

To: Listed Projects Team – Ministry for the Environment

From: Rebecca Sanders/Nick Roberts – Barker & Associates Limited

Date: 11 June 2026

Re: Planning Memorandum for Drury West Crossing

1.0 Introduction

1.1 Drury West Crossing

Drury West Crossing Limited engaged Barker & Associates (B&A) to provide planning services for the consenting of *Drury West Crossing* located at 21-25 Ararimu Road, Ramarama (the Site). *Drury West Crossing* is located adjacent to the Ramarama Interchange and provides strategic access to the wider Auckland transport network. *Drury West Crossing* is a proposed industrial development that will provide a significant employment node in southern Auckland. *Drury West Crossing* will consist of the following:

1. A 111.9ha light industrial precinct that will provide approximately 350,000m² of industrial GFA;
2. 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;
3. Up to six electronic billboards;
4. A green network incorporating existing ecological areas and features, stormwater management, landscape buffers and public open spaces;
5. Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure; and
6. Interim storage yard use while construction is ongoing.

The Masterplan is shown below in Figure 1.

The development is not proposed to be staged.



Figure 1: Drury West Crossing Masterplan

1.1.1 Three Waters

The proposed three-waters strategy for the Site is set out in the Preliminary Civil Infrastructure Report (**Attachment 7**). By way of summary, the follow strategies are proposed.

Stormwater

There is currently no public stormwater infrastructure within the Site.

The preliminary Civil Engineering Assessment prepared by Maven proposes a water-sensitive design approach to maintain hydraulic neutrality in line with Stormwater Management Area Flow condition 01 (SMAF-1) to improve water quality and protect downstream environments. This will be provided through a combination of catchment raingardens, wetland and treepits (public roads) and through a combination of wetlands, and tanks in support of the private accessways and lots. For private accessways not benefited by a catchment-wide solution, tanks will provide extended detention only.

The proposed stormwater infrastructure will provide a means of disposal for all impervious areas (public roads, common accessways, driveways and buildings).

Water supply

Water supply will be privately sourced and will not rely on the public network.

The Preliminary Civil Infrastructure Report prepared by Maven, confirm that the proposed development can be serviced through groundwater abstraction. While more detailed bore testing and hydrological assessment will occur as part of a substantive assessment there are existing water take consents and volumes in the site which exceed the required demand.

In addition to groundwater, there is the potential for roof water harvesting to significantly supplement the communal bore supply and reduce potable water abstraction demand.

Wastewater

There is currently not public wastewater connection available at the Site.

The proposal will therefore be supported by a private, centralised wastewater treatment plant (WWTP), with disposal of treated effluent to land. GWE Consultant engineers have been engaged to provide specialist wastewater and water advice to the proposal. GWE have proposed a Membrane Bioreactor (MBR) or hybrid Membrane Aerated Biofilm Reactor (MABR-MBR) system to provide wastewater treatment.

A network utility company will be established to own and operate the WWTP.

Power and Telecommunication

Telecommunications in the area are managed by Chorus, Power supply in the area is managed by Counties Power. The Preliminary Civil Infrastructure Report outlines that with upgrades in place, services will be available to service the development. The applicant will continue to work with Counties Power and Chorus prior to the lodgement of a substantive application.

1.1.2 Transport

The proposed roading and access arrangement is set out within the Transport Memorandum by Commute (Attachment 9). In summary, the proposal includes the following key roading arrangements:

- A network of public industrial roads will be created within the site that will connect to Ararimu Road and Great South Road; and
- An upgrade of Ararimu Road will include the provision of walking and cycling links that can connect to the proposed shared path adjacent to SH1.

The majority of traffic is expected to use the Ramarama Interchange to access the surrounding road network. The existing interchange comprises two intersections, with the western intersection controlled by a stop control intersection and the eastern intersection being roundabout controlled. In 2024, NZTA lodged two Notice of Requirements (NoR) in the area relating to the interchange and surrounds. Commute note that the inclusion of the roundabout at the interchange (west side) will be a significant improvement to the existing arrangement both in terms of safety and efficiency. Further discussion with NZTA will occur as part of a substantive application.

2.0 Site Context

2.1 The Site

The site is a large rural site (approximately 120 ha comprising several land parcels) located on the western side of SH1 and includes land north and south of Ararimu Road. The following parcels form part of the wider site:

Appellation	Landowner Name(s)	Area (hectares)
1329 Great South Road, Ramarama	s 9(2)(a)	15.0444 ha

<i>Part Allotment 42 Parish of Opaheke</i>		
Lot 10 Deposited Plan 156964 and Lot 17 Deposited Plan 156964	s 9(2)(a)	7.4676 ha
<i>Lot 11 Deposited Plan 156964 and Lot 17 Deposited Plan 156964</i>	s 9(2)(a)	8.798 ha
<i>Lot 9 Deposited Plan 156964 and Lot 17 Deposited Plan 156964</i>	s 9(2)(a)	1.8968 ha
1358 Great South Road, Ramarama <i>Lot 1 Deposited Plan 156964</i>	s 9(2)(a)	5.6622 ha
1361 Great South Road, Ramarama <i>Lot 2 Deposited Plan 156964</i>	s 9(2)(a)	0.3783 ha
<i>Lot 3 Deposited Plan 156964</i>	s 9(2)(a)	4.4939 ha
<i>Lot 4 Deposited Plan 205615</i>	s 9(2)(a)	3.8191 ha
<i>Lot 5 Deposited Plan 205615 and Lot 17 Deposited Plan 156964</i>	s 9(2)(a)	9.302 ha
1393 Great South Road, Ramarama <i>Lot 1 Deposited Plan 37604</i>	s 9(2)(a)	0.3516 ha
1399 Great South Road, Ramarama <i>Lot 6 Deposited Plan 156964 and Lot 6 Deposited Plan 156964</i>	s 9(2)(a)	0.911 ha
10 Ararimu Road, Ramarama <i>Part Allotment 44 Parish of Opaheke</i>	s 9(2)(a)	0.9270 ha
21 Ararimu Road, Ramarama <i>Lot 7 Deposited Plan 156964</i>	s 9(2)(a)	0.3913 ha
23 Ararimu Road, Ramarama <i>Lot 1 Deposited Plan 209317</i>	s 9(2)(a)	0.3913 ha
24 Ararimu Road, Ramarama <i>Lot 3 Deposited Plan 606492</i>	s 9(2)(a)	1.2158 ha
25 Ararimu Road, Ramarama <i>Lot 2 Deposited Plan 193620</i>	s 9(2)(a)	3.9719 ha
26 Ararimu Road, Ramarama <i>Lot 2 Deposited Plan 193620</i>	s 9(2)(a)	1.2031 ha

<i>Lot 1 Deposited Plan 193620</i>	s 9(2)(a)	0.0268 ha
<i>Lot 12 Deposited Plan 156964 and Lot 17 Deposited Plan 156964</i>	s 9(2)(a)	6.019 ha
<i>Lot 13 Deposited Plan 156964 and Lot 17 Deposited Plan 156964</i>	s 9(2)(a)	1.2983 ha
<i>Lot 14 Deposited Plan 156964</i>	s 9(2)(a)	1.3663 ha
<i>Lot 15 Deposited Plan 156964</i>	s 9(2)(a)	1.9251 ha
<i>Lot 16 Deposited Plan 156964</i>	s 9(2)(a)	1.9937 ha
<i>Allotment 414 Parish of Opaheke</i>	s 9(2)(a)	0.4869 ha
<i>Part Lot 1 Deposited Plan 56918</i>	s 9(2)(a)	3.8442 ha
<i>34 Maher Road, Ramarama Part Lot 10 Deposited Plan 48332</i>	s 9(2)(a)	1.0543 ha
<i>Part Lot 11 Deposited Plan 48332</i>	s 9(2)(a)	1.081 ha
<i>Part Lot 12 Deposited Plan 48332</i>	s 9(2)(a)	1.0918 ha
<i>44 Maher Road, Drury Part Lot 13 Deposited Plan 48332</i>	s 9(2)(a)	1.2926 ha
<i>Lot 4 Deposited Plan 606492</i>	s 9(2)(a)	35.268 ha

