

October 2025

Use of Public Conservation Land Report (section 19)

For the referral application for the Mill Road project – FTAA-2506-1079



Department of
Conservation
Te Papa Atawhai

Te Kāwanatanga
o Aotearoa
New Zealand Government

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Introduction

The Director General is required to provide a report under section 19 of the Fast-track Approvals Act 2024 (the Act). Statutory delegations are in place for the Department to prepare it. The report provides information for the Minister for Infrastructure (the Minister) in relation to the use of public conservation land (PCL) as part of the consideration of the referral application for the Mill Road project by New Zealand Transport Agency (NZTA).

The Act defines “public conservation land” as land to which either or both of the following apply:

- (a) *The land is held, managed, or administered under the Conservation Act 1987, the National Parks Act 1980, the Reserves Act 1977, or the Wildlife Act 1953;*
- (b) *The land is listed in Schedule 4*

This report addresses the information that must be contained in a report in relation to PCL as set out in s19(2)(a) and (b) of the Act and outlines any consultation undertaken as required by s19(3), as outlined in the sections below.

The information required under s19(2)(c) is not required in this report because NZTA does not require a ministerial determination under section 24(2) or (4) for new electricity lines as part of the Mill Road project and the referral application is not required to provide information under section 13(4)(q) or (r).

The Referral Application

The Mill Road project involves an upgraded transport corridor between the Redoubt Road interchange on State Highway 1 (SH1) in Manukau to the Philip Road intersection with Mill Road in Takanini, Auckland.

The Project involves developing new roads, upgrading existing roads, some local road improvements, changing existing designations and additional land acquisition to result in:

- An upgrade of the existing Mill Road to four lanes and associated local road connections;
- A westbound bus lane on Redoubt Road between Hollyford Drive and SH1;
- A new shared path active mode facility along Mill Road from the SH1/Mill Road interchange to the intersection of Murphy's Road; and
- An off-road active mode corridor using the old Mill Road alignment from the Murphy's Road intersection to Alfriston Road.

Although not specified in the referral application, NZTA has confirmed that temporary occupation of St Johns Redoubt Historic Reserve is required, but that no permanent acquisition of the Reserve or part of the Reserve is proposed.

The St Johns Redoubt Historic Reserve (Section 1, SO 65987) is administered by the Department of Conservation (DOC) and is public conservation land (PCL). The location of the St Johns Redoubt Historic Reserve (shown in blue) is in Appendix 1 (Figures 1 and 2).

Summary of advice

The detailed assessment is set out below but the key matters are:

- While the St Johns Redoubt Historic Reserve is PCL, the day-to-day management is undertaken largely by the Auckland Council.
- The only risks and potential liabilities to the Crown identified are those normally associated with development of infrastructure of this nature but these should be able to be adequately managed through appropriate conditions and good management practices.

- It is recommended, the scope of any referral notice enables a concession to be sought as part of a substantive application, if required.

Existing arrangements for the public conservation land

Administration

While the St Johns Redoubt Historic Reserve is DOC administered PCL, there is very limited day to day management undertaken by DOC. DOC management currently is limited to site visits a few times a year to assess the condition of the Reserve and to identify any other matters that may have arisen.

The St Johns Redoubt Historic Reserve is currently maintained by Auckland Council, under its facility maintenance contract which reflects a long-standing informal arrangement between DOC and Auckland Council dating back to well before the establishment of Auckland Council (through Manukau City Council). Auckland Council contractors mow the area as it is adjacent to the larger Auckland Council Reserve (under Reserves Act 1977) on Lot 2 DP 96631 (23 Redoubt Road) and Lot 65 DP183482 (13R Boeing Place) as shown in Appendix 1.

Auckland Council has advised that this arrangement includes the location/maintenance/renewal of council signs and assets on land outside of DOC administration, for example on the Redoubt legal road frontage to be widened as part of the Mill Road upgrade (as shown in Appendix 2 Figures 1 and 2). Other council owned and maintained assets include furniture, hard surfaces, paths, trees, turf, gates are either on the legal road or on council land at 13R Boeing Place.

