

Attachment 4 – Drury West Crossing Consultation

Organisation	Date	Method	Attendees	Summary
Department of Conservation	Pre-lodgement request 22 April 2026	Email	N/A	Pre-lodgement consultation initiated via formal application to DoC email at Fasttrackapplicationenquires@doc.govt.nz . Subsequently, DoC were provided with a description of the project. Pre Lodgement Consultation Summary provided by DoC attached.
New Zealand Transport Authority	Meeting 9 June	Email and Online Meeting	NZTA Tessa Robbins Priya Thakur Heather Liew Drury West Crossing: Nick Roberts [Planner] Rebecca Sanders [Planner] Leo Hills [Transport]	A pre application meeting was held with NZTA. The minutes of the meeting are attached. NZTA indicated This can be investigated further with NZTA as part of a substantive application if successfully referred.
Auckland Council, Watercare and Auckland Transport	Meeting 26 th May	Email and Online Meeting	Auckland Council, Watercare and Auckland Transport Russell Butchers - Premium Consents Colin Hopkins - Planner Hiliary Johnston - Healthy Waters Carmel O'Sullivan - Healthy Waters Martin Meyer – Healthy Waters Maria Baring - Development engineer	Consultation has occurred with the Premium Consenting Team, Parks, Healthy Waters, the Development Engineer, Auckland Transport and Watercare Services Ltd. The minutes of the meeting are attached. Following the meeting detailed feedback has been received from the Premium Consenting Team. The applicant will continue to work through the more detailed feedback raised as part of the preparation of a substantive application. An initial response to the detailed feedback is attached.

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			Nagaraj Prabhakara- Auckland Transport Minnie Liang- Auckland Transport Chris Freke - Auckland Transport Roja Tafaroji - Parks Tim Matthews - Watercare Drury West Crossing: Nick Roberts [Planner] Rebecca Sanders [Planner] Leo Hills [Transport] Toby Mandeno [Civil Engineer] Gareth Williams [Wastewater] Matt Doughney [Applicant]	
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Fast-track Pre-Lodgement Notification Response

Purpose - This document provides a response from DOC following notification in writing for an application under the Fast-track Approvals Act 2024

Project Details

Project name:	Drury West Crossing
Engagement type:	Pre-lodgement notification for referral
Applicant/agent:	Applicant: Drury West Crossing Limited Agent: Rebecca Sanders (Barker & Associates)
Proposal overview:	The project is a light industrial development in Ramarama, Auckland.
Location:	Ararimu Road, Ramarama, Auckland.
Date pre-lodgement request received:	22 April 2026
Documents provided by the applicant	Project Masterplan Aerial map showing project area outline DOC pre-lodgment notification form
Summary of pre-lodgement engagement: The applicant sought a response from DOC within 20 working days. The applicant provided a preliminary masterplan of the site and basic information on the project. The applicant specifically requested that no meeting occur at the referral stage. This is a brief response given the information provided and the timeframe requested by the applicant.	
Fast track project lead DOC:	Shawn Gardner – Consultant Fast-track Consents Advisor (Enspire)
DOC Permissions/ Approvals Identified by applicant in pre-lodgement request as potentially required:	The applicant is seeking Wildlife Act Approvals (WAA) for skinks.

DOC Commentary on Fast Track approvals and permissions identified:	It is the applicant's responsibility to comply with the Fast-track Approvals Act 2024 (FTAA) and ensure that the necessary approvals are identified and all required information is provided as part of the referral application. Section 13(4) sets out the information to be included in a referral application. Wildlife Act Approvals WAA authorise acts that would otherwise be an offence under the Wildlife Act 1953, including to: • Catch and handle wildlife onsite (including wildlife sampling and wildlife salvage) • Take samples from wildlife • Take or destroy the eggs of wildlife • Attach identification tags to wildlife • Mark, tag, or attach other scientific apparatus to wildlife • Catch and temporarily hold wildlife in captivity (less than 3 months) • Transfer captive wildlife from one holding facility to another holding facility • Kill wildlife • Hunt, disturb, kill or catch alive protected wildlife that are causing damage • Translocate wildlife If any of these activities are required for protected species, wildlife approvals for these activities in relation to that species will be required. DOC considers that adverse effects on conservation values, including indigenous biodiversity, that arise as a result of the project must be appropriately managed. This is of particular importance where the species affected are Threatened or At-Risk and where those effects may be cumulative. Complex Freshwater Fisheries Approvals DOC notes that there are records of Threatened and At-Risk species within the vicinity of the site. There are also ponds and likely natural inland wetlands present on the site. The applicant has not indicated the need to obtain Complex Freshwater Fisheries Activity approvals (CFFA). The applicant should be aware of the approval requirements under the Freshwater Fisheries Regulations. The information requirements for CFFA are specified in clause 3 of Schedule 9 of the Act. The project will need to address this information requirement if CFFA are included in the application. We recommend, if there is a possibility CFFA is required, that this is included in the referral application. The applicant should be aware that any instream structures will need to adhere with the New Zealand Fish Passage Guidelines Earth Sciences New Zealand NIWA.
Treaty partners:	In the time available, DOC has not carried out a process to identify Treaty partners with interests relevant to this site. DOC encourages the applicant to reach out directly to relevant Māori groups as required by section 11(b)(ii) of the FTAA.

