

I hereby give notice that a hearing by commissioners will be held on:

Date: Wednesday 25 - Tuesday 31 August 2021
Time: 9.30AM
Meeting room: Manukau Room
Venue: Ground Floor, Civic Annex
31-33 Manukau Station Road, Manukau

PRIVATE PLAN MODIFICATION 50
HEARING REPORT
VOLUME 2
WAIHOEHOE PRECINCT
OYSTER CAPITAL

COMMISSIONERS

Chairperson Greg Hill
Commissioners Karyn Kurzeja
Mark Farnsworth

Sam Otter
SENIOR HEARINGS ADVISOR

Telephone: 09 353 9587 or 021 196 2582
Email: sam.otter@aucklandcouncil.govt.nz
Website: www.aucklandcouncil.govt.nz

WHAT HAPPENS AT A HEARING

Te Reo Māori and Sign Language Interpretation

Any party intending to give evidence in Māori or NZ sign language should advise the hearings advisor at least ten working days before the hearing so a qualified interpreter can be arranged.

Hearing Schedule

If you would like to appear at the hearing please return the appearance form to the hearings advisor by the date requested. A schedule will be prepared approximately one week before the hearing with speaking slots for those who have returned the appearance form. If changes need to be made to the schedule the hearings advisor will advise you of the changes.

Please note: during the course of the hearing changing circumstances may mean the proposed schedule may run ahead or behind time.

Cross Examination

No cross examination by the applicant or submitters is allowed at the hearing. Only the hearing commissioners are able to ask questions of the applicant or submitters. Attendees may suggest questions to the commissioners and they will decide whether or not to ask them.

The Hearing Procedure

The usual hearing procedure is:

- **the chairperson** will introduce the commissioners and will briefly outline the hearing procedure. The Chairperson may then call upon the parties present to introduce themselves. The Chairperson is addressed as Madam Chair or Mr Chairman.
- **The applicant** will be called upon to present their case. The applicant may be represented by legal counsel or consultants and may call witnesses in support of the application. After the applicant has presented his/her case, members of the hearing panel may ask questions to clarify the information presented.
- **Submitters** (for and against the application) are then called upon to speak. Submitters' active participation in the hearing process is completed after the presentation of their evidence so ensure you tell the hearing panel everything you want them to know during your presentation time. Submitters may be represented by legal counsel or consultants and may call witnesses on their behalf. The hearing panel may then question each speaker.
 - Late submissions: The council officer's report will identify submissions received outside of the submission period. At the hearing, late submitters may be asked to address the panel on why their submission should be accepted. Late submitters can speak only if the hearing panel accepts the late submission.
 - Should you wish to present written evidence in support of your submission please ensure you provide the number of copies indicated in the notification letter.
- **Council Officers** will then have the opportunity to clarify their position and provide any comments based on what they have heard at the hearing.
- the applicant or their representative has the right to summarise the application and reply to matters raised by submitters. Hearing panel members may further question the applicant at this stage. The applicants reply may be provided in writing after the hearing has adjourned.
- **The chair** will outline the next steps in the process and adjourn or close the hearing.
- If adjourned the hearing panel will decide when they have enough information to make a decision and close the hearing. The hearings advisor will contact you once the hearing is closed.

Please note

- that the hearing will be audio recorded and this will be publicly available after the hearing
- catering is not provided at the hearing.

A NOTIFIED PRIVATE PLAN MODIFICATION TO THE AUCKLAND UNITARY PLAN BY OYSTER CAPITAL

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Reporting officer, David Mead, Planner

Reporting on a proposed private plan modification to rezone 48.9 hectares of land located to the north of Waihoehoe Road and east of the North Island Main Trunk Railway, from Future Urban to Residential: Terrace Housing and Apartment Buildings zone. at Waihoehoe Precinct

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SUBMISSIONS AND FURTHER SUBMISSIONS

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 50 (Private) - Dannielle Haerewa
Date: Sunday, 6 September 2020 6:30:21 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Dannielle Haerewa

Organisation name:

Agent's full name:

Email address: dhaerewa@gmail.com

Contact phone number:

Postal address:
115 Waihoehoe Road
Drury
Auckland 2113

Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:
We just want to be kept updated.

Property address: We just want to be kept updated.

Map or maps: We just want to be kept updated.

Other provisions:
We just want to be kept updated.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified | 1.1

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
We just want to be kept updated with the changes happening as it affects our house.

