

Before the Expert Consenting Panel

under: the Fast-track Approvals Act 2024

in the matter of: applications for resource consents and archaeological authorities and notices of requirement by the New Zealand Transport Agency Waka Kotahi to develop a rapid transit link and associated infrastructure and connections between Brigham Creek and Auckland City centre, alongside State Highway 16, known as 'North West Rapid Transit'

applicant: **New Zealand Transport Agency**
Requiring Authority and Applicant

Statement of Evidence of Paul May for New Zealand Transport Agency Waka Kotahi

Dated: 3 June 2026

Reference: Paula Brosnahan (paula.brosnahan@chapmantripp.com)
Nicola de Wit (nicola.dewit@chapmantripp.com)

chapmantripp.com
T +64 9 357 9000
F +64 4 472 7111

PO Box 2206
Auckland 1140
New Zealand

Auckland
Wellington
Christchurch



**STATEMENT OF EVIDENCE OF PAUL MAY FOR NEW ZEALAND
TRANSPORT AGENCY WAKA KOTAHI**

- 1 My full name is Paul Clifford May. I am the author of the Assessment of Stormwater and Flooding Effects lodged with the Application (*Stormwater and Flooding Assessment*).¹
- 2 My qualifications and experience are set out in my Flooding Assessment. I reaffirm the Code of Conduct statement set out in my Stormwater and Flooding Assessment.
- 3 My evidence has been prepared to support the New Zealand Transport Agency Waka Kotahi's (NZTA) response to comments on NZTA's notices of requirement (NORs) and applications for resource consents and archaeological authorities (together, *Application*) for the North West Rapid Transit Project (*Project or NWRT*).

SCOPE OF EVIDENCE

- 4 My evidence responds to the comments on the Application from Cabra Industrial Limited, Cabra Fred Taylor Limited and Foundry Industrial Limited (*Foundry Group*).

**CABRA INDUSTRIAL LIMITED, CABRA FRED TAYLOR LIMITED
AND FOUNDRY INDUSTRIAL LIMITED**

- 5 Foundry Group manage three properties at [REDACTED] [REDACTED] (*Foundry Group sites*) within and/or adjacent to NOR 1 and NOR 2. There are six industrial yards located on [REDACTED] [REDACTED] (*Industrial Yard/s*). The establishment of the six Industrial Yards and land use activities on two of the Industrial Yards are authorised under resource consent BUN60420052 at Appendix 1 to the comment (*Industrial Consent*). One Industrial Yard is completely within the Proposed Designation, and another is partly within. The resource consent does not authorise land use activities on these Industrial Yards.

Implications of the Project for compliance with the Industrial Consent

- 6 The Foundry Group comment notes:²

the busway traversing the eastern end of the site will trigger amendments to the Operational and Maintenance Plan for the stormwater and treatment devices that are currently operating on the site The implications of the changes to the existing stormwater network on Foundry's site are not yet known, as the Application does not appear to incorporate stormwater discharge from the existing yard development.

¹ Part 6 – Attachment 6.19 – Assessment of Stormwater and Flooding Effects (*Stormwater and Flooding Assessment*).

² Comment 32 - Foundry Group (*Foundry Group Comment*), page 6.

- 7 The Industrial Yards do not rely on a single stormwater treatment device located at the lowest point of the catchment. Rather, stormwater is managed through a series of treatment and attenuation devices, each serving discrete sub-catchments across the six Industrial Yards. For each Industrial Yard, stormwater runoff is managed by a grassed swale along the northern and eastern sides that discharges into a dry pond in the north-eastern corner of each yard. Each dry pond then discharges into one of three existing overland flow paths along the northern boundary of [REDACTED].³
- 8 Because stormwater is managed for discrete sub-catchments across the six Industrial Yards, I consider the remaining Industrial Yards (Platforms 1 to 4, which are outside the Proposed Designation) will still be able to be operated in accordance with the Industrial Consent (noting that land use activities are only authorised on two of those Industrial Yards). Platform 5 will be severed by the Proposed Designation (leaving a small residual area outside the Proposed Designation) and Platform 6 will be entirely within the Proposed Designation. Any impacts on those platforms arising from property acquisition will be dealt with through the Public Works Act.

Implications of the Project for existing overland flow paths

- 9 The Foundry Group comment says:⁴
- A stormwater pond is proposed [as part of the Project] at the eastern end of the property at [REDACTED], being the low point of the Foundry property. As discussed above, stormwater from the Foundry site currently discharges to an existing overland flow path in the north eastern corner of the site. Aspire query whether the proposed stormwater design takes this into account, and/or whether the proposed stormwater device and culverts have been designed to allow for stormwater from the upper catchments, so as not to restrict increased discharge at a later date (owing to future impervious area being anticipated from new development following rezoning). Aspire suggests that a stormwater connection to the proposed stormwater device would provide for and recognise this.
- 10 The three existing overland flow paths along the northern boundary of [REDACTED] flow into the Proposed Designation in a manner that replicates pre-development flow conditions. The Industrial Consent does not change the entry and exit points of the overland flow paths into and out of [REDACTED]. The Project will accommodate the overland flow paths that flow into the Proposed Designation from upstream catchments in a manner that does not adversely affect the Foundry site.

³ Foundry Group Comment, page 2.

⁴ Foundry Group Comment, page 6.

- 11 I am satisfied the existing overland flow regime is well understood by the Project design team, and that the design assumptions adopted for the Indicative Design appropriately reflect the existing hydrological conditions.
- 12 Accordingly, I consider the Project takes into account the existing overland flow paths from the [REDACTED] property.
- 13 As noted in Section 5.3.2 and Figure 5-1 of the Stormwater and Flooding Assessment, the Project works will not increase the danger rating or water levels or change the overland flow paths within the portion of the [REDACTED] property outside the Proposed Designation.
- 14 I confirm that the hydraulic modelling undertaken for the Indicative Design incorporates the Maximum Probable Development (*MPD*) scenario under the Auckland Unitary Plan, including full upstream development and associated increases in impervious surfaces. The culvert infrastructure in the Indicative Design has been conservatively designed to convey MPD flows for the entire contributing upstream catchment, including allowances for climate change and Auckland Council's interim TP108 rainfall approach. These parameters are included in Proposed Designation Conditions 8 and 9. In my view, this ensures no adverse hydraulic effects on upstream or neighbouring properties and does not constrain future catchment development.
- 15 Accordingly, I consider the Project has, and will be, designed to allow for stormwater from the upper catchments.

Paul May
3 June 2026