Treaty Settlement implications/considerations:	In the time available, DOC has not carried out a process to identify Treaty settlement obligations specifically relevant to this site but notes for the applicant that this will form part of the section 18 report prepared by the Ministry for the Environment (MFE).
Potential Resource Management Act (RMA) considerations and effects: <i>Note: DOC's role in relation to 53(2)(m)(i) FTAA</i>	The pre-lodgement notification was primarily in relation to the WAA being sought. Some primary Resource Management Act (RMA) considerations for DOC include that relevant biodiversity and environmental effects are considered as part of the full and comprehensive Assessment of Environmental Effects (AEE) included in the substantive application. The AEE should specifically address the management of any indigenous species and habitats onsite, including threatened plant species, and freshwater values including fishes, wetlands and streams. The AEE should include: • A clear description of all proposed activities and required approvals, including why each approval is required (what rule or standard is not met) and for each rule or standard that is met, a description of how this rule or standard is met • A summary of any mitigations proposed in expert reports • Proposed monitoring and adaptive management strategies, including ecological triggers and strategies for when triggers are tripped • An assessment against relevant plans and policies including the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Freshwater Management Conditions should be developed and presented to manage any effects on the values noted above. DOC would like to see draft conditions prior to the submission of the substantive application. Further advice can be provided during any pre-lodgement consultation on the substantive application.
DOC Statutory Planning Document considerations in relation to site (e.g. CGP/CMS/CMP):	The following Statutory Planning Documents are relevant to the project: • Conservation General Policy 2005 (CGP) • Auckland Conservation Management Strategy 2014 The application is not inconsistent with the relevant statutory planning provisions. However, consideration needs to be given to: • Conserving any threatened and at-risk species to ensure their persistence • Protecting and restoring relevant indigenous ecosystems • Protecting freshwater fish habitat and fish passage
Any specific information requests to applicant(s)/agent for pre-app engagement at this point:	Should the application be referred, the applicant is encouraged to engage with DOC prior to lodging a substantive application. Surveys for any Threatened or At-Risk species, including indigenous flora, should be undertaken prior to the lodgement of the substantive application.

	The applicant should undertake a stocktake of any waterways, streams and wetlands onsite. Specific documents DOC would like to review prior to the lodgement of the substantive application include: • Assessment of Environmental Effects • Ecological report • Any wildlife management plans (including, but not limited to those required for any WAA) • Draft conditions • Offsetting and compensation plan (if offsetting or compensation is proposed) The Ecological report should include: • Findings from surveys of existing ecology onsite, including surveys for any Threatened and At-Risk species, including indigenous flora and stocktake of any waterways, streams and wetlands onsite • Details of any proposed works within streams, wetlands or waterways (including enhancement activities) and how these activities are expected to impact any existing freshwater habitats onsite • Details of any proposed mitigations and how these will reduce any ecological impacts • For any unavoidable ecological impacts, a description of why they cannot be avoided and a reference to how they will be offset/compensated for It is noted that management plans should include (at a minimum) the following information: • Details of mitigation and minimisation strategies utilised to minimise impacts on wildlife and indigenous ecosystems • Any proposed exclusion periods (based on species present and any vulnerable periods for these species) • Salvage/relocation plans, including methodology and release locations (including at least one primary release location and one secondary release location) • Monitoring requirements and methodologies • Where no WAA is proposed, management plans should detail how impacts on indigenous species will be avoided such to comply with the requirements of the Wildlife Act (1953) Fish Management Plans should also include: • A Freshwater Monitoring Programme, including water quality, quantity, temperature, fish monitoring and habitat monitoring • A Baseflow Monitoring Programme, with the identification of limits/triggers and mitigations/remediation options should monitoring show reductions below triggers
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	• Details on any proposed augmentation of stream flows If offsetting or compensation is proposed, an Offsetting and Compensation Plan should be provided. This should include, at a minimum: • A description of ecological values where effects cannot be avoided • A description of any methods employed to minimise impacts on relevant ecological values in the first instance • Identification of specific proposed offsetting, including locations and timeframes • For any temporary or permanent loss of freshwater values, Stream Ecological Valuation and Environmental Compensation Ratios • Any proposed long-term pest management and how it will be funded and actualised
Any further information/considerations:	While the information provided is too high-level to be certain, it appears as though the project area is near some areas of bush designated as Significant Ecological Areas by Auckland Council. These areas could be a source and/or refuge for lizards. The applicant should give consideration to these habitats and the implications of lizard habitat near the area of works.
Additional Notes:	DOC encourages the applicant to share draft substantive application documents including proposed draft condition, should the application be referred. This enables DOC to provide feedback on how the draft documents align with the information requirements of the FTAA. Note that a panel will invite the statutory bodies listed in clause 4 of Schedule 7 to comment on any wildlife approval as part of any substantive application (NZCA, conservation boards, Fish and Game Council, and Game Animal Council). We encourage applicants to engage with these bodies in advance of lodging a substantive application. For clarity of use and easy reading, DOC recommends that the application documents clearly address each of the requirements of the relevant schedule of the FTAA, with a separate section for each required approval. This enables the relevant authorities and the Panel to clearly understand the relevant issues for each approval.

Project: Ramarama Referral -NZTA

Date: 9 June 2026

Time: 9-9:30pm

Location: Online via MS Teams

Attendees: Nick Roberts (B&A), Rebecca Sanders (B&A), Leo Hills (Commute), Matt Doughney (Drury West), Tessa Robins (NZTA), Priya Thakur (NZTA), Heather Liew (NZTA)

Item	Detail
1	Development Overview • 70 hectares light industrial development • Supporting commercial services to provide for the day to day needs of employees • Electronic billboards
2	Site & Transport Overview • The site is positioned near the interchange and close to Stevenson's and Drury Hub, offering strong transport synergies • The site is considered well-located for industrial/employment use due to direct interchange access for trucks, minimising use of the local road network • A full assessment of the interchange — including capacity, timing, and trigger points for further upgrades — is acknowledged as necessary work ahead
3	NZTA Relationship & Interchange Timing • NZTA has not yet been engaged on this specific proposal — prior conversations related only to the earlier notice of requirement process • There is an agreement with NZTA to continue working together, with timing and sequencing as a key open question • Originally, NZTA was expected to build a roundabout within its designation timeframe before any development occurred; however, the fast track timeline means the development is now likely to proceed first • Trigger points for interchange upgrades relative to development staging will be a critical detail in the ITA going forward
4	Trip Generation Rates • A question was raised about the use of **0.4 as the trip rate** for industrial warehousing, with concern it may be too low • Recent Australian research (last 1–2 years) suggests that peak-hour trip rates for industrial warehousing have **decreased**, partly due to changes in technology such as automated racking systems