I or we seek the following decision by council: Approve the plan change without any amendments

Details of amendments:

Submission date: 6 September 2020

Attend a hearing

Do you wish to be heard in support of your submission? No

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 50 (Private) - Douglas Signal
Date: Tuesday, 29 September 2020 3:15:52 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Douglas Signal

Organisation name:

Agent's full name: Doug Signal

Email address: wiseolddog@hotmail.com

Contact phone number: 0273223727

Postal address:
wiseolddog@hotmail.com
Drury
auckland 2577

Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:
Integrated transport assessment waihoehoe rd, drury

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

The assessment is relies on the auckland council and the nzta to build infrastructure. The section 2.3.4 Waihoehoe Road 'The proposed development will likely upgrade Waihoehoe Road from a primary collector to an arterial road over time as development occurs, which is consistent with the SGA's preferred network'

This is vague and I think the PC 48, PC 49, PC 50 and PC 51 all need to work on getting traffic to move through the waihoehoe rd and great south rd round about as this section has heavy traffic at the moment and the proposed rezoning will overload traffic that is already at its limit.

I propose a full plan on all roads and intersections in the area, that need to be upgraded before zoning is granted, as it should not be that public local residents are impacted by private firms that do not live in the area. A case study of the Stevensons road management for Drury south would advised as I drive this every day with it often adding long delays and unsafe amounts of soiling to

the roads with stevensons showing little care or consideration for the public, a replication of this at Drury would be frustration that does not need to happen.

The timelines for the council roading and the speed new houses would be built would mean years of traffic problems for new and existing residents, a case in point today 29/9/2020 I received an email outlining mill road will be completed in 2028. so a delay until infrastructure catches up, seems better for new and existing residents to not be trapped by traffic.

I or we seek the following decision by council: Decline the plan change

2.1

Submission date: 29 September 2020

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

From: [Unitary Plan](#)
 To: [Unitary Plan](#)
 Subject: Unitary Plan Publicly Notified Submission - Plan Change 50 (Private) - Peter David Dodd
 Date: Tuesday, 6 October 2020 4:46:14 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Peter David Dodd

Organisation name: Dodd Civil Consultants

Agent's full name: Peter Dodd

Email address: pdodd@doddcivil.co.nz

Contact phone number: 0274914200

Postal address:

58 Broadway

Papakura

Auckland

Auckland 2244

Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:

General flooding to the Slippery Creek Catchment , significant areas currently flood and will only become further adversely affected by the future development of the area. All reports refer to the "Pass Forward principle for the stormwater removal for the lower reaches which I support but there is little information or control provided to show how this will be achieved for the greater area beyond Plan change 50.

The upper reaches of this catchment require detention to lessen the effects of flooding. Without significant effort much of the low lying area north of Waihoehoe Rd will be unusable for residential. This will place more pressure on further urban sprawl . Also and just as important is what will this land then be used for

I have previously met with Craig Cairncross to discuss this and suggested large lots for this area with elevated building platforms and onsite compensation for flooding .

With private plan changes the risk is the greater good for the area can be overlooked.

Property address: 224 Waihoehoe Rd

Map or maps: Nil

Other provisions:

Flooding and future land use for the flood prone area north of Waihoehoe Rd .

See previous .

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

3.1

3.1

The reason for my or our views are:

The area currently floods and future development will increase the frequency and depth.

Concerns over what the flood prone area north of Waihoehoe Rd will be used for and the waste of future housing opportunity if it is not managed correctly.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: As above

Submission date: 6 October 2020

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission (including personal details, names and addresses) will be made public.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) Eloise Taylforth, Planner - Beca

Organisation Name (if submission is made on behalf of Organisation)

Fire and Emergency New Zealand

Address for service of Submitter

PO Box 100, Victoria Street West, Auckland, 1142

Telephone:

Fax/Email:

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 50

Plan Change/Variation Name

Waihoehoe Precinct

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

the provision for future development to be supported by water supply infrastructure

Or

Property Address

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

The reasons for my views are:

Please refer to the attached submission letter prepared by Beca on behalf of Fire and Emergency

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation 4.1
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

Please refer to the attached submission letter prepared by Beca on behalf of Fire and Emergency

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing



12.10.2020

Signature of Submitter
(or person authorised to sign on behalf of submitter)

Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could / could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