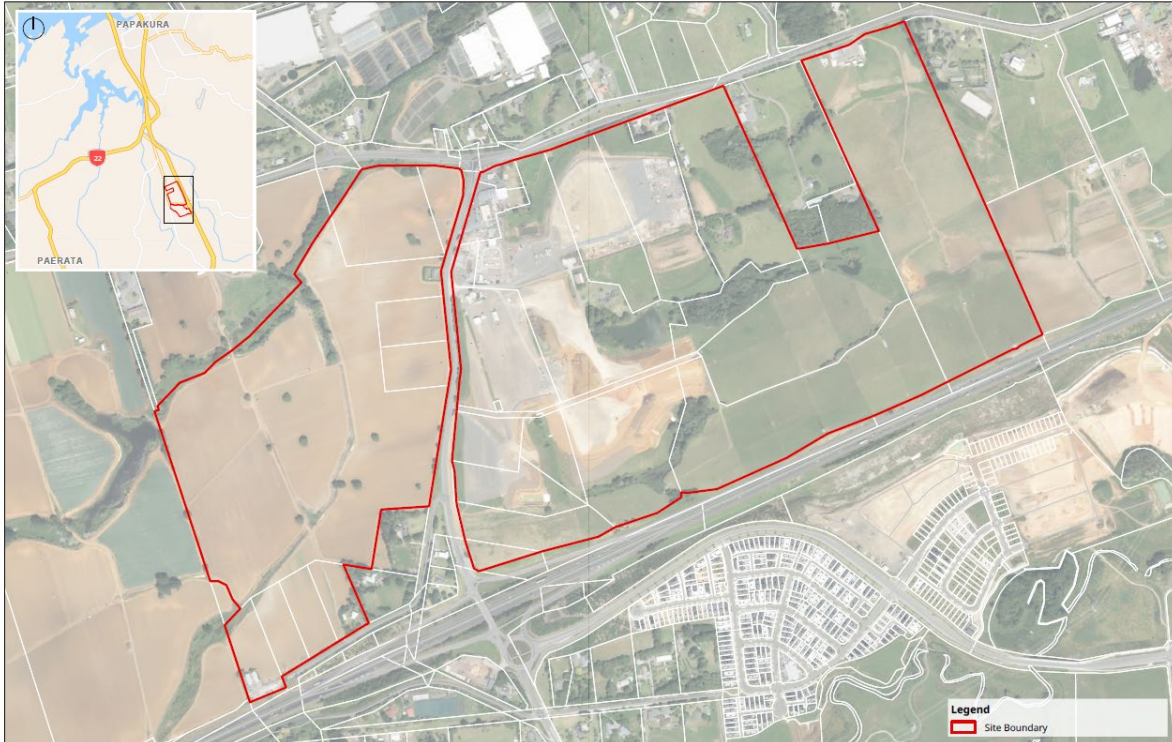


Figure 2: Site Locality Plan. Source: Emaps.

The Site is irregular in shape and is bound by rural land to the north, Great South Road to the west, rural land to the south and the SH1 to the east. The Site is bisected by Ararimu Road.

The Site is currently being used for a combination of rural and commercial uses. Land south of Ararimu Road is predominantly used for horticultural production, including vegetable crops such as broccoli and lettuce. North of Ararimu Road, parts of the Site are undergoing staged earthworks pursuant to existing resource consents enabling bulk earthworks (BUN60431828 and LUC60398151-A). This area also accommodates a small cluster of established activities near the Ararimu Road intersection, including a dairy and various rural-commercial operations. The northern rectangular portion of the Site is currently used for grazing and is not subject to any active resource consents.

The Site is characterised by a gentle to moderately sloping contour. There are steeper contours which exist around the streams and wetland features in the northern parts of the Site. A Significant Ecological Area Overlay is present in the northern portion of the Site.

The Site is contained within two stormwater catchments. The northern and eastern watercourses flow to Hingaia stream before discharging into the Coastal Marine Area. The western watercourses flow to the Ngākōroa stream and then discharge into the Coastal Marine Area.

In terms of existing infrastructure, the Site is not currently served by any primary wastewater or water infrastructure networks.

The Site sits within a wider area that is transitioning from rural activities toward urban and industrial use. To the northeast of the site, across SH1, is the Drury South Crossing development, which is being progressively built out as a major industrial and residential precinct. Stevenson's Drury Quarry is located further east.

The site is well connected being located directly adjacent to the Ramarama Interchange providing quick and convenient access to the wider Auckland and Waikato regions. Direct vehicle access is also provided to Drury South Precinct via Ararimu Valley Road and the motorway overbridge.

2.2 Auckland Unitary Plan— Zoning, Overlays, Controls and Designations

The subject Site is zoned Rural – Mixed Rural. The following additional restrictions apply to the site under the AUP:

- Natural Resources: Significant Ecological Areas Overlay - SEA_T_80, Terrestrial
- Natural Resources: High-Use Stream Management Areas Overlay
- Natural Resources: High-Use Aquifer Management Areas Overlay - Bombay Drury Kaawa Aquifer
- Natural Resources: High-Use Aquifer Management Areas Overlay - Bombay Volcanic
- Natural Resources: Quality-Sensitive Aquifer Management Areas Overlay - Franklin Volcanic Aquifer
- Controls: Macroinvertebrate Community Index - Native
- Controls: Macroinvertebrate Community Index - Rural
- Designations: Designations - 9104, Pukekohe to East Tamaki Gas Pipeline, Designations, First Gas Limited

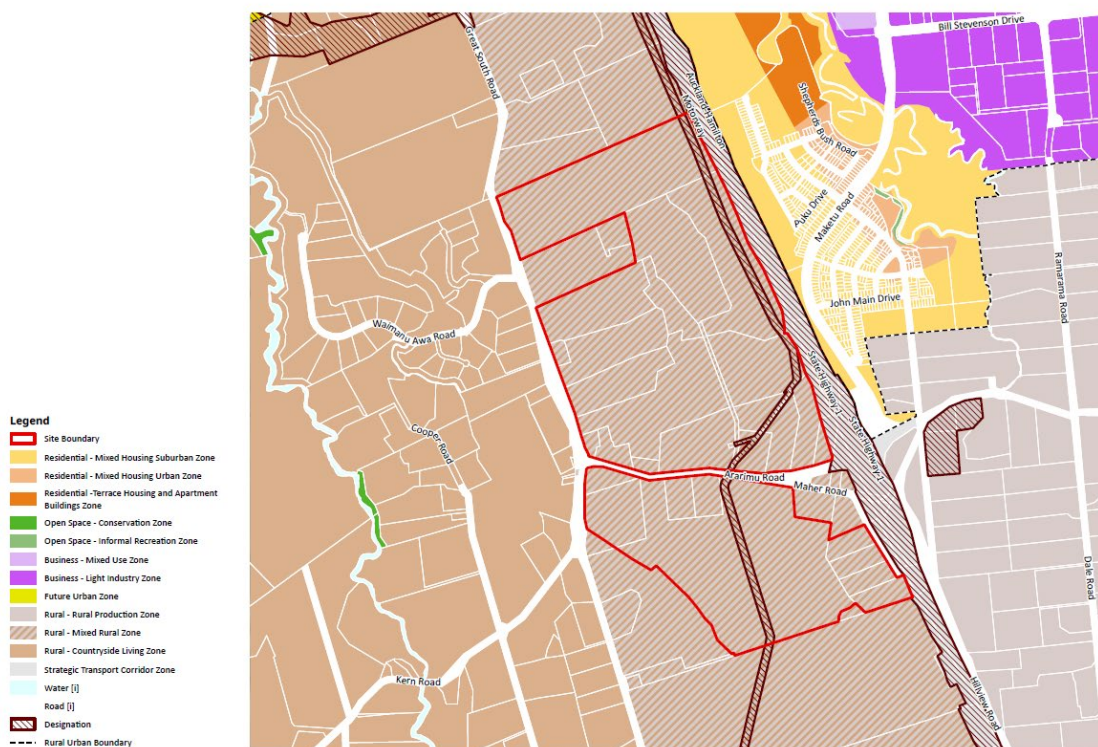


Figure 3: Auckland Unitary Plan

2.3 Regional Significance of the Project

The Fast-track Approvals Act 2024 has established a framework that differs from the Resource Management Act 1991. The matters outlined in Sections 22(1)(a) and 22(2)(a) of the Fast Track Approvals Act direct the considerations available to the Minister when assessing a project's eligibility for referral.

In summary, *Drury West Crossing* is a development project that will deliver significant economic benefits for Auckland, including substantial one-time construction impacts, enduring on-site employment and GDP, a major boost to industrial land supply, improved market competition, and stronger support for southern Auckland's role as a major employment location. Furthermore, *Drury West Crossing* is generally consistent with the relevant strategic outcomes identified in local and regional planning documents.

Section 22(2)(a)(i) – has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

While the *Drury West Crossing* project is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, it fits well with the strategic intent and lens of the need to attract business and investment in the Auckland Region. In particular, and as discussed in more detail below *Drury West Crossing* is consistent with the Southern Auckland Economic Masterplan is a 30-year plan for Drury-Opāheke and the surrounding areas developed by Tātaki Auckland Unlimited. The Southern Auckland Economic Masterplan plan acknowledges the desirability of southern Auckland for growth give its strategic location on the growing Auckland to Hamilton economic corridor and identifies the land adjacent to the Ramarama Interchange as an opportunity node for industrial and large format activities.

In this regard, the project aligns with the Fast-track Approvals Act 2024 purpose of accelerating projects that deliver significant regional benefits, as set out below.

Section 22(2)(a)(iv) – will deliver economic benefits

The Economic Assessment sets out the economic benefits that will be delivered by *Drury West Crossing*. In summary these include:

- One-off economic impacts through the direct construction activity and supporting services.
- Total direct capital expenditure (excluding land) of \$1.3 billion.
- Approximately 5,135 FTE-years of employment across Auckland over the development period.
- Development of the proposal is estimated to generate \$461 million in wages and salaries, and contribute \$923 million to regional GDP.

- Local employment opportunities once the local centre is operational.
- At full operation, future onsite industrial and commercial activity is estimated to directly support work for around 1920 people, equivalent to approximately 1,820 FTEs.
- These workers are estimated to earn approximately \$175 million in annual wages and salaries, with the future onsite activities generating approximately \$360 million in annual GDP.
- The proposal would add a substantial quantum of industrial land in southern Auckland, which is one of Auckland's principal locations for new large-format industrial development. This is important because Auckland is New Zealand's primary industrial market and plays a critical role in supporting regional and national supply chains.

Section 22(2)(a)(vii) – will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:

Drury West Crossing supports climate change mitigation, particularly through the management of flooding hazards and incorporates measures to support the reduction of greenhouse gas emissions (such as active mode transport infrastructure).