A tree and the end of the hard sealed area are within the St Johns Redoubt Historic Reserve as shown in Figures 1 and 2 in Appendix 2. These are maintained by Auckland Council.

DOC intends to approach Auckland Council about formalising an agreement with Auckland Council or for Auckland Council to be formally appointed under the Reserves Act (1977) to Control and Manage the St Johns Redoubt Historic Reserve as well as to classify the Auckland Council reserve areas as Historic Reserve. To date this has not occurred. Auckland Council has confirmed it is open to establishing an agreement.

The reserve is listed as an “Actively Managed Historic Place” in the Auckland Conservation Management Strategy 2014-2024¹, and in DOC systems as a ‘Significant Redoubt in urban area’.

Access

Public access is available to and through the St Johns Redoubt Historic Reserve. There is an existing gated vehicle access into the St Johns Redoubt Historic Reserve from Redoubt Road. The locked gate is present to restrict vehicle access. This access barrier was most likely installed by Auckland Council or its predecessor years ago. There are no formalised access arrangements or roads in the reserve.

There is indirect access to the St Johns Redoubt Historic Reserve via the entrance way at the end of Boeing Place. This entrance way is part of the Auckland Council managed Recreation Reserve which shares its northern (unfenced) boundary with the St Johns Redoubt Historic reserve.

¹ [Auckland: Conservation management strategies](#)

Access would also be possible from Wilisa Rise, a private road on the eastern boundary of the reserve.

In 2014 Auckland Council developed a concept and access plan to support the use and the preservation of the St Johns Redoubt.

Because of its proximity, the area is frequently used by the public as a pedestrian throughfare between Boeing Place and Redoubt Road. The intention was to formalise this access to minimise impacts on the Redoubt itself. Council developed a concept plan for this purpose and had it reviewed by Clough and Associates, who had previously undertaken the site's heritage assessments. The concept plan was not progressed as the Manurewa Local Board received negative feedback from neighbours along the adjoining driveway.

Uses

There are currently three active concessions and one concession at the pre- application stage² that include the St Johns Redoubt Historic Reserve area. However, they are all generic concessions applicable to larger areas of PCL rather than specific to the St Johns Redoubt Historic Reserve.

There are no community agreements or other authorised uses of the St Johns Redoubt Historic Reserve. DOC is aware of some instances of informal and unauthorised use of the site for occasional carparking.

As a classified Historic Reserve, all uses should comply with s18 of the Reserves Act (1977): [Reserves Act 1977 No 66 \(as at 05 April 2025\), Public Act 18 Historic reserves – New Zealand Legislation](#).

Risks and potential liabilities to the Crown

The only risks and potential liabilities to the Crown identified are those normally associated with development of infrastructure of this nature, including health and safety, potential contamination, and hazards posed to neighbouring landowners, but these should be able to be adequately managed through appropriate conditions and good management practices.

Auckland Council has advised that the truncation of the road reserve at Redoubt Road will result in a retaining wall and altered access to the public. Excavation for road widening will impinge on areas associated with the redoubt construction and use, and its extent of place, and will likely require archaeological protocols with regard to finds. However, these areas are outside of the St Johns Redoubt Historic Reserve (Section 1 S0 65987) and are mainly comprising unformed legal road or within Auckland Council land.

Outcomes of consultation

Section 19(3) requires that the reporting on matters required by sections 19(2)(a) and 19(2)(b) is prepared in consultation with every owner, administrator, or manager of the affected PCL who is not the Crown.

² 48655-FLO – Botany Department of the University of Auckland - for the nationwide collection of small quantities of lichen from Public Conservation Land, 64146-FAU –Ospri - a nationwide authority for the trapping of ferrets and stoats, 99271 – FAU – Wildlands Consultants Ltd - to survey, measure, tail-tip lizards and frogs for identification and salvage throughout Auckland on both private and public land. Concession at pre application stage 47913-RES – Kessels and Associates - to operate an electric fishing machine on all wadeable rivers, streams, ponds, lake margins and wetlands throughout NZ.

