

Auckland Council comments on a project under the Fast-track Approvals Act 2024

Project name	Drury West Crossing (FTAA-2606-1248) Auckland Council reference: PRR00044402 21-25 Ararimu Road, Ramarama
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Auckland Council		
*First name	Russell		
*Last name	Butchers		
Postal address	Private Bag 92300, Victoria Street West, Auckland 1142		
*Contact phone number	s 9(2)(a)	Alternative	-
*Email	s 9(2)(a)		

2. Please provide your comments on this application

Overview

1. Thank you for the opportunity to provide comments on the referral application for the Drury West Crossing project at 21–25 Ararimu Road, Ramarama. Auckland Council has sought input from relevant Council departments and Council-Controlled Organisations (CCOs), and a summary of that feedback is provided below.
2. Overall, Auckland Council **opposes** the project proceeding through the Fast-track Approvals Act 2024 process. While the proposal may generate local economic and employment benefits, the development is inconsistent with Auckland’s planned growth framework, including the Future Development Strategy and Southern Rural Strategy, and is located outside identified growth areas and planned growth sequencing.
3. The application has not demonstrated a strategic need for additional industrial land in this location, nor has it demonstrated that the proposal will deliver significant regional or national benefits as contemplated by section 22 of the Act. Auckland Council also has concerns regarding

the permanent loss of highly productive land and the implications of the proposal for integrated infrastructure planning and long-term urban form outcomes in southern Auckland.

4. In the invitation letter, it has been requested that Auckland Council provide input on two questions pertaining to s17(3) of the Fast-track Approvals Act 2024 (the Act). We respond below:

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.

5. We are not aware of any applications that have been lodged with the Council that would represent a competing project.

In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.

6. Our understanding is that s42(4)(a) does not apply in this case for a referral. We are not aware of existing consents issued under s124C(1)(c) or s165ZI of the RMA that apply in this case.

Auckland Council Resource Consents and Planning Department

7. The project comprises a proposed industrial precinct development on rural land at Ramarama. The Applicant and its consultants have engaged with Auckland Council at pre-lodgement stage, and the information presented within the referral application is generally consistent with Council's understanding of the project and its overall scope. Having reviewed the referral application and supporting material, Auckland Council provides the following preliminary comments in relation to the matters set out in section 22 of the FTAA.

Does the project have significant regional or national benefits?

8. Auckland Council does not consider that the project will deliver significant regional or national benefits. While the proposal may generate local economic activity, employment and construction expenditure, the Applicant has not demonstrated that these benefits would be significant at a regional or national scale.
9. The Council's Chief Economist Unit has identified a number of limitations in the Economic Impact Assessment, noting that many of the quantified benefits rely on unsupported assumptions regarding development timing, uptake and construction costs, and that much of the reported economic activity may not represent net additional benefits to the Auckland region.
10. In particular, the assessment largely identifies gross economic activity rather than net economic benefits and does not adequately demonstrate the extent to which the claimed benefits would be additional to, rather than displaced from, existing economic activity elsewhere in Auckland.

Accordingly, Auckland Council is not satisfied that the proposal has demonstrated significant regional or national benefits for the purposes of section 22 of the Act.

Would referring the project facilitate its delivery in a more timely and cost-effective way?

11. Referral may facilitate the delivery of the project in a timelier and cost-effective way. Given the scale of the proposal several applications would likely be required, including a plan change and a range of associated resource consents. The FTAA process would provide a more streamlined pathway for obtaining those approvals.
12. However, the potential efficiency gains associated with the fast-track process do not, in themselves, demonstrate that the project satisfies the other referral criteria set out in section 22 of the Act.

Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?

13. Auckland Council is not aware of any reason why referral of the project would materially affect the efficient operation of the fast-track approvals process. However, the Council does not consider that the application has demonstrated significant regional or national benefits sufficient to justify referral when assessed against the criteria in section 22 of the Act.

Has the project been identified as a priority in any government or sector plan or strategy?

14. No. The project has not been identified as a priority project in any central government, local government, or sector plan or strategy. While the Applicant relies on the Southern Auckland Economic Masterplan, that document identifies potential economic opportunities rather than planned growth areas and does not form part of Auckland's statutory growth planning framework. The site is not identified for future urban growth in the Future Development Strategy 2023–2053, is not located within the Drury Structure Plan area, and sits outside Auckland's planned growth sequencing framework.

Will the project deliver new or support existing regionally/nationally significant infrastructure?

15. No regionally or nationally significant infrastructure is proposed. The proposal will be privately serviced for water and wastewater, and does not contribute to any regionally significant infrastructure upgrades for Watercare.

Will the project increase housing supply or contribute to a well-functioning urban environment?

16. As an industrial development, the project would not increase housing supply. The proposal states that it would contribute to a well-functioning urban environment by enabling light industrial development in an accessible location, and as a comprehensively planned industrial

precinct, it may have some potential to contribute to a well-functioning urban environment. However, as outlined by the Growth and Strategy Team, a well-functioning urban environment requires development to occur in identified locations and to be integrated with planned infrastructure and land-use patterns. The proposal is located outside Auckland's planned growth areas and growth sequencing framework, and the application has not demonstrated that industrial development in this location is necessary to achieve a well-functioning urban environment.

Will the project deliver significant economic benefits?

17. As noted above and in the assessment from the Council's Chief Economist Unit, the proposal has not demonstrated that it will deliver significant economic benefits.
18. While the Applicant's Economic Impact Assessment identifies substantial levels of construction expenditure, employment and economic activity, those figures are primarily based on gross economic impacts derived from multiplier modelling and do not adequately demonstrate the extent to which those benefits would be net additional to the Auckland economy. The assessment relies on assumptions regarding development timing, uptake and construction costs that are not supported by detailed market evidence. Nor does the assessment provide evidence of demand or uptake rates sufficient to demonstrate that the scale of benefits claimed will be realised.
19. Accordingly, Auckland Council is not satisfied that the proposal has demonstrated significant regional or national economic benefits for the purposes of section 22 of the Act.

Will the project support primary industries (e.g., aquaculture)?

20. The project will not directly support primary industries. To the contrary, the proposal would result in the permanent loss of highly productive land through its conversion to industrial uses. Parts of the site are currently used for horticultural production and the Applicant has not demonstrated that the land is subject to permanent or long-term constraints that would prevent its continued use for economically viable primary production. This matter is discussed further below in relation to the National Policy Statement for Highly Productive Land.

Will the project support development of natural resources (e.g., minerals, petroleum)?

21. The project will not directly support the development of natural resources.

Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?

22. There is no evidence in the proposal that the project will support climate change mitigation.

23. As outlined in the feedback from AT, public transport is very limited and future employees are likely to be highly reliant on private vehicles.

Will the project support climate change adaptation or recovery from natural hazard events?

24. The proposal is not expected to make a significant contribution to climate change adaptation or recovery from natural hazard events. While future development would be required to appropriately manage flooding and other natural hazard risks, these matters would be addressed through the detailed design and consenting process and do not represent a particular benefit of the proposal.

Will the project address significant environmental issues?

25. The proposed development will not address any significant environmental issues. While the proposal includes environmental management and mitigation measures, such as stormwater treatment and ecological enhancement, these are primarily intended to manage or offset the effects of the development itself rather than resolve an existing significant environmental issue.

Is the project consistent with local or regional planning documents (e.g., spatial strategies)?

26. The Drury West Crossing proposal seeks to establish a large-scale industrial precinct on land zoned Rural – Mixed Rural under the Auckland Unitary Plan (AUP). The site sits outside the Rural Urban Boundary (RUB) and is not identified for future urbanisation or industrial development in Auckland's Future Development Strategy (FDS) or other components of Auckland's statutory planning framework. From a strategic planning perspective, the proposal therefore represents an out-of-sequence development on rural land that is intended to remain outside Auckland's planned urban growth programme.
27. Under the AUP, industrial activities of this scale are not anticipated in the Rural – Mixed Rural Zone, and the site is not subject to any precinct provisions that would support or enable urbanisation. As a result, the proposal does not align with the zoning framework or the strategic intent for growth sequencing and integrated infrastructure planning in southern Auckland.
28. While the proposal includes internal transport networks, the scale of development will generate significant transport demands that extend beyond the site. Auckland Transport identifies that substantial upgrades to Great South Road, Ararimu Road, the Ramarama interchange, active mode connections, and potentially pavement infrastructure are likely to be required to safely and efficiently accommodate the traffic generated by the proposal. These upgrades would need to be delivered and funded by the Applicant, as they are not part of Council's planned transport investment programme for this area.
29. Auckland Transport also notes that no detailed traffic modelling has yet been provided to demonstrate that the surrounding transport network can accommodate the forecast traffic volumes.

30. Public transport services in the locality are currently very limited, and future employees are likely to be highly reliant on private vehicles. At this stage, the proposal does not yet demonstrate that it can be integrated with the transport network in a manner consistent with the outcomes sought in Chapter B2 (Urban Growth and Form) and Chapter B3 (Infrastructure, Transport and Energy) of the AUP.
31. The site is not serviced by public three-waters infrastructure. The proposal will rely on private water supply, private wastewater treatment, and on-site stormwater management. These servicing arrangements reflect the rural zoning and reinforce that the area is not planned for urban infrastructure investment. While private servicing is feasible, it does not demonstrate alignment with Auckland's integrated infrastructure planning framework, or contribute to upgrades that would support growth in the surrounding area.
32. As identified by Council's Growth & Spatial Strategy (GSS) team, Auckland's existing planning framework already provides substantial industrial land capacity within the Drury Structure Plan area and other planned southern growth locations. No strategic need has been demonstrated for an additional 112 hectares of industrial land outside these areas. This position is reinforced by Council's economic review, which notes that the Applicant has not provided sufficient evidence regarding demand, uptake rates, or development timing assumptions to demonstrate the need for additional industrial land at this location. Accordingly, the proposal represents an expansion beyond Auckland's adopted spatial growth framework rather than implementation of it.
33. In addition, the proposal would introduce a major employment node in a location not identified through spatial planning processes, raising broader strategic concerns with respect to the distribution of employment growth, the protection of productive rural land, and the long-term integrity of Auckland's growth sequencing framework.
34. While the proposal may deliver employment opportunities and economic activity, the application has not demonstrated that industrial development in this location is required to support a well-functioning urban environment, particularly given the substantial industrial land capacity already available within Auckland's planned growth areas.
35. Overall, while the proposal may provide additional industrial land supply and economic benefits, it is not aligned with Auckland's planned growth framework, has not demonstrated a strategic need for industrial development in this location, requires significant transport upgrades, and relies on private servicing arrangements. Auckland Council therefore considers that the proposal is not consistent with local or regional planning documents and spatial strategies, and these matters weigh against referral.

Are there any other relevant matters to consider?

National Policy Statement Highly Productive Land (NPS:HPL)

36. The NPS-HPL is relevant to this proposal as the site is rurally zoned and contains land identified as highly productive land.
37. Auckland Council considers that the proposal is inconsistent with the policy framework and outcomes sought by the NPS-HPL. In particular, the proposal would result in the permanent urbanisation of a substantial area of highly productive land for industrial purposes.
38. The Applicant's planning assessment acknowledges that the proposal does not strictly satisfy the tests set out in clause 3.10 of the NPS-HPL. Auckland Council agrees with that conclusion. The Applicant has not demonstrated that there are permanent or long-term constraints which mean the highly productive land is unable to be used for economically viable land-based primary production for at least 30 years.
39. Nor has the Applicant demonstrated that the proposal avoids significant loss of productive capacity, avoids fragmentation of highly productive land, or that the environmental, social, cultural and economic benefits of the proposal outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production.
40. In particular:
- The economic benefits are uncertain and are anticipated to be significantly lower than those claimed by the Applicant.
 - The proposal would permanently remove a substantial area of highly productive land from primary production.
 - The proposal has potential implications for the long-term protection of highly productive rural land and the management of the rural-urban interface
 - The proposal may create pressure and expectations for further industrial or urban development in the wider Drury-Ramarama area beyond land identified for future growth.
 - The proposal is located outside Auckland's planned growth areas and has not demonstrated a strategic need for industrial development in this location.
41. Accordingly, Auckland Council considers that the proposal raises significant unresolved issues under the NPS-HPL which weigh against referral.