Climate change will be accounted for within the final stormwater design. In particular, the stormwater design will manage the development layout to move impermeable surfaces and built structures away from identified flood prone areas. Development works will mitigate downstream concerns relating to 1% AEP events. The final design details will be informed by flood modelling utilising climate adjusted stormwater rainfall data to safeguard people and infrastructure against potential future extreme storm events and manage the potential effects of climate change.

Drury West Crossing is designed to reduce dependency on private motor vehicles as the upgrade of Ararimu Road will include the provision of walking and cycling that links both the proposed shared path adjacent to SH1 and links to Drury South via Maketu Road. This will allow employees in the area to use alternative modes of travel to and from the employment of the site. The proposal also includes a small commercial offering to support the day-to-day needs of employees in walking distance.

Section 22(2)(a)(x) – is consistent with local or regional planning documents, including spatial strategies:

Overall, **Drury West Crossing** is consistent with the relevant local and regional planning documents, as set out in section 5.5 and 5.6 below.

2.4 Benefit of the Fast-Track Approvals Act (2024) for Drury West Crossing

As outlined in Section 22(1)(b)(i) and (ii), part of the determination for accepting a referral application includes outlining whether the FTAA (2024) process would facilitate a more efficient and timely delivery of the project;

(b) referring the project to the fast-track approvals process—

- would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and*
- is unlikely to materially affect the efficient operation of the fast-track approvals process.*

The fast-track process will enable the project to be processed in a more timely and cost-efficient manner than under the normal process, for the following reasons:

- Under the Fast-track Approvals Act 2024, expert panels will consider required approvals as a single application package, as opposed to the normal process where several applications would be required for the different activities and to different authorities;
- Under the Fast-track Approvals Act 2024, public and limited notification is precluded, expert panels are only permitted to invite comments from specified persons who have a short timeframe to provide comment. Given the scale of this development, it would likely be a fully notified application under the Resource Management Act 1991 which would significantly slow down the consenting process and add to cost, taking into account the appeal rights enabled under the standard RMA process;
- Under the Fast-track Approvals Act 2024, timeframes are shorter and stricter than that of the normal process resulting in significant less time for obtaining resource consent and efficiencies for the project; and
- There is resourcing in place to process the application efficiently and certainty around timeframes for the applicant to ensure the project remains 'shovel ready'.

3.0 Reasons for Consent

3.1 Auckland Unitary Plan (Operative in Part)

At this stage, we understand that resource consent will be required under the AUP rules listed below. This list is not exhaustive and is based upon the information available to date. Further consent triggers may be identified as the proposal develops.

E3 Lakes, Rivers, Streams and Wetlands

- Conservation planting not complying with the standards listed in E3.6.1.2 is a **restricted discretionary activity** pursuant to E3.4.1(A3).
- Diversion of a river or stream to a new course and associated disturbance and sediment discharge is a **discretionary activity** pursuant to E3.4.1(A19).
- Any new structures and associated diversion of water not complying with the general permitted activity standard E3.6.1.14 is a **discretionary activity** pursuant to E3.4.1(A44).
- Pursuant to Rule E3.4.1(A49) the reclamation of streams is a **non-complying activity**.

E5 On-site and Small-Scale Wastewater Treatment and Disposal

- Pursuant to Rule E5.4.1(A6) the discharge of wastewater on-site disposal is a **discretionary activity**.

E6 Wastewater Network Management

- Pursuant to Rule E6.4.1(A6) the discharge of wastewater on-site is a **discretionary activity**.

E7 Taking, Using and Diversion of Water and Drilling

- Temporary diversion of surface water for urban development purposes not otherwise listed is a **discretionary activity** pursuant to E7.4.1(A13).

- The diversion of groundwater caused by excavation that does not meet the permitted activity standards is a **restricted discretionary activity** pursuant to E7.4.1(A28).

E8 Stormwater Discharge and Diversion

- Pursuant to Rule E8.4.1(A10) the diversion and discharge of stormwater runoff from impervious areas not otherwise provided for is a **discretionary activity**.
- The proposal involves the diversion and discharge of stormwater runoff from a new stormwater network. This is a **discretionary activity** pursuant to E8.4.1(A11).

E9 Stormwater Quality – High Contaminant Generating Carpark and Roads

- Pursuant to Rule E9.4.1(A6) development of a high contaminant generating carpark is a **controlled activity**.

E11 Land Disturbance – Regional

- Pursuant to Rule E11.4.1(A5), earthworks greater than 50,000m² where land has a slope of less than 10 degrees outside a Sediment Control Protection Area is a **restricted discretionary activity**.
- Pursuant to Rule E11.4.1(A8), earthworks greater than 2,500m² where land has a slope of equal to or greater than 10 degrees is a **restricted discretionary activity**.
- Pursuant to Rule E11.4.1(A9), earthworks greater than 2,500m² within the Sediment Control Protection area is a **restricted discretionary activity**.

E12 Land Disturbance – District

- Pursuant to Rules E12.4.1(A6) and (A10) the proposal to undertake cut / fill greater than 2,500m³ is a **restricted discretionary activity**.

E15 Vegetation Management and Biodiversity

- Vegetation alteration or removal, including cumulative removal on a site over a 10-year period, of greater than 250m² of indigenous vegetation is a **restricted discretionary activity** pursuant to E15.4.1(A10).
- The proposal involves the removal of vegetation within 20m of rural streams. This is a **restricted discretionary activity** pursuant to E15.4.1(A16).
- Vegetation alteration or removal within 10m of rural streams in the Rural Mixed Use Zone is a **restricted discretionary activity** pursuant to E15.4.1(A17).
- The proposal involves the removal of vegetation within 20m of a natural wetland and in the bed of a stream. This is a **restricted discretionary activity** pursuant to E15.4.1(A18).

E23 Signs

- Signs in the Mixed Rural and Rural Coastal Zones are a **discretionary** and/or **non-complying activity** pursuant to E23.4.1(A11 and A12).

E25 Noise and Vibration

- Construction works are anticipated to exceed the applicable maximum 75dB LAeq long-term construction noise limits under Standard E25.6.27. This is a **restricted discretionary activity** under E25.4.1(A2).

E26 Infrastructure

- Aboveground pipelines and attached ancillary structures for the conveyance of wastewater are a **restricted discretionary activity** pursuant to E26.2.3.1 (A50).
- Wastewater treatment plants are a **restricted discretionary activity** pursuant to E26.2.3.1(A54).
- Pursuant to Rule E26.2.3.1(A55), stormwater detention/retention ponds/wetlands are a **controlled activity**.

E27 Transport

- Pursuant to Rule E27.4.1(A3), the generation of more than 100vph is a **restricted discretionary activity**.

• E30 Contaminated Land

- Pursuant to Rule E30.4.1(A6), the potential discharge of contaminants onto the land not meeting Standard E30.6.1.2 but meeting Standard E30.6.2.1, is a **controlled activity**.

E36 Flooding and Natural Hazards

- Construction of stormwater management devices in the 1 per cent annual exceedance probability (AEP) floodplain is a **restricted discretionary activity** pursuant to E36.4.1(A33).
- The proposal involves piping an overland flow path. This is a **restricted discretionary activity** pursuant to E36.4.1(A41).
- The proposal involves infrastructure on land subject to overland flow paths and the 1% AEP floodplain. This is a **restricted discretionary activity** pursuant to Rule E36.4.1(A56).

E39 Subdivision

- Subdivision establishing an esplanade reserve is a **restricted discretionary activity** pursuant to E39.4.1(A5).
- Subdivision of land within the 1% AEP floodplain is a **restricted discretionary activity** pursuant to E39.4.1(A8).
- Subdivision which does not meet the standards in E39.6.1 is a **discretionary activity** pursuant to E39.4.1(A9).
- The proposal involves subdivision for open spaces, reserves and roads in the Mixed Rural zone. This is a **discretionary activity** pursuant to E39.4.2(A11).
- Subdivision which does not meet the standards in E39.6.5.1 is a **non-complying activity** pursuant to E39.4.2(A13).
- The proposal involves subdivision in the Mixed Rural Zone not provided for in Tables E39.4.1 or E39.4.2. This is a **non-complying activity** pursuant to E39.4.2(A27).

E40 Temporary Activities

- The proposed construction activity associated with the proposed development will exceed 24 months. This is a restricted discretionary activity pursuant to E40.4.1(A24).

H19 Mixed Rural Zone

- Pursuant to Rule H19.8 new buildings have the same activity status and standards as applies to the land use activity, industrial activities are **discretionary activities** pursuant to C1.7(1).
- Pursuant to Rule C1.7(1), the proposal to establish retail, commercial and industrial activities is a **discretionary activity**.

Overall, under the Auckland Unitary Plan, the proposal would require consent as a **Non-Complying Activity**.

3.2 National Environmental Standard – Freshwater

Resource consents will likely be required for a range of reasons under the National Environmental Standards: Freshwater (**NES:F**), including earthworks or, vegetation clearance within 10m of a natural inland wetland, or the diversion of water or the discharge of water into water within 100m of a natural inland wetland. Reclamation of some streams and wetlands with lower ecological values may be required to facilitate development.

More detailed work will confirm if work around wetlands triggers a prohibited activity status by way of Regulation 53 of the NES:F. Regardless, s21(7) of the Fast-track Approval Act enables the Minister to accept a referral application for an activity that is prohibited under the Resource Management Act 1991. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

3.3 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (**'NES:CS'**) sets a nationally consistent set of planning controls and soil contaminant values.