The St Johns Redoubt Historic Reserve is administered by DOC and is Crown land. However, Auckland Council is involved in the day-to-day management of the reserve. Accordingly, DOC has consulted with Auckland Council and the Council's comments have been incorporated above.

The Council also confirmed that Totara Park, which is also affected as part of the Mill Road project is land held in fee simple under the Local Government Act 2002. It is not subject to the Reserves Act 1977 and is a park defined by s138 of the Local Government Act. Therefore, Totara Park is not PCL as defined in the Fast-track Approvals Act 2024.

Any other relevant information

Nga Mana Whenua o Tamaki Makaurau - Tamaki Collective have right of first refusal over the St Johns Redoubt Historic Reserve subject to s121, 128 and 129 of the Nga Mana Whenua o Tamaki Makaurau Collective Redress Act 2014.

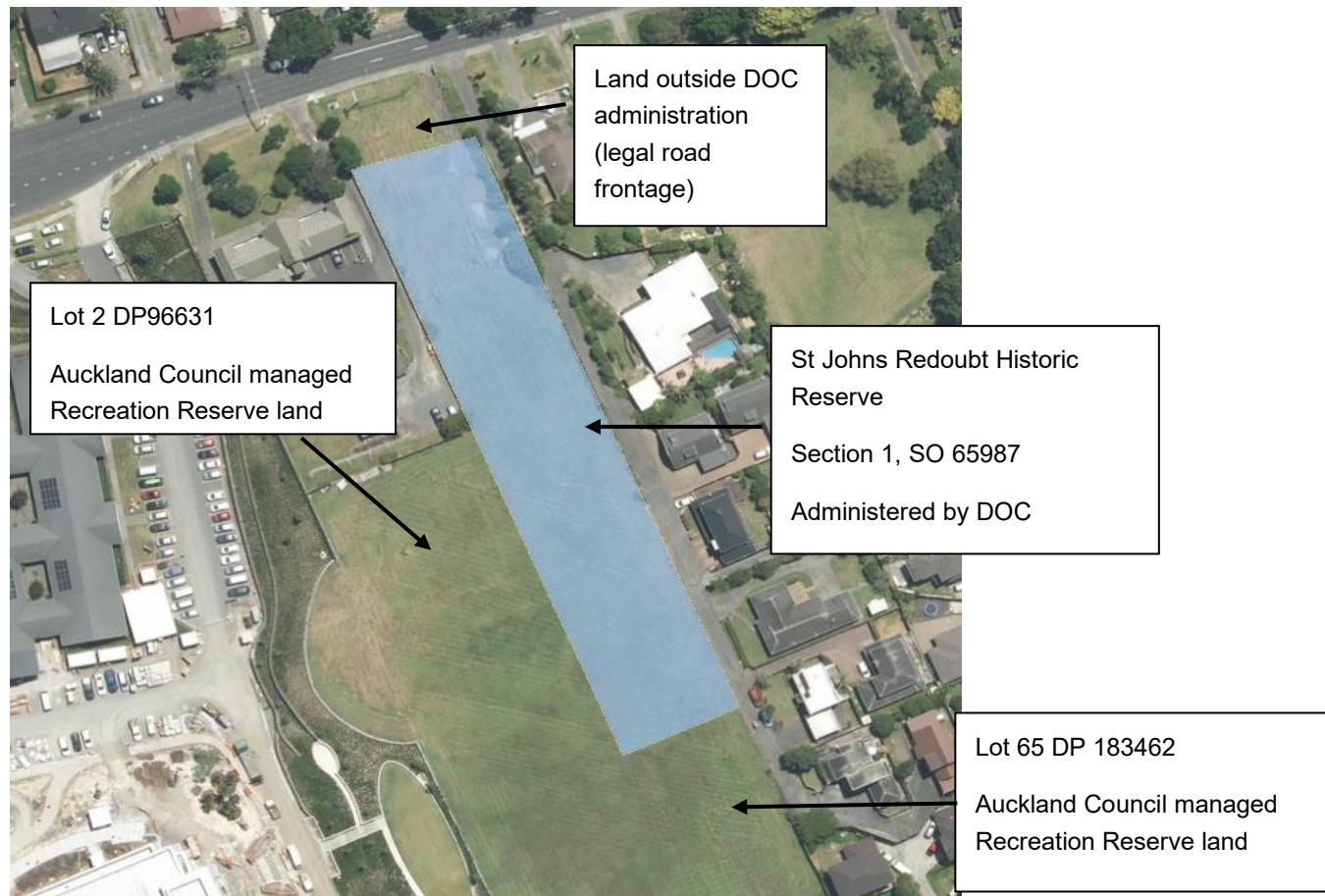
Nga Mana Whenua o Tamaki Makaurau – Tamaki Collective, Ngāti Tamaoho, Te Kawerau a Maki and Ngāi Tai ki Tamaki all have conservation relationship agreements with DOC on how DOC and iwi should work together. While the Ngāi Tai ki Tamaki agreement refers to some specific sites it does not refer to St Johns Redoubt Historic Reserve. The other two relationship agreements do not list specific sites. None of these relationship agreements include any details in relation to the use of the St Johns Redoubt Historic Reserve.

