households, reflecting the anticipated yield within the Wainui Precinct. The memo also notes that the broader development area, which includes Milldale North and Wainui West, could yield more than 7,000 households at full build-out.

We acknowledge this broader context and provide the following clarifications:

- The 4,500-household figure used in our benchmarking reflects the area subject to the current Fast-track application, being the final remaining stages of the development.
- The wider development area is expected to accommodate its own centres or commercial nodes. For instance, initial plans for Milldale North include a proposed neighbourhood centre (NC5) with a land area of 0.8 hectares, along with potential provision for smaller commercial nodes at key intersections. While not yet live zoned, these elements reflect the developer's intentions and early spatial planning work for the broader development area.
- As such, commercial demand from the wider development area is not expected to be met solely by the centres within the Wainui Precinct.

That said, even if all 7,000 households were assumed to rely only on the centres within the Wainui Precinct, the total zoned centre area would still exceed typical regional benchmarks. In short, we

remain confident that the proposed centre network, including the revised NC4, provides an appropriate scale of provision to meet future demand.

RESPONSE TO SUGGESTED CONSENT CONDITIONS

Council's economic specialist does not propose any specific conditions. As such, no further economic-related conditions are recommended or responded to in this memo.

I trust that this memo provides all the information that you need for now, but please let me know if you need anything further.

Sincerely,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a cursive-style name.

Fraser Colegrave
Managing Director