

25 May 2026

North West Rapid Transit Fast-track Application
Environmental Protection Authority
Private Bag 63002
Wellington 6140

Via email: substantive@fasttrack.govt.nz

Tēnā koutou

Comments from Costco Wholesale New Zealand Limited on the North West Rapid Transit Application (FTAA-2511-1146)

1. We act for Costco Wholesale New Zealand Limited ('Costco'), the owner and operator of the Costco member warehouse at 2 Gunton Drive, Westgate. This letter has been prepared jointly by Gerard Francis Thompson and Cassandra Siu Hwa Rippon of Barker & Associates Limited. Paragraphs 2-3 introduce Mr Thompson and paragraphs 4-5 introduce Mrs Rippon.

Gerard Francis Thompson

2. I am a Director of Barker & Associates Limited ('B&A'), an independent planning consultancy based in Auckland. I hold a Master of Science degree in Geography from Canterbury University and a Master of Environmental and Resource Planning degree from Massey University. I have practiced as a planner for 24 years and am a full member of the New Zealand Planning Institute.
3. I have been involved with and overseen private plan changes, as well as numerous large-scale urban developments, master planning and resource consenting projects throughout New Zealand, including, but not limited to, Sylvia Park Centre, Ormiston Town Centre and Stonefields. I have been involved with projects under both fast-track consenting regimes (both the COVID-19 Recovery (Fast-track Consenting) Act 2020 and the Fast-track Approvals Act 2024, including Great South Homes Park which was approved in January 2024 under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Cassandra Siu Hwa Rippon

4. I am an Associate at B&A, an independent planning consultancy based in Auckland. I hold a Bachelor of Planning (Honours) from the University of Auckland. I have practised as a planner for 10 years and am a full member of the New Zealand Planning Institute.

5. I have been involved with a number of large-scale urban developments and resource consenting projects throughout New Zealand, including, but not limited to, Ormiston Hospital, Spedding Road and Drury. I was the author of the Waihoehoe Precinct Fast-track application, approved in September 2023 under the COVID-19 Recovery (Fast-track Consenting) Act 2020, and have assisted Foodstuffs North Island with resource consents and the preparation of submissions and evidence for Notice of Requirements across the North Island.

Environment Court's Code of Conduct for Expert Witnesses

6. While this is not a hearing before the Environment Court, we have read and are familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023, and agree to comply with it. Our qualifications as experts are set out above. Except where we state that we are relying on the advice of another person, we confirm that the issues addressed in this letter are within our area of expertise. We have not omitted to consider material facts known to us that might alter or detract from the opinions that we express.

Introduction

7. Costco has been invited by the Panel, under section 53 of the Fast-track Approvals Act 2024 ('FTAA') to provide written comments on the North West Rapid Transit application Made by the New Zealand Transport Agency Waka Kotahi ('NZTA'). These comments are provided in response to that invitation and are supported by expert traffic engineering advice by Flow Transportation Specialists Ltd ('Flow'). Flow's advice is included as **Attachment 1**.

Background - Costco and Westgate Operation

8. Costco is a global, membership-based retailer that provides high-quality goods and services at competitive prices, including groceries, fuel, pharmacy services, and household essentials. Costco is recognised internationally for delivering value and convenience to its members, while creating local employment opportunities and supporting local suppliers. The company also contributes to local communities through charitable initiatives and long-term investment in the areas in which it operates.
9. Costco opened its first New Zealand store in Westgate in September 2022 and quickly experienced strong demand, with approximately 150,000 New Zealand members joining within its first year of operation. Following the success of the Westgate warehouse, Costco is progressing plans for a second warehouse in the Drury Town Centre in South Auckland to expand its presence in the Auckland region.
10. The Westgate warehouse, including its associated petrol station, was strategically located for its accessibility from SH16 and its location within North-West, one of Auckland's largest planned metropolitan centres (refer to Figure 1). The site is a significant regional retail destination and plays

an important role in providing supermarket competition, competitive retail offerings and increased consumer choice through Costco's low-cost, membership-based wholesale model.