Inputs from Auckland Council Departments and Organisations

42. Inputs from various Auckland Council departments and CCOs are appended to these comments as Appendix 1. An overview of the inputs is provided below:

Auckland Council Growth and Spatial Strategy

43. Overall, Auckland Council Growth and Spatial Strategy **opposes** the application for referral.
44. The proposal is inconsistent with Auckland's strategic growth plans. The site is outside the Rural Urban Boundary and is not identified for future urban development. The proposed industrial

activity is not supported by the AUP, the FDS, or any Council-endorsed spatial planning documents.

45. The development is out of sequence and unplanned. The location has not been prioritised for growth, and the proposal would introduce industrial development into an area where Council has not planned for urbanisation, infrastructure investment, or supporting services.
46. The Drury Structure Plan already provides substantial industrial land capacity in planned and sequenced locations. No strategic need for additional industrial land outside these areas has been identified.
47. A well-functioning urban environment is not solely dependent on the provision of additional development capacity. While the proposal may increase industrial land supply, a well-functioning urban environment requires development to occur in identified locations, integrated with planned infrastructure and land-use patterns. The application does not demonstrate that industrial development in this rural location is necessary to achieve such outcomes.
48. The proposal may create pressure for further industrial or urban development on surrounding rural land, with implications for productive rural land protection, the rural–urban interface, and long-term growth expectations in the Drury–Ramarama area.
49. Whilst there are potential benefits, including addition supply of industrial land, and associated employment opportunities (including during construction), as well as support for regional economic productivity and supply chain functions, these benefits must be considered in the context of existing planned industrial capacity in southern Auckland. The presence of benefits does not demonstrate a strategic need for industrial development outside the adopted spatial growth framework.

Auckland Council – Chief Economist Unit

50. The Auckland Council – Chief Economist Unit is **neutral** on the application for referral.
51. Of note is that the Auckland Council – Chief Economist Unit identifies that while the proposal is likely to generate positive local economic effects, the information provided does not demonstrate that these benefits reach the threshold of significant regional benefits required under section 22 of the FTAA. The Economic Impact Assessment (EIA) prepared by the Applicant contains several methodological limitations, relies on unstated assumptions, and does not provide sufficient evidence to support the scale or regional significance of the claimed benefits. A summary of their comments is provided below.

52. While the project may generate local economic activity, the evidence provided does not demonstrate significant regional or national economic benefit as required under section 22 of the FTAA.
53. A more robust economic assessment is required to evaluate the proposal against FTAA criteria. The EIA would need to demonstrate that the benefits outweigh the costs and provide sufficient evidence to determine whether the project delivers significant regional or national economic benefits. If the application proceeds to the substantive phase, the economic assessment should:
- clearly demonstrate net additional economic benefits rather than displaced activity;
 - assess development timing and discount future benefits to present value;
 - provide stronger evidence supporting industrial and commercial demand through market analysis or benchmarking; and
 - include a more comprehensive assessment of wider economic benefits.

Auckland Transport (AT) (Development Planning)

54. Overall, AT is **neutral** on the application for referral.
55. AT's feedback highlights that the Drury West Crossing proposal involves large-scale industrial development on land not anticipated for urbanisation under the Auckland Unitary Plan, and that the transport network in this location is not currently configured to support the scale of development proposed. AT advises that key upgrades to Great South Road, Ararimu Road, and the Ramarama Interchange are likely to be required, but no detailed transport modelling has been provided to demonstrate feasibility, timing, or delivery responsibilities.
56. AT advises that a comprehensive transport assessment (including an Integrated Transport Assessment and a Pavement Impact Assessment) is required to support any substantive application and demonstrate that the proposal is viable within the existing and planned transport network.

Watercare Services Limited (WSL)

57. Overall, WSL is **neutral** on the application for referral.
58. Feedback from WSL reflects that the Applicant intends to privately service the development, and that the site is located within the Rural – Mixed Rural Zone, which sits outside Watercare's serviced area under Watercare's Growth Servicing Policy 2026.
59. In summary WSL outline that:
60. WSL does not provide water supply and wastewater to service rural zoned land.
61. WSL has no current plans to service the Project Area, and its ongoing planning for future wastewater infrastructure does not provide for the Project to be connected to, or vested to,

Watercare in the future. As the site is located within a rural zone, it should be assumed that the wastewater system will remain permanently private, including its ownership, operation, renewals and maintenance.

62. The Applicant proposes a private bore-sourced water supply supplemented by roof water harvesting, and a private centralised wastewater treatment plant with disposal of treated effluent to land. WSL defers to Auckland Council regarding the design, governance, and regulatory performance of these private systems.
63. Although the systems are private, WSL recommends that water and wastewater infrastructure be designed and constructed to Watercare's standards to ensure long-term safety, reliability, and compatibility should any future servicing discussions occur

Auckland Council – Healthy Waters and Flood Resilience Department (Healthy Waters)

64. Overall, Healthy Waters is **neutral** on the application for referral.
65. Healthy Waters' feedback reflects that the proposal will require private stormwater diversion and discharge consents, as the site is zoned Rural – Mixed Rural and therefore cannot be authorised under the Regionwide Network Discharge Consent (RWNDC). Healthy Waters advises that while no stormwater matters currently warrant recommending decline of the referral, significant further information will be required at the substantive stage to confirm that stormwater, flooding, and stream-related effects can be appropriately managed.
66. A summary of their comments is provided below:
67. As the site is rural (and the RWNDC cannot be utilised) stormwater diversion and discharge must be authorised through a private stormwater consent under AUP Chapter E8.
68. A full Stormwater Management Plan (SMP) will be required at substantive stage, demonstrating that SMAF hydrology mitigation requirements are met, and provide detail of water quality treatment device sizing and discharge locations.
69. A detailed Flood Assessment supported by modelling outputs, assumptions, and sensitivity testing will be required.
70. Stream erosion and stream modification effects are not yet addressed. The proposal identifies that it will include stream crossings, culvert upgrades, stormwater discharges, and earthworks near streams. A detailed stream erosion risk assessment, with supporting geomorphic and hydraulic analysis will be required to demonstrate how stream stability and ecological values will be protected.
71. The Applicant proposes vesting stormwater infrastructure and green network areas to Auckland Council. Healthy Waters notes that:

72. Vesting must align with Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy.
73. Council will only vest land where stormwater function and public benefit are clearly demonstrated.
74. Long-term operation and maintenance responsibilities must be clarified.
75. As the Applicant proposes a private entity to own and operate water and wastewater networks, given stormwater will also require private consents, it may be appropriate for that private entity to manage stormwater assets as well.

Auckland Council – Parks and Community Facilities

76. Overall, Auckland Council – Parks and Community Facilities is **neutral** on the application for referral.
77. The feedback outlines on the uncertainty surrounding the proposed open space network, the lack of clarity around ownership and long-term management, and the fact that the development is not aligned with Council’s open space planning framework for industrial areas. Parks does not identify any significant adverse effects on existing public open space, nor any regionally significant open space benefits arising from the proposal. A summary of their comments is provided below.
78. The masterplan shows a mix of potential open space types, including esplanade reserves, shared paths, stormwater and wastewater areas, and “maintenance of natural features” areas, but does not identify the ownership, public access arrangements, vesting requirements or long-term management responsibilities associated with these areas.
79. Under Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy (2025), Council does not plan to acquire public open space within industrial zones. Parks therefore has no current plans to acquire open space within this development.
80. The development is out of sequence with the FDS given it is Rural – Mixed Rural zone. The lack of an adopted greenways plan for the area means Parks cannot determine whether the proposal contributes to regional open space outcomes. Parks is investigating future connectivity options in the locality, including a potential east–west greenway along Ararimu Road, but this connection is not currently provided for in the proposal.
81. It is agreed that esplanade reserves are likely to be required, but the extent and location cannot be confirmed from the current information.

82. Streetscape landscaping is supported in principle, but this does not constitute regionally or nationally significant infrastructure from a Parks and Community Facilities perspective.

83. There are no existing Council-owned open spaces within or directly adjacent to the site, and Parks has not identified any significant adverse effects on existing publicly owned open space assets at the referral stage.

Houkura – Independent Māori Statutory Board

84. No comment was received from Houkura – Independent Māori Statutory Board

Franklin Local Board

85. The Franklin Local Board have advised that they support this application for referral in principle, but raises concerns over water usage/wastewater treatment and traffic/billboard creations.

CONCLUSION

86. Overall, Auckland Council **opposes** the project proceeding through the fast-track consenting process. While the proposal may generate local employment and economic benefits, the development is inconsistent with Auckland's Future Development Strategy, Southern Rural Strategy and planned growth sequencing framework. The proposal would establish a major industrial precinct on highly productive rural land outside identified growth areas and without any demonstrated strategic need for additional industrial land in this location.

87. Furthermore, the Applicant has not demonstrated that the claimed economic benefits represent significant net additional regional or national benefits, as required by section 22 of the Act. In Auckland Council's view, the proposal is inconsistent with Auckland's integrated approach to land use and infrastructure planning, productive rural land protection objectives, and the strategic direction provided by Auckland's spatial planning framework.

88. Accordingly, Auckland Council considers that the matters weighing against referral outweigh the potential benefits identified in the application.

Comments prepared by:



Colin Hopkins

Consultant Planner (DCS)

For Resource Consents

Date: 28 July 2026

A handwritten signature in black ink that reads "R Butchers". The "R" is stylized with a large loop, and "Butchers" is written in a cursive, slightly slanted script.

Russell Butchers

Principal Project Lead

Premium Resource Consents

Auckland Council

Date: 28 July 2026

Documents enclosed:

1. Growth & Spatial Strategy Comments
2. Chief Economist Comments
3. Auckland Transport Comments
4. Watercare Services Limited Comments
5. Healthy Waters & Flood Resilience Comments
6. Parks & Community Facilities Comments
7. Franklin Local Board Comments

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Drury West Crossing
Address	21 Ararimu Road, Drury
FT application number	FTAA-2606-1248
Council ref	PRR00044402

Respondent Information

Name	Eva Zombori
Role	Senior Advisor, Growth and Spatial Strategy
Agency / Department	Policy
Date	17.07.2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☒ Oppose
☐ Neutral

Agency/Department Response

1. Ineligible Activities (Section 5 FTAA)

From a Growth and Spatial Strategy perspective, no information has been identified that suggests the proposal involves an ineligible activity as defined by section 5 of the Fast-track Approvals Act 2024. Confirmation of any ineligible activity matters would more appropriately sit with planning, environmental and infrastructure specialists.

2. Strategic Growth and Infrastructure Planning Assessment (Section 22)

2.1 Consistency with Auckland's Strategic Growth Framework

The proposal seeks approval for a large-scale industrial development comprising approximately 112 hectares of industrial land and associated commercial and infrastructure activities on rural land (Rural – Mixed Rural Zone) at Ramarama/Drury West. The application acknowledges that the site is not identified for future industrial development within Auckland's Future Development Strategy (FDS).

From a strategic planning perspective, the proposal is inconsistent with Auckland's planned growth sequencing framework, which seeks to align urban development with the timing and provision of enabling infrastructure and services. The site is not currently identified as a growth area within the FDS and sits outside the planned sequence for future urban development.

In addition, Auckland's strategic planning framework already provides for substantial industrial land and employment growth within the Drury Structure Plan area, including land specifically identified and sequenced for industrial development. From a Growth and Spatial Strategy perspective, no strategic need has been identified for additional industrial land of this scale outside the planned urban growth areas. The proposal therefore represents expansion beyond, rather than implementation of, Auckland's planned growth programme.

2.2 Growth Sequencing and Urban Form

A key strategic issue is that the proposal would introduce a substantial employment node on rural land that has not been identified through Auckland's established spatial planning processes for future industrial growth. While the site is located adjacent to major transport infrastructure and near the Drury growth area, the proposal would develop land in a location not identified for growth.

