



MILL ROAD STAGE 1 – FAST TRACK APPROVALS ACT (FTAA) APPLICATION

PART A – INTRODUCTION AND FTAA REQUIREMENTS

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ACRONYMS AND ABBREVIATIONS

Acronym / abbreviation	Meaning
2014 design	Concept design prepared to support the Notices of Requirement lodged in 2014 for Designation 6786.
ACDP:M	Auckland District Plan – Operative Manukau Section 2002
AC Parks	Auckland Council Parks and Community Facilities
AEE	Assessment of Environmental Effects
AEP	Annual Exceedance Probability
AT	Auckland Transport
AUP	Auckland Unitary Plan
BCM	Biodiversity Compensation Model
BPO	Best Practicable Option
CMA	Coastal Marina Area
CoP	Code of Practice
Corridor	The full Mill Road Corridor, ultimately planned to be completed as a 21.5km four-lane corridor between Manukau and Drury
CSAs	Construction Support Areas
CVA	Cultural Values Assessment
DOC	Department of Conservation
DSI	Detailed Site Investigation
DWP	Delivery Works Plan
ECR	Environmental Compensation Ratio
ESCP	Erosion Sediment Control Plan
FAQs	Frequently Asked Questions
FDS	Future Development Strategy
FFR	Freshwater Fisheries Regulations 1983
Freshwater Ecology Assessment	Assessment of Freshwater Ecology Effects
FTAA	Fast Track Approvals Act 2024
GD01	Guideline Document 01 ‘Stormwater Management Devices in the Auckland Region’
GD05	Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region – Guideline Document 2016/005
GDP	Gross Domestic Product
GPS	Government Policy Statement on Land Transport 2024–34
HAIL	Hazardous Activities and Industries List
HCV	Heavy Commercial Vehicle
HNZPT Act	Heritage New Zealand Pouhere Taonga Act 2014
HNZPT	Heritage New Zealand Pouhere Taonga
HPMV	High Productivity Motor Vehicle
ICOMOS	International Council on Monuments and Sites
MCA	Multi-Criteria Assessment
MfE	Ministry for the Environment

Acronym / abbreviation	Meaning
Minister	Minister for Infrastructure
MoU	Memorandum of Understanding
MVAs	Māori Values Assessments
NES	National Environmental Standards
NES-AQ	National Environmental Standard for Air Quality 2004
NES-CS	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-ET	National Environmental Standards for Electricity Transmission Activities 2009
NES-FW	National Environmental Standards on Freshwater
NLTP	National Land Transport Programme
NoR	Notice of Requirement
NPS	National Policy Statement
NPS-FM	National Policy Statement on Freshwater Management
NPS-HPL	National Policy Statement on Highly Productive Land
NPS-I	National Policy Statement on Infrastructure
NPS-IB	National Policy Statement on Indigenous Biodiversity
NPS-UD	National Policy Statement on Urban Development
NPV	Net Present Value
NUOs	Network Utility Operators
NZCPS	New Zealand Coastal Policy Statement
NZTA	NZ Transport Agency Waka Kotahi
NZUP	New Zealand Upgrade Programme
PAUP	Proposed Auckland Unitary Plan
PPFs	Protected premises and facilities
Project	Stage 1 of the Mill Road Project
PWA	Public Works Act 1981
RMA	Resource Management Act 1991
RoNS	Road of National Significance
RPS	Regional Policy Statement
RUB	Rural-Urban Boundary
S&E Manager	Stakeholder and Engagement Manager
SAR	Substantive Application Report (this report)
SCPA	Sediment Control Protection Area
SEA	Significant Ecological Area
SH1	State Highway 1
SIA	Social Impact Assessment
Significant Tree	As defined in Table 1 of the Old Growth Tree Management Plan
SNAs	Significant natural areas
SMAF-1	Stormwater Management Area – Flow 1
SQP	Suitably Qualified Person(s)
Te Tupu Ngātahi	Te Tupu Ngātahi Supporting Growth Programme