Item	Detail
	• The exact rate will depend on what is confirmed for the site, and will be worked through in detail in the ITA • A recommendation was made to also review the **NZA research report** on trip rates, in case the proposed rate needs to be adjusted upward from a transport assessment perspective
5	Next Steps and Process • Application at referral stage only. If referral approved, detailed transport assessment will be conducted in close collaboration with NZTA • Referral memo will note this meeting and guidance provided

Minutes

Project: Drury West Crossing Fast Track

Date: 26 May 2026

Time: 9:00am

Location: MS Teams

Attendees: [Insert]

Name	Role/Organisation
Nick Roberts	Planner/ Barker & Associates
Rebecca Sanders	Planner/ Barker & Associates
Cam Wallace	Urban Design / Barker and Associates
Matt Doughney	Drury West Crossing Ltd
Leo Hills	Transport / Commute
Toby Mandeno	Maven
Gareth Williams	GWE - wastewater
Russell Butchers	Premium Consents/ Auckland Council
Colin Hopkins	Planner / Auckland Council
Hilary Johnston	Healthy Waters/ Auckland Council
Carmel O'Sullivan	Healthy Waters/ Auckland Council
Martin Meyer	Healthy Waters/ Auckland Council
Maria Baring	Development engineer / Auckland Council
Nagaraj Prabhakara	Auckland Transport
Minnie Liang	Auckland Transport
Chris Freke	Auckland Transport
Roja Tafaraji	Parks / Auckland Council
Tim Matthews	Watercare

Apologies: N/A

Item	Detail
1	Introduction
2	CW provided an overview of the Drury West Crossing Masterplan.

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Item	Detail
3	Stormwater Management TM provided an overview of the stormwater aspects of the proposal: • A portion of the site north of Ararimu Road is covered by existing discharge consent (DIS60350470) supported by Tonkin & Taylor SMP. The existing consent requires attenuation (SMAF only) and treatment of impervious areas. Areas outside existing consent will require additional private discharge consent. • The site has a split catchment: western catchments flow to Ngākoroa, eastern catchments flow under motorway to Hingaia. • Proposed approach includes catchment rain gardens, converting existing pond to wetland for treatment/mitigation, and proprietary devices with tanks for individual lots. • Modelling will be provided with the substantive application to ensure no downstream affects. • Engagement with Iwi – Lucie Rutherford from Ngāti Tamaoho has provided preferences for stormwater treatment. Healthy Waters Feedback: • HJ - Downstream is highly sensitive with existing flooding concerns in Hingaia and Ngākoroa • HJ – Invite applicant team to coordinate with Healthy Waters and Martin on modelling parameters and flood hazard management • HJ – Provide clarity in the substantive application in relation to what assets and land is intended to be vested. • CO’S -Mitigation likely required above standard SMAF levels due to downstream stream erosion and updated climate change assumptions • MM- consenting strategy – will there be a new discharge consent that covers the site or will the discharge consent cover only the portions no covered in the T&T SMP. More consideration to be given to this. • MM - Treatment may be required for Ararimu Road upgrade under AUP E9 • Need to ensure no overland flow onto motorway • Standard overland flow path and culvert calculations required for substantive
4	Wastewater and water supply servicing GW provided an overview of the wastewater and water servicing aspects of the proposal: • Private wastewater system proposed with package treatment plant and land application to northeast corner • Water supply via existing bore (requires analysis for iron/manganese removal) with fallback of roof water collection • Assumed 40 persons per 10,000m² of warehousing, 40 litres per head per day • Peak flow approximately 56m³/day for domestic wastewater plus 10m³/day for ancillary uses

Item	Detail
	• Treatment to secondary/tertiary quality with pressure compensating drip line application • Discretionary activity requiring high level of ongoing service, maintenance and monitoring • Legal framework for ownership (incorporated society or similar) to be detailed in substantive application Watercare Feedback: • Watercare confirmed no service provided to rural zoned land; private water supply scheme would be subject to Taumata Arowai regulation (Drinking Water Quality Assurance). • Servicing of future urban zoned land not expected until 2035 at earliest, and rural land not included in scope • Confirm discharge location doesn't adversely effect the receiving environment and Watercare's existing operations • Although the schemes would be private, we strongly recommend they are designed in accordance with Watercare's relevant Codes of Practice for Land Development and Subdivision. • Applicant to confirm governance, funding and maintenance arrangements for the private schemes. It is understood this would come at the substantive phase. • Application site is not in Veolia service area. Auckland Transport feedback: • Encroachment licence may be required from Auckland Transport if private wastewater pipes located in road reserve.
5	Transport LH provided an overview of the transport aspects of the proposal: • Site benefits from direct access to state highway via proposed NZTA interchange upgrade • NZTA designation includes comprehensive separated cycleway network through interchange and along motorway • Most internal roads anticipated to be vested and designed to AT standards • Ararimu Road to receive full urban upgrade with roundabouts and cycle lanes AT Feedback: • Discussion around upgrading of Great South Road. LH had envisioned this would remain rural standard, but AT indicated preference an upgrade to urban standard on eastern side with a cycle lane. CF indicated that there is a need for an interim upgrade to close gap along Great South frontage • Discussion around what the ITA in support of the substantive application should cover: - Assessment of interim capacity without interchange upgrade

