

To: Daniel Minhinnick – Milldale Expert Panel Chair

From: Euan Williams and Rachel Morgan – Wood and Partners Consultants Limited and Barker & Associates Limited

Date: 25 July 2025

Re: Milldale Stages 4C, 10 – 13 [FTAA-2503-1038] – Response to Item [2] as part of Minute 3

This memorandum has been prepared in response to a request received from the Milldale Expert Panel detailed in Minute 3, dated 15 July 2025. The Panel has requested further information on the following three items:

- (1) Provide examples of the granted 'blanket' land use consents from the earlier stages of Milldale.
- (2) Submit an update on discussions with Watercare in relation to acceptance of waste from the proposed temporary wastewater treatment plant.
- (3) Provide additional detail regarding the rationale for the proposed density of development within Stage 4C. This should include consideration of efficiency (including efficient use of resources), saleability, and the relevant AUP objectives and policies (within the Regional Policy Statement and the Terrace Housing and Apartment Buildings zone). Tied to this, clarification is also sought as to the yield assumption for Stage 4C within the economics report.

The following list of attachments should be read in conjunction with the following response:

- Attachment 1A, 1B, 1C – Milldale Stage 8, 7 and 9 Approved Resource Consents;
- Attachment 2 – Watercare Correspondence;
- Attachment 3 - Memorandum of Counsel;
- Attachment 4 - Milldale Stage 4C – Urban Design Response; and
- Attachment 5 – Insight Economics Technical Memo.

(a) Item 2(a) Examples of Blanket Consents

Blanket consents have been sought and approved by Auckland Council on a number of Milldale subdivision stages since 2018, with the focus on ensuring lots can be developed for housing efficiently following subdivision. Blanket land use consents are an enabling tool to address:

- split zoned lots or zoning abnormalities;
- erroneous or repetitive Auckland Unitary Plan (AUP) consenting matters; or
- site-wide outcomes that may not meet an AUP planning standard(s).

An example of an erroneous planning standard is in the Wainui Precinct whereby a restricted discretionary consent is required for any subdivision, building and development (refer to I544.4.1 (A2)). In practice, this would require every dwelling on every individual lot to obtain a land use consent. To address this unfortunate wording and to alleviate pressure on Council, blanket land use consents have been obtained on every subdivision stage in Milldale to permit new development and buildings in accordance with I544.4.1 (A2) of the Auckland Unitary Plan.

In other instances, blanket consents have been utilised to address sites with split zoning. Instead of future development being subject to the requirements of multiple zones, this has been resolved through obtaining blanket land use consents that enable assessment of a development against development standards of the predominant zone.

Blanket land use consents do not change the zone of the site. Rather consent is sought to infringe specific AUP standards and apply development standards of a particular zone to future dwellings or development. In doing so, it provides certainty to future build partners and owners by addressing land use consent matters up front as part of the subdivision process, and to safeguard against potential consenting difficulties for future developers of the affected lots. It also avoids repetitive and unnecessary consents that increase Council's workload and cause unnecessary costs to builders/owners with no corresponding environmental benefit.

Another application of blanket land use consents has been the approval of a Milldale-specific driveway crossing design that does not align with the AUP standard. Based on the width of the site and road classification, this blanket consent enables build partners to construct vehicle crossings to the consented designs or to comply with the AUP standard. This is another example of a process that avoids repetitive and unnecessary consents and unnecessary costs to builders/owners.

The following approved resource consents (and associated approved scheme plans) for Stages 8, 7 and 9 have been provided for the Panel in **Attachment 1** and include blanket consent approvals:

- **Attachment 1A** - Milldale Stage 8 – BUN60430899; and
- **Attachment 1B** - Milldale Stage 7 – BUN60425347;
- **Attachment 1C** - Milldale Stage 9 – BUN60427756.

Specifically in relation to Stage 8, the blanket consents are detailed in **Table 1** below:

Table 1: Stage 8 Reasons for Consent and Associated Purpose.