This raises broader strategic concerns regarding the location of employment growth across southern Auckland. Auckland's adopted growth strategy seeks to direct urban and industrial development to identified locations where growth can be coordinated with infrastructure provision and broader urban development outcomes. The proposal would establish a substantial industrial precinct outside that framework and ahead of planned sequencing.

2.3 Well-functioning urban environment

The applicant states that the proposal would contribute to a well-functioning urban environment through the provision of additional industrial land supply and employment opportunities in southern Auckland.

From a Growth and Spatial Strategy perspective, a well-functioning urban environment is not solely dependent on the provision of additional development capacity. It also relies on growth occurring in locations identified through strategic planning processes and being integrated with planned infrastructure investment, land use patterns, transport networks and broader urban development outcomes.

While the proposal may increase industrial land supply, Auckland's existing growth planning framework, including the Drury Structure Plan area, already provides substantial capacity for future industrial growth and employment development. The application has not demonstrated that additional industrial land supply is required in this rural location to achieve a well-functioning urban environment.

The proposal therefore raises a strategic question as to whether development outside planned growth areas would support or undermine the long-term efficiency and effectiveness of Auckland's urban growth framework. From a strategic planning perspective, development that occurs outside identified growth areas and growth sequencing may detract from the

coordinated urban form outcomes anticipated through the Future Development Strategy and related spatial planning documents.

2.4 Infrastructure Planning and Funding Implications

The proposal has the potential to create demand for transport, water, wastewater and other infrastructure beyond that currently anticipated through Auckland's long-term growth and infrastructure planning programmes. While the applicant proposes that infrastructure can be provided as part of the development, it is unclear at the referral stage whether growth of this scale can occur without creating future pressure for additional public infrastructure investment.

From a strategic perspective, development occurring ahead of planned growth sequencing can create challenges for efficient infrastructure planning, funding and delivery.

2.5 Potential Cumulative and Precedent Effects

The proposal may create pressure for further industrial and urban development on surrounding rural land beyond areas currently identified through Auckland's strategic planning framework. This has potential implications for the long-term protection of highly productive rural land and the management of the rural-urban interface and future growth expectations within the wider Drury-Ramarama area.

The protection of productive rural land is a key principle underpinning the Future Development Strategy and the Southern Rural Strategy. Development of this nature risks undermining the strategic distinction between planned urban growth areas and rural land intended to remain available for productive rural purposes.

3. Strategic Benefits Relevant to Section 22

Notwithstanding the concerns outlined above, the proposal may deliver a number of benefits relevant to the Minister's assessment under section 22 of the Act.

These include:

- Provision of approximately 112 hectares of additional industrial land supply in southern Auckland.
- Significant employment generation during construction and operation. The applicant estimates approximately 5,135 FTE-years during construction and around 1,820 ongoing FTE jobs at full operation.
- Potential support for regional economic productivity and supply chain functions through the development of a major industrial precinct adjacent to the State Highway 1 corridor.
- Potential contribution to employment growth in southern Auckland and improved access to jobs for future residents in the wider Drury area.

While these benefits are acknowledged, they should be considered in the context of existing planned industrial capacity within the Drury Structure Plan area and wider southern Auckland. From a strategic growth perspective, the existence of economic and employment benefits does not in itself demonstrate a need for industrial development in a location that falls outside Auckland's adopted spatial growth framework.

4. Reasons Potentially Relevant to Referral Decision (Section 21(5))

From a Growth and Spatial Strategy perspective, the principal concern is not that the project is ineligible, but that it is not aligned with Auckland's adopted growth sequencing and spatial planning framework. The proposal is not aligned with the Future Development Strategy and broader southern growth planning and may have implications for long-term infrastructure planning, funding, productive rural land protection and the management of future urban growth in an area where coordinated sequencing is critical to successful delivery.

These matters are relevant considerations for the Minister when assessing whether the project is appropriate for referral under section 22 of the Fast-track Approvals Act 2024.

5. Overall GSS Position

The proposal presents a tension between:

- potential economic and employment benefits arising from additional industrial development; and
- inconsistency with Auckland's planned growth sequencing, Future Development Strategy, Southern Rural Strategy, productive rural land protection objectives and integrated infrastructure planning approach.

While the proposal may generate economic and employment benefits, Auckland's strategic planning framework already provides for substantial industrial growth and employment development within the Drury Structure Plan area and other planned southern growth locations. From a Growth and Spatial Strategy perspective, the application has not demonstrated a strategic need for additional industrial land in this rural location, nor has it demonstrated that development outside the planned growth framework is necessary to achieve a well-functioning urban environment.

Accordingly, the identified economic benefits are not considered sufficient to outweigh the strategic concerns arising from development occurring outside Auckland's planned growth framework. The proposal risks undermining the long-term effectiveness of Auckland's growth sequencing, integrated infrastructure planning, productive rural land protection objectives and intended urban form outcomes for southern Auckland. These matters weigh against referral.

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Project Information

Project Name & FTAA number	Drury West Crossing PRR00044402
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Respondent Information

Name	Rodney Yeoman
Role	Economics
Agency / Department	Formative Limited
Date	16 July 2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

Agency/Department Response

While I consider that the proposal is likely to generate positive economic effects, I do not consider that the information provided demonstrates those benefits reach the threshold of significant regional benefits contemplated by the Fast-track Approvals Act.

The Economic Impact Assessment (**EIA**) from Insight Economics identifies substantial construction activity and ongoing business activity. However, many of the quantified benefits rely on development assumptions which are not stated in the report and many of the assessed economic benefits will not be net additional benefits to the Auckland region.

Given Auckland's large and diverse economy, it is not immediately evident that the scale of both one-off construction and ongoing economic benefits would, in themselves, be regionally significant.

The EIA has not assessed the demand or supply situation, and hence there is no evidence to support the likely development phasing or the uptake of premises. This has implications in terms of the construction and ongoing benefits from the proposed industrial and commercial centre. Nor has it assessed the feasibility of the new commercial centre or the implications within the wider hierarchy of centres in the area.

My neutral position should not be interpreted as disagreement that the project has economic merit, but rather reflects uncertainty as to whether the evidence currently presented demonstrates the level of significance required under the FTAA.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Does the project have significant regional or national benefits?

The extent to which the economic benefits associated with the proposal are genuinely additional to the regional economy remains unclear.

I note that in other FTAA decisions involving large-scale developments in the Auckland region, commissioners have acknowledged that the net economic benefit is likely to be "well less than" the gross economic benefits identified through an EIA. In particular, the commissioners in the Sunfield FTAA concluded that less than one quarter of the construction activity would be additional and that the resulting economic benefits would be materially lower than the gross values reported in the EIA.

Applying the findings from Sunfield would imply that the majority of the gross economic values presented in the EIA are not net additional to the wider Auckland economy, but instead represent activity displaced from elsewhere in the region. Consequently, the net economic benefits of the proposal are likely to be materially smaller than those presented in the applicant's assessment.

Furthermore, aspects of the assessment are not adequately explained, and several assumptions that are critical to the quantified benefits may be questionable, as discussed further in the sections below

Would referring the project facilitate its delivery in a more timely and cost-effective way?

From an economic perspective, yes, although this is not addressed in the Economic Assessment.

It is reasonable to conclude that referral through the Fast-track process would enable delivery of the project more quickly, allowing any economic benefits to be realised sooner than under an RMA application.

Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?

From an economics perspective I would expect that the referral would not materially affect the efficient operation of the fast-track approvals process.

Has the project been identified as a priority in any government or sector plan or strategy?

Unknown, and no such identification is stated in the application.

Will the project deliver new or support existing regionally/nationally significant infrastructure?

No, in my opinion the project will not deliver new or support existing regionally/nationally significant infrastructure.

Will the project increase housing supply or contribute to a well-functioning urban environment?

No.

Will the project deliver significant economic benefits?

In my opinion the proposal is likely to deliver significant local economic benefits across both the construction and operational phases. During construction, the project would generate substantial investment in Drury local area, employment and value added, providing a short-term stimulus to the economy. Once operational, the proposal would increase business activity, introduce additional industrial and commercial premises, and support increased activity within the Drury.

However, as discussed above the quantification in the EIA does not provide sufficient evidence to conclude that the benefits will be regionally significant as required in the FTAA.

Will the project support primary industries (e.g., aquaculture)?

No.

Will the project support development of natural resources (e.g., minerals, petroleum)?

No.

Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?

No.

Will the project support climate change adaptation or recovery from natural hazard events?

No.

Will the project address significant environmental issues?

No.

Is the project consistent with local or regional planning documents (e.g., spatial strategies)?

No, although I note that this is primarily a planning matter.

From an economic perspective, the proposal is generally aligned with the strategic direction of regional and local planning documents, which anticipate industrial development in the wider Drury area. However, this particular site is located outside the Rural Urban Boundary and is not identified for development in the longer term.

Are there any other relevant matters to consider?

From an economic perspective, no additional matters materially affect my conclusions. I note, however, that while the construction and operational related analysis is based on established economic modelling techniques and provides a reasonable indication of the gross scale of economic activity associated with the development. As such, both the construction and the wider operational benefits should be interpreted with caution.

Auckland Council Criteria

From an economic perspective, the application does not meet most of the Auckland Council assessment criteria relevant to economics.

Furthermore, the assessment is stronger in demonstrating that the proposal will generate positive, and potentially significant, economic benefits within the local economy than it is in demonstrating that those benefits satisfy the higher threshold of significant regional benefits contemplated by the Fast-track Approvals Act. Many of the enduring benefits, wider economic benefits, are based on professional judgement rather than empirical evidence. Accordingly, some caution should be exercised in the weight placed on these benefits.

While I acknowledge that EIA have become the predominant form of economic evidence accompanying Fast-track applications, they should not necessarily be regarded as the optimal framework for assessing whether a project generates significant economic benefits. EIAs primarily measure changes in economic activity and therefore tend to emphasise gross impacts without fully accounting for displacement, transfer effects, opportunity costs, or other factors relevant to determining net economic benefits to society.

I note the following issues that should be considered when assessing the quantified economic benefits:

- **Development timeframe:** the EIA provides no justification for the assumed phasing of development, which means it is not possible to assess the reasonableness of the timing assumptions underpinning the analysis. Importantly the EIA provides no assessment of the demand for, or supply of, comparable developments in Auckland. As a result, there is no supporting evidence to justify the assumed 9-year development timeframe. For a development of this scale, the rate of uptake is a critical assumption that directly affects the timing and present value of the estimated economic benefits. Without analysis of market capacity, competing supply, and likely absorption rates, the assumed development period is not supported.
- **Net Present Value:** the EIA does not convert the raw construction values into comparable present value terms. When comparing economic activity occurring over multiple years, it is standard economic practice to convert values into a common base year to account for the fact that future values are worth less than current values due to time preference and the opportunity cost of capital. As a result, the reported GDP contribution of \$0.9 billion overstates the economic value of the construction activity, as it has not been appropriately discounted and expressed in present value terms. Using the limited information provided in Figure 4 and Table 4, and assuming a

straight-line expenditure profile over the construction period, I have estimated that the present value of the construction activity is approximately \$0.6 billion, which is materially lower than the value reported in the EIA (more than 46% lower).¹ This has resulted in a material overstatement of the reported gross construction benefits.

- **Net Economic Value:** the EIA reports only gross benefits and implicitly assumes that all of the activity (both construction and ongoing) at Drury West Crossing would not otherwise have been built elsewhere in Auckland. As noted previously, the decision on the Sunfield proposal recognised that gross economic impacts materially overstate the true economic benefits of development. The same issue arises for Drury West Crossing, where it is likely that a substantial proportion of the gross economic activity would occur elsewhere in Auckland even if the development did not proceed. I note that Insight Economics has acknowledged this limitation in other Economic Assessments that I have reviewed within the RMA context. I consider that a substantial proportion of the gross economic activity identified would represent a transfer from other locations within Auckland, and that, at the regional level, the net economic benefits would be materially smaller than those reported in the EIA.
- **Construction Cost:** The EIA provides limited detail regarding the assumptions used to estimate construction costs. The reported figures are unusually high build costs, which are described as representing the regional average over the last two years based on building consent data. The reported regional average of \$2,900 per square metre of industrial floorspace is significantly higher than the average observed in Southern Auckland², which was approximately \$2,100 per square metre of industrial floorspace over the same period. Furthermore, I also note that QV CostBuilder data indicates substantially lower construction costs, ranging from approximately \$1,500 to \$2,100 per square metre of industrial floorspace depending on the specification of the development.