Item	Detail
	- Study extent to include SH22/Great South Road intersection (current constraint point) and interchange • Discussion in relation to access management required; most lots can access from side roads. Mahira Road intersection may need treatment to discourage through traffic - options include left in/left out, or converting to cul-de-sac with pedestrian/cycle access only • LH confirmed 23.6m road widths proposed internally to accommodate B-trains and logistics vehicles • Discussion regarding that Ararimu and Great South are designated heavy traffic bypass routes and therefore must accommodate over-dimensional vehicles. Road pavement life analysis will be required given significant increase in heavy vehicle movements • Questions in relation to the staging of the development. Applicant team indicated that the likely starting point for development is north of Ararimu Road, where existing development is centred. • CF considers that future road connection to adjacent eastern land should be provided to avoid additional cul-de-sacs on Great South. LH confirmed this can be addressed through more detailed design as part of a substantive. • ML - Visibility assessment required for access points near S-bends on Great South. LH confirmed that this can be provided as part of a substantive application. • Discussion about the road width requirement along Ararimu Road for urbanisation (currently only 20m) • Applicant team confirmed that active mode connection details, gradients, and interconnections to be provided as part of a substantive application
6	Parks RT provided an overview of the information that would be required to support a substantive application including: • Stream survey required to determine if qualifying streams trigger esplanade reserve provisions. If triggered, 20m width from mean high water springs of the sea, and along the bank of any river or along the margin of any lake, as the case may be required (in accordance with S230 of the RMA and E39.6.4.1. of the AUP). • Comprehensive landscape plans required showing soft/hard landscaping including planting, pathways, taking into account flood levels. • Tree works on existing roads require tree asset owner approval from Urban Forestry (separate from regulatory process) • Landscape buffer areas need clarification - covenant vs vesting • Boundary interface details required for private lots adjoining open space. Council's preference is for low and min 50% transparent fencing/planting along or within 2m of the shared boundaries to encourage passive surveillance and an attractive interface.

Item	Detail
	• Safe and legible interfaces between industrial development and any existing or future public open space are encouraged, including clear public/private boundaries and avoidance of service areas or blank façades adjoining open space or green corridors. • Access ways shown in light green need clarification - are they vested reserve or transport function? • Landscape treatment details required for all access ways. • Streetscape landscaping- For any new roads proposed to be vested to Council, streetscape landscaping plans must be provided to demonstrate amenity and longer-term canopy outcomes are manageable as future Council assets. Landscape plans must show clearance between tree roots and underground infrastructure on the road reserve.
7	Timeframes and next steps • Applicant targeting lodgement of referral application within next two weeks • Council to provide written section 11 response and feedback next week

Rebecca Sanders
Senior Associate
Barker & Associates

4 June 2026
Council ref: PRR00043996

Section 11 Response – Fast Track Approvals Act 2024

Proposed Drury West Crossing – 21–25 Ararimu Road, Ramarama

Tēnā koe Rebecca,

Auckland Council acknowledges receipt of the notification under section 11 of the Fast-track Approvals Act 2024 (FTAA) for the above proposal. The following comments are provided to assist the Applicant in progressing a potential referral application to the Ministry for the Environment.

At this stage comment has been sought from the council's asset owners however further specialist engagement will be required should the proposal be accepted for fast-tracking. These comments represent an initial, high-level assessment based on information currently available and are intended to identify key planning, infrastructure, and environmental considerations relevant to the referral stage.

1. Planning

The subject site is zoned Mixed Rural under the Auckland Unitary Plan and is located outside the Rural Urban Boundary (RUB). The proposal for a large-scale light industrial development (approximately 70ha) represents urban-scale development in a rural zone, and is therefore inconsistent with the operative planning framework.

The site is not identified for urbanisation in Auckland Council's Future Development Strategy (FDS) and is therefore out of sequence with the planned sequencing of urban growth and infrastructure provision.

Key strategic planning considerations include:

- The premature introduction of urban land use outside identified growth areas;
- The potential to undermine the plan-led approach to urban development and infrastructure investment;
- The absence of structure planning or precinct planning for the site or wider area;
- The risk of fragmented and uncoordinated urbanisation, particularly given proximity to planned Drury growth areas.
- The loss of productive rural land, including areas of Land Use Capability (LUC) Class 2 and LUC Class 3 soils, which are a finite and nationally important resource for primary production and are identified for protection from inappropriate urban development.

The proposal effectively constitutes a new industrial precinct outside of the established planning framework.

2. Healthy Waters & Flood Resilience

The site is not eligible to be authorised under the Regionwide Network Discharge Consent (RWND) due to its rural zoning. As a result:

- A separate private diversion and discharge consent will be required;

- There is uncertainty regarding the appropriateness of existing consents (e.g. DIS60350470) for this proposal.

The development represents a significant change in hydrology, with substantial increases in impervious area. Key concerns include:

- Flooding and hydrological effects, including impacts on upstream and downstream properties and infrastructure;
- Effects on downstream systems, including Drury South, which are designed based on rural catchment assumptions;
- Capacity constraints in existing motorway culverts, which are not sized for urban flows;
- Potential cumulative catchment effects in the Hingaia and Ngākoroa catchments.

In addition, there are concerns regarding:

- Stream erosion and geomorphic stability, particularly within erosion-prone watercourses;
- The need for catchment-scale modelling, including climate change scenarios;
- Uncertainty around stormwater infrastructure ownership and long-term maintenance.

Further detailed assessment will be required to demonstrate that the proposal can avoid or adequately mitigate adverse stormwater and natural hazard effects.

3. Auckland Transport

At the referral stage, Auckland Transport notes that a full Integrated Transport Assessment is not yet required however this would be required as part of any substantive application, should the referral application be accepted. Notwithstanding this, the proposal raises significant strategic transport considerations.

