

Your Comment on the Drury Metropolitan Centre – Stages 1 and 2

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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2. We will email you draft conditions of consent for your comment			
<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct

Thank you for your comments

MEMORANDUM OF NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI ON THE DRURY METROPOLITAN CENTRE STAGE 1 AND 2 PROJECT

11 August 2025

1 INTRODUCTION

- 1.1 This memorandum presents the assessment undertaken by NZ Transport Agency Waka Kotahi (**NZTA**) of the substantive application for the Drury Metropolitan Centre Stage 1 and 2 project application (**Application**), submitted by Kiwi Property Holdings No.2 Limited (**Kiwi Property**) under the Fast-track Approvals Act 2024 (**FTAA**).
- 1.2 The assessment has been prepared in response to an invitation from the Expert Panel (**the Panel**) to provide comment and includes a summary of preliminary findings relating to transportation.
- 1.3 This assessment is based on the Application materials submitted to the Environmental Protection Authority (**EPA**) and the subsequent correspondence between the Panel, Kiwi Property and Auckland Council.
- 1.4 Kiwi Property and NZTA, in conjunction with Auckland Transport (**AT**), have had discussions prior to and post lodgement of the Application. These discussions have largely focussed on detailed traffic assessment matters, and to a lesser extent, the appropriateness of the proposed revised triggers. This engagement has been collaborative and NZTA expect to continue such discussions throughout the processing of the application.

2 BACKGROUND

- 2.1 Kiwi Property and NZTA have a long relationship in the Drury area due to the proximity of their development land and State Highway 1 (**SH1**), particularly the Drury Interchange. NZTA was a submitter on Plan Change 48 which re-zoned the land for urban uses, and the related plan changes for development in other parts of Drury East. NZTA also provided comments on the consent applications under the Covid-19 Fast Track Consenting Act.
- 2.2 The plan change was incorporated into the Auckland Unitary Plan (**AUP**) as the Drury Centre Precinct (**Precinct**) which contains provisions that control the level of development to relative to transport upgrades. Some of these upgrades such as Mill Road South and its associated connection to the proposed Drury South Interchange are currently not funded for construction.
- 2.3 Subsequent to the plan change, NZTA lodged resource consents and a Notice of Requirement under the Resource Management Act (**RMA**) in August 2023 for the Drury Access Ramp. The consents were granted the designation was confirmed in August 2024. This project is an off-

ramp from SH1 at the Drury Interchange, which will connect to the proposed Application site and is the 'SH1 direct connection' referred to in the Precinct provisions.

- 2.4 NZTA is currently constructing stage 1B of the Papakura to Drury (**P2D**¹) project, this will provide for six traffic lanes on SH1 from Papakura to Drury and involves a re-build of Drury Interchange. Construction of this project is expected to be complete in 2030. This project is the 'SH1 Six-laning Papakura to Drury' project referred to in the Precinct provisions.
- 2.5 Given the proximity of the Application to SH1 and the interplay between NZTA's and Kiwi Property's projects, NZTA expects to continue discussions with Kiwi Property through the processing of this consent and beyond.

3 ASSESSMENT

- 3.1 NZTA is neutral with regard to the proposed development and notes that the land use proposed is broadly in line with what was anticipated at the time of the plan change which established the Precinct. NZTA's interest in the Application is confined to the robustness of the assessment submitted and to ensure that transport effects, particularly those that relate to the state highway network, are adequately managed.
- 3.2 The issues that NZTA wish to comment on are:
 - The assumptions around the proportion of people who will work from home (**WFH**) in the assessment, noting that this matter is unlikely to have a significant bearing on the effects generated by a predominantly commercial development;
 - The proposed land uses which are proposed to change from a mix of uses as assumed in the plan change assessments, to a primarily retail-based development, particularly in the early stages of the development;
 - The proposal to defer community activities to later stages;
 - The reasoning behind moving the requirement for the Drury Access Ramp to an increased level of development in the trigger table; and
 - The need for clarification as to how the proposed consent interacts with future consents for other developers in the Drury East area and how the conditions relate to the Precinct provisions.

Working from home

- 3.3 As noted above, Kiwi Property, NZTA and AT have had discussions regarding the assumed level of WFH in the trip generation calculations in the Integrated Transport Assessment (**ITA**). Kiwi Property have provided further information to substantiate their position, but outstanding queries remain. While NZTA agrees that WFH is more prevalent today than before the COVID-19 pandemic, there are outstanding concerns regarding the assumptions, including:
 - The census data relied upon, only relates to trips from home to work whereas household peak travel also relates to other purposes. These other purposes are captured in the base assumptions used in traffic modelling and only 39% of trips in the model are from home to work, so if a discount for WFH is to be applied, it should only apply to those home to work trips; and
 - It is possible that there are other trips occurring in the inter-peak period by people who WFH that are not captured in the modelling as people who would have commuted and

¹ Note that P2D is a portion of the wider Papakura to Bombay (P2B) project. Stage 2 of P2B from Drury to Bombay has recently gone through a Notice of Requirement process and is currently not funded for construction.

carried out other activities as linked trips, may still make those additional trips but separately.