Table 1 of the EIA reports construction activity of \$1,035 million. Applying the average construction cost observed in Southern Auckland would reduce this estimate to approximately \$755 million, which is 27% lower than the value reported in the EIA. The EIA provides no explanation or supporting evidence as to why the higher build cost assumption is appropriate. Either the proposed development is expected to comprise industrial buildings of a materially higher specification than comparable developments in Southern Auckland, or the construction costs applied in the EIA are overstated. I have not identified any evidence in the EIA to suggest that the proposed development would be materially different from other industrial developments in Southern Auckland.

The four matters discussed above each, in their own right, materially reduce the likely economic benefits associated with the proposal. Taken together, these matters raise significant questions as to whether the

¹ Applying commercial discount rate that is prescribed by Treasury of 8%.

² Local Board Areas Mangere-Otahuhu, Manurewa, Papakura and Franklin.

scale of benefits identified in the EIA provides reliable evidence that Drury West Crossing satisfies the FTAA requirement for regional significance.

In terms of the wider economic benefits, these are discussed in the EIA largely in theoretical terms rather than being supported by quantitative analysis. While such benefits may occur to some extent, I consider that they are unlikely to be material to the assessment of whether the development is of regional or national significance within the FTAA framework.

Also I note that Cost-Benefit Analysis (**CBA**) would have enabled a more comprehensive assessment of the project's economic efficiency and the extent to which the claimed benefits represent genuine net gains. Nevertheless, given current practice and the qualitative nature of many of the project's anticipated benefits, I do not consider the absence of a CBA materially undermines the conclusions reached in the EIA.

Overall, I consider the EIA provides a credible basis for concluding that the proposal is likely to generate meaningful economic benefits and make a positive contribution to industrial and the commercial supply. However, whether those benefits are of sufficient magnitude to satisfy the FTAA threshold of significant regional benefits ultimately remains a matter of planning judgement informed by, but not determined solely by, the economic evidence.

To better understand the potential economic effects against FTAA criteria, the Economic Impact Assessment would need to provide a more robust assessment of the economic costs and benefits, in order to show that the costs do not outweigh the benefits, and also to enable a conclusion as to whether the proposal will have significant regional or national benefits. If the application is referred and proceeds to the substantive phase, I recommend that an economic assessment provided at that stage should provide:

- A clearer demonstration of net economic benefits, including the extent to which the anticipated economic activity represents genuinely additional activity rather than redistribution or displacement from elsewhere within Auckland.
- Assessment of the development timing and present value of benefits.
- Additional evidence supporting the industrial and commercial provision, including market analysis, benchmarking against comparable projects, or other empirical evidence demonstrating the anticipated increase in local demand.
- A stronger assessment of wider economic benefits.
- I recognise that some of the effects described in this list are difficult to predict, and recommend sensitivity testing of key assumptions, particularly those relating to development time frame, occupancy and employment generation, to demonstrate the robustness of the conclusions under a range of plausible scenarios.

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Drury West Crossing
Address	21 Ararimu Road, Drury
FT application number	FTAA-2606-1248
Council ref	PRR00044402

Respondent Information

Name	Nagaraj Prabhakara
Role	Principal Development Planner
Agency / Department	Auckland Transport
Date	21 July 2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

Agency/Department Response

- The Minister for Infrastructure ('the Minister') has asked Auckland Council to provide written comments on an application to refer Drury West Crossing ('the project' or 'the proposal') under the Fast-track Approvals Act 2024 ('the Act') to the fast-track process.
- Auckland Council has asked Auckland Transport to provide comments on the project, which will form part of Auckland Council's response to the Minister.
- Auckland Transport support the project's referral to the Fast-track process, subject to a review of the detailed Integrated Traffic Assessment Report and Pavement Impact Assessment Report, and considers that the project will result in significant regional employment benefits.

Project description

- The project involves the subdivision and development of a large vacant light industrial lots across the site approximately 111.9 ha, located at 21-25 Ararimu Road, Ramarama, Auckland. The development will provide approximately 350,000 m2 of industrial gross floor area (GFA) including up to 5,000 m2 area of commercial services

to provide for the day-to-day needs of employees and visitors potentially including a petrol station, gym, café and convenience retail.

- The project includes transport infrastructure, an open space network and on-site water, wastewater and stormwater.
- The proposal is located within the Rural - Mixed Rural Zone in the Auckland Unitary Plan ('AUP').

Lack of integration between land use and transport infrastructure/services

- The project involves commercial development of land that was not anticipated for urban development, given that the site is zoned Rural - Mixed Rural Zone and sits outside of the Rural Urban Boundary (RUB).
- Waka Kotahi ("NZTA") has lodged two Notice of Requirements (NoR 2 & 4) in this area.
- Notice of requirement 2 (NoR 2) proposes to alter State Highway 1 Designation 6700 'Motorway' to authorise improvements to an area between a point south of the Quarry Road overbridge and the State Highway 1 Great South Road overbridge at Bombay, including upgrades to the Ramarama Interchange, a new overbridge and a new roundabout on western side of State Highway 1, and the associated infrastructure.
- Notice of requirement 4 (NoR 4) is a new designation sought by NZTA for a new shared user path to be constructed in the area 200m north of Quarry Road to the existing Bombay/Mill Road interchange.
- Both NoR's provide pedestrian / cycling connections from the west side of SH1 (subject side) to the eastern side (Drury south).
- Section 6.1.3 of the transport memo dated 11 June 2026 prepared by Commute Transportation Consultants stated the below existing road network will likely be upgraded to support the proposed light industrial development.

ID	Upgrade	Comment
A	Great South Road / Ararimu Road	Roundabout likely required.
B	Ramarama interchange (west side)	The western intersection likely required to be upgraded to roundabout as per NoR. Small amount of development is likely permitted before this upgrade.
C	Ararimu access	Roundabouts likely required to serve both sides of Ararimu Road)
D	Ararimu Road	Upgrade Ararimu Road along the site frontage to urban industrial road including pedestrian / cycling provision
D	Great South Road	Right turn bay / upgrade at each intersection
E	Walking cycling	Internal links to future NZTA pedestrian / cycling path to SH1 required

The anticipated traffic generation from the proposed industrial development would be 1675 peak hour trips and 13,400 daily trips.

No detailed traffic model is provided to indicate if the existing road network can cater for the additional traffic generation from the proposed development. The traffic memo confirms the Integrated Traffic Assessment (ITA) will be developed as part of the substantive application.

AT supports the current development subject to the review of an Integrated Traffic Assessment (ITA) . The applicant must also provide Pavement Impact Assessment (PIA) along the intended truck routes to indicate if the existing road structure can cater the additional heavy commercial vehicles without affecting the remaining life of the road asset and to ensure the no adverse safety impact effects on the other road users.

- Public transport services in the area are currently very limited, given that the area to the east of the subject site is zoned Future Urban and is not anticipated to urbanise in near future, according to Auckland Council's Future Development Strategy. Future employees within the project site are therefore likely to become highly reliant on private vehicles for travel to/from home.
- Given that the project neither aligns with the provision of bulk transport infrastructure and services nor was anticipated as part of the modelling to support the designation of the future transport network, Auckland Transport considers that the project will result significant regional employment benefits and contribute to a "well-functioning existing road network such as Great South Road and State Highway ". As such, the project can be referred to the fast-track process subject to an ITA & PIA and existing road network upgrades.

Matters for the applicant to address

Should the application be referred to the fast-track process, Auckland Transport requests that the applicant provides a comprehensive transport assessment as part of the substantive application. The transport assessment should assess, but is not limited to, the following matters:

Integrated Transport Assessment (ITA) Requirements

A full ITA is required to assess the transport effects of the proposal and address the following.

- 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.

Trip Generation and Assessment Methodology

The trip generation assessment must be robust and locally appropriate.

AT notes that:

- The 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.

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.

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 the proposed Lots.
- Adequate spacing from intersections.

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 GSR.
 - #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.

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.

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.

Maher Road and Internal Network

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

Internal road layout must:

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

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.

Safety and Risk

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

Design must follow:

- Safe System principles.
- Appropriate speed environment and sight distance.

Active Modes Integration

- Continuous pedestrian and cycling infrastructure required along:
 - GSR.
 - Ararimu Road.
- Connectivity must align with:

- Future P2D active mode network.

Pavement Impact Assessment Report

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.

The Infrastructure Report should assess, but is not limited to, the following matters:

Stormwater

The application must include:

- Flooding and overland flow path assessment.
- Culvert design details.
- Assessment of downstream effects.
- Stormwater Management Plan clearly stating the treatment requirements, and how these will be met.
- Roading and Stormwater design drawings.
- Overland flow path calculations demonstrating compliance with Table 3 of the Road Drainage chapter of AT's TDM.
- Culvert calculations demonstrating compliance with section 4.3.9.8 of the Stormwater Code of Practice.

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.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

21 July 2026

Russell Butchers
Principal Project Lead, Auckland Council
s 9(2)(a)

Dear Russell

Response to referral application for the Drury West Crossing project at 24 Ararimu Road, Ramarama under the Fast-track Approvals Act 2024

Introduction

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Drury West Crossing Fast-track referral application (**Application**), made under section 13 of the Fast-track Approvals Act 2024 (**Act**).
2. Drury West Crossing Limited (**Applicant**) is proposing a light industrial development comprising approximately 112 hectares of land, including up to 5000 m² of supporting commercial services (**the Project**), along Ararimu Road, Ramarama (**the Project Area**). The subject land is zoned Rural – Mixed Rural under the Auckland Unitary Plan – Operative in Part (**AUP-OP**). The Applicant is proposing to privately service the development for both water and wastewater. The Application states the possibility of future connections to Watercare's network could be explored but the development is not reliant on this possibility.
3. Watercare provided initial comments to Auckland Council in response to the Applicant's section 11(1)(b) notice. The comments in the letter dated 29 May 2026 still stand, unless otherwise stated in this letter.
4. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
 - Drury West Crossing Fast Track Referral Application Covering Letter, Barker & Associates dated 11 June 2026
 - Fast-track referral application form from Rebecca Sanders dated 11 June 2026
 - Attachment 1 – Planning Memorandum for Drury West Crossing, Barker & Associates dated 11 June 2026
 - Attachment 4 – Drury West Crossing Consultation, Barker & Associates
 - Attachment 5 – Drury West Crossing Masterplan Package, Barker & Associates dated June 2026
 - Attachment 7 – Civil Infrastructure Report: Drury West Crossing, Maven Associates Limited dated 10 June 2026
 - Attachment 8 – Drury West Crossing Limited: Water Supply Servicing Report, GWE Consulting dated May 2026.
5. Any amendment to the Application will require further review from Watercare.

6. This advice is valid as at the date of this letter. All servicing advice is based on the best available information at the time and may change if updated network modelling or programme and/or funding reviews indicate materially different outcomes.

Watercare's purpose and statutory obligations

7. Watercare is New Zealand's largest provider of water and wastewater services, operating as a substantive council-controlled organisation owned by Auckland Council with the purpose embodied in the Māori whakatauki "*Ki te ora te wai, ka ora te whenua, ka ora te tangata*" (When the water is healthy, the land and the people are healthy), reflecting the connection between its services and the wellbeing of the community and local environment.
8. Watercare is required to manage its operations efficiently, with a focus on minimising overall costs while maintaining long-term asset integrity. These obligations are subject to economic regulation under the Watercare Charter, with oversight provided by the Commerce Commission as the appointed Crown monitor. Watercare must also give effect to the relevant aspects of Auckland Council's Long-term Plan and act consistently with other council plans and strategies, including the Auckland Plan 2050 and the Future Development Strategy (**FDS**).
9. Through its annual Statement of Intent responding to the council's Letter of Expectation, Watercare commits to contributing to Auckland Plan 2050 outcomes. This includes working collaboratively with the wider council group to support areas of growth identified by the council, acting consistently with the FDS for major infrastructure development for future urban areas and ensuring alignment of infrastructure projects with other utilities. Watercare also commits to fully recovering growth-related costs so that growth pays for growth.