The site is located adjacent to key transport corridors, including State Highway 1, Great South Road, and Ararimu Road, which function as strategic freight routes.

Key issues include:

- The introduction of a large-scale industrial development generating significant freight and traffic demand;
- Out-of-sequence demand on the transport network, which is planned to be upgraded in line with Future Urban Area development sequencing;
- Uncertainty around network capacity, particularly at:
 - SH1 interchange and ramps;
 - Great South Road and Ararimu Road;
 - Local intersections and road corridors.

The proposal will likely require:

- Substantial upgrades to strategic and local roading infrastructure;
- Integration with planned transport projects and upgrades;
- Consideration of cumulative effects with Drury development.

At a strategic level, there is uncertainty as to whether the existing and planned transport network can accommodate the proposal without significant additional investment, and how such upgrades would be delivered and funded.

4. Watercare

Watercare has confirmed that:

- The site is not serviced by public water or wastewater networks;
- Servicing for nearby future urban areas is not expected until at least 2035, and does not include this rural-zoned land;
- The proposal will rely on private water supply and wastewater systems.

The proposal includes:

- A private water supply (e.g. bore and/or roof water); and
- A private wastewater treatment plant with land disposal.

Key considerations include:

- The appropriateness and resilience of private servicing solutions for a development of this scale;
- The need for clear governance, funding, and long-term maintenance arrangements;
- Compliance with Taumata Arowai regulatory requirements for drinking water;
- The need to demonstrate that wastewater discharge will not adversely affect the receiving environment.

There is also uncertainty regarding:

- Integration with future public networks;
- Potential duplication or inefficiencies in infrastructure provision;
- Requirements for approvals where infrastructure is located in the road reserve.

Overall, the proposal relies on infrastructure solutions that are not aligned with planned network provision, reinforcing the out-of-sequence nature of the development.

5. Parks & Community Facilities

The proposal incorporates a green network, however there is currently limited clarity regarding its form, function, and ownership.

Key matters include:

- The need for a stream assessment to determine whether esplanade reserves are required, which could significantly affect site layout and development capacity;
- Uncertainty regarding whether open space areas will be:
 - Vested as reserve, or
 - Privately owned (e.g. via covenants or easements);
- The need for comprehensive landscape design, including integration with stormwater systems and consideration of long-term maintenance;
- The importance of achieving high-quality interfaces between industrial land and:
 - Open space;
 - Green corridors;
 - Any future public reserve areas.

Additional considerations include:

- Clarity of accessways (public vs private function);
- Streetscape and landscape design for any assets proposed to vest to Council;
- Management of tree assets within road corridors.

At this stage, there is insufficient information to confirm that the proposal will deliver appropriate open space outcomes, public amenity, or long-term asset management arrangements.

6. Overall Council Position

Auckland Council acknowledges the potential economic and employment benefits associated with the proposed industrial development.

However, at a strategic level, the proposal:

- Is inconsistent with the Auckland Unitary Plan zoning and Future Development Strategy sequencing;
- Relies on unplanned and private infrastructure solutions;
- Raises significant unresolved issues in relation to:
 - Stormwater and flooding;
 - Transport network capacity and integration;
 - Water and wastewater servicing;
 - Open space provision and urban form outcomes.

These matters collectively indicate that the proposal presents significant strategic, infrastructure, and environmental considerations, which would require comprehensive assessment and robust justification should it proceed to a substantive application.



Russell Butchers
Principal Project Lead

Attachments:

1. Healthy Waters & Flood Resilience detailed comments
2. Auckland Transport detailed comments

Healthy Waters & Flood Resilience (HWFR)

HWFR understand that the proposed development will include 70ha of light industrial area with associated infrastructure and servicing, including a green network that incorporates existing ecological features. Limited detail has been provided for review at this stage, the Applicant's Agents have presented the proposed development, masterplan, and preliminary stormwater management strategy as part of pre-application engagement.

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 located within the Rural - Mixed Rural zone and therefore will not be able to be authorised under the RWNDC.

Areas of the development are subject to an existing diversion and discharge consent DIS60350470 and associated Stormwater Management Plan (Ramarama Flood Hub, Stormwater Management Plan). It should be clarified that the SMP was developed to outline stormwater management associated with this private consent and has not been adopted under the RWNDC.

The appropriateness of the applicability of DIS60350470 and the associated SMP to the proposed development is subject assessment by the regulatory stormwater specialist.

HWFR remains available to work closely with the Applicant's team and the regulatory stormwater specialist in respect of any private diversion and discharge consent that may be required.

Stormwater Management

Preliminary information on stormwater management has been provided. Given the nature of the development, flooding and hydrological effects will likely be HWFR key areas of concern for this application, particularly given the sensitivities within the downstream areas.

HWFR expects that a detailed stormwater assessment will be provided if the project were to progress to demonstrate how the potential effects from the proposed development on stormwater will be managed. The stormwater assessment is expected to address, but would not be limited to:

- Flood risk, floodplain impacts, and overland flow path management
- Management of hydrological effects
- Stream stability and erosion risk
- Stormwater attenuation and hydrology mitigation approaches
- Asset ownership and maintenance responsibilities

Natural Hazards

Part of the proposed development will discharge to the Drury South development. It is important to note that the Drury South stormwater management approach and design are based on flows into Drury South from upstream areas that assume predominantly rural land use within the upstream catchment, including the proposed development at 21 Ararimu Road, and 2.1°C climate change. Therefore, the Applicant's Engineer's will need to demonstrate that the proposed development would not result in negative or adverse impacts on Drury South, such as increased risk of flooding.

The existing motorway culverts that part of the proposed development will discharge to will not have been sized to account for urban development and the associated extent of imperviousness proposed. The Applicant's Engineers will also need to assess the impacts of the proposed development on motorway culverts.