Given the historical rural uses of the site, it is likely that provisions of the NESCS will apply to future development at the locations where HAIL activities are likely to have occurred. A detailed site investigation (DSI) involving a targeted soil sampling will be undertaken at the site in support of the substantive application. This will ascertain whether NESCS and/or AUP:OP contaminated land resource consents are required to be sought in support of the development.

3.4 Other Approvals

3.4.1 Wildlife Act Authority (Permit)

A Wildlife Approval is required under the Wildlife Act from the Department of Conservation for the relocation of skinks within the site, in case the number of skinks that require relocation is greater than 20. This threshold is important as the region wide wildlife permit held by herpetologists is usually limited to 20 individuals. In this case, as the site is large, it is prudent to apply for this permit just in case the numbers that need to be relocated when suitable vegetation is cleared (e.g. weedy vegetation / rank grass) exceed this.

3.4.2 Complex Fisheries Freshwater Approvals

The consultation with the Department of Conservation (DOC) has noted that there are records of Threatened and At-Risk freshwater species present at and in the vicinity of the site. DOC also considers it probable that there are inanga spawning sites within the project area. It is possible that works including instream structures such as culverts, weirs or similar structures, or where culverts do not meet the relevant permitted standards may trigger the need to obtain Complex Freshwater Fisheries Activity approvals (CFFA). At this stage, the detailed culvert and stream crossing design has not been undertaken, so it is difficult to confirm definitively whether the approval will be required. It is prudent to apply for this approval just in case it is required.

No other permits are requested.

4.0 Consultation

In preparing this application consultation has been undertaken with Ministry for the Environment, Auckland Council, Department of Conservation, Watercare Services Ltd and Iwi. An overview of the consultation undertaken and the feedback received is outlined in **Attachments 3 and 4**. This memorandum provides a response to the feedback received within the relevant sections. The Consultation and Iwi Engagement Report (**Attachments 3 and 4**) provide a more detailed overview in response to feedback received.

The applicant has undertaken engagement and consultation with key stakeholders, and the outcomes are summarised below.

- **Iwi:** All Iwi with interests in the area have been contacted and invited to engage on the proposal. Ngāi Tai ki Tāmaki and Ngāti Tamaoho responded seeking to engage. An onsite hui was held with representatives from both Iwi on the 18th May 2026. A detailed overview of the engagement is contained within **Attachment 3**. No responses were received from the other Iwi contacted within the 20 working day notification period required under S11(b)(ii) of the FTAA 2024.
- **Auckland Council and Council Controlled Organisations** – Consultation has occurred with the Premium Consenting Team, Auckland Transport and Watercare Services Ltd. Detailed feedback has been received from the Premium Consenting Team. The applicant will continue to work through the more detailed feedback raised as part of the preparation of a substantive application. An initial response to the detailed feedback is provided in Attachment 4.
- **Department of Conservation (DoC)** – Pre-lodgement consultation initiated via formal application to DoC email at Fasttrackapplicationenquires@doc.govt.nz. Subsequently, DoC were provided with a description of the project. DoC has provided feedback. The Consultation Report (**Attachments 4**) provide a more detailed overview in response to feedback received. Engagement with DoC is primarily in relation to the Wildlife Act and will be ongoing as part of the preparation of a substantive application.
- **NZTA:** Pre-lodgement consultation initiated via formal application to NZTA email at EnvironmentalPlanning@nzta.govt.nz. Subsequently, NZTA were provided with a description of the project and a meeting was held. The Consultation Report (**Attachments 4**) provides the minutes from the meeting.

A summary of consultation undertaken and copies of the feedback received is included at **Attachment 4**.

4.1 Treaty Settlements

Section 7 of the FTAA requires all persons performing and exercising functions, powers, and duties under the Act must act in a manner that is consistent with the obligations arising under existing treaty settlements, while Section 16 sets out the requirements for the Minister.

Treaty settlements with the following iwi/groups are therefore of relevance to the project area:

- Ngāti Tamaoho;
- Ngāi Tai ki Tāmaki; and
- the Tāmaki Collective.

The Ngāti Tamaoho Claims Settlement Act 2018 gave effect to the deed of settlement signed by the Crown, Ngāti Tamaoho and the Ngāti Tamaoho Settlement Trust on 30 April 2017.

Ngāi Tai ki Tāmaki, the trustees of the Ngāi Tai ki Tāmaki Trust and the Crown signed a deed of settlement on 7 November 2015. Amendment deeds were signed in 2016, 2017 and 2018. The Treaty settlement was enacted by the Ngāi Tai ki Tāmaki Claims Settlement Act 2018.

Ngā Mana Whenua o Tāmaki Makaurau (the Tāmaki Collective) signed the Tāmaki Makaurau Collective Redress deed on 5 December 2012. An amendment deed was signed 23 August 2013, and legislation to give effect to the deeds is contained in the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014. The FTAA defines this Act as a Treaty settlement Act for the purposes of the FTAA.

Neither the Ngāi Tai ki Tāmaki or the Ngāti Tamaoho create any new co-governance or co-management processes which would affect decision-making under the RMA for this project. No areas covered by a statement of association, statutory acknowledgement or any other form of cultural or commercial redress provided in the Ngāi Tai ki Tāmaki Treaty settlement would be directly affected by the project. As a general principle, an absence of specific settlement redress does not indicate the absence of an iwi's cultural association with ancestral lands, sites, wāhi tapu or other taonga within an area. Therefore, the applicant has acknowledged the cultural relationship of Ngāi Tai ki Tāmaki within its rohe, and have contacted Ngāi Tai ki Tāmaki regarding engagement on the proposed development. Ngāi Tai ki Tāmaki will undertake a cultural values assessment as part of a substantive application. This is outlined further in the consultation summary (**Attachment 3**).

The Ngāti Tamaoho Claims Settlement Act 2018 covers the site as it falls within a Statutory Acknowledgement area. The purpose of the Ngāti Tamaoho Settlement Act 2018 is to:

(a) to record in English and te reo Māori the acknowledgements and apology given by the Crown to Ngāti Tamaoho in the deed of settlement; and

(b) to give effect to certain provisions of the deed of settlement that settles the historical claims of Ngāti Tamaoho.

Section 9 of the Ngāti Tamaoho Settlement Act 2018 sets out the Crown's acknowledgements of its past failings and of Ngāti Tamaoho's grievances. Section 9(12) summarises the impact of these failings, acknowledging that the alienation of Ngāti Tamaoho from their lands has hindered their economic, social and cultural development and is a breach of te Tiriti o Waitangi/the Treaty of Waitangi and its principles.

Section 10 of the Ngāti Tamaoho Settlement Act 2018 sets out the Crown's apology.

Section 31 sets out that the relevant consent authority “must have regard to the statutory acknowledgement relating to the statutory area in deciding, under section 95E of the Resource Management Act 1991, whether the trustees are affected persons in relation to the activity”.

Schedule 1 of the Ngāti Tamaoho Settlement Act 2018 contains a list of areas subject to statutory acknowledgement, which is also recorded at Appendix 21 of the AUP (OP). A map of “Ngakoroa Stream and its tributaries (deed plan OTS-129-20)” is included below. The site is located within this statutory acknowledgement area.

Ngakoroa Stream and its tributaries (OTS-129-20)