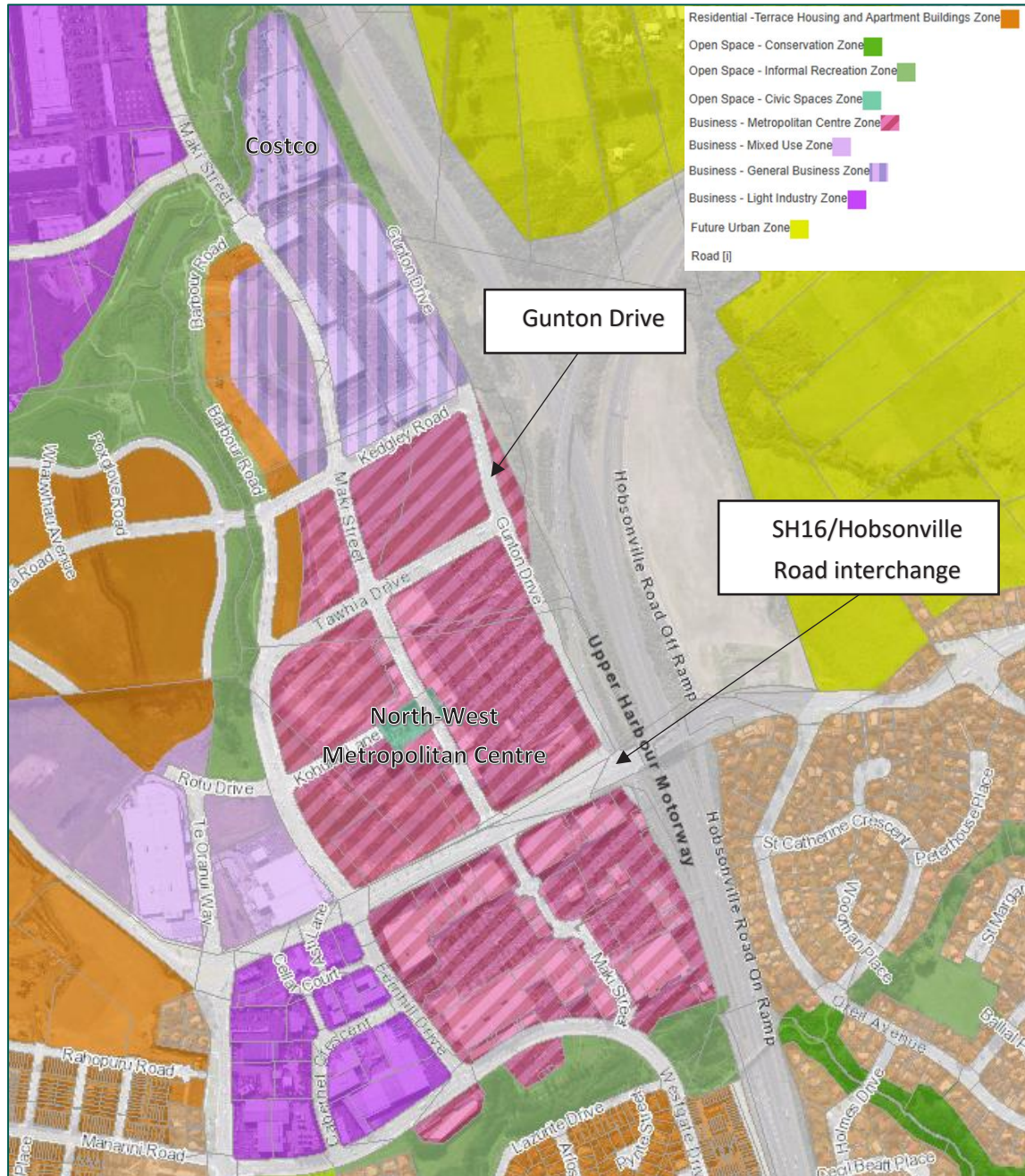


Figure 1: Map showing Auckland Unitary Plan zoning of sites surrounding Gunton Drive and Hobsonville Road interchange. Source: Auckland Council.

11. Gunton Drive and the Hobsonville Road interchange provide the primary access to the Westgate warehouse for both customers and freight, as well as key access to the North-West Metropolitan Centre. Gunton Drive effectively operates as a motorway offramp, with traffic exiting SH16,

crossing Fred Taylor Drive and entering Gunton Drive for direct access to Costco, North-West Mall and the North-West Metropolitan Centre (refer to Figure 1).