Stage 8 Blanket Land Use Consent	Purpose
Building and development in accordance with Rule 1544.10.1 Wainui Precinct Plan 1.	To ensure dwellings can be constructed on completed lots without needing to obtain additional land use consent.
Split zone lots to exclusively apply the predominant zone.	To ensure the predominant zone's development standards apply to a split zone site.
Apply the height in relation to boundary standard to new development from the top of the proposed retaining walls and not the approved ground level at the time of subdivision.	For legal and maintenance reasons, the common boundary is located at the bottom of retaining walls. To ensure the up-hill dwelling is not unduly impacted, the AUP recession plane standard is taken from the top of the wall.

Vehicle crossings being constructed within 10m of a T-intersection.	To enable construction of a vehicle crossing to those lots on the opposite side of a T-intersection.
Vehicle crossings that exceed the maximum width requirement of 3.5m, with vehicle crossings up to 4.8m wide proposed.	To enable build partners the option to construct a Milldale-specific driveway crossing design based on width of the site and road classification.
Driveway gradients that exceed the maximum gradients for safety platforms of 1 in 20 for the first 4m length.	To enable access to building platforms to have a maximum 12.5% grade where the driveway will slope from the road up to the garage or parking area.
Construct new residential buildings within the Business – Neighbourhood Centre (NC) zone. Construction of dwellings that infringe NC zone core standards including residential activities on ground floor and infringements to side and rear yard standards (1m sought). Note: The approach consented in Stage 8 is consistent with that applied to the Stage 12 proposed NC zone for the Fast Track application.	To enable the construction of residential dwellings on residual NC zoned land and to infringe associated NC zone core standards so that dwellings can be constructed without further consent required.
Construct new residential buildings within the Open Space zone on Lot 1280 and super lot 5040, an activity not provided for.	To enable the construction of residential dwellings on Open Space zoned land that is no longer wanted by Auckland Council and to infringe associated open space zone standards

Blanket land use consents for the respective sites involve the application of development standards for the predominant residential zone associated with each affected site. As detailed in the Stage 8 decision, where appropriate, conditions are imposed on the land use consent, and where appropriate, imposed as a consent notice on individual records of title. Future build partners have a choice to utilise the blanket land use consent for their developments, or in some instances, seek require further land use consent(s) if the proposed development does not fall within the scope of the blanket resource consent approval. For instance, in Stage 8 blanket consent was approved for any development on Lots 1200 (residual NC zoned lot) to be designed in accordance with the activity table and standards of the Residential - Mixed Housing Suburban (MHS) Zone in H4.6 of the AUP. It is therefore expected that a residential dwelling be designed and constructed in accordance with the permitted standards in H4.6 rather than the NC zone provisions. If a build partner wishes to infringe a MHS standard(s), they are required to seek resource consent to infringe the respective MHS standard(s). In this situation, the blanket land use consent would be utilised as a baseline for consideration.

(b) Item 2(b) Watercare Correspondence

Further correspondence from Watercare is included at **Attachment 2** to this memo.

The letter clarifies that Watercare agrees in principle (subject to conditions) to:

- a. the discharge of the RO waste stream from the temporary WWTP to the Watercare wastewater network in certain limited scenarios; and
- b. the extraction of an equivalent volume of wastewater from the same transmission main (in addition to the wastewater that is extracted from the network for treatment for the proposed upstream development the WWTP will service) for treatment at the WWTP resulting in a neutral net flow impact.

(c) Item 2(c) Rationale for the Density of Development within Stage 4C

Item 2C raises several matters regarding the rationale for the proposed density within Stage 4C including:

- Efficiency (including the efficient use of resources);
- Saleability; and
- The relevant AUP(OP) objectives and policies (within the Regional Policy Statement and the Terrace Housing and Apartment Buildings (THAB) zone).

In addition to this, the Panel has sought clarification as to the yield assumption for Stage 4C within the Economic Report.

These matters are addressed in detail below and also within the Memorandum of Counsel included in **Attachment 3**.

Efficiency

We start by clarifying the yield within Stage 4C as follows:

- Land use consent is sought to enable the construction of 168 new residential units in the form of terraced housing;
- One balance lot is proposed to Parish Drive. Preliminary schemes undertaken by FHLD indicate that this super lot has capacity to accommodate approximately 68 apartment and terraced units, subject to a future land use consent process;
- The application seeks consent for 168 residential units but with the balance lot provides capacity for circa 236 residential units.