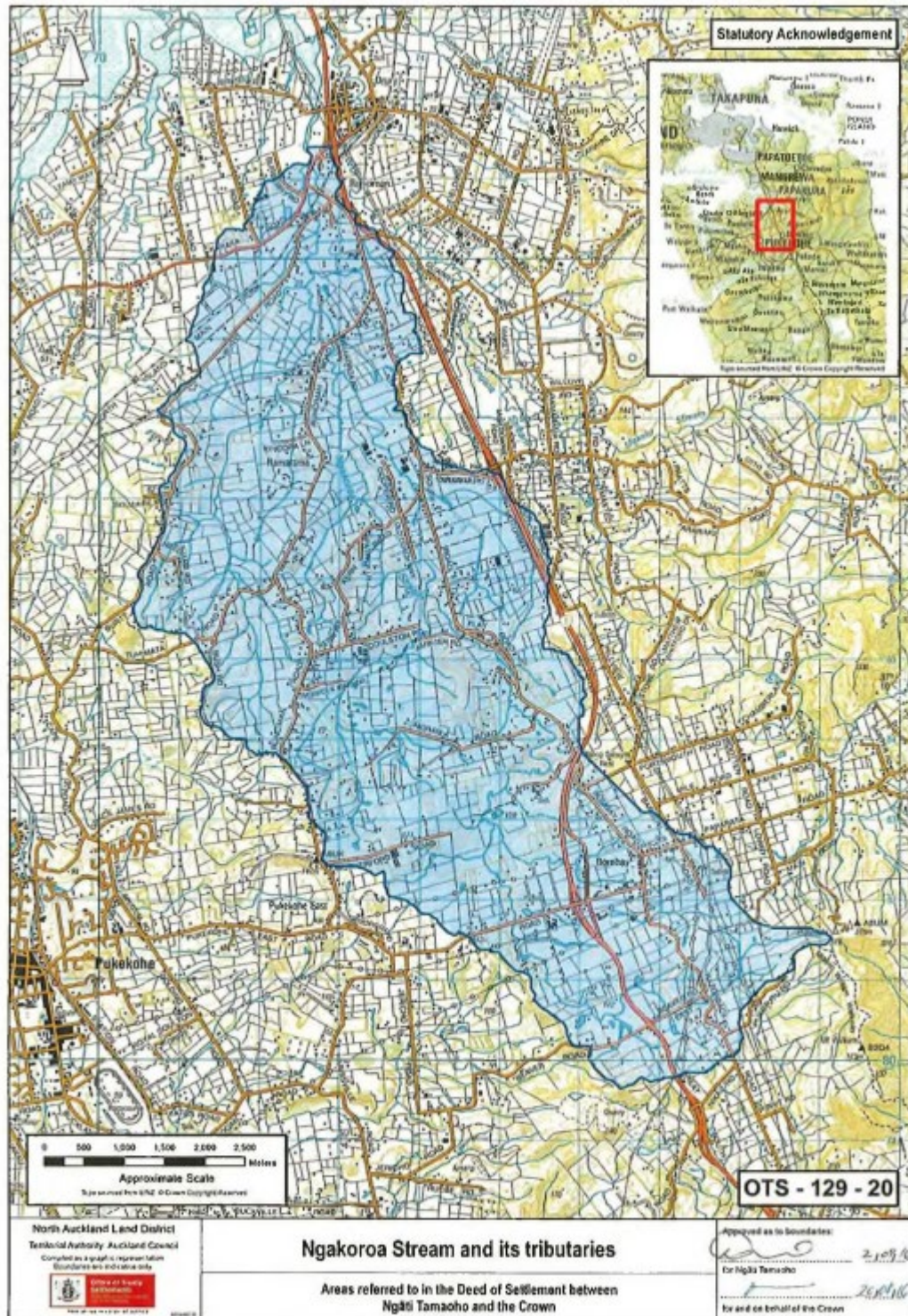


Figure 4: Ngāti Tamaoho Claims Settlement Act 2018 – Statutory acknowledgment area

The applicant has acknowledged the cultural relationship of Ngāti Tamaoho within its rohe and have engaged early and meaningfully with them on the proposed development. This is outlined further in the consultation summary (**Attachment 3**). Ngāti Tamaoho will undertake a cultural values assessment as part of a substantive application. The proposed stormwater management approach and potential downstream

water quality effects will be subject to further assessment as part of a substantive application. Engagement with Ngāti Tamaoho is ongoing and will continue throughout the course of the project.

The Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 and its associated deed provide collective redress for the shared interests of the 13 iwi and hapū of the Tāmaki Collective in maunga, motu and lands within Tāmaki Makaurau. These provisions do not settle any historical Treaty claims; this is addressed instead through the specific settlements with each iwi/hapū. The redress provided through the Act is provided ‘on account’ of those individual Treaty settlements.

A significant part of the collective redress is concerned with governance and management arrangements over the maunga of central Auckland and some of the islands of Tīkapa Moana (the Hauraki Gulf).

Some commercial redress is also included, in the form of rights of first refusal (RFR) over Crown properties over a wide area of Auckland, and second rights to purchase deferred selection properties not selected or acquired by iwi/hapū under their individual settlements.

5.0 Statutory Framework

This section is provided in accordance with subclause 2(1)(a)(i) – (iii) of Schedule 5. This requires that applications include an assessment of the activity against the relevant provisions and requirements of the following statutory documents:

- a) any relevant national policy statements:
- b) any relevant national environmental standards:
- c) If relevant, the New Zealand Coastal Policy Statement:

5.1.1 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 (**‘NPS-FM’**) seeks to manage natural and physical resources to prioritise firstly, the health and well-being of water bodies and freshwater ecosystems, secondly, the health and needs of people, and thirdly the ability to provide for the social, economic, and cultural well-being of people and communities. The NPS-FM was amended in 2025 (with provision taking effect from January 2026) in relation to quarrying and mining activities.

It is considered that the project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- The proposed masterplanning of *Drury West Crossing* has taken into account the location of wetlands and waterways to design the development around these features (Policies 6, 7 and 9).
- The proposal provides the opportunity for wetland redevelopment and restoration and ecological restoration of an area including the establishment of planted and protected riparian margins of waterways which will improve the overall quality of freshwater environments on site (Policy 5).
- Engagement with Iwi is on-going for this project (Policy 2).
- Ongoing monitoring will take place to ensure the condition of water bodies and freshwater ecosystems is not degraded (Policy 13).

Based on the assessment above, it is considered that the project is consistent with the NPS-FM.

5.1.2 National Policy Statement Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 ('NPS-HPL') ensures the availability of New Zealand's most favourable soils for food and fibre production, now and future generations. It is noted the NPS-HPL recently came into effect on 17 October 2022 and was amended in August 2024.

The NPS-HPL (notwithstanding it is due to be amended shortly) applies to land in the General Rural or Rural Production Zone, or the equivalent zone. The site is within the Mixed Rural Zone under the AUP:OP and is arguably **not equivalent** to the General Rural and Rural Production Zone. However, in the event that decision-makers consider that it is, then an assessment of the project against the NPS-HPL is provided below.

The New Zealand Land Resource Inventory (NZLRI) maps have classified the site as LUC 2 (27ha), LUC 3 (106 ha) and LUC 6 (3 ha).

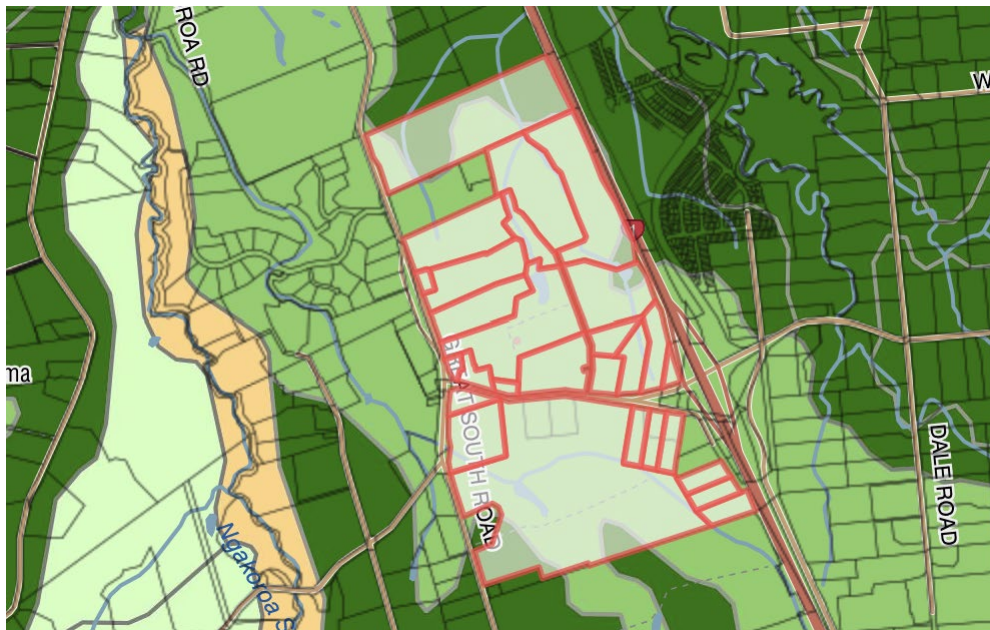


Figure 5: New Zealand Land Resource Inventory Map Source: Our Environment

The objective of the NPS-HPL is to protect highly productive land for use in land-based primary production, however, there are exceptions to this in particular circumstances.

Further, under Clause 3.10, Auckland Council may allow highly productive land to be subdivided, used or developed if satisfied that:

- a. *there are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years; and*
- b. *the subdivision, use, or development:*
 - i. *avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district; and*
 - ii. *avoids the fragmentation of large and geographically cohesive areas of highly productive land; and*
 - iii. *avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development; and*

- c. *the environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*

The proposal does not strictly meet these criteria, however:

- The NZLRI is based on an LUC assessment of the whole of New Zealand and has been carried out at a scale of 1:50,000. It is intended for regional use and planning and is not meant to be used at an individual site scale.
- The productivity of the site is limited as only part of the site is currently in active horticultural production, while other areas are used for grazing, accommodate existing rural-commercial activities, or are subject to consented staged earthworks that are progressively displacing existing rural uses.
- According to the Economic Assessment undertaken by Insight Economics even under an illustrative upper-bound scenario that assumes the full site is used for horticultural production, the forgone rural production is estimated at only around \$2.2 million in annual GDP, \$973,000 in wages and salaries, and 16 FTEs. This is small relative to the economic activity enabled by the proposal.
- The Southern Auckland Economic Masterplan identifies the land adjoining the Ramarama Interchange as an opportunity node for industrial and large format activities. The development of the Site enables Drury West Crossing to fulfil this role through urbanising existing rural land within a strategically accessible area adjoining an existing access to State Highway 1.
- Through the technical analysis in support of this application the Site has been identified as appropriate and practicable for future urban development.
- The business land supply proposed by ***Drury West Crossing*** will support a reduction of loss of ‘more productive’ highly productive land within the district as it provides the necessary supply to meet industrial demand in an appropriate and practicable location. In particular the Site’s size, flat contour, motorway access, proximity to Drury South Crossing, and connection to the wider Auckland-Hamilton-Tauranga corridor make it well suited to land-extensive industrial activities such as warehousing, logistics, construction-related uses and light manufacturing.
- It is considered that through design, particularly with cultural and ecological input, ***Drury West Crossing*** can deliver a development that provides environmental, social, cultural and economic benefits that outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land.

5.1.3 National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity (‘NPS-IB’) ensures the protection, maintenance and restoration of New Zealand’s most threatened indigenous species. It is noted that the NPS-IB came into effect, gazetted on 4 August 2023. The NPS-IB was amended in 2025 (with provision taking effect from January 2026) in relation to quarrying and mining activities.