Watercare's comments

10. Watercare has considered the Project against the assessment criteria set out in section 22 of the Act and provides the following comments.

Overview of Watercare's servicing policy

11. The Project Area is zoned Rural – Mixed Rural under the AUP-OP. Watercare's Growth Servicing Policy 2026 sets out Watercare's approach to servicing growth. The policy recognises rural or equivalent zoned land as a distinct servicing category located outside of Watercare's area of service. It also recognises that development may be proposed through Fast-track or resource consent processes, in which case Auckland Council will undertake a policy assessment considering consistency with its plans and strategies and wider infrastructure requirements needed to support a thriving community. Watercare will follow Auckland Council's lead on strategic consistency and provision of public infrastructure servicing for such proposals.
12. In line with this policy, Watercare does not provide water or wastewater services to rural land unless Auckland Council has determined through its policy assessment that provision of public servicing should proceed. As of the date of this letter, no policy assessment for servicing the Project Area has been provided by Auckland Council.
13. Notwithstanding this policy position, the comments below are provided in relation to the Applicant's proposed servicing options.

Water supply

14. The Civil Infrastructure Report by Maven states that the proposed development is estimated to generate an average potable water demand of approximately 86 m³ per day. The Applicant proposes a private water supply network utilising bore water and supplemented by roof water as required.
15. Watercare defers to Auckland Council for comments on the proposed private water supply servicing for the proposed development including design, governance and environmental performance. Additionally, any private water supply would be subject to regulation by Taumata Arowai as the water services regulator.
16. While the Project does not rely on a public water connection, the Civil Infrastructure Report notes that it may be possible to connect to the bulk supply point near Quarry Road. As per the Growth Servicing Policy, Watercare does not service rural land unless directed by Auckland Council.

Wastewater servicing

17. The Applicant is proposing a private, centralised wastewater treatment plant with disposal of treated effluent to land. The preferred wastewater reticulation approach is not confirmed but options identified by the Applicant include a low-pressure sewer system or a conventional gravity network with wastewater pump stations. The Applicant proposes to evaluate these options at the detailed design stage.
18. Watercare defers to Auckland Council for comments on the proposed private wastewater servicing for the Project, including design, governance and environmental performance.
19. The Civil Infrastructure Report also notes that there could be a possible connection to the public Drury Crossing vacuum system and that while the proposed development is not reliant on a public connection, the possibility of a future public connection “is an ongoing consultation piece with Watercare”. Watercare has no current plans to service the Project Area, and its ongoing planning for future wastewater infrastructure does not provide for the Project to be connected to, or vested to, Watercare in the future. As the site is located within a rural zone, it should be assumed that the wastewater system will remain permanently private, including its ownership, operation, renewals and maintenance.
20. Watercare provided initial comments on the Applicant’s section 11(1)(b) notice, requesting that any proposed private wastewater servicing scheme and associated discharges should include a robust assessment of potential effects on the receiving environment, being the Manukau Harbour. The assessment should demonstrate that the proposal will not compromise the ongoing operation, resilience, or environmental performance of Watercare’s existing public infrastructure and services.

General comments on private servicing

21. The Applicant should clearly outline the intended long-term servicing plan for water supply and wastewater servicing which demonstrate that the proposed solutions are feasible and sustainable in perpetuity, including from financial, operational and environmental perspectives.
22. While the schemes are proposed to be privately owned and operated, it is recommended that they are designed and constructed in accordance with Watercare’s relevant Codes of Practice for Land

Development and Subdivision to ensure long-term safety and reliability of the water and wastewater networks.

23. Additionally, should a future connection to the public network be proposed, Watercare has concerns regarding the ability to vest private water and wastewater treatment assets that have been operational, managed and maintained outside of Watercare's control without significant additional investment.

Conclusion

16. Watercare does not provide water supply or wastewater connections to rural land unless Auckland Council, through a policy assessment, has determined that provision of public servicing should proceed. As at the date of this letter, no policy assessment for servicing the Project has been provided by Auckland Council.
17. Watercare is open to further discussions with the Applicant and Auckland Council.

Yours faithfully,



Helen Shaw
Head of Strategy and Consenting
Watercare Services Limited

Address for correspondence:
Emily Ip
Senior Development Planner
Phone: s 9(2)(a) [REDACTED]
Email: fasttrack@water.co.nz

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Drury West Crossing
Address	21 Ararimu Road, Drury
FT application number	FTAA-2606-1248
Council ref	PRR00044402

Respondent Information

Name	Hillary Johnston
Role	Fats-Track Lead
Agency / Department	Healthy Waters
Date	20.07.2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

Agency/Department Response

Healthy Waters & Flood Resilience (HWFR) has reviewed the referral application for the proposed Drury West Crossing development located at 21–25 Ararimu Road, Ramarama. We understand that the proposal comprises approximately 112ha of industrial development, supporting commercial activities, associated infrastructure, and a green network incorporating ecological areas, stormwater management areas, and public open space.

Reasons for Consent

HWFR holds a Regionwide Network Discharge Consent (RWND) which authorises the diversion and discharge of stormwater from public stormwater networks within existing urban areas and land rezoned through an approved plan change process.

The development sites are zoned Rural – Mixed Rural and therefore cannot be authorised under the RWND. The Planning Memorandum appropriately identifies that a private stormwater diversion and discharge consent will be required under Chapter E8 of the Auckland Unitary Plan.

HWFR notes that part of the wider site is already subject to an existing private discharge consent (DIS60350470) and associated Stormwater Management Plan. The Civil Infrastructure Report indicates that this consent provides a design framework and stormwater management requirements for portions of the site, while additional stormwater approvals will be required for areas not covered by the existing consent.

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

Stormwater Management

A high-level stormwater management strategy has been provided within the Civil Infrastructure Report. The assessment indicates that stormwater quality treatment and SMAF hydrology mitigation are proposed through a combination of raingardens, wetlands, tree pits and detention tanks. The Report also outlines that at this stage, it has been assumed that flood mitigation for the 1% AEP event will be required and that suitable areas have been set aside to accommodate this.

The Civil Infrastructure Report indicates that stormwater management for the areas subject to existing discharge consent (DIS60350470) will be undertaken in accordance with the conditions of this consent and the associated Tonkin & Taylor SMP. Stormwater management for all other areas of the development site are proposed to comply with the requirements of the RWNDC.

Should the proposal proceed, HWFR would expect a Stormwater Management Plan to accompany any substantive application. This should include confirmation of stormwater management proposed and conceptual device sizing for water quality treatment and hydrology mitigation, the proposed discharge locations, and long-term operation and maintenance requirements. It is expected that if the development proceeds, detailed flood modelling will be undertaken to determine flood management. The relationship between existing consented stormwater infrastructure and any proposed new infrastructure should be clear.

Natural Hazards and Flooding

HWFR notes that the site contains overland flow paths, floodplains, and stream corridors associated with both the Hingaia and Ngākōroa catchments. The Civil Infrastructure Report states that existing flood hazards have informed the master planning process and that future development areas have generally been located outside identified flood-prone areas.

The application references flood modelling previously undertaken in support of discharge consent DIS60350470, which concluded that downstream flooding effects could be appropriately managed. The Civil Infrastructure Report proposes that additional flood modelling will be undertaken should the development proceed.

At a high level, HWFR does not currently identify any matters that would prevent flooding effects from being appropriately assessed and managed through a substantive application

process. However, a detailed Flood Assessment supported by modelling outputs, assumptions, and sensitivity testing should accompany any future application.

HWFR welcomes further discussion on flood modelling assumptions and methodology and expect that this would be discussed with Council prior to lodgment of any substantive application.

Stream Erosion

The site drains to both the Hingaia and Ngākōroa catchments and contains a number of streams, wetlands, and associated riparian margins. The proposal envisages multiple stream crossings, culvert upgrades, stormwater discharges, and earthworks/land modification adjacent to streams.

While stormwater management and flooding has been considered at a conceptual level, limited information has been provided regarding potential stream erosion effects, stream modification works, culvert upgrades, and long-term discharge of stormwater from the proposed development.

Should the proposal proceed, HWFR would expect a detailed assessment of stream erosion risk together with supporting geomorphic and hydraulic assessments where appropriate. Any substantive application should demonstrate how stream stability, infrastructure resilience, ecological values, and downstream receiving environments will be protected and how any adverse effects will be addressed.

Asset Ownership

The Civil Infrastructure Report proposed that stormwater infrastructure be vested to Auckland Council, while potable water supply and wastewater infrastructure are proposed to remain under private ownership and operation through a dedicated infrastructure entity.

The proposal also includes substantial green network areas comprising ecological features, stormwater management infrastructure, open space and stream corridors.

Auckland Councils Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy which was adopted by Council in May 2025 sets out the how Council will consider the provision of open space including for stormwater management purposes. The strategy also seeks to support the vesting of stream corridors or natural wetlands where the function sits best in public ownership. This is to avoid vesting of land that would result in an ongoing financial maintenance burden to Council without a clear and tangible public benefit. If the project were to progress, the extent and location of any land proposed for vesting for stormwater management purposes should be accompanied by evidence and clear rationale linked to *Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy* that the land delivers essential stormwater function as well as wider public benefit.

While the Civil Infrastructure Report outlines that SMAF hydrology mitigation, water quality treatment, and flood management will be achieved, the proposed stormwater management or treatment approach has not yet been finalised. If the project were to progress, HWFR seek

further input on proposed stormwater management so that, if necessary, there is opportunity to comment on the operation and maintenance requirements of any public stormwater system.

It is understood that a private ownership entity is proposed to be established for the operation and management of the private water supply and wastewater networks to be aligned with the proposed private water and wastewater consents. It may also be appropriate for this entity to consider the proposed stormwater network alongside the wastewater and water servicing given the stormwater discharge consent will also need to be private. Healthy Waters remain open to further discussions with the applicant over these future arrangements.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Summary

From a HWFR perspective, the information provided does not currently identify any stormwater related matters that would warrant recommending decline of the referral application under section 21 of the FTAA. However, it is noted that the proposed development cannot be authorised under the RWNDC due to current zoning, and a private diversion and discharge consent will be required.

If the application is to proceed, further information will be required including confirmation of the proposed approach to address water quality treatment and hydrology mitigation, and to manage effects on the receiving environment including stream erosion and flooding, particularly in respect of upstream and downstream properties, and infrastructure.

HWFR welcomes further engagement with the Applicant's Agent should the proposal progress.

Parks Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Drury West Crossing
Address	21 Ararimu Road, Drury
FT application number	FTAA-2606-1248
Council ref	PRR00044402

Respondent Information

Name	Andrew David Miller
Role	Consultant Parks Planner
Agency / Department	Parks Planning, Parks and Community Facilities
Date	14/07/2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

Agency/Department Response

Applicant Drury West Crossing Limited Proposal New industrial development consisting of: • 111.9ha light industrial precinct that will provide approximately 350,000m² of industrial GFA; • Up to 5,000m² of supporting commercial services to provide for the day-to-day needs of employees and visitors potentially including a petrol station, gym, café and convenience retail; • Up to six electronic billboards; • A green network incorporating existing ecological areas and features, stormwater management, landscape buffers and public open spaces; • Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure; and • Interim storage yard use while construction is ongoing Introduction Parks Planning have been asked to provide high-level input on behalf of Parks and Community Facilities on the proposal as it relates to open space, the proposal network, and input on any other relevant
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matters. Feedback has been sought from the following internal specialists:

- Kristen Greenfield – Parks and Places Specialist (Parks and Community Facilities)
- David Barker – Parks and Places Specialist (Parks and Community Facilities)
- Rahman Bashir – Property Provision Specialist (Land Advisory)

Proposed Open Space Provision

Attachment 5 of the application material in an indicative masterplan which shows a network of open spaces within the development. The masterplan appears to indicate the potential for esplanade reserves, shared paths, wastewater and stormwater disposal areas, and 'maintenance of existing natural features' areas. However, the application does not clearly identify the ownership, public access arrangements, vesting requirements or long-term management responsibilities associated with these areas.