12. Flow, in their advice at **Attachment 1**, highlight the importance of Gunton Road noting that the transport network required to fully support Westgate is incomplete, notably, the Northside Drive connection remains incomplete with no committed funding or construction timeframe, placing significant pressure on the Hobsonville Road interchange and Gunton Drive, which is the busiest access serving the Westgate area. Whilst alternative routes exist (e.g. via Fred Taylor Drive), Gunton Drive remains the most efficient route to Costco given existing high levels of traffic. Accordingly, Costco is highly reliant on the safe, efficient and continuous operation of Gunton Drive, the Hobsonville Road interchange, and the adjacent SH16 motorway off-ramps to maintain safe and effective access, minimise congestion, and ensure its continued operation.

Background - Previous Engagement and Planning Context

13. By way of background, Costco provided a submission in 2023 to Auckland Council on Auckland Transport's Notice of Requirement ('NoR') for the Northwest Bus Station (known in the NWRT project as the 'Westgate Te Waiarohia Station') and associated resource consent application (refer to **Attachment 2**). The original proposal contemplated an "on-line" station directly accessing Gunton Drive. However, through the NoR process, this was amended to an off-line configuration, necessary to protect the function, safety and efficiency of Gunton Drive.
14. Costco considers this prior outcome to be relevant to the present project, as it demonstrates the importance of maintaining the operational integrity of Gunton Drive as a critical access route within the North-West transport network.

Background – Collaboration with Stride Property Limited and New Zealand Retail Property Group

15. As relevant background, Costco has been working collaboratively with Stride Property Limited ('Stride') and New Zealand Retail Property Group ('NZRPG'), as the two other major landowners and stakeholders affected by the works proposed to the Gunton Drive and Hobsonville Road interchange. For the ease of the Panel, Costco confirms that, with respect to the changes proposed to the Gunton Drive and Hobsonville Road interchange, it generally aligns with and supports the positions and conditions proposed by Stride and NZRPG. This is reflected in Costco's relief sought (refer to paragraph 32 below).

Comments

16. The above background is provided to assist in understanding Costco's operations, its reliance on the surrounding transport network and the relationship between the project and the Costco warehouse.
17. Costco's specific comments and relief sought are set out in the following sections of this letter.

18. Costco acknowledges that the NWRT project is a significant infrastructure proposal intended to improve rapid transit connections between the North-West and Auckland City Centre.
19. Costco is generally supportive of the project as it involves investment and improvement in public transport accessibility in the North-West area.
20. Costco, however, opposes the project in its current form because the proposed alignment and construction works will result in significant adverse effects on the capacity and level of service of Gunton Drive, the Hobsonville Road interchange, and the surrounding road network. As Costco effectively relies on a single dominant access route (being Gunton Drive and the Hobsonville Road interchange), it is particularly vulnerable to any changes and construction proposed in this area. Costco is concerned that these effects during construction will occur over an extended period and have not been adequately considered in the application. Costco is particularly concerned that the existing road network already experiences congestion and operational constraints, meaning there is limited network resilience to absorb further reductions in capacity during construction, and that insufficient information and assessment has been provided to adequately assess the effects of construction on the Westgate area.
21. Gunton Drive, Fred Taylor Drive and the SH16/Hobsonville Road interchange fall within the area identified for the designation, and the project proposes significant works and upgrades within this area. Those works include, but are not limited to, construction of an underpass at Fred Taylor Drive, changes to the Hobsonville Road interchange, and realignment of Gunton Drive. These have the potential to cause major disruptions to access and increase congestion for Costco customers and freight movement.
22. Section 19.1 of the substantive planning assessment assesses the construction traffic effects of the proposal, considering that construction traffic effects will be *“temporary and necessary in order to secure the transport outcomes sought by the project”*. This is supported by the Assessment of Transport Effects, which:
 - a. Anticipates the construction of the underpass under Fred Taylor Drive to take four years;
 - b. States the Hobsonville Road interchange has existing operational issues; and
 - c. States the works will cause disruptions to local road operations, with SIDRA modelling anticipating a 10% reduction in capacity.
23. Flow has reviewed the application and supporting assessment in their advice at **Attachment 1** and overall, considers that insufficient information and assessment has been undertaken on the impacts of construction on the Westgate area.