Acronym / abbreviation	Meaning
Terrestrial Ecology Assessment	Assessment of Terrestrial Ecology Effects
TP10	Technical Publication 10 'Stormwater Treatment Devices Design Guideline Manual'
TPEC	Tōtara Park Equestrian Centre
TSS	Total Suspended Solid
VKT	Vehicle Kilometres travelled
Wildlife Act	Wildlife Act 1953
WEBs	Wider Economic Benefits
ZOI	Zone of Influence

MANAGEMENT PLAN ACRONYMS

Acronym	Management Plan
CMP	Cultural Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CSMP	Contaminated Soil Management Plan
CTMP	Construction Traffic Management Plan
DMP	Dust Management Plan
FMP	Freshwater Management Plan
HHMP	Historic Heritage Management Plan
LMP	Lizard Management Plan
NFCRP	Native Fish Capture and Relocation Plan
OGTMP	Old Growth Tree Management Plan
TMP	Terrestrial Management Plan
ULDMP	Urban and Landscape Design Management Plan

1. INTRODUCTION

This Substantive Application Report (**SAR**) has been prepared on behalf of the NZ Transport Agency Waka Kotahi (**NZTA**) in support of a substantive application under the Fast-track Approvals Act 2024 (**FTAA**), for all necessary approvals to construct, operate and maintain Stage 1 of the Mill Road Corridor ('**Stage 1**' or '**the Project**'). The extent of Stage 1 is outlined in Part B of this SAR.

The full extent of the Mill Road Corridor between Manukau and Drury is included as a listed project in Schedule 2 of the FTAA. The Minister for Infrastructure (**Minister**) issued the decision for referral of Stage 1 under section 21 of the FTAA (ref. FTAA-2506–1079) on 14 November 2025.

The decision specifies the following requirements:

- a) **Timeframe for lodgement of substantive application (section 28(3)(d)(ii)):** The due date is 14 November 2027.
- b) **Specified matters for accepted referral application:**
 - i) NZTA is specified as the person authorised to lodge a substantive application for the Project under section 27(2).
 - ii) The following direction applies to the Project under section 16(2)(c) and is specified under s27(3)(a) of the Act that a panel must comply with the applicable consultation processes and procedural arrangements when assessing any substantive application for the project, including:
 - A. complying with the consultation process set out in the Ngā Mana Whenua o Tāmaki Makaurau conservation relationship agreement when engaging with Ngāi Tai ki Tāmaki on the Wildlife Act 1953 approvals being sought (unless a modified arrangement can be agreed); and
 - B. considering applying the same process to consultation with Ngāti Tamaoho and Te Ākitai Waiohū on such matters.

All matters required to be addressed in accordance with the FTAA for a referred project are contained in the substantive application documents.

1.1 Statement of Experience – Chris Scafton

My full name is Christopher James Scafton. I am a Technical Fellow – Planning at Beca Limited and I am a Fellow of the New Zealand Planning Institute.

I hold the qualifications of a Bachelor of Arts in Geography from the University of Hull, and a Postgraduate Certificate and a Masters in Town Planning from the South Bank University, London. I am also an accredited Commissioner under the Ministry for the Environment and Local Government New Zealand "Making Good Decisions" 2006 Programme.

I am currently the Planning Lead for the Mill Road Stage 1 Project and have been working on the Project since October 2024. I am the lead author of this Substantive Application. I have over 25 years' experience in town planning. I have worked in both the public and the private sector and have held leadership roles on a number of infrastructure projects. Projects related to the Mill Road Corridor include:

- Planning Lead, Mill Road Stage 1 Project (January 2025 – present);
- Planning Lead, Mill Road Stage Takaanini Section Notice of Requirement (June 2025);
- Planning Lead, Mill Road Investment Case (2024);
- Planning Manager, Te Tupu Ngātahi Supporting Growth (March 2018 – present);
- Planning Lead, Mill Road, New Zealand Upgrade Programme (2020 – 2021); and
- Planning Lead, Strategic South Detailed Business Case (2018 – 2019).

1.2 Statement of Experience – Himani Bhatia-Mitha

My full name is Himani Bhatia-Mitha. I am an Associate – Planning at Beca Limited and I am a full member of the New Zealand Planning Institute. I hold the qualifications of a Bachelor of Urban Planning from the University of Auckland.