Consequently, Parks and Community Facilities is unable to determine the extent to which the proposal may create future obligations for Auckland Council or contribute toward wider open space outcomes for the region.

The provision of open space is ordinarily guided by Manaaki Tamaki Makaurau Auckland Open Space, Sport and Recreation Strategy (May 2025) ('open space strategy'). Broadly speaking, the strategy does not intend to enable the provision of open spaces within industrial areas and Parks and Community Facilities currently has no plans to acquire any publicly owned open spaces within this development site.

The development appears to be out of sequence in terms of the Future Development Strategy, given its Rural – Mixed Rural zoning context. This is relevant to determine regional significance given that there is currently no adopted greenways plan for the location. Parks and Community Facilities is currently in the process of investigating possibilities for connectivity in the locality. A future priority greenway route running east-west along Ararimu Road (through the development site) is likely to be required. Given this finding, and that such connections are not currently provided or indicated, Parks and Community Facilities are unable to form a view as to whether the proposal is of regional significance in this regard.

We defer the assessment and requirements of shared paths to Auckland Transport.

Esplanade Reserves

Based on the submitted planning memorandum by Barker and Associates and Attachment 5 and 7, esplanade reserves are likely to be required within the development. The extent and location of any reserve vesting cannot be confirmed from the information currently available or to determine if it would be of regional significance.

Streetscape

Figure 2.2 of Appendix 5 indicates a road network with street tree planting, however no specific details are provided about this matter. For clarity, Parks and Community Facilities supports streetscape landscaping in principle. The proposed landscaping does not appear to constitute regionally or nationally significant infrastructure from a Parks and Community Facilities perspective at this stage.

Existing Open Spaces

There are no existing publicly owned open spaces within or directly affected by the project. Accordingly, no significant adverse effects on existing publicly owned open space assets have been identified at the referral stage.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- **Does the project have significant regional or national benefits?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard. However, and at a high-level, there does not appear to be any significant regional or national benefits that would arise in terms of parks and open spaces.
- **Would referring the project facilitate its delivery in a more timely and cost-effective way?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.
- **Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.
- **Has the project been identified as a priority in any government or sector plan or strategy?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard. There are no currently operative parks planning strategies at play for the location.
- **Will the project deliver new or support existing regionally/nationally significant infrastructure?**
The proposal does not appear to provide any regionally or nationally significant park or open space infrastructure.
- **Will the project increase housing supply or contribute to a well-functioning urban environment?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard. However, landscaping, ecological corridors and potential shared path connections may contribute positively to the local environment for workers and visitors.
- **Will the project deliver significant economic benefits?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.

- **Will the project support primary industries (e.g., aquaculture)?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.
- **Will the project support development of natural resources (e.g., minerals, petroleum)?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard
- **Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard. However, it is acknowledged that the development proposes green corridors of open space – albeit not spaces that Parks and Community Facilities have Identified to acquire and publicly own.
- **Will the project support climate change adaptation or recovery from natural hazard events?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.
- **Will the project address significant environmental issues?**
This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.
- **Is the project consistent with local or regional planning documents (e.g., spatial strategies)?**
No significant inconsistency has been identified from a parks and open space perspective. The project does not appear to directly conflict with current Parks and Community Facilities strategies or identified open space acquisition priorities. As stated above, Parks and Community Facilities is currently in the process of investigating possibilities for greenway connectivity in the locality. It is however acknowledged that out of sequence development may impact on coordinated planning for the region from a parks and open space perspective.
- **Are there any other relevant matters to consider?**
See comments below.

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- **Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?**

Outcome: Transport and access, 'Direction 2' of the Auckland Plan 2050 notes the outcome to improve connectivity through all modes of transport to enable people access to amenities and encourage ease on emission-heavy journeys.

Outcome: Homes and Places, 'Direction 4' of the Auckland Plan 2050 is directly relevant to the project and seeks to provide inclusive and accessible public open spaces in urban areas to *“support multiple uses, be able to adapt and change in the future, play dual roles in recreation and action on climate change, reflect who we are as communities, Aucklanders and New Zealanders”*.

Summary:

There does not appear to be any obvious inconsistencies with the Auckland Plan 2050 or the Auckland Unitary Plan as it relates to the provision of parks and open spaces. However, given that a potential priority greenway may be required along Aririmu Road, and this does not appear to be recognised in the masterplan, the project could be inconsistent with Direction 2 of the of the Auckland Plan 2050. We defer to the other technical specialists and planners to comment further on this matter.

- **Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?**

We understand this area to be outside of the Future Development Strategy scope since it is located outside of the Rural Urban Boundary and therefore could be considered to be 'out of sequence'. We however defer to the other technical specialists and planners to comment on this matter.

- **Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?**

The application is silent on ownership structures of the various open spaces and may have substantial impact on Parks and Community Facilities if ownership and maintenance responsibilities are assumed.

- **Is there the potential for significant adverse environmental effects to occur?**

Based on the limited information provided, it does not appear that there would be significant adverse environmental impacts as it relates to parks and open spaces.

Please note that the above is initial advice only and is based on the limited plans and information presented at this referral stage. The above is not a final specialist memo and is not a written approval of the scheme. If you have queries relating to this document, please contact me on s 9(2)(a) or email via s 9(2)(a)

You can contact the Parks Planning Team on parksconsent@aucklandcouncil.govt.nz.

Prepared by:

Agency lead / Manager release:



Andrew David Miller
Consultant Parks Planner
Parks Planning
Parks and Community Facilities
Date: 17 July 2026



Hester Gerber
Manager Parks Planning
Parks Planning
Parks and Community Facilities
Date: 17 July 2026

Franklin Local Board Feedback – Fast-track Approvals Act 2024

Project Name:

FTAA-2606-1248 - Drury West Crossing Project

Location:

21-25 Ararimu Road, Ramarama

Date:

13 July 2026

Prepared by:

Franklin Local Board Pukekohe Subdivision Lead – Andrew Kay

Local Board Feedback

The Franklin Local Board is supportive in principal but has serious concerns over a few elements of the proposal, which the board believes need to be addressed before any approval is provided.

Areas of concern:

- Development will create significant heavy vehicle traffic, is Ararimu Road capable to accommodate this?
- Tapping into private water supply/ bores - do not support use of this.
- Electronic billboard clutter - potential negative impacts to the landscape and also distractions to motorists on the motorway.
- Traffic – applicant's own transport consultant says the eastern roundabout is expected to be near capacity by 2048 in the afternoon peak, and this is being punted to the "substantive application" stage rather than sorted now. We recommend that NZTA/Auckland Transport be asked to confirm capacity and get any upgrades locked in early, not left for later. Seek NZTA/Auckland Transport to bring forward development/improvements to the network now, rather than later, to accommodate this.
- The board does not support the applicant having their own waste treatment plant due to the weather events this area experiences and the long term viability of them. This means Council would end up maintaining it and the high potential that the plant is not up to Council specifications would require significant funds to resolve.

We would qualify this information based on the attachment to this feedback which highlights the serious risks posed by private water treatment services.

Conclusion

In summary, the Franklin Local Board is supportive of this application, but has serious concerns over water usage/wastewater treatment and traffic/billboard creations. These need to be addressed before any approval is given.

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



27 July 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ- 0036665

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 on the referral applications for Out of Scope [redacted] Drury West Crossing (FTAA-2606-1248), Out of Scope [redacted] [redacted] [redacted] [redacted] [redacted] [redacted] [redacted] [redacted]

I am providing these comments in my capacity as Minister for Economic Growth. They focus on whether each application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided by the applicants. The quantitative estimates below are drawn from economic assessments prepared for the applicants.

Out of Scope

[Large redacted area]

Drury West Crossing, FTAA-2606-1248

The application is for an approximately 123-hectare industrial development between State Highway 1 and Great South Road, adjacent to the Ramarama Interchange in southern Auckland. It would provide a 111.9-hectare light-industrial precinct comprising 91 lots, 66.8 hectares of net developable land, 350,000 square metres of industrial floorspace, and up to 5,000 square metres of supporting commercial floorspace. It would also include internal roads, a green network, public open space, up to six electronic billboards, an interim construction storage yard, and associated transport and utility infrastructure.

According to the economic assessment prepared for the applicant, total project investment is estimated at \$1.293 billion, including around \$1.035 billion in building construction costs. Over the nine-year development period, construction and development activity is estimated to contribute \$923 million to Auckland's regional GDP, comprising \$297 million in direct effects and \$626 million in indirect effects.

It is also estimated to support 5,135 FTE-years of employment, comprising 1,570 direct and 3,565 indirect FTE-years, and generate approximately \$461 million in wages and salaries, comprising \$146 million from direct activity and \$315 million from indirect activity. This equates to a simple annualised equivalent of approximately 571 FTE-years over the nine-year development period.

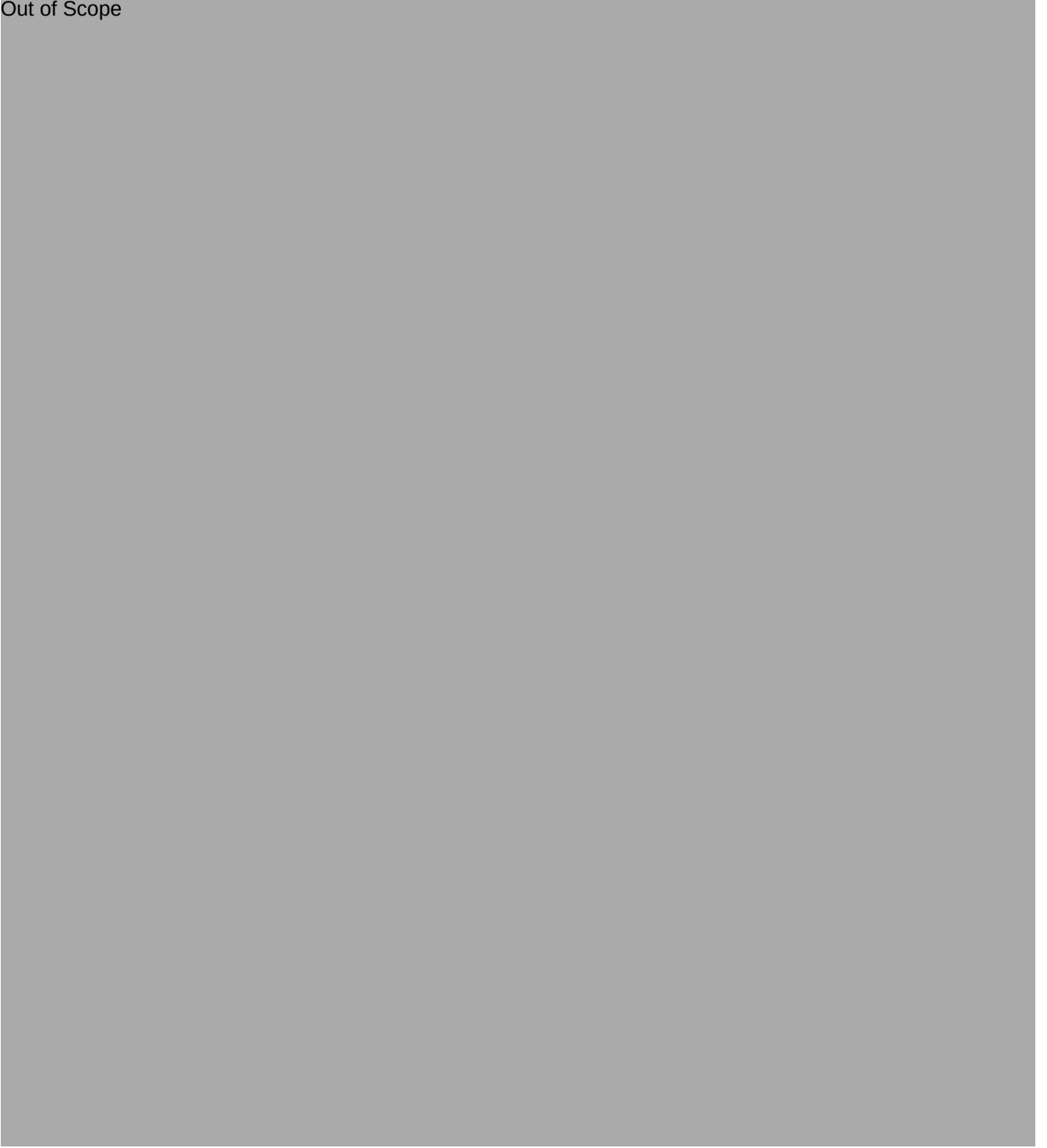
At full build-out, the industrial and commercial activities enabled by the proposal are estimated to directly support work for approximately 1,920 people, equivalent to 1,820 ongoing FTEs. They are also estimated to contribute approximately \$360 million to Auckland's regional GDP annually and generate around \$175 million in annual wages and salaries.