The Applicant's Engineer will need to assess the impacts of the proposed development on property and infrastructure within the Ngākoroa catchment. We acknowledge that the Ramarama Flood Hub, Stormwater Management Plan(August 2019, T+T) suggests a pass flows forward approach. However, the SMP also outlines more detailed stormwater management solutions and design should be undertaken as part of individual land use consents for development. We consider that there is therefore scope under the existing consent and associated SMP to require the Applicant to demonstrate that the proposed development will not result in negative or adverse impacts on upstream or downstream properties.

HWFR are happy to work with the Applicant's Agents on determining the effects of the proposed development on downstream flooding and expects that sufficient information will be provided to demonstrate that:

- The proposed works will not increase flooding to upstream and downstream properties, infrastructure, or the surrounding environment; and
- The proposed development appropriately manages stormwater runoff, including consideration of attenuation for the purpose of flood mitigation where required.

Stream Erosion

Erosion of Hingaia Stream and its tributaries is a known issue. The erosion potential of the stream (lateral and incision) needs to be understood so that structures have adequate setback and will not be undermined by an eroding stream during their lifetime.

Should the project progress further, a geomorphic assessment of the stream should be provided. The assessment would need to include a stream design with reference to an industry accepted stream design guideline and should include consideration of grade control, bed protection, and toe protection to reduce or withstand high shear stress. Widening the cross sectional area of the flow may need to be considered to reduce shear stresses to avoid excessive armouring and reduction of ecological values associated with significant erosion protection if shear stresses remain high. A planting plan should also be developed with consideration given to species appropriate for stream bank planting with consideration to shear stresses, bank stability and roughness to align with any hydraulic modelling and stream design. Any geomorphic assessment should consider maximum probable development upstream plus climate change (3.8 degrees).

Asset Ownership

HWFR seek further information on the intended ownership of stormwater network and management devices so that, if necessary, there is opportunity to comment on the operation and maintenance requirements of the public stormwater system.

HWFR expects that if the project were to progress further information should be provided on land, stormwater network, and management devices that may have the potential to be vested to HWFR in future as public assets. 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. If the project were to progress,

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.

Summary

HWFR comments are limited to the area of expertise and not a comment on the overall principle of the development . In summary it is noted that the proposed development cannot be authorised under the RWNDC due to current zoning, and an additional private diversion and discharge consent will be required.

Further assessment and information will be required to confirm the proposed stormwater management approach, measures to manage effects on the receiving environment including stream erosion, and the management of flooding, with specific emphasis given to the sensitivities within the downstream environment.

HWFR welcomes further engagement with the Applicant's Agent if the proposal progresses.

Auckland Transport (AT)

The below comments relate to the preparation of any substantive application for the proposed development, should it be accepted for fast-tracking.

1. Integrated Transport Assessment (ITA) Requirements

A full ITA is required to assess the transport effects of the proposal. The ITA must:

- Consider cumulative effects, including the Drury West Storage Private Plan Change (PPC).
- Reflect that Great South Road (GSR) and Ararimu Road are Over-Dimension (OD) freight routes.
- Include vehicle tracking and swept path analysis based on OD vehicle requirements.
- Provide Safe Intersection Sight Distance (SISD) assessment method from Austroads for visibility evaluations, as it incorporates additional factors such as road gradient and driver reaction time for the proposed intersections and roads.
- Detailed road designs including longitudinal and cross-sectional plans.
- Active modes design details.
- Capacity analysis for the existing intersections/road carriageway including necessary upgrade works.

2. Trip Generation and Assessment Methodology

The trip generation assessment must be robust and locally appropriate. AT notes that:

- Reliance solely on RTA (NSW) data is insufficient.
- The applicant must utilise New Zealand-based data sources, including:
 - Waka Kotahi/NZTA Research Report 453
 - Local survey data
 - Comparable consented developments

The assessment must:

- Adopt a practical worst-case scenario
- Include sensitivity testing
- Clearly outline assumptions and demonstrate conservative modelling inputs

3. Traffic Modelling and Network Assessment

Comprehensive traffic modelling is required to assess both local and strategic network effects.

Required Scenarios:

- Full build-out of Drury South
- Without:
 - Maketu Road–SH1 interchange
 - Maketu Road–Fitzgerald Road link
- With:
 - GSR diversion volumes from approved developments

Network Coverage:

- SH1 interchange and ramps
- Great South Road
- Ararimu Road
- Karaka Road
- Maher Road

Assessment must include:

- Turning movements
- Queue lengths and propagation
- Impacts on SH1 ramps and adjacent intersections
- Integration with future P2D (Penlink to Drury) upgrades

4. Roading Network and Access Strategy

Access Principles

- All proposed lots must be serviced via internal roads
- Direct access onto Great South Road must be avoided
- Access consolidation is required to maintain GSR's arterial function

A plan must be provided showing:

- Proposed intersections with GSR
- Indicative access locations for Lots 1 & 2, and 43 & 44
- Adequate spacing from intersections

5. Great South Road (GSR) Upgrades

GSR is a Rural Arterial (80 km/h) and an important alternative to SH1.

Required Upgrades:

- Full frontage upgrade to Rural Arterial standard
- Provision of safe road margins, particularly for northbound traffic
- Assessment of effects on west-side properties between Ararimu Road and the northern boundary

Property Access:

- Maintain safe access for 1333 & 1349 GSR
- Ensure continued usability for future land use changes

Active Modes:

- Provide a bi-directional shared path along site frontage
- Connect to SH1 shared path
- Extend to the southern boundary

Safety Considerations:

- Address visibility constraints at the northern access (horizontal curve)
- Design all access points for based on operating speed environment in accordance with Austroads standards.

