

BEFORE A PANEL OF INDEPENDENT HEARINGS COMMISSIONERS

FTA-2502-1019

UNDER the Fast Track Approvals Act 2024 ("**FTAA**")

IN THE MATTER of an application by Kiwi Property Holdings No. 2 Limited
under section 42 FTAA for approvals relating to the Drury
Metropolitan Centre – Consolidated Stages 1 and 2 Project

**MEMORANDUM OF COUNSEL FOR THE APPLICANT REQUESTING MINOR
CORRECTIONS TO THE DECISION PURSUANT TO SECTION 89 FTAA**

19 NOVEMBER 2025

**ELLIS GOULD
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MAY IT PLEASE THE PANEL:

Introduction

1. This memorandum is filed on behalf of Kiwi Property Holdings No.2 Limited (“**Kiwi Property**”), the applicant for the Drury Metropolitan Centre – Consolidated Stages 1 and 2 Project (“**Project**”).
2. It requests that the Panel issue a minor correction to Annexure A of the decision dated 7 November 2025 (“**Decision**”).
3. Section 89(1) FTAA provides that amendments to decision documents may be issued where they:
 - (a) Are to correct minor omissions, errors, or other defects in it; and
 - (b) Are issued within 20 working days of the decision date.
4. The error to be corrected is at Annexure A to the Decision (the Conditions) where the incorrect table has been included at Advice Note 6 to Condition 85.
5. The table included in the conditions at Annexure A to the Decision is Figure 3 from Mr Hughes’ post conference modelling update¹, which has ‘track changes’ showing² (“**Figure 3 Version**”). To remove the risk of future confusion, a clean copy of this table was included in the final conditions provided to the Panel on 6 November 2025 (“**6 November Version**”).³
6. Paragraph 368 of the Decision records the Panel’s intention to adopt the clean, corrected 6 November Version of the table (emphasis added):

The Applicant and Auckland Transport are also agreed on a proposed new Advice Note 6 to Condition 85 to clarify the modelling basis for the revised development threshold triggers for transport infrastructure upgrades approved under this consent. The Panel has imposed the wording proposed by the Applicant together with the clean version of the relevant Table 3 provided by the Applicant’s transport modelling expert (Mr Hughes)

¹ Dated 13 October 2025.

² Showing amendments from an earlier version.

³ One additional (minor) amendment was made to it as per comments on the conditions provided on 4 and 6 November 2025.

following expert conferencing. The correct version of that Table was provided to the Panel on 6 November 2025 in response to a section 67 further information request dated 5 November and has been included in new Advice Note 6.

7. On the basis that the Panel's intent was to include the 6 November Version of the table, the inclusion of the Figure 3 Version is considered to be a minor error which can be corrected pursuant to section 89(1) FTAA.
8. Accordingly, Kiwi Property asks the Panel to correct the Decision by replacing the table at Advice Note 6 of Condition 85 with the copy of the table appended as **Appendix A**.

DATED this 19th day of November 2025

A handwritten signature in blue ink, consisting of two distinct, stylized cursive marks.

Douglas Allan / Alex Devine

Counsel for Kiwi Property Holdings No. 2 Limited

Appendix A

Row	Transport Infrastructure	Expected Completion	Level of Development enabled by Transport Infrastructure				
			Residential (Dwellings)	Retail (GFA)	Commercial (GFA)	Community (GFA)	Drury East Peak Hr Trip Gen
(a)	Existing GSR / Waihoehoe roundabout	N/A	Up to 600 units	Up to 5,000sqm	-	-	Up to 800 trips
(b)	Waihoehoe Road Ultimate upgrade incl AT/NZTA GSR/Waihoehoe signalisation	Early - mid 2028	600 to 1,100 units	5,000 to 32,000sqm	-	-	800 to 2,000 trips
	Drury Central Rail Station	Late 2026					
(c)	SH1 Six-laning Papakura to Drury.	2028-30	1,100 to 2,196 units	32,000 to 45,000sqm	-	-	2,000 to 2,883 trips
(d)	Full (Plan Change Design) Waihoehoe Ultimate Upgrade	Unknown	2,196 – 2,660 units	45,000 to 71,000sqm	-	-	2,883 to 3,800 trips
(e)	Mill Road southern connection (Fitzgerald to SH1 (incl. Drury South Interchange))	Not programmed	2,660 to 3,300 units	71,000 to 78,500sqm	up to 6,000sqm	Up to 600sqm	3,800 to 4,300 trips
	SH1 direct southbound connection	Not programmed					
(f)	Mill Road northern connection	Not programmed	3,300 to 5,800 units	78,500sqm to 97,000sqm	6,000 to 47,000sqm	600 to 10,000sqm	4,300 to 5,600 trips
	Opaheke northern link	Not programmed					