I am currently the AEE Lead for the Mill Road Stage 1 Project and have been working on the Project since January 2025. I am an author of this Substantive Application. I have over 9 years' experience in town planning. I have worked on a number of infrastructure projects. Projects related to the Mill Road Corridor include:

- Mill Road Stage 1 Project (January 2025 – present);
- Mill Road Stage Takaanini Section Notice of Requirement (June 2025);
- Te Tupu Ngātahi Supporting Growth (March 2018 – present);
- Mill Road, New Zealand Upgrade Programme (2020 – 2021); and
- Strategic South Detailed Business Case (2018 – 2019).

1.3 Statement of Experience – Adriene Grafia

My full name is Adriene Maire Sue Loon Grafia. I am a Senior Planner at Beca Limited and I am an intermediate member of the New Zealand Planning Institute. I hold the qualifications of a Bachelor of Urban Planning from the University of Auckland. I am an author of this Substantive Application.

I have over 9 years' experience in town planning. I have worked on a number of infrastructure projects. Projects related to the Mill Road Corridor include:

- Mill Road Stage 1 Project (March 2025 – present);
- Te Tupu Ngātahi Supporting Growth (November 2021 – December 2024); and
- Pūhoi to Warkworth Motorway Project, Northern Express Group (NX2) Construction Joint Venture and Design Joint Venture (September 2021 – June 2022).

1.4 Code of Conduct

Although this matter is not before the Environment Court, we confirm that we have read the Code of Conduct for Expert Witnesses as contained in the Environment Court Practice Note 2023 and agree to comply with that Code. Our qualifications as an expert are set out above. We confirm that the matters addressed in this application are within our area of expertise, except where we state that we have relied on information provided by another person or expert. We have not omitted to consider material facts known to us that might alter or detract from the opinions expressed.

2. THE FTAA APPLICATION

2.1 Approvals sought

NZTA seeks the following approvals for the Project under the FTAA:

- a) An alteration to existing Designation 6786 (previously Designation 1836) in the Auckland Unitary Plan (**AUP**) for which a notice of requirement would otherwise be lodged under the Resource Management Act 1991 (**RMA**);
- b) A waiver of the outline plan requirements that would otherwise be sought under section 176A of the RMA;¹

¹ A panel may waive the requirement for an outline plan required by section 176A of the RMA under Schedule 5, clause 29(a) of the FTAA.

- c) Resource consents that would otherwise be applied for under the RMA², pursuant to sections 9(2), 9(3), 13, 14 and 15;
- a) A wildlife approval for an act or omission that would otherwise be an offence under the Wildlife Act 1953 (**Wildlife Act**); and
- d) An approval or dispensation that would otherwise be applied for under regulation 42 and 43 of the Freshwater Fisheries Regulations 1983³ (**FFR**) in respect of a complex freshwater fisheries activity.

2.2 Authorised person

NZTA is the sole authorised person for this (listed and referred) Project under section 42(1) of the FTAA and the proposed holder of all approvals sought through this application. The referral decision specifies NZTA as the person authorised to lodge a substantive application for the project under section 27(2).

2.3 Project is an eligible activity

The Project is not excluded by the criteria under section 5 of the FTAA. A table setting out the analysis required for section 5 is at **Appendix A1** confirming that the Project is an eligible activity and meets the requirement of section 46(2)(c).

2.4 Information requirements

This application has been prepared in accordance with section 43 and section 44 of the FTAA, together with the relevant clauses under Schedules 5, 7, and 9. A copy of the checklist as it relates to section 43 and 44 is included at **Appendix A1**.

2.5 Section 30 requirements

NZTA received notification from Auckland Council on 20 August 2026 that the substantive application satisfies section 30(3)(b) of the FTAA that there are no existing resource consents to which section 124C(1)(c) or 165ZI of the RMA would apply.

2.6 Payment of any fee, charge or levy

NZTA has paid the fee and levy for a substantive application as prescribed under the Fast-track Approvals (Cost Recovery) Regulations 2025, prior to lodging the substantive application, as required by section 43(1)(j).