The proposal would increase the supply and range of large-format industrial land in southern Auckland. Its location beside State Highway 1 and the Ramarama Interchange could support warehousing, logistics, construction-related services, and light manufacturing, while improving access to large, well-connected sites. The assessment also identifies potential benefits from greater land-market competition, stronger links between employment and planned residential growth in the wider Drury area, and connections to regional and North Island supply chains.

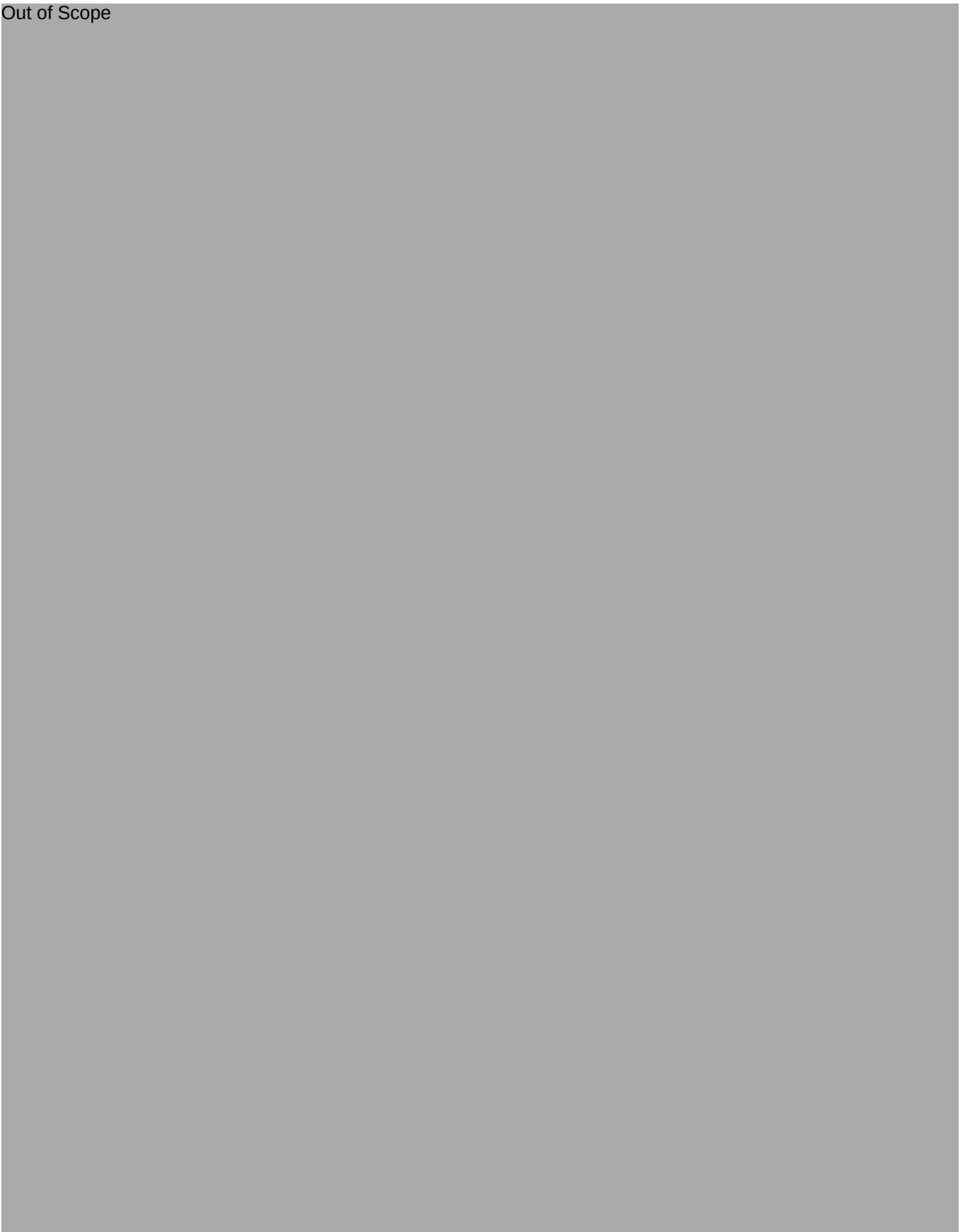
The benefits would be principally regional, although Auckland's wider freight and supply-chain role may generate national effects.

On the basis of the points above, the proposal appears likely to deliver significant regional economic benefits under section 22(2)(a)(iv) of the Act, primarily through the scale of capital investment, construction and development activity, and ongoing industrial and commercial activity.

Out of Scope



Out of Scope



Out of Scope

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', with a stylized flourish at the end.

Hon Nicola Willis
Minister for Economic Growth

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Drury West Crossing
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name	Director-General of Conservation Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G.		
*First name	Lana		
*Last name	Gooderham		
Postal address			
*Contact number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ;		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff



Linda Kirk

Fast Track Applications Manager

22 July 2026

Director-General of Conservation s17 comments

Project name	Drury West Crossing
Applicant name	Drury West Crossing Limited
Application number	FTAA-2606-1248
Project summary details	The project involves the development of an approximately 123-hectare industrial precinct in southern Auckland. The site is located at 21–25 Ararimu Road, Ramarama, Auckland. It is adjacent to the Ramarama interchange on the Southern Motorway, approximately 6 kilometres south of Drury. The project comprises: a. approximately 111.9-hectare light industrial precinct that will provide approximately 350,000m² of industrial gross floor area (total of all buildings combined) b. up to 5,000m² of supporting commercial services, potentially including a petrol station, gym, café and convenience retail c. up to six electronic billboards d. a green network incorporating existing ecological areas and features, stormwater management, landscape buffers and public open spaces e. associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure f. an interim storage yard for use during construction. The project will require the proposed approvals: g. consents under the Resource Management Act 1991 h. permits under the Wildlife Act 1953. The project may also require approval or dispensation under regulations 42 or 43 of the Freshwater Fisheries Regulations 1983 in respect of a potential complex freshwater fisheries activity. The site is not located on any Public Conservation Land (PCL).

1 Summary

1.1 Applicant Engagement

- 1.1.1 As the project includes an approval under a specified Act for which the Director-General of Conservation is the administering agency, the applicant was required to notify DOC and allow 20 working days to respond before lodging the referral application in accordance with section 11.
- 1.1.2 In relation to this application, DOC has had the following engagement with the applicant:
- 1.1.3 DOC was notified of the application on 22 April 2026;
- 1.1.4 the referral application was lodged on 15 June 2026;
- 1.1.5 In the period available specific feedback was able to be provided as discussed below.

1.2 Wildlife Approval

- 1.2.1 The referral application states that the Project will require a wildlife approval for the relocation of lizards. A wildlife approval will be applied for in the event that a region-wide wildlife permit held by qualified herpetologists (which is usually limited to 20 individual lizards) cannot be relied upon and the number of lizards to be relocated exceed the specified amount. The region-wide wildlife approval is not specified in the referral application.
- 1.2.2 Any substantive application will need to include a statement whether a wildlife approval is required, confirmation of whether there are lizards on site and how many (greater than or less than 20) and address the information requirements for a wildlife approval.
- 1.2.3 If a region-wide wildlife approval is to be relied on (for less than 20 lizards), the approval would need to cover the area the application relates to. Details of any region-wide wildlife approval (including the permit number) should be referenced in the substantive application.
- 1.2.4 Any accompanying Lizard Management Plan would need to name the herpetologist that holds the region wide permit. If a region wide wildlife approval is to be relied upon a Lizard Management Plan would need to be submitted.
- 1.2.5 The referral application does not indicate if the scope of the proposed wildlife approval includes any other activities other than relocation of lizards, such as capture and handle, incidentally harm or kill wildlife. If these activities will need to be carried out as part of the Project, any referral notice for the Project should ensure these activities are also in scope for a substantive wildlife approval.
- 1.2.6 The referral application does not identify that any other Wildlife approvals are required.

1.3 Freshwater Fisheries approval

- 1.3.1 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 site. It is also likely that works will include in-stream structures such as culverts. To this end, DOC advised at notification that complex Freshwater Fisheries approval may be required.
- 1.3.2 The applicant has applied for complex Freshwater Fisheries approval as part of their referral application on a precautionary basis. The applicant notes that culvert and in-stream crossing design has not yet been undertaken.

2 Criteria for Minister's decision on referral application

- 2.1.1 Sections 21 and 22 of the FTAA set out matters to be considered by the Minister in determining whether a referral application should be accepted.
- 2.1.2 Comments below are targeted to provisions where DOC has specific interests or information relevant to the Minister's decision.

2.2 Criteria for declining a referral application

- 2.2.1 Section 21 sets out the criteria for the Minister for declining a referral application. DOC has considered these criteria and provides comments in the table below.

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	Based on the information available, DOC has considered the ineligibility criteria at sections 5(1)(h), (i), (j) and (k), and has not identified any aspect of the Project that would be ineligible based on those criteria.
21(3)(c)	Is there adequate information to inform a decision	With respect to the approvals identified in the referral application for which DOC is the administering agency, DOC considers the information adequate in terms of a referral decision.
21(4)	Are there any other reasons to decline the application?	Based on the information available, DOC has not identified any reason why the Project should be declined.

Section	Criteria	Comments
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	Based on the information available, DOC has not identified any inconsistency with any relevant Treaty settlement or other obligations.
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	Based on the information available, DOC has not identified any reason why the Project should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on the information available, DOC considers it is likely that adverse effects of the Project can be addressed through appropriate conditions on any substantive approvals.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	Based on the information available, DOC has not identified any competing applications in respect of conservation approvals.

2.3 Criteria for accepting a referral application

2.3.1 Section 22 sets out the criteria for the Minister for accepting a referral application.

2.3.2 DOC has considered these criteria and has not identified anything where DOC has specific interests or information relevant to the Minister's decision.

3 Matters for the Minister to specify (s27)

3.1.1 If the project is referred, it is recommended the Minister request the applicant provide the following information in the substantive application:

- Confirmation if there are lizards present on site and how many and confirmation whether a wildlife approval will be sought.
- Details of any region-wide wildlife approval if it is to be relied upon as part of the project, including any Lizard Management Plan.
- A Lizard Management Plan (LMP) containing the information requirements for a wildlife approval that adheres to relevant Department of Conservation lizard salvage

principles and is informed by best practice lizard survey. The LMP must include identification of a suitable release site if lizard salvage is proposed.

3.2 Conclusion

3.2.1 In conclusion, DOC is not aware of any reason the Project should not be referred.

A handwritten signature in blue ink, appearing to read 'L. Kirk', is positioned above the printed name.