As outlined in the Department's s17 comments on the referral application, any use or occupation of the St Johns Redoubt Historic Reserve as part of the referral project (such as for access, machinery storage, re-grading or structures) would normally trigger the requirement for a Concession. It was recommended in the s17 comments that the scope of any referral notice is sufficiently broad enough that if a concession is required, this is in-scope for a substantive application.

Appendix 1

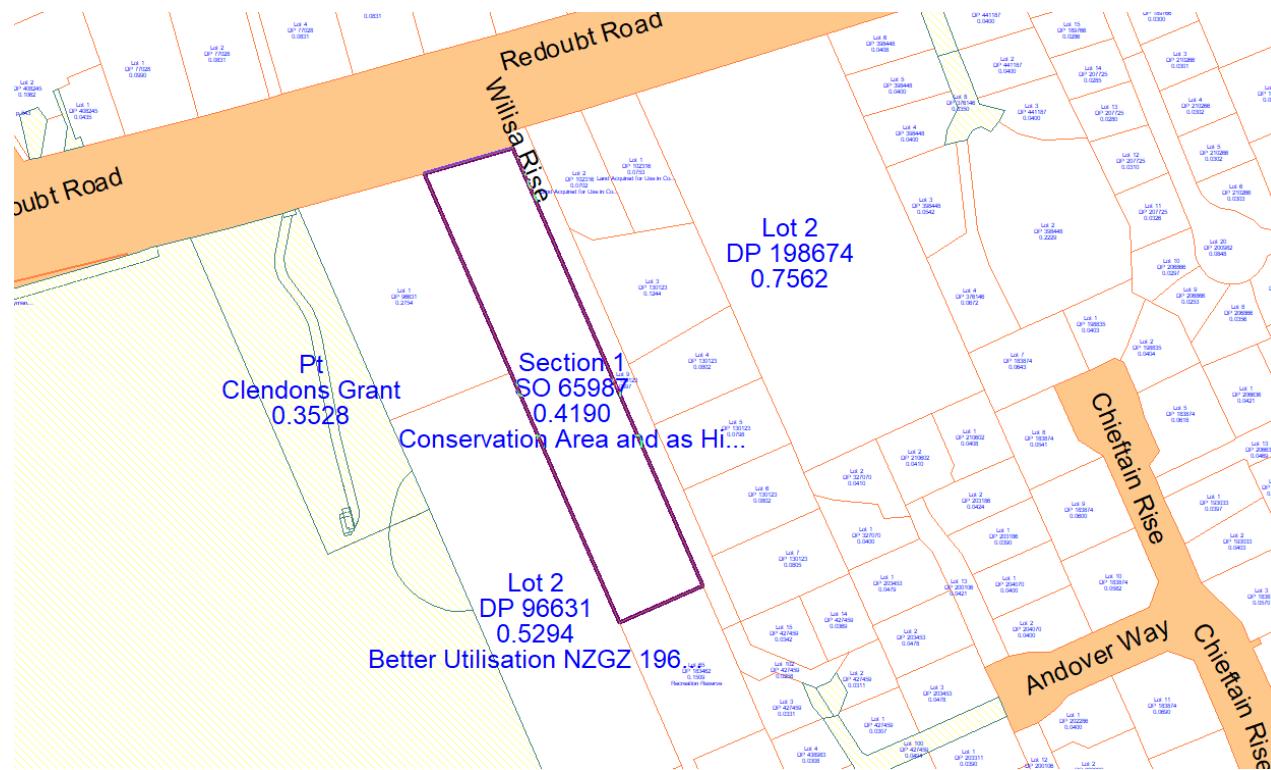
Figure1: Extent of St Johns Redoubt Historic Reserve, Public Conservation Land (shown in blue)