² A complete list of the consents required under the AUP; the National Environmental Standards for Freshwater; and National Environmental Standards for Assessing and Managing Contaminant in Soil to Protect Human Health is set out in Part D, Section 2 of this application.

³ A full outline of the requirements for approvals relating to complex freshwater activities are set out in Schedule 9.

APPENDIX A1 FTAA REQUIREMENTS

Requirements relevant to the entire application – sections 42 and 43

The requirements relevant to the substantive application under sections 42 and 43 are outlined in **Table A** below.

Table A: Requirements relevant to the substantive applications

Subclause	Information requirement	Comment / Section of substantive application
Section 42 Authorised person may lodge substantive application for approvals		
42(1)(a)	An authorised person for a listed project or a referred project may lodge with the EPA one substantive application for the project.	NZTA is the 'authorised person' seeking all necessary approvals for the Project under s 42(4) of the FTAA and is specified in the referral decision (ref: FTAA-2506–1079) as the persons authorised to lodge a substantive application for the project under section 27(2).
42(1)(b)	An authorised person for a listed project or a referred project may lodge with the EPA — in the case of a referred project whose referral application was accepted under section 21(1)(a), one substantive application for each stage of the project.	N/A – the Project is not a staged project.
42(2)(a)	A substantive application must comply with section 43.	The application complies with section 43 – refer to commentary below.
42(2)(b)	A substantive application must, if there is more than one authorised person for the project, be lodged jointly by every authorised person who is the proposed holder of an approval.	N/A – NZTA is the only authorised person in relation to the application.
42(3)(a)	For each of the approvals sought under subsection (4), the applicant must be eligible to apply for any corresponding approval under a specified Act.	The applicant is eligible to apply for all approvals sought under the RMA, Wildlife Act and FFR. NZTA is the requiring authority for the designation it is seeking to alter.
42(3)(b)	For each of the approvals sought under subsection (4), if the substantive application is lodged by more than 1 authorised person, the authorised person who is proposed to hold the approval sought under subsection (4) must be a person who would be eligible to apply for any corresponding approval under a specified Act.	N/A – NZTA is the only authorised person in relation to the application.
42(5)(a)	A substantive application that seeks an approval described in subsection (4)(a) may seek that approval for an activity that is a prohibited activity under the RMA.	N/A – no prohibited activities are being applied for.
42(5)(b)	A substantive application that seeks an approval described in subsection (4)(a) must, if section 30(6) applies, be lodged within the time frame specified in that section.	Auckland Council provided written notice on 20 August 2026 that there are no existing resource consents within the Project area to which sections 124C(1)(c) or 165ZI of the RMA would apply (refer to Appendix A2 of the substantive application). In accordance with the requirements of section 30(6) of the FTAA, the substantive application has been lodged within 3 months of the date of this notice.
Section 43 Requirements for substantive application		
43(1)(a)	The application must be lodged in the form and manner approved by the EPA.	The prescribed form for the substantive application has been completed online.
43(1)(b)(i) and (ii)	Explain how the project to which the application relates is consistent with the purpose of this Act.	The decision on the referral application confirmed that the Project meets the purpose of the Act, being satisfied that the project is an infrastructure or development project that would have significant regional or national. The benefits of the Project are discussed in detail in Section 9 of Part B of the SAR.
43(1)(b)(ii)(A)	For a project referred under section 21(1)(a), explain how both the stage to which the application relates and the whole project are consistent with the purpose of this Act.	N/A
43(1)(b)(ii)(B)	The application must contain information relating to the likelihood that any later stages of the project will be completed.	N/A