- 3.4 NZTA notes that as the Application is primarily a commercial development with limited residential activity proposed, the adjustments to trip rates for WFH are unlikely to significantly alter the level of traffic generated in this case. However, it appears that the assessment has overstated the effect of WFH on trip demand. Notwithstanding the low number of trips affected by WFH assumptions, this issue should be reconsidered in combination with the concern regarding the proposed mix of land uses discussed below and form part of sensitivity testing and/or inform reduced levels of development provided for, prior to the need for infrastructure upgrades.

Mix of land uses proposed

- 3.5 The assessments which supported the plan change which established the Precinct, assumed a mix of land uses including commercial, residential retail and community activities. Although retail was always planned to be a substantial part of the mix, it was balanced out by other land uses.
- 3.6 This assumption is significant in transport terms as the assessment assumed a level of 'internal trips' to the development i.e. that people living and visiting the centre would carry out activities within the site such as a resident carrying out their local shopping, education or employment needs. If the development is primarily or exclusively retail based, particularly in its early years, then these internal trips will not occur and a higher level of trips than assumed will occur.
- 3.7 In order to address this issue, the applicant should undertake a sensitivity test using higher trip rates to compensate for the lower level of internal trips, combined with the WFH point above. These revised figures should then be used to inform the trigger table in the proposed consent conditions.

Community activities

- 3.8 Related to the above point around mix of land uses is the deferral of community activities to later of stages of development and their replacement by retail activities in the earlier stages. This is problematic in terms of internal trips as noted above, but it also calls into question the feasibility and timing of such activities, as they are proposed to be dependent on the southern portion of the Mill Road project. This project does not yet have a designation in place nor has construction funding allocated.
- 3.9 Given the importance of community activities for capturing trips within the development for residents and enabling visitors to the site to undertake multiple activities within a trip, the community activities enabled should remain at the level and timing in the Drury Centre Precinct and not as proposed in the Application.

Drury Access Ramp

- 3.10 The ITA has referred to modelling of scenarios where the Drury Access Ramp is deferred or not provided but no detail of this modelling has been provided and NZTA is not in a position to comment on the effects of such a proposal due to a lack of information.
- 3.11 The ITA also states that the Drury Access Ramp is only beneficial in later stages of the development. However, the ITA includes the Drury Infrastructure Funding and Financing Study

(DIFF) as an appendix and that study concluded that this connection is required in the short and longer term, even if Mill Road is in place.

- 3.12 NZTA is keen to work with Kiwi Property to better understand the timing and need for the Drury Access Ramp, but at present, does not support the proposal to defer the need for this item in the proposed trigger table and instead prefers the existing Precinct provisions.

Interaction with other consents and Precinct provisions

- 3.13 The three plan changes for Drury East were heard together and relied on a shared transport assessment given their close proximity and reliance on the same infrastructure upgrades. This resulted in common precinct provisions which sought to holistically manage and sequence development with infrastructure upgrades. NZTA supports these provisions and seeks that they are implemented in subsequent resource consents.
- 3.14 The proposed application does not align with the Precinct provisions in that it proposes to 'use up' development potential which was intended to be available for the three precincts. As it will take a long period of time for the development in the Application to progress, particularly with a 15 year lapse period, other developments will not be able to be consented as the council will need to take into account this development (if approved).
- 3.15 NZTA requests that Kiwi Property provide more information on this matter and if it cannot be resolved, the panel is requested to consider approving a lesser amount of development to align staging with infrastructure which is in place, conditioned to be provided or under construction as required by the Precinct provisions.

4 Conclusion

- 4.1 The proposed Application is largely in line with the provisions in the Precinct. NZTA has been working with Kiwi Property and other parties to ensure that the assessment supporting the Application is robust and that all relevant transport matters will be addressed.
- 4.2 NZTA has identified areas where further information is required to understand the effects of the Application and potential reasons why the scale and type of development may be excessive compared to the proposed staging of infrastructure provision, particularly the Drury Access Ramp.
- 4.3 NZTA is keen to further discuss these issues with Kiwi Property and provide further information to the Panel as it becomes available. As there is a need for further assessment to be undertaken by Kiwi Property, NZTA has not yet proposed changes to the draft consent conditions but intends to comment on those prepared by the panel. However, NZTA supports the intent of the proposed conditions (particularly condition 85) and seeks that they be amended following the submission of a revised ITA as outlined above.
- 4.4 NZTA seeks that the panel requests further information from the applicant on the above points and directs them to continue engagement with NZTA and AT on these points. If this does not occur, NZTA requests that the panel impose consent conditions which give effect to the trigger table and associated provisions in the Precinct rather than the applicant's current proposal.