As set out within the Urban Design Memorandum (UDM) prepared by Barker & Associates and included as **Attachment 4** of the response, this is at a net density of approximately 51 units per hectare. Density of this nature is considered to be significantly greater than the net density of a typical suburban subdivision of approximately 14 units per hectare and similar to the Waihoehoe development which has a net density of approximately 50 units per hectare respectively.

To the above point, there is no one size-fits-all approach to determining appropriate density for the development of a zone. As set out within the UDM, there are a range of important factors (amenity, proximity to public transport, local amenities, ground conditions, land values and relative maturity of the housing market in the area) that inform an appropriate design outcome. The result of these factors is that the development outcomes within a THAB zoned site should be expected to be different across different

areas of THAB zoning in Auckland. Cam Wallace states that *‘in other words, one would expect a greater level of density to be realised in locations such as the THAB zoned land near Newmarket, which is more central and has more mature development, than locations such as Milldale’*. To expect or require the same development outcomes in completely different contexts and based purely on the underlying zoning of the AUP does not reflect real-world market conditions and may ultimately undermine the delivery of housing choices that reflect local housing preferences.

Notwithstanding the above, many of the factors that contribute to appropriate density are temporal in nature. This means that they will change over time as new amenities are constructed, the housing market matures and land values increase. In this sense, there is a need to establish a residential population to support the development of amenities. This matter has been addressed in detail within the Economic Memorandum prepared by Insight Economics and included as **Attachment 5**.

Insight Economics consider that *‘current conditions at Milldale do not support widespread apartment delivery. The Local Centre zone is yet to be developed, and the surrounding area lacks the supporting amenity and connectivity needed to make apartments an attractive proposition for buyers’*. In this sense, there is a need to establish a residential population to support the development of amenities. In turn, the establishing residential population and amenities will support higher land values and more intensive development (such as potential future apartments on Lot 4050 - i.e. the balance parcel in Stage 4C). Cam Wallace notes that there are several examples in Auckland where lower density development to establish basic amenity has supported the eventual development of higher density living.

Saleability

Saleability has been addressed within the Economic Memorandum prepared by Insight Economics and included as **Attachment 5**.

As set out within the memorandum, there is little to no market interest in apartments in Milldale. However, local agencies have noted that apartments are tending to perform better in areas with established amenities such as Takapuna, Milford and Albany. The lack of market interest in apartments has been noticeable over the last couple of years where several build partners have attempted to deliver apartments on THAB zoned land in Milldale with little success. On the other hand, developers that pursued terrace housing from the outset have successfully delivered and sold their developments. As set out within the Insight Economics memo, this pattern is echoed in other emerging fringe locations across Auckland.

Further to the above, Insight Economics consider that imposing overly ambitious development density requirements carries several risks including delaying development, stalling capital investment and resulting in inefficient use of serviced land. They note that outside of zoning, developers are strongly incentivised to make efficient use of their land by delivering homes that people *want* to buy and progressing development in a timely and viable manner. This is by definition an efficient use of land, as the housing delivered will, based on sales activity and evidence, be taken up by the market quickly. More intensive housing that potentially would not meet the needs of people would sit unoccupied for longer or, more likely, would not be built in the first place.

AUP(OP) Objectives and Policies

The proposal consists of terrace housing which is entirely consistent with the relevant objectives and policies of the Auckland Unitary Plan (AUP) Regional Policy Statement (RPS) and Terrace Housing and Apartment Building (THAB) Zone for the reasons set out below in **Tables 2 and 3**.

The RPS sets out the overall strategic statutory framework to achieve integrated management of the natural and physical resources of the Auckland Region. The RPS broadly gives effect to the strategic direction set out in the Auckland Plan. The objectives and policies of the THAB in turn give effect to the relevant parts of the RPS.

In our opinion, the proposal is consistent with the relevant objectives and policies of the RPS that relate to density for the reasons set out in **Table 2** below.

Table 2: RPS Objectives and Policies Assessment.