Subclause	Information requirement	Comment / Section of substantive application
43(1)(c)	The application must demonstrate that the project does not involve any ineligible activities.	The substantive application does not involve any ineligible activities, refer to the plans and schedules in Appendix B1 and the plans in Part H. The activity does not occur: (a) On identified Māori land (s 5(1)(a)). (b) In a customary marine title area (s 5(1)(b)). (c) In a protected customary rights area (s 5(1)(c)). (d) On Māori customary land or land set apart as a Māori reservation as defined in s 4 of Te Ture Whenua Māori Act 1993 (s 5(1)(d)). (e) Within an aquaculture settlement area (s 5(1)(e)). (f) On land that is listed in Schedule 4 of the FTAA (s 5(1)(h)). (g) On a national reserve held under the Reserves Act 1977 (ss 5(1)(i)). (h) On a reserve held under the Reserves Act 1977 that is vested or managed by someone other than the Crown or a local authority (s5(1)(j) and (k)) The activity: (a) Does not require an access arrangement under s 61 or 61B of the Crown Minerals Act 1991 (s 5(1)(f)). (b) Is not prevented under s 165J, 165M, 165Q, 165ZC, or 165ZDB of the Resource Management Act 1991 (s 5(1)(g)). (c) Is not a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (s 5(1)(l)(i)). (d) Does not involve a type of discharge described by s 15B of the RMA that is prohibited (s 5(1)(l)(ii)). (e) Is not prohibited by s 15C of the Resource Management Act 1991 (s 5(1)(l)(iii)). (f) Does not involve a decommissioning-related activity (s 5(1)(m)). (g) Is not an offshore renewable energy project (s 5(1)(n)).
43(1)(d)	The application must, if lodged by more than 1 authorised person, state the proposed approval to be held by each person.	The substantive application is not lodged by more than one authorised person.
43(1)(e)(i)	The application must comply with any information requirements specified by the Minister under section 27(3)(b)(ii).	The referral decision does not specify any information required to be included with the application.
43(1)(e) (ii)	The application must comply with the requirements listed in subsection (3) that apply to the approvals sought.	The application complies with the relevant requirements for resource consents, alterations to an existing designation, wildlife approvals and fisheries approvals.
43(1)(f)	The application must, if the authorised person has applied under section 39 for a determination under section 23 or 24, include a copy of the notice under section 39(4).	N/A
43(1)(g)	The application must, if the application seeks an approval for an activity that is the subject of a determination under section 23, set out the steps taken to secure the agreement referred to in section 5(1)(a).	N/A

Subclause	Information requirement	Comment / Section of substantive application
43(1)(h)	The application must state whether the application relates to a priority project and, if so, include confirmation that, to the best of the applicant's knowledge, there are no competing applications	N/A
43(1)(i)	The application must be made by the deadline specified in the notice under section 28(3)(d).	The referral decision confirms that the deadline for lodging the application, under section 28(3)(d)(ii), is two years after the notice is given to the applicant. The due date is 14 November 2027.
43(1)(j)	The applicant must not lodge a substantive application unless any fee, charge, or levy payable under regulations in respect of the application is paid.	The applicant has paid all necessary lodgement fee in respect of the substantive application.
43(2)	If a substantive application is for a listed project, it must also contain the information required by section 13(4) (other than section 13(4)(b), (f)(ii) and (iii), and (g)).	The Project is not a listed project (although the wider Mill Road Project is listed, that listing is not relied on for this application for Stage 1).
43(3)(a)	The requirements referred to in subsection (1)(e)(ii) are those set out in, for an approval described in section 42(4)(a) (resource consent), clauses 5 to 9 of Schedule 5.	These requirements are addressed in the SAR.
43(3)(d)	The requirements referred to in subsection (1)(e)(ii) are those set out in, for an approval described in section 42(4)(d) (designation), clauses 9 and 12 of Schedule 5.	These requirements are addressed in the SAR.
43(3)(h)	The requirements referred to in subsection (1)(e)(ii) are those set out in, for an approval described in section 42(4)(h) (wildlife approval), clause 2 of Schedule 7.	Refer to Part E
43(3)(j)	The requirements referred to in subsection (1)(e)(ii) are those set out in,— for an approval described in section 42(4)(j) (complex freshwater fisheries activity approval), clause 3 of Schedule 9.	Refer to Part F

APPENDIX A2 AUCKLAND COUNCIL SECTION 30 RESPONSE

APPENDIX A3 AUCKLAND TRANSPORT LETTER OF SUPPORT