The project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- The site is largely devoid of vegetation give the previous agriculture and commercial uses and consented earthworks. The proposal will continue to be designed to result in ecological gains through the provision of comprehensive native landscaping.

- Development will avoid the SEA located in the northern portion of the site to ensure ongoing protection of this vegetation.
- The applicant has sought to engage with local iwi to recognise and provide for Hūia Te Rito in the management of indigenous biodiversity. Engagement with Iwi is ongoing for this project (Policy 2).
- The benefits from ecological restoration on the site will provide a significant positive contribution in relation to the indigenous biodiversity loss this part of the region has historically experienced (Policies 13 and 14).

Based on the assessment above, it is considered that the project is consistent with the NPS-IB.

5.1.4 National Policy Statement on Urban Development 2020

The NPSUD came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPSUD includes a focus on achieving well-functioning urban environments, promoting intensification within urban environments, such as Auckland, as a means of increasing housing supply, supporting competitive land markets and improving affordability. There is now a much greater focus on:

- Introducing and defining the concept of well-functioning urban environments with a key component being the provision of a variety of homes that meet the needs of different households in terms of type, price and location. (Objective 1 and Policy 1);
- A greater emphasis on enabling more people to live in and more business to locate in areas that are near centres, planned public transport and where there is high demand (see Objective 3);
- A greater emphasis on improving housing affordability (see Objective 2);
- A greater emphasis on robust strategic planning and the need to integrate urban development with infrastructure (see Objective 6);
- Changing the policies from providing sufficient development capacity to providing at least sufficient development capacity (see Policy 2). This is coupled with other changes that direct Councils to provide more development capacity
- Being more directive about what it means for Councils to be 'responsive' in the urban environment with respect to Plan Changes (Policy 8); and
- Ensuring New Zealand's urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change (Objective 8, Policy 1(e)).

The proposal is consistent with the NPS-UD for the following reasons:

- The proposal will establish a light industrial development that enables the southern Auckland community to provide for their social and economic wellbeing through the creation of employment opportunities (Objective 1).
- The proposal will contribute to a well-functioning urban environment as it will enable a range of light industrial development including large format activities on flat land that is highly accessible to the Ramarama Interchange and therefore highly accessible to the region (Policy 1).
- The proposal will be coordinated with the delivery of private infrastructure (including stormwater, wastewater, water supply, electricity, gas and telecommunications) (Objective 6).

- The proposal will involve a change to the amenity and character of the area, with a higher intensity of development a change from vacant rural land. However, the proposal will offer amenity values through the provision of a green network incorporating existing ecological areas and features, stormwater management and landscape buffers to minimise the effects on rural character (Objective 4).
- The proposal will support a reduction in greenhouse gases through enabling the development of light industry and large format activities adjacent to the motorway interchange and therefore in a highly accessible location. (Objective 8).

Based on the assessment above, it is considered that the project is consistent with the NPSUD.

5.1.5 New Zealand Coastal Policy Statement

The NZCPS sets out a number of objectives and policies for achieving the purpose of the RMA in relation to the coastal environment of New Zealand. As the proposed development is not located within close vicinity to the coastal environment, the NZCPS is not relevant to this project.

5.1.6 National Policy Statement for Natural Hazards 2025

The NPS-NH applies to flooding, landslip, coastal erosion, coastal inundation, active faults, liquefaction, and tsunami natural hazards. The NPS-NH seeks to manage natural hazard risk associated with subdivision use and development to people and property using a risk-based proportionate approach, with the risk level being assessed using the NPS-NH risk matrix.

The Site is subject to flood hazards including overland flow paths, flood plains and flood prone areas. The proposed masterplanning of *Drury West Crossing* has taken into account the location of these flood hazards. Flood modelling will be undertaken in support of a substantive application to ensure the development does not result in downstream effects and to confirm if any mitigation is required.

In terms of potential geotechnical hazards, a detailed Geotechnical Assessment will be undertaken to support a substantive application. This will identify any potential geotechnical natural hazard risk and confirm if mitigation is required to ensure the development is consistent with the NPS-NH.

Based on the assessment above, it is considered that the project is consistent with the NPS-NH.

5.1.7 National Policy Statement for Infrastructure 2025

The NPS-I provides national direction under the RMA to guide the efficient development, management, and upgrading of infrastructure across New Zealand. The NPS-I is applicable to all infrastructure activities, except for activities managed under the NPS-REG and NPS-EN.¹

Drury West Crossing includes supporting infrastructure activities and therefore the NPS-I applies. The proposal is considered to be in keeping with the objective of the NPS-I. In particular, the proposed infrastructure will support development and contribute to the social and economic wellbeing of people and communities as well as their health and safety, has been appropriately designed to be compatible with the proposed activities and surrounding environment, and will be delivered in a timely manner that is coordinated with the proposed activities.

Based on the assessment above, it is considered that the project is consistent with the NPS-I.

¹ See NPS-I, clause 1.3.

5.2 National Environmental Standards for Air Quality

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 ('**NES:AQ**') sets standards to guarantee a minimum level of health protection for people living in New Zealand.

An Air Discharge consent may be required for the Wastewater Treatment Plant. This will be confirmed as part of the detailed design.

The potential for effects on air quality in relation to the Project relate primarily to dust during the construction phase. Measures will be proposed in the substantive application to manage potential effects in response to the air quality objectives and policies.

The management of dust and odour will be addressed in the Construction Management Plan and an Erosion and Sediment Control Plan as part of a substantive application. As such, ambient air quality will be maintained once constructed.

5.3 National Environmental Standards for Freshwater

The **NES:F** sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which prohibit works in and around natural wetlands and works affecting rivers and streams.

As a precaution we have identified that the proposal could potentially trigger a prohibited activity status by way of Regulation 53 of the NES:F given some reclamation of streams and wetlands with lower ecological values may be required to facilitate development. This will be confirmed as part of a substantive application if successfully referred.

5.4 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('**NES:CS**') sets a nationally consistent set of planning controls and soil contaminant values.

Given the historical rural uses of the site, it is likely that provisions of the NESCS will apply to future residential development at the locations where HAIL activities are likely to have occurred. A detailed site investigation (DSI) involving a targeted soil sampling will be undertaken at the site in support of the substantive application. This will ascertain whether NESCS and/or AUP:OP contaminated land resource consents are required to be sought in support of the development.

5.5 Auckland Regional Policy Statement

The Urban Growth and Form objectives and policies are the heart of the Regional Policy Statement (RPS) and set the policy framework for managing Auckland's growth. The RPS seeks to achieve a quality compact urban form by:

- a) Ensure the location or any relocation of the Rural Urban Boundary identifies land suitable for urbanisation in locations that contribute to a well-functioning urban environment and that: promotes a quality compact urban form; enables the efficient supply of land for commercial and industrial activities; integrates land use and transport supporting a range of transport modes;

provides a choice in working environments; follows the structure eplan guidelines; supports the efficient provision of infrastructure; avoids scheduled resources, elite and prime soils, and significant natural hazards (B2.2.2(2));

- b) Promoting quality compact urban form (B2.2.2(4) – (9));
- c) Ensuring that employment, commercial and industrial opportunities meet current and future demands (B2.5.1(1)); and
- d) Industrial growth and activities are enabled in a manner that promotes economic development; promotes the efficient use of buildings, land and infrastructure in industrial zone; manages conflicts between incompatible activities; recognises the particular locational requirements of some industries; and enables the development and use of Mana Whenua’s resources for their economic well-being. (B2.5.1 (3)).

Plan Change 80 (PC80) sought to align the with the objectives and policies of the NPSUD. PC80 is now operative. The RPS seeks to achieve a “quality compact urban form” to urban development in Auckland, by applying a centres-based approach (B2.2.2(7)), and promoting residential intensification in and around centres, corridors and close to public transport, social facilities and employment (B2.2.2(6)). This approach is broadly consistent with the NPSUD concept of well-functioning urban environments.

While the proposal is located outside of the urban area 2016 it adjoins the SH1 interchange. The RPS does anticipate movement of the rural urban boundary. In particular, B2.2.2.1(2) requires the urban growth is primarily located within the urban area 2016. B2.2.2(2) provides guidance for shifting the rural urban boundary and identifying land for urbanisation. The technical reporting and subsequent masterplanning of the site demonstrates that the elements of B2.2.2(2) are given effect to, including:

- Urbanisation of the site promotes a quality compact urban form as it adjoins the existing motorway interchange at Ramarama (B2.2.2(2)(a));
- The project enables approximately 350,000m² industrial GFA ensuring sufficient industrial supply and supporting the competitive operation of development markets (B2.2.2(2)(b)&(ee));
- The project supports a range of working environments through the establishment of an industrial and large format activities in a suitable and accessible location (B2.2.2(2)(e));
- The urbanisation of the site integrates transport and land use planning through locating industrial development adjacent to the interchange which provides access to the wider region (B2.2.2(2)(c));
- The project supports efficient infrastructure through the provision of on-site wastewater and water supply servicing (B2.2.2(2)(d));
- The project avoids scheduled items, areas with significant natural hazard risk and adverse effects on receiving water bodies and mana whenua values (B2.2.2(2)(g), (e) & (l)).

The proposal avoids the urbanisation of elite soils and is consistent with the policy directive to avoid where practicable prime soils because it will support a reduction of loss of ‘more productive’ highly productive land within the district as it provides the necessary supply to meet demand in an appropriate and practicable location in Ramarama on land adjacent to the Interchange. The technical reporting and subsequent masterplanning of the Site demonstrates that the proposal is consistent with B2.2.2(2).