24. Flow considers the Assessment of Transport Effects to understate the likely severity and duration of construction effects. Flow highlights that the assessment describes the underpass works at Fred Taylor Drive to be “temporary” and “minor”, but that the supporting construction documentation confirms that the works involve a substantial four-year “top down” construction methodology. Flow considers the four-year construction period to be significant, and the on-going operation of the Westgate area to be a critical factor when confirming the project design.
25. While the assessment identifies existing operational issues at the Hobsonville Road interchange and a reduction in capacity, Flow notes that it does not consider the wider network impacts. It does not consider the potential adverse effects on Costco, which is a key existing activity at North-West and an important regional retail destination. It also does not consider the potential adverse effects on the North-West Metropolitan Centre.
26. The temporary construction effects identified in the application have the potential to adversely affect Costco far beyond the construction phase. B&A have worked with supermarket operators and obtained resource consents for supermarkets for several years. Through this work, B&A understands that supermarkets, as high-traffic generators, are particularly vulnerable to changes in access conditions, congestion and travel time reliability. Costco has also advised that even a 10% reduction in revenue would materially affect its overall profitability and is critical for on-going business operations. Whilst construction effects may be characterised as “temporary”, prolonged disruption to access and travel times can influence long-term changes to customer travel behaviour and established shopping patterns. This would be detrimental to Costco’s business operations, affecting its ability to continue to provide competitive retail offerings and contribute to much-needed supermarket competition. Accordingly, the minimum four-year construction period associated with the Fred Taylor Drive underpass and 10% reduction in capacity at the Hobsonville Road interchange are unlikely to be merely “temporary” and are likely to result in lasting and significant impacts on Costco which have not been appropriately considered in the application.
27. The adverse effects identified above are not limited to Costco’s operations and also raise broader concerns regarding the accessibility and function of the North-West Metropolitan Centre. The Hobsonville Road interchange and Gunton Drive form a critical access route to the planned metropolitan centre at North-West, which is identified in the Auckland Unitary Plan (‘AUP’) as an emerging metropolitan centre and a key growth node within Auckland’s north-west. Metropolitan centres represent, after the City Centre zone, the highest-order centres in Auckland’s urban hierarchy and are intended to accommodate significant concentrations of business activity, employment, retail, and residential intensification, supported by high-capacity transport infrastructure.
28. The AUP sets out clear objectives and policies that seek to reinforce the role and function of metropolitan centres. Of note:

- a. Objective H9.2(6) provides that *“Metropolitan centres are reinforced and developed for commercial, community and civic activities and provide for residential intensification”*;
 - b. Objective H9.2(7) seeks that *“Metropolitan centres are an attractive place to live, work and visit with vibrant and vital commercial, entertainment and retail areas”*; and
 - c. Policy H9.3(20) seeks to *“Encourage developments to support a range of transport modes serving metropolitan centres and the ability to change transport modes”*.
29. These provisions emphasise the importance of protecting the role and function of metropolitan centres as major business areas, including during periods of construction and infrastructure delivery. The extent of works proposed within the designation area—including impacts on the existing road network, motorway off-ramps, and bridge structures—is therefore significant in the context of maintaining the accessibility and ongoing function of the North-West Metropolitan Centre.
30. In addition, while Policy H9.3(20) is directed at development supporting transport integration, it reinforces the importance of maintaining reliable and multi-modal access to metropolitan centres. Material disruption to key access corridors, such as Gunton Drive and the Hobsonville Road interchange, has the potential to undermine the accessibility and transport choice outcomes sought by the policy.
31. Based on the above, Costco is concerned that the application has not adequately assessed the adverse effects of the project on the Gunton Drive, Hobsonville Road interchange, and Fred Taylor Drive section of the project, and that construction effects on Costco and the North-West Metropolitan Centre have not been adequately addressed. Costco considers that further assessment of alternative options and mitigation measures for this location, including consideration of site-specific operational requirements and construction traffic effects, is required to satisfy Schedule 5 Clause 12(1)(b), (d) and (h) of the Fast-track Approvals Act 2024.

Relief Sought

32. Costco seeks the following relief on the NWRT project:
- a. That the alignment of the proposed busway and associated works is amended to avoid changes or alterations to any part of Gunton Drive and the Hobsonville Road interchange (including those parts of Fred Taylor Drive), ensuring that the existing access to Costco from the Hobsonville Road interchange and Gunton Drive is maintained, and that there is no reduction in traffic capacity or level of service at the interchange and surrounding road network during construction or operation; or

b. If the above is rejected, that:

- i. The following *Westgate Construction Traffic Management Plan* condition is included:

XX. *Westgate Construction Traffic Management Plan*

- a. *The Requiring Authority must submit a Construction Traffic Management Plan – Westgate (CTMP-W) for certification in accordance with Condition C. Where there is any inconsistency between the CTMP-W and any other management plan (except for the CTMP-NW), the provisions of the CTMP-W shall prevail.*
- b. *The purpose of the CTMP is to avoid or mitigate adverse effects on traffic safety and network efficiency on routes that provide access to and egress from the Westgate Precinct resulting from the construction works, in order to:*
- i. Protect public safety, including the safe passage of pedestrians and cyclists;*
 - ii. Maintain capacity and connectivity of all routes and all modes to and from the Westgate Precinct;*
 - iii. Minimise delays and congestion to all road users, pedestrians and cyclists, and particularly public transport at all times, especially bus travel times at peak traffic periods during weekdays (06:30 to 09:30 and 16:00 to 19:00); and*
 - iv. Avoid construction works which impact traffic capacity to and from the Westgate Precinct between 1 November and 7 February.*
 - v. Inform the public and landowners about any potential temporary impacts on the road network.*
- c. *The CTMP-W shall be prepared using best practice (to better understand the effects of construction of the works subject of the OP on the wider Westgate roading network -), which may include the use of traffic modelling tools. Any such assessment which is to include mitigation that protects access and capacity of the Westgate area shall be undertaken in consultation with Auckland Transport and have the ability to simulate lane restrictions, road closures and if necessary, new road connections (such as Northside Drive). The outcome of consultation undertaken between the Requiring Authority, Auckland Transport and affected landowners listed in XXX. Management Plans shall be documented and any comments not acted on provided with the final CTMP-W when submitted to the Council.*

- d. *The CTMP-W shall describe the methods for avoiding, remedying or mitigating the local transportation effects resulting from the Project works subject of the relevant OP, and shall address the following matters:*
- i. *Methods to avoid, remedy or mitigate the local effects of the construction of individual elements of the Project (e.g. intersections/overbridges/underpasses) and the use of staging to ensure minimal disruption to the transport network;*
 - ii. *Traffic management measures to address and maintain traffic capacity of all routes within and surrounding the Westgate Precinct and minimise adverse effects including, where applicable to the relevant OP;*
 - iii. *Retaining the existing number of traffic lanes along Gunton Drive and allow for existing traffic movements along Gunton Drive (between Tawhia Drive and Maki Street), noting that temporary restrictions to one lane or temporary full closures may be required overnight (between 9pm and 6am) for traffic switches or stage changes, where applicable to the relevant OP;*
 - iv. *Retaining two traffic lanes on Gunton Drive between Fred Taylor Drive and Tawhia Drive throughout the construction period, noting that temporary restrictions to one lane or temporary full closures may be required overnight (between 9pm and 6am) for traffic switches or stage changes, where applicable to the relevant OP;*
 - v. *Retaining the existing number of traffic lanes on the Hobsonville offramp, Fred Taylor Drive and Hobsonville Road that provide movements to Gunton Drive, where applicable to the relevant OP;*
 - vi. *Measures to maintain existing vehicle access to private properties, or where the existing property access is to be removed or becomes unsafe as a result of the construction works, measures to provide alternative access arrangements (including any revised internal layout changes resulting from the change) in consultation with Auckland Transport and the affected landowner.*
- ii. That the *Management Plan – Certification and Review* condition, as proposed in Stride’s comments, is adopted. Specifically, that Costco is listed as a party subject to consultation on the Key Stakeholder Communication and Consultation Plan,

Construction Traffic Management Plan and the Westgate Construction Traffic Management Plan.

Conclusion

33. Costco appreciates the opportunity to provide input to this proposal. Through these comments, Costco seeks to ensure continued access to and operation of the Costco warehouse, as a key existing activity in North-West and regional retail destination, is not unduly compromised by the project.

34. Costco would appreciate the opportunity to review the draft conditions for comment – the email address for service below is correct.

35. If you have any queries or require additional information, please do not hesitate to contact us.

Yours sincerely | Nā māua noa, nā

Barker & Associates Limited



Gerard Thompson
Director



Cassandra Rippon
Associate

Address for Service: Costco Wholesale New Zealand Limited
C/o Barker & Associates (Attention: Gerard Thompson)
PO Box 1986
Shortland Street
Auckland 1140

Contact number: 029 474 6660
Contact email: gerardt@barker.co.nz

Copied to: Abdul Deeb, Real Estate Director, Costco Wholesale Australia Pty Ltd

Attachments:

Attachment 1 – Transport Assessment by Flow Transportation Specialists Ltd

Attachment 2 – Letter to Auckland Council on the North-West Bus Station (13 March 2023)