6. Ararimu Road Upgrades

Ararimu Road must be upgraded to Rural Arterial standard, including:

- Carriageway widening
- Road reserve improvements

Specific works required:

- Upgrade of NE and SE corners of the GSR/Ararimu intersection
- Integrate land not included in previous interim NZTA works

All designs must:

- Accommodate OD vehicle envelopes
- Provide safe and efficient operation
- The applicant should discuss with NZTA for the interchange upgrade works including P2D active modes facilities.

7. Intersections and Design Standards

Concept designs for all key intersections must be submitted for review, including:

- GSR intersections
- Ararimu Road intersections
- Maher Road intersection

Designs must:

- Safely accommodate turning movements
- Avoid excessive delays
- Provide appropriate capacity analysis

Potential treatments include:

- Auxiliary lanes
- Roundabouts
- Turn restrictions or LOS (left-in/left-out) arrangements

Standards and Reviews:

- Compliance with Austroads Guide to Traffic Management (GTM6)
- Completion of a Safe System Audit

8. Maher Road and Internal Network

- Detailed design required for Maher Road intersection
- Maher Road must be upgraded to accommodate:
 - Anticipated Development traffic volume
 - Future surrounding land development

9. Internal road layout must:

- Provide efficient circulation
- Enable future network connections to adjacent properties.
- Support adjacent land development

10. SH1 Interchange and Strategic Network

- Upgrade of the western SH1 interchange (signals or roundabout) is required
- Agreement required for:
 - Maher Road / Ararimu Road LILLO arrangement

Timing of works:

- May be determined via threshold-based triggers, reflecting staging and demand

11. Safety and Risk

- The GSR / Ararimu Road intersection is identified as medium-high risk
- ITA must include:
 - Safety assessment
 - Mitigation measures

Design must follow:

- Safe System principles
- Appropriate speed environment and sight distance

12. Active Modes Integration

- Continuous pedestrian and cycling infrastructure required along:
 - GSR
 - Ararimu Road
- Connectivity must align with:
 - Future P2D active mode network

13. Stormwater

The application must include:

- Flooding and overland flow path assessment
- Culvert design details
- Assessment of downstream effects

AT recommends:

- Consideration of offline stormwater treatment systems, including:
 - Wetlands
 - Communal raingardens

A whole-of-life cost assessment is required for roadside gardens proposed to vest with AT

14. Pavement

A full pavement impact assessment is required to confirm:

- Existing pavement capacity
- Suitability for increased heavy vehicle volumes

AT notes:

- Sections of Ararimu Road are not designed for high heavy vehicle volumes
- Pavement upgrades are likely to be required

Other approvals:

- Encroachment Approval: A separate approval is required from Auckland Transport or Auckland Council for any private drains located within the road reserve. All private drains must be designed and constructed in accordance with Watercare and Healthy Waters standards.
- Engineering Approval: The construction of public roads requires a separate engineering approval from Auckland Council.

- Designation Works: Any works within a designation area will require separate approval under Section 176 of the Resource Management Act

Drury West Crossing - Auckland Council, AT & Watercare

Feedback Sought	Response
Planning Feedback The subject site is zoned Mixed Rural under the Auckland Unitary Plan and is located outside the Rural Urban Boundary (RUB). The proposal for a large-scale light industrial development (approximately 70ha) represents urban-scale development in a rural zone, and is therefore inconsistent with the operative planning framework. The site is not identified for urbanisation in Auckland Council's Future Development Strategy (FDS) and is therefore out of sequence with the planned sequencing of urban growth and infrastructure provision. Key strategic planning considerations include: • The premature introduction of urban land use outside identified growth areas; • The potential to undermine the plan-led approach to urban development and infrastructure investment; • The absence of structure planning or precinct planning for the site or wider area; • The risk of fragmented and uncoordinated urbanisation, particularly given proximity to planned Drury growth areas. • The loss of productive rural land, including areas of Land Use Capability (LUC) Class 2 and LUC Class 3 soils, which are a finite and nationally important resource for primary production and are identified for protection from inappropriate urban development. The proposal effectively constitutes a new industrial precinct outside of the established planning framework.	Refer to Attachment 1 Planning Memorandum Section 5 which provides analysis which responds to this feedback. The following however, should be noted: • The FDS highlights a current shortage of industrial land and emphasises the need to enable greenfield capacity for new and displaced industrial users. It also emphasises that land extensive industries have specific requirements for large, flat sites with good accessibility. The project is consistent with this direction. • This feedback focuses on the outcomes identified within the FDS but does not address the outcomes for the site identified through the Southern Auckland Economic Masterplan another Auckland Council strategy which identifies the site as an opportunity node for industrial development given its proximity to the interchange. • <i>Drury West Crossing</i> is entirely consistent with the Southern Auckland Economic Masterplan as it makes efficient use of the opportunity node identified for the land adjacent to the Ramarama Interchange by enabling light industrial development. The timing of the development will largely align with the proposed 2028-2033 staging. • The FDS spatial response for rural areas acknowledges more work needs to be done to specifically address growth in existing rural areas. The Southern Rural Strategy has now been developed and was adopted by Council in May 2025. • While <i>Drury West Crossing</i> varies from the outcome identified for Ramarama within the Southern Rural Strategy the analysis to inform this strategy is coarse and high level and the application site is grouped with the much larger Ramarama rural area.