Regional Policy Statement	
Objectives	
<p>Quality Built Environment Objective B2.3.1: A well-functioning urban environment with a quality built environment where subdivision, use and development do all of the following:</p> <ul style="list-style-type: none"> (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) - (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) - <p>(2) -</p> <p>(3) -</p>	<p>The proposal is consistent with this policy direction as the development has been comprehensively master planned, is in general accordance with the Precinct Plan and designed to result in a quality-built environment.</p> <p>The Stage 4C development has been designed to respond to the intrinsic qualities and physical characteristics of the site. Namely, the proposed density responds to context of the Milldale development. Development in Milldale to date has accommodated single storey, detached units on larger lots with concentrated areas of terraced housing in strategic locations, resulting in a net density of 25 units per hectare. The proposed density within the THAB is significant comparatively at 51 units per hectare.</p> <p>The proposal will contribute to a diverse mix of choice and opportunity for within the Milldale community by introducing 168 terraced houses into the housing market. Further, there is a future opportunity to develop approx. 68 apartments on Lot 4050 which will add to the diverse mix of choice within Milldale.</p> <p>Efficiency has been addressed in detail above, and within the Urban Design Memorandum included as Attachment 4. It is considered that the Stage 4C proposal is efficient and in balance with the market.</p> <p>In respect of adapting to changing needs, it is anticipated that the development will intensify</p>

	over time as amenities are progressively established and diversified. There are several instances in Auckland where this has occurred; namely Hobsonville Point and Sylvia Park.
Residential Intensification Objective B2.4.1.1: Residential intensification contributes to a well-functioning urban environment and supports a quality compact urban form.	The Stage 4C development will provide for 168 terraced units and a future opportunity for approx. 68 apartments on Lot 4050 that will contribute to a well-functioning urban environment and support a quality compact urban form in the Milldale context. There are also other THAB sites on the eastern side of the town centre available for future apartment development if there is demand for the same.
Residential Intensification Objective B2.4.1.4: An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population.	<p>The Stage 4C development will provide for 168 terraced units. This will provide for a range of residential typologies across the Milldale which to date has largely been limited to single storey, detached units on larger lots.</p> <p>There is a future opportunity for approx. 68 apartments on Lot 4050. However, at this point in time there is currently little to no market interest in apartments in the area, with the only apartment block built to date still having units available some considerable time after being completed. It is anticipated that this may change once the Milldale centre and surrounds are established.</p>
Policies	
<p>Quality Built Environment Policy B2.3.2.1: Manage the form and design of subdivision, use and development so that it contributes to a well-functioning urban environment and does all of the following:</p> <p>(a) supports the planned future environment, including its shape, landform, outlook, location and relationship to its surroundings, including landscape and heritage.</p> <p>(b) –</p> <p>(c) –</p>	<p>The planned future environment has been addressed above. It is considered that the Milldale Stage 4C development responds to the context of the wider Milldale development which is of a medium to low density.</p> <p>In respect of operational need, the market has shown that there is little to no demand for apartment typologies within the area. There is a need to provide housing that meet the market demand for terrace housing typologies.</p>

<p>(d) –</p> <p>(e) meets the functional, and operational needs of the intended use</p> <p>(f) allows for change and enables innovative design and adaptive re-use</p> <p>(g) -</p>	<p>As addressed above, in respect of changing and innovating, it is anticipated that the development will intensify overtime as amenity is established. There are several instances in Auckland where this has occurred; namely Hobsonville and Sylvia Park.</p>
<p>Quality Built Environment Policy B2.3.2.1: Enable a range of built forms to support choice and meet the needs of Auckland's diverse population</p>	<p>The provision of 168 terraced houses will enable a greater degree of choice in an area.</p>
<p>Residential Intensification Policy B2.4.2.1: Provide a range of residential zones that enable different housing types and intensity that are appropriate to the residential character of the area</p>	<p>As addressed in the relation to our response on efficiency, the development outcomes within a THAB zoned site should be expected to be different across different areas of THAB zoning in Auckland. The proposed density responds to context of the Milldale development.</p>

In respect of the AUP(OP), it is important to note that while the site is zoned to enable intensive housing, the THAB objective and policy framework does not require this and enables residential development of a lesser intensity. This is inherent in the name of the zone, which provides for both terraced housing and apartments. The objective and policy framework is inclusive, focused on ensuring that high quality urban residential living in close proximity to amenities and transport links is achieved. The relevant objectives and policies have been addressed in **Table 3**.