Linda Kirk
Fast Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 22 July 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Drury West Crossing
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	NZ Transport Agency		
*First name	Nicola		
*Last name	Foran		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast track approvals process. NZTA has had pre-application engagement with the applicant regarding this project organised via the applicant's planning consultants – Barkers & Associates. An online meeting was held with NZTA and the applicant's team on 9 June 2026. The applicant's team provided a brief presentation of the proposed development and the general transport interface with the existing state highway network and the NZTA Papakura to Bombay (P2B) project. NZTA provided preliminary feedback in writing to the applicant's team on 15 June 2026 via email to Rebecca Sanders (Barkers & Associates). As per the matters set out on the invitation to comment, NZTA provides the following commentary: 1. NZTA Papakura to Bombay Project (P2B) Stage 2 of the wider Papakura to Bombay project will protect the route and land required for future improvements to the SH1 Southern Motorway between Drury and Bombay. NZTA lodged two Notices of Requirements for Stage 2 of P2B with Auckland Council in mid-February 2024. These were included in the Auckland Unitary Plan (Operative in Part) as: Notice of Requirement 2 (NoR 2) proposes to alter State Highway 1 Designation 6700 'Motorway' to authorise improvements to the Southern Motorway, including upgrades to the Ramarama Interchange.

Insert Fast-track logo

- Notice of Requirement 4 (NoR 4) for a new shared user path to be constructed in the area 200m north of Quarry Road to the existing Bombay/Mill Road interchange.

Following the withdrawal of all appeals, the NoR has been confirmed and will be appropriately updated in the Auckland Unitary Plan by Auckland Council within their quarterly updates.

There is currently no funding earmarked for the delivery of Stage 2, meaning there is no confirmed timeframe for construction at this stage.

2. Ramarama Interchange

Introducing a large-scale industrial activity in a rural zone not identified for future urbanisation represents an unplanned proposal, creating a mismatch between land use and the infrastructure planning. This will impact the planning and sequencing for transport infrastructure investment which needs to be better understood.

As the timing of P2B is yet to be confirmed, if this application is accepted for referral and the subsequent substantive process, it would be expected that transport upgrades commensurate with the scale of activity proposed are undertaken on the current roading environment of SH22, specifically the Ramarama interchange.

The applicant has already acknowledged that they will need to undertake transport infrastructure upgrades in advance of the P2B project, and as such can not rely upon the P2B project to manage and mitigate the effects of the increased traffic volumes at the Ramarama interchange that will be generated by this development. The proposed extent of these upgrades will be critical to NZTA's assessment of the proposal.

3. General Comments

The subject site is adjacent to the Southern Motorway (State Highway 1) with an average annual daily traffic generation of 25,423 and a speed limit of 100km/h.

NZTA notes that electronic billboards form part of the proposed application, although the location, size and supports is unknown. Further detail is required to assess the potential adverse effects and NZTA is unlikely to support the proposed electronic billboards if visible from the state highway due to the visibility from a high speed and high traffic generating environment.

4. Information Requirements

If this application is accepted for processing through the FTAA, NZTA would expect to see a robust integrated transport assessment as part of the substantive application that provides modelling and identifies appropriate transport infrastructure upgrades.

Modelling: The modelling proposed in the referral application is SIDRA intersection modelling and the list of intersections currently identified for assessment excludes the motorway ramp terminals and their interaction with the SH1 mainline. These could be modelled using AIMSUN modelling which would take account of weaving and merging movements. Given the scale of the development and the direct interface with the state highway network, consideration should be given to whether network simulation modelling of the surrounding road network is warranted. If such modelling is not proposed, robust justification should be provided as to why an intersection-based approach via SIDRA modelling is considered sufficient.

Upgrades: The ITA will also need to determine what level of development can be accommodated prior to upgrades being required, the likely trigger points for intersection and interchange upgrades, and whether interim development can occur before operational effects become unacceptable.

Above and beyond the ITA and modelling, NZTA would expect the following information to be provided in the substantive application to determine the potential adverse effects associated with the P2B project and general adjacent state highway network:

- The interface between P2B and the planned transport upgrades.
- Proposed electronic billboards location, size, content and dwell time.
- Information on proposed stormwater discharge including what (if any) stormwater is proposed to discharge to SH1 and whether they are proposing a stormwater neutral design.

If the application is accepted for referral, NZTA would welcome the opportunity to provide comments on any substantive application in due course.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Nicola Foran

Date 23 July 2026

23 July 2026

Environmental Protection Authority
Private Bag 63002
Wellington 6140
NEW ZEALAND

Teenaa koe

DRURY WEST CROSSING – REFERRAL APPLICATION

1. These comments are provided on behalf of Te Whakakitenga o Waikato Incorporated (Waikato-Tainui).
2. Te Whakakitenga o Waikato Incorporated is the governing body for the 33 hapuu and 68 marae of Waikato and manages the tribal assets for the benefit of over 100,000 registered tribal members. It is also:
 - a) the trustee of the Waikato Raupatu Lands Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato Raupatu Lands Deed of Settlement 1995 and the Waikato Raupatu Claims Settlement Act 1995;
 - b) the trustee of the Waikato Raupatu River Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato-Tainui River Deed of Settlement 2009 and the Waikato Raupatu Claims (Waikato River) Settlement Act 2010 (River Settlement);
 - c) the mandated iwi organisation for Waikato-Tainui for the purposes of the Maaori Fisheries Act 2002; and
 - d) the iwi aquaculture organisation for Waikato-Tainui for the purposes of the Maaori Commercial Aquaculture Claims Settlement Act 2004.
3. Waikato-Tainui has outstanding and unresolved Treaty of Waitangi claims, including those specific to the Manukau Harbour. These claims form part of the broader Wai 30 claim, encompassing land, coastal and marine areas, and associated social, cultural, and economic interests. While settlement redress is not yet finalised, these claims underpin Waikato-Tainui's recognised interests in Auckland Region's coastal waters, harbours, waterways, and their connected catchments, alongside the interests of other iwi and hapuu with customary rights and Treaty interests in the region.
4. Waikato-Tainui welcomes the opportunity to provide comment on the Drury West Crossing Fast Track referral application.

WAIKATO-TAINUI COMMENTS

5. Waikato-Tainui understands that the Drury West Crossing is a proposed industrial development at 21–25 Ararimu Road, Ramarama, adjacent to the Ramarama Interchange. The proposal comprises approximately 111.9 hectares of light industrial development, including around 350,000m² of industrial gross floor area, supporting commercial activities, associated infrastructure, and integrated ecological, stormwater and landscape features. The applicant identifies the site's location adjacent to the strategic transport network as supporting its suitability for a significant industrial employment node in southern Auckland.
6. The proposal sits within the wider southern Auckland growth context, including the Auckland Future Development Strategy 2023–2053, and the Southern Rural Strategy 2025–2055. While Drury West Crossing Limited (the Applicant) identifies the proposal as supporting strategic objectives relating to industrial land supply and economic development, Waikato-Tainui defers to Auckland Council regarding the extent of regional industrial land demand and the appropriateness of additional industrial capacity at this location. The site is not currently identified as a future urban growth area under the established strategic framework and therefore represents a potential extension of the anticipated urban growth pattern. Should the project advance to the substantive phase, further consideration is required regarding how the proposal integrates with wider strategic outcomes, including infrastructure provision, transport integration, rural land management, freshwater outcomes, and mana whenua values.
7. Given the scale and location of the proposed development, any substantive application should clearly demonstrate how the proposal addresses the relevant objectives and policies of the Auckland Regional Policy Statement and wider growth strategies. This should include assessment of cumulative effects associated with urban expansion in southern Auckland, including impacts on infrastructure capacity, transport networks, freshwater systems, biodiversity, landscape character, highly productive land, and cultural values. Mana whenua input should continue to inform the assessment and design of the proposal, including opportunities for cultural outcomes, ecological restoration, and the protection and enhancement of waterways and areas of significance.
8. The Applicant acknowledges that the proposal does not strictly meet the criteria in clause 3.10 of the National Policy Statement for Highly Productive Land 2022 (NPS-HPL). Notwithstanding this, the Applicant contends that the site is appropriate for industrial development based on its strategic location, surrounding growth context, identified demand for industrial land, and anticipated social and economic benefits. In support of this position, the Applicant relies on a range of technical assessments addressing land capability, industrial land demand, infrastructure capacity, and the anticipated economic benefits of the proposal.
9. The extent to which the NPS-HPL applies to the site, including whether the Mixed Rural Zone is an equivalent zone for its purposes, the proposal's consistency with the relevant policy framework, the significance of any loss of productive land, and the

balance between housing, social and economic benefits and the long-term effects of converting productive rural land, will require consideration if advanced to the substantive phase. Any benefits arising from the proposal should be considered as part of the overall planning assessment, having regard to the full range of relevant environmental, cultural, social, economic, and strategic considerations.

10. The application acknowledges that further investigations are required to determine whether any proposed activities would constitute a prohibited activity under the National Environmental Standards for Freshwater. Waikato-Tainui considers that the potential for prohibited activities reflects the significance and sensitivity of the affected wetlands and requires the highest level of scrutiny. Should the proposal proceed, the substantive application should provide compelling justification for any such activities, demonstrate that practicable alternatives have been exhausted, and clearly identify how adverse effects on wetland values will be avoided or, where avoidance is not possible, remedied or mitigated.
11. The Applicant proposes an on-site three waters servicing strategy comprising private stormwater management infrastructure, a private wastewater system, and a mix of groundwater and rainwater-based water supply. The Applicant relies on supporting technical assessments addressing the feasibility of the proposed servicing approach and its ability to support the development. Key matters requiring careful consideration include potential effects on freshwater and coastal receiving environments, the sustainability and resilience of the proposed water supply arrangements, the management of groundwater abstraction (particularly the cumulative effects and availability within the wider catchment), and the long-term operation, maintenance, monitoring, and governance of private wastewater and stormwater infrastructure.
12. The scale of the proposed development raises questions as to whether sufficient land is available to accommodate an appropriately sized on-site wastewater disposal field. This should be carefully assessed, as any constraints on land-based disposal may have implications for the proposed wastewater management approach and the nature of any resulting environmental effects.
13. The application references the relevant Treaty settlement legislation and associated statutory acknowledgements, and indicates engagement with relevant iwi and hapuu, including Ngati Tamaoho and Ngai Tai ki Taamaki, across a range of matters. Should the project advance to the Fast-Track substantive phase, the applicant should continue to engage with and appropriately resource Ngati Tamaoho and Ngai Tai ki Taamaki to participate in the assessment process, including through the preparation of any Cultural Values Assessments or other cultural assessments that may be identified as appropriate by the relevant iwi to inform the ongoing development and assessment of the proposal.
14. The matters raised in these comments are not intended to be exhaustive. Given the preliminary nature of the referral stage and the information currently available, Waikato-Tainui may raise additional matters and provide further comments should the proposal progress beyond the referral stage and further information become available.

OVERALL POSITION

15. Waikato-Tainui does not take a final position on the proposal at referral stage. However, the matters identified above are considered to be of significance to Waikato-Tainui and will require further detailed assessment should the project be advanced to the substantive phase.
16. In particular, further consideration would be required in relation to:
 - effects on freshwater and marine systems, particularly ongoing concerns around aquifer extraction;
 - loss of highly productive land and cumulative land use change;
 - cultural and archaeological values within the project area; and
 - alignment of the project with Tai Tumu, Tai Pari, Tai Ao (Waikato-Tainui Environmental Plan).
17. Waikato-Tainui reserves its position pending further information, including completion of cultural impact assessments, ongoing engagement with mana whenua, and appropriate resourcing by the Applicant to support continued involvement.
18. The referral application provides a sufficient high-level understanding of the proposal and its potential interface with Waikato-Tainui interests. However, significant matters remain to be addressed at substantive stage to enable a full assessment of effects and mitigation outcomes.
19. Waikato-Tainui looks forward to continued engagement as the proposal progresses through the Fast-track Approvals process.

Naaku i roto i ngaa mihi, naa

A handwritten signature in black ink, reading "Te Maakariini Mapu".

Te Maakariini Mapu
ENVIRONMENTAL PLANNER
WAIKATO-TAINUI