Feedback Sought	Response
	• The more detailed analysis undertaken to inform the application has confirmed that the proposed development it is appropriate for urban light industrial development and is not reliant on bulk wastewater or water supply servicing and is suitable from a transport perspective. • It is considered that through design, particularly with cultural and ecological input, <i>Drury West Crossing</i> can deliver a development that provides environmental, social, cultural and economic benefits that outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land.
Healthy Waters Feedback	
<i>Authorisation:</i> The site is not eligible to be authorised under the Regionwide Network Discharge Consent (RWNDL) due to its rural zoning. As a result: • A separate private diversion and discharge consent will be required; • There is uncertainty regarding the appropriateness of existing consents (e.g. DIS60350470) for this proposal.	Noted. The applicant will apply for a private discharge consent through a substantive application if successfully referred.
<i>Natural Hazards:</i> The development represents a significant change in hydrology, with substantial increases in impervious area. Key concerns include: • Flooding and hydrological effects, including impacts on upstream and downstream properties and infrastructure; • Effects on downstream systems, including Drury South, which are designed based on rural catchment assumptions; • Capacity constraints in existing motorway culverts, which are not sized for urban flows;	Noted. A complete flooding and stormwater assessment will be provided with a substantive application if successfully referred. The applicant team will continue to work with Healthy Waters will continue to work with Healthy Waters to address these concerns.

Feedback Sought	Response
• Potential cumulative catchment effects in the Hingaia and Ngākorua catchments. In addition, there are concerns regarding: • Stream erosion and geomorphic stability, particularly within erosion-prone watercourses; • The need for catchment-scale modelling, including climate change scenarios; • Uncertainty around stormwater infrastructure ownership and long-term maintenance. Further detailed assessment will be required to demonstrate that the proposal can avoid or adequately mitigate adverse stormwater and natural hazard effects.	Noted. The applicant team will continue to work with Healthy Waters regarding further assessment to support a substantive application. A geomorphic assessment will be provided with a substantive application if successfully referred. The details of land to be vested will be worked through with Healthy Waters as part of a substantive application if successfully referred.
Auckland Transport Feedback At the referral stage, Auckland Transport notes that a full Integrated Transport Assessment is not yet required however this would be required as part of any substantive application, should the referral application be accepted. Notwithstanding this, the proposal raises significant strategic transport considerations. The site is located adjacent to key transport corridors, including State Highway 1, Great South Road, and Ararimu Road, which function as strategic freight routes. Key issues include: • The introduction of a large-scale industrial development generating significant freight and traffic demand; • Out-of-sequence demand on the transport network, which is planned to be upgraded in line with Future Urban Area development sequencing; • Uncertainty around network capacity, particularly at: - o SH1 interchange and ramps; - o Great South Road and Ararimu Road; - o Local intersections and road corridors.	Noted. Consultation has commenced with NZTA and AT. The applicant will continue to engage with both stakeholders as part of a substantive application if successfully referred. Further transport modelling and a full Integrated Transport Assessment will be undertaken in support of a substantive application. A Transportation Memorandum has been prepared by Commute which outlines the transportation context, anticipated effects, and future assessment needs, and concludes that there are no transportation issues that would prevent the proposal from progressing to the Fast Track consenting stage.

Feedback Sought	Response
The proposal will likely require: • Substantial upgrades to strategic and local roading infrastructure; • Integration with planned transport projects and upgrades; • Consideration of cumulative effects with Drury development. At a strategic level, there is uncertainty as to whether the existing and planned transport network can accommodate the proposal without significant additional investment, and how such upgrades would be delivered and funded.	
Watercare Feedback	
Watercare has confirmed that: • The site is not serviced by public water or wastewater networks; • Servicing for nearby future urban areas is not expected until at least 2035, and does not include this rural-zoned land; • The proposal will rely on private water supply and wastewater systems. The proposal includes: • A private water supply (e.g. bore and/or roof water); and • A private wastewater treatment plant with land disposal. Key considerations include: • The appropriateness and resilience of private servicing solutions for a development of this scale; • The need for clear governance, funding, and long-term maintenance arrangements; • Compliance with Taumata Arowai regulatory requirements for drinking water; • The need to demonstrate that wastewater discharge will not adversely affect the receiving environment.	Noted. This feedback will be worked through as part of the detailed design of the development as part of a substantive application if successfully referred.

Feedback Sought	Response
There is also uncertainty regarding: • Integration with future public networks; • Potential duplication or inefficiencies in infrastructure provision; • Requirements for approvals where infrastructure is located in the road reserve. Overall, the proposal relies on infrastructure solutions that are not aligned with planned network provision, reinforcing the out-of-sequence nature of the development.	
Parks & Community Facilities The proposal incorporates a green network, however there is currently limited clarity regarding its form, function, and ownership. Key matters include: • The need for a stream assessment to determine whether esplanade reserves are required, which could significantly affect site layout and development capacity; • Uncertainty regarding whether open space areas will be: - o Vested as reserve, or - o Privately owned (e.g. via covenants or easements); • The need for comprehensive landscape design, including integration with stormwater systems and consideration of long-term maintenance; • The importance of achieving high-quality interfaces between industrial land and: - o Open space; - o Green corridors; - o Any future public reserve areas. Additional considerations include: • Clarity of accessways (public vs private function);	Noted. This feedback will be worked through as part of the detailed design of the development as part of a substantive application if successfully referred.

Feedback Sought	Response
• Streetscape and landscape design for any assets proposed to vest to Council; • Management of tree assets within road corridors. At this stage, there is insufficient information to confirm that the proposal will deliver appropriate open space outcomes, public amenity, or long-term asset management arrangement	
Overall Council Position	
Auckland Council acknowledges the potential economic and employment benefits associated with the proposed industrial development. However, at a strategic level, the proposal: • Is inconsistent with the Auckland Unitary Plan zoning and Future Development Strategy sequencing; • Relies on unplanned and private infrastructure solutions; • Raises significant unresolved issues in relation to: - o Stormwater and flooding; - o Transport network capacity and integration; - o Water and wastewater servicing; - o Open space provision and urban form outcomes. These matters collectively indicate that the proposal presents significant strategic, infrastructure, and environmental considerations, which would require comprehensive assessment and robust justification should it proceed to a substantive application.	Noted. This feedback will be worked through as part of the detailed design of the development as part of a substantive application if successfully referred.