Section 1 SO65987



Source: Department of Conservation

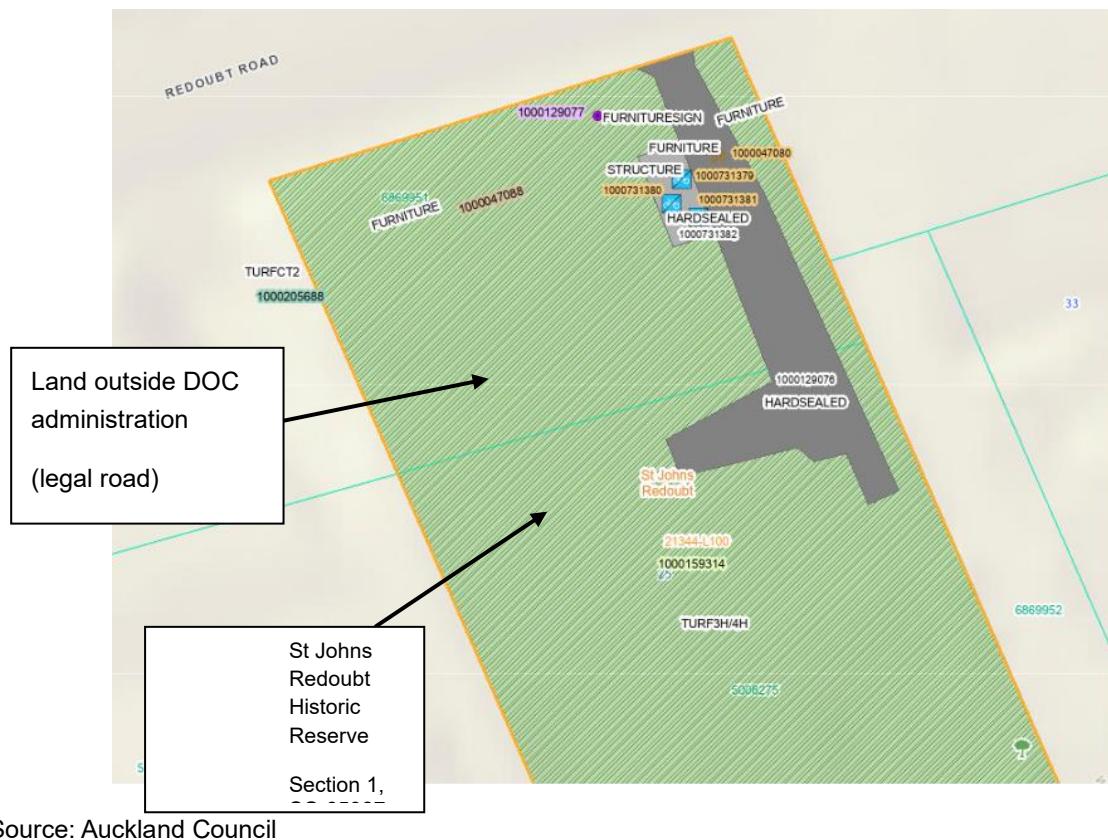
Figure 2: Extent of St Johns Redoubt Historic Reserve and legal road frontage



Source: Department of Conservation

Appendix 2

Figure 1: Location of Auckland Council signs and assets (map view) 25 Redoubt Road



Source: Auckland Council

Appendix 2

Figure 2: Location of council signs and assets (aerial view) 25 Redoubt Road

UNCLASSIFIED



Source: Auckland Council