The proposal is entirely consistent with B2.5.1(3). It will enable industrial growth in a manner that promotes economic development. Furthermore it will promote the efficient use of accessible and flat land for industrial activities on a site which provides many of the locational requirements for industrial use.

5.6 The Auckland Future Development Strategy 2023-2053

The Auckland Future Development Strategy (FDS) provides a long-term growth strategy for Auckland looking ahead to 2053. The purpose and content of the FDS set out in clause 3.13 of the NPSUD. This states that its purpose is to promote long-term strategic planning, within which it must identify broad locations in which development capacity will be provided over the long term. The FDS does not specifically identify the site as a growth area, nor does it appear to have been ever considered by the Council in its evaluation of the spatial scenarios.

The FDS spatial response for rural areas acknowledges more work needs to be done to specifically address growth in existing rural towns and settlements and in the interim, merit-based development in areas adjacent to existing towns and settlements. There is a supporting action to develop a Rural Strategy (prioritising the southern rural area) to inform the future approach to rural areas. The Southern Rural Strategy has now been developed and was adopted by Council in May 2025. This is discussed further in relation to Ramarama below.

In relation to Industrial Growth the FDS highlights a current shortage of industrial land. The FDS indicates that there are few undeveloped sites in the region's older traditional industrial areas and constraints on (re)development have intensified². In particular, increasing demand from other activities places upward pressure on rental costs and incentivises the conversion of sites to higher value, non-industrial, activities that can afford to locate in high rental value areas³. As a result some of the regions older industrial areas are transitioning to different uses and for some industries, particularly those that need to be in light industrial zones with available prime grade premises, locational choice has become very limited⁴. The FDS concludes that enabling greenfield capacity for new and displaced industrial users, is key⁵. It also emphasises that land extensive industries have specific requirements for large, flat sites with good accessibility⁶.

5.7 The Southern Rural Strategy

The Southern Rural Strategy 2025-2055 anticipates the southern rural area will see an increase of 89,900 people, 37,500 households, and 16,500 jobs by 2052. Most of this growth is expected to occur in the existing urban and future urban areas of Pukekohe, Drury, Ōpaheke and Paerātā. Some growth is expected in the existing urban and future urban (where relevant) areas in Patumāhoe, Glenbrook Beach, Waiuku, Kingseat, Karaka, Clevedon, Beachlands and Maraetai. Other settlements are expected to experience very limited growth.

The Southern Rural Strategy notes that Ramarama, is a small dispersed rural settlement, located to the north of the Bombay Hills and 5km to the south of Drury. The Strategy anticipates that given the limited services and facilities available, no changes to population and housing, or employment numbers will occur at Ramarama. Despite this statement the Strategy does recognise that the SH1 Papakura to Bombay project will include upgrades to improve accessibility in the wider area.

² Auckland Future Development Strategy 2023-2053 pg 34

³ Auckland Future Development Strategy 2023-2053 pg 34

⁴ Auckland Future Development Strategy 2023-2053 pg 34

⁵ Auckland Future Development Strategy 2023-2053 pg 34

⁶ Auckland Future Development Strategy 2023-2053 pg 53

While *Drury West Crossing* varies from the outcome identified for Ramarama the analysis to inform the Southern Rural Strategy is coarse and high level. Further, the application site is grouped with the much larger Ramarama rural area. The more detailed analysis undertaken to inform the application has confirmed that the proposed development it is appropriate for urban light industrial development. The proposal is not reliant on bulk wastewater or water supply servicing and is suitable from a transport perspective.

It is further noted that the conclusion reached within the Southern Rural Strategy in respect of Ramarama does not acknowledge the market desirability of southern Auckland for growth which, has been demonstrated through the rezoning of significant portions of the Future Urban Zone ahead of the proposed sequencing through private plan changes.

The conclusion reached within this Strategy is also at odds with the conclusion reached in the Southern Auckland Economic Masterplan, another Auckland Council strategy which identifies the site as an opportunity node for industrial development given its proximity to the interchange. This is discussed in more detail below.

5.8 Southern Auckland Economic Masterplan

The Southern Auckland Economic Masterplan is a 30-year plan for Drury-Opāheke and the surrounding areas developed by Tātaki Auckland Unlimited. The Southern Auckland Economic Masterplan is intended to guide iwi, local and central government, and the private sector in the development of Drury-Opāheke and the surrounding areas. This plan acknowledges the desirability of southern Auckland for growth given its strategic location on the growing Auckland to Hamilton economic corridor. It further notes that there is significant private interest in development across the area which, Council and Government will continue to respond to by providing infrastructure to support development. Additionally, the masterplan recognises that the existing significant investment in road and rail that is underway is a catalyst for further private sector development.

The Southern Auckland Economic Masterplan includes a potential land use plan which builds upon the Drury-Opāheke Structure Plan and private plan change work within the wider Drury area. Therefore, the land use plan identifies economic opportunities outside of the existing urban area, including the development site, which it identifies as an opportunity node given it is adjacent to a motorway interchange *refer to Figure 6 below*:

“The existing motorway interchange at Ramarama, and a future interchange between Drury and Ramarama, provide an opportunity to unlock land for industrial and large format activities that are highly accessible to the wider region through State Highway 1....

....Development around motorway interchanges should cater to larger format, lower density development due to the low level of active and public transport accessibility. Shipping and handling of goods is well suited for this node due to the high level of regional accessibility. Suitable land uses include: Logistics, Industrial & Enterprise.”

The Southern Auckland Economic Masterplan includes a Staging plan over three time horizons: 0-5 years, 5-10 years, and 10+ years. The staging of site is included within the second stage of development (5-10 years).

Drury West Crossing is entirely consistent with the Southern Auckland Economic Masterplan as it makes efficient use of the opportunity node identified for the land adjacent to the Ramarama Interchange by enabling light industrial development. The timing of the development will largely align with the proposed 2028-2033 staging.

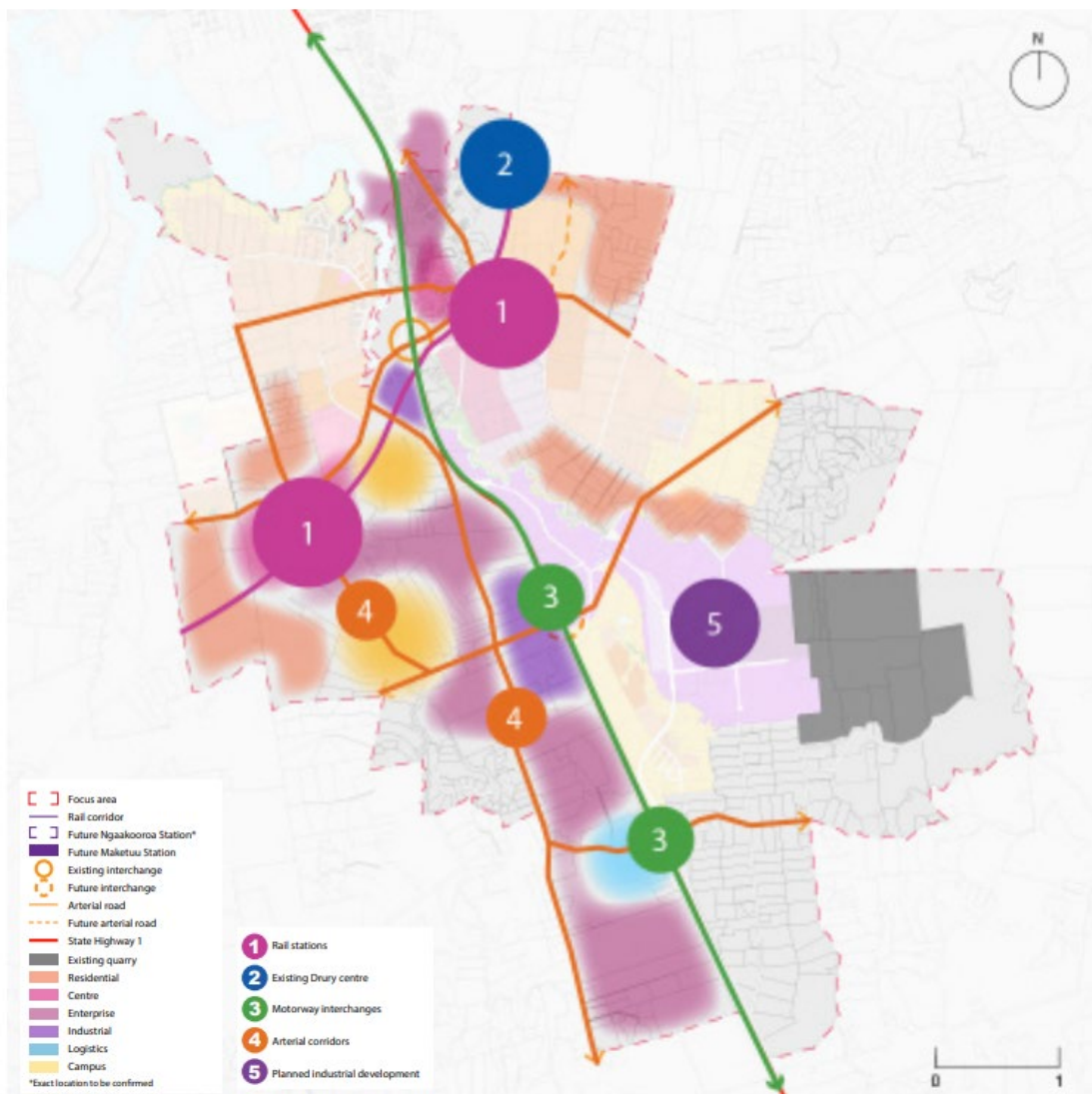


Figure 20
The implementation of the opportunity nodes in the land use plan.