Table 3: AUP(OP) Objectives and Policies Assessment

Auckland Unitary Plan – Chapter H6 Residential Terraced Housing and Apartment Building	
Objectives	
<p>Objective H6.2.1: Land adjacent to centres and near the public transport network is efficiently used to provide high-density urban living that increases housing capacity and choice and access to centres and public transport.</p>	<p>The Milldale 4C development will deliver 168 terrace units that are in keeping with areas that have been planned for urban built character to enable terraced housing, and the future opportunity for 68 apartments enabled through the superlot subdivision.</p> <p>As outlined above, the proposed net density of approximately 51 units per hectare is considered high density in the context of Milldale and its location relative to Orewa and Central Auckland. It is also important to keep in mind that this objective applies zone-wide and there will be 'overs and</p>

	unders' in terms of density achievable in any given area.
Objective H6.2.2: Development is in keeping with the areas planned urban built character of predominantly five, six or seven storey buildings in identified areas, in a variety of forms.	<p>The planned character of Milldale THAB zones, compared to THAB zoning in and around the central city and metropolitan centres is of a lower intensity, commensurate to the scale of existing and consented development in Milldale. The word "predominantly" in the objective provides for this outcome.</p> <p>As addressed in relation to our response on efficiency, the development outcomes within a THAB zoned site should be expected to be different across different areas of THAB zoning in Auckland. In this sense, there is a need to establish a residential population to support the development of amenities. In turn, the establishing residential population and amenities will support higher land values and more intensive development (such as potential future apartments on Lot 4050) and on the eastern side of the town centre.</p> <p>Furthermore, it is important that the proposal is a commercially viable development. As addressed above, there is currently little to no market interest in apartments in Milldale. Imposing overly ambitious development density requirements carries several risks including delaying development, stalling capital investment and resulting in inefficient use of serviced land.</p>
Policies	
Policy H6.3.1: Enable a variety of housing types at high densities including terrace housing and apartments and integrated residential development such as retirement villages.	The proposal will contribute to the variety of housing types available in Milldale and the wider north Auckland market. As stated above, the density of development is a step up from what has been developed at Milldale previously and reflects its location closer to the centre balanced with future market demand.
Policy H6.3.2: Require the height, bulk, form and appearance of development and the provision of setbacks and landscaped areas to achieve a high-	While the site is zoned to enable intensive housing, the policy framework does not preclude the site from being developed with residential

<p>density urban built character of predominantly five, six or seven storey buildings in identified areas, in a variety of forms.</p>	<p>development of a lesser intensity. As already noted the use of the word “predominantly” reinforces this conclusion.</p> <p>As set out above, the development outcomes within a THAB zoned site should be expected to be different across different areas of THAB zoning in Auckland. In this regard, the planned character of Milldale THAB zones, compared to THAB zoning in and around the central city and metropolitan centres, is of a lower intensity, commensurate to the scale of existing and consented development in Milldale.</p>
<p>Policy H6.3.3: Manage the height and bulk of development to maintain daylight access and a reasonable standard of privacy, and to minimise visual dominance effects to adjoining sites and developments</p>	<p>Height and bulk of development has been managed to achieve a reasonable standard of privacy, sunlight access and minimise visual dominance effects to adjoining sites and developments for the reasons set out within Volume 3. In addition, terrace housing offers a mid-rise, human-scaled built form that integrates well into the Milldale context. It also provides a transition between traditional dwellings on single lots and more intensive apartment type development that may be established in the future and the local centre.</p>

Clarification of Yield Assumptions

The economic assessment assumes that Stage 4C will yield a total of 236 units. This comprises the proposed 168 terraced units for which land use consent is sought, and the future opportunity for approximately 68 units that could be constructed on the balance lot (Lot 4050), which will be subject to a future land use consent application.