Figure 6: Suggested land use plan and opportunity nodes Drury. Source: Southern Auckland Economic Masterplan

6.0 Assessment of Effects

This section is provided in accordance with s13(4)(h) of the FTAA. This requires that applications include a description of the anticipated and known effects of the project on the environment.

The proposal will not generate significant adverse effects on the environment, and any adverse effects on the environment will be appropriately avoided, remedied or mitigated to be minor or less than minor in nature. The key potential adverse effects are addressed in general below and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

6.1 Economics

An Economic Assessment of the proposal has been undertaken by Insight Economics. Over a nine year period it is estimated that the development could have the following economic impact on business activity within Auckland Region:

- Total direct capital expenditure (excluding land) of \$1.3 billion;
- Direct employment for 5,135 FTE-years; and
- Generate an estimated \$461 million in wages and salaries, and
- Contribute \$923 million to regional GDP.

At full operation, future onsite industrial and commercial activity is estimated to:

- Directly support work for around 1,920 people, equivalent to approximately 1,820 FTEs;
- Generate an estimated \$175 million in annual wages and salaries; and
- Future onsite activities generating approximately \$360 million in annual GDP.

In respect of the economic benefits particularly associated with the proposed urbanisation the Economic Report finds that the proposal responds to longer-term spatial trends in Auckland's industrial market, including the progressive shift of industrial activity southwards as more central precincts face pressure from higher land values, competing urban uses, fragmented ownership and limited opportunities for site aggregation. By increasing the number and range of industrial lots available in a strategically located part of southern Auckland, the Economic Assessment concludes that the proposal would improve market choice, support greater land market competition, and help improve the responsiveness of industrial supply to future demand growth. This would support the efficient functioning of the industrial land market.

Insight Economics are also of the view that the proposal likely to generate synergies with surrounding employment and urban growth areas. In particular, its proximity to Drury South Crossing and the substantial residential growth planned and underway across the wider Drury area creates a strong spatial relationship between jobs and housing. This can support labour-market efficiency by improving access to employment opportunities, reducing commuting distances for some workers, and reinforcing the role of southern Auckland as an integrated location for both population and employment growth.

Insight Economics concludes that the fast-track process ensures these benefits are realised sooner than traditional development pathways would otherwise normally allow. In their expert view, the proposal meets criteria 22(2)(a)(iii) and 22(2)(a)(iv) of the FTAA and is supportable on economic grounds.

6.2 Transport

A Transportation Memorandum has been prepared by Commute which outlines the transportation context, anticipated effects, and future assessment needs, and concludes that there are no transportation issues that would prevent the proposal from progressing to the Fast Track consenting stage.

The Transport Memorandum identifies that the majority of traffic is expected to use the Ramarama interchange to access the surrounding road network. The existing interchange comprises two intersections, with the western intersection controlled by a stop control intersection and the eastern intersection being roundabout controlled. As previously discussed in 2024, NZTA lodged two NoRs in the area relating to the interchange and surrounds. Commute have noted that the inclusion of the roundabout at the interchange (west side) will be a significant improvement to the existing arrangement both in terms of safety and efficiency.

Commute have reviewed the transport modelling and reporting in support of NZTA's Notices of Requirement which provides an indication of the capacity and performance of the Ramarama Interchange. In particular the "Drury South - Stage 1 Transport Infrastructure - Transport Assessment" undertaken in 2017 notes that:

- The current roundabout on the east of the interchange experience little / no delay.
- The roundabout would still have significant capacity in 2036 even with all Drury South traffic added.

Additionally, the Assessment of Transport and Traffic Effects lodged with the Papakura to Bombay Stage 2 NoR showed that the Ramarama interchange (with the western upgrade) notes the following:

"The Ramarama interchange (with the western upgrade) would operate efficiently in the morning peak period however, the situation differs during the evening peak period, where the interchange is predicted to be nearing capacity by 2048. At the eastern roundabout the Ararimu Road east approach is predicted to operate with a Degree of Saturation of 78%, while the north Maketu Road approach is predicted to operate with a Degree of Saturation of 93%. This is mainly due to the relatively high volumes from the large industrial area in-between Ramarama and Drury. These users will head onto SH1 southbound via Maketu Road."

In response to these previous findings the Transport Memorandum notes that that the performance of the eastern roundabout interchange in the PM peak will need to be fully assessed in the substantive application to gauge if any mitigation is required. It is however noted that the development will not add significant traffic to the critical Maketu Road approach, and the traffic that is added is likely to be already using the interchange (eg residents in the area currently travelling to employment outside the area now travelling to the subject site). The applicant has begun discussions with NZTA and will continue to work with NZTA through a substantive assessment process.

6.3 Earthworks

During construction, erosion and sediment control measures will be utilised to avoid an adverse environmental effect. All proposed sediment and erosion control measures will be designed in accordance with the Auckland Council's GD05.

Any adverse dust effects can be appropriately managed with standard conditions of consent.

On the basis of the above, it is considered that any adverse effects associated with earthworks can be managed in that they will be less than minor.

6.4 Infrastructure

Details of the proposed infrastructure services such as stormwater, wastewater, water supply and utilities are outlined above and further detailed within the Preliminary Civil Infrastructure Report from Maven.

There is currently not public wastewater or water supply connection available at the Site however, the Preliminary Civil Infrastructure Report from Maven confirms that the Site is able to be adequately serviced now, and in the future. The proposed development can be serviced for water supply through a combination of roof rainwater capture and groundwater abstraction.

In relation to wastewater the proposal will be supported by a private, centralised wastewater treatment plant (WWTP), with disposal of treated effluent to land. GWE have proposed a Membrane Bioreactor (MBR) or hybrid Membrane Aerated Biofilm Reactor (MABR-MBR) system to provide wastewater treatment.

A network utility company will be established to operate the water and wastewater infrastructure to service the proposed development.

On the basis of the above, there will not be any significant adverse effects in relation to infrastructure and servicing.

6.5 Flooding

Flooding within the site and downstream are largely limited to the streams, gullies and riparian areas. Given the location of the site, being at the bottom of the catchment, the risk of downstream effects from the intended urbanisation is reduced. However, in support of this referral application, Maven has built a catchment flood model using TUFLOW software and has undertaken pre and post development modelling for the 100-yr event.

The modelling has been undertaken in accordance with Auckland Council Stormwater Code of Practice approach referenced in Section 3.8 and Auckland Council's current 3.8°C climate change guidance. The modelling confirms no upstream or downstream effects and has been used to confirm minimum FFLs and height of the bridge and culverts contained within the civil design.

6.6 Ecology

As previously discussed, years of agriculture have left the subject site devoid of indigenous vegetation with the exception of the SEA in the northern portion of the site. The masterplan will ensure that the SEA is protected. The proposal involves restoration of riparian margins, as well as significant opportunities within the proposed landscape buffers and open space areas for future ecological restoration and enhancement and replanting.

For the reasons set out above, any potential adverse ecological effects will be less than minor.

6.7 Cultural Values

A summary of consultation undertaken with iwi through the life of the proposal will be included with the final application.

The project will not occur on land returned under a Treaty Settlement. The Ngāti Tamaoho Claims Settlement Act 2018 covers the site as it falls within a Statutory Acknowledgement area. Engagement with Ngāti Tamaoho is ongoing and a CVA will be undertaken as part of a substantive application. In addition, Ngāi Tai ki Tāmaki have also indicated an interest in the proposal. Ngāi Tai ki Tāmaki will undertake a cultural values assessment as part of a substantive application.

The Applicant is committed to working with all iwi groups that have registered their interest in this project to develop the masterplan should the project be referred.

6.8 Positive Effects

Drury West Crossing will deliver a number of positive effects, including but not limited to:

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- By increasing the number and range of industrial lots available in a strategically located part of southern Auckland, the proposal would improve market choice, support greater land market competition, and help improve the responsiveness of industrial supply to future demand growth. This would support the efficient functioning of the industrial land market and contribute to a well-functioning urban environment under the NPS-UD;
- Delivery of an industrial development on a large site with a flat contour in highly accessible location adjacent to the Ramarama intersection consistent with the outcomes sought within Tātaki Auckland Unlimited's Southern Auckland Economic Masterplan;
- Enhancement of the natural environment through the restoration of riparian margins and the design which seeks to weave natural space through the development; and
- Generation of a wide range of economic benefits, such as providing a significant employment hub, and contributing significant regional economic benefits.

6.9 Mitigation

This memorandum, and the supporting memorandums from the technical experts, identify a range of measures to address potential adverse effects and ensure that those adverse effects are avoided, remedied or mitigated. This includes the application of standard and well-established mitigation measures and more bespoke approaches to manage the particular effects of this proposal. These can be addressed through design, conditions of consent, and monitoring.

7.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning-related reasons why *Drury West Crossing* could not proceed under the Fast-Track Approvals Act 2024. Through strong design and technical input, *Drury West Crossing* can achieve a built form that positively impacts on the wider Drury community, without having an adverse effect on the environment.

It is acknowledged that a full and comprehensive Assessment of Environmental Effects will be undertaken as part of the resource consent application, however at this stage, no more than minor adverse effects have been identified that preclude the development from occurring.