Form 13

**SUBMISSION ON A NOTIFIED APPLICATION FOR A
PRIVATE PLAN CHANGE UNDER SECTION 96, RESOURCE
MANAGEMENT ACT 1991**

To: Auckland Council

Submission on: Private Plan Change 50

Name of submitter: Fire and Emergency New Zealand

Address for service: c/o Beca Ltd

Attention: Eloise Taylforth
PO Box 6345
Auckland
eloise.taylforth@beca.com
+6493009044

This is a submission on the proposed private plan change 50 (PPC 50) at Drury East, Auckland by Barker and Associates on behalf of Oyster Capital (the Applicant) to Auckland Council. The Applicant requests to change the zoning of the plan change area (approximately 48.9 hectares) from Future Urban to a mix of Residential zones. This submission is written on behalf of Fire and Emergency New Zealand (FENZ).

The specific parts of the application that FENZ submission relates to is:

- Whether the water supply infrastructure for firefighting will be in accordance with the requirements of the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Water Supplies Code of Practice) to service the plan change area.

Background:

In achieving the sustainable management of natural and physical resources under the Resource Management Act (RMA), decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act (2017) to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency monitors development occurring under the RMA to ensure that, where necessary, appropriate consideration is given to fire safety.

The Fire and Emergency submission is:

The plan change area includes the land bounded by Waihoehoe Road to the south, North Auckland Line Railway Network to the west, and Waihoihoi stream to the north-east. The plan change area is currently zoned as Future Urban under the Auckland Unitary Plan: Operative in Part (AUP: OP). The Applicant seeks to rezone the plan change area to accommodate for the Terrace Housing and Apartment zone in accordance with the Drury-Opāheke Structure Plan.

The plan change area is not currently connected to the reticulated network, however an existing 1200mm diameter water supply main runs parallel with Flanagan Road to a Watercare Services Limited pump station. A Bulk Water Supply Point (BSP) is available adjacent to the pump station and a new watermain along Flanagan Road south of the plan change area to connect to the BSP. The Applicant has acknowledged that the water supply infrastructure will extend into the plan change area and will need to be sized during Resource Consent and Engineering Plan Approval stage as part of the consenting process. This will be required to provide for adequate flow rates and pressures to service any future development in accordance with the New Zealand Fire Service Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.

Fire and Emergency supports the proposal to construct a reticulated network throughout PPC50 to service development.

To complement the rezoning, the Applicant proposes a new precinct with associated provisions as part of PPC50. The proposed precinct provisions currently require the integration of land use development with infrastructure. It is essential that water supplies, including for firefighting purposes are developed at the same time (or in advance of) land use so they are available in event of an emergency. Fire and Emergency supports the current policy wording set out in the plan change request:

- Policy 6: Ensure that development in Drury East is coordinated with supporting stormwater, wastewater and water supply infrastructure.

Fire and Emergency seeks the following decision from the consent authority:

Fire and Emergency wish to make a submission in support of this private plan change.

Fire and Emergency is not a trade competitor.

Fire and Emergency does not wish to be heard in support of this submission.



Eloise Taylforth
Planner
Beca

Date: 12/10/2020

4.1

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 50 (Private) - Wendy Hannah
Date: Monday, 19 October 2020 6:30:39 PM
Attachments: [228 Flanagan Road Map_20201019182201.203.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Wendy Hannah

Organisation name: God Save The Flag Ltd

Agent's full name:

Email address: hannahshouse87@gmail.com

Contact phone number: 0273342444

Postal address:
PO Box 38513

Howick
Auckland
Auckland 2012

Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:

Property address: 228 Flanagan Road Drury 2113

Map or maps: We have attached a map of our property and its vicinity to the surrounding plan changes.

Other provisions:

We would need further clarification of how the change would affect our property ie access to roading, transport, flooding, services, utilities, visual, and environmental issues. Main amendments would be to make sure the access to our property We are in support of the plan change but due to close proximity to our property is not compromised and remains fully accessible by a dual carriageway, that already exists and services and utilities are made available to us.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Ownership of 228 Flanagan Road Drury 2113 and that we have the ability to fair accessible rights to services, and utilities to be able to develop our property in the future.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

5.1

Details of amendments: Access rights to dual carriageway roading, services and utilities in the future.

| 5.1

Submission date: 19 October 2020

Supporting documents
228 Flanagan Road Map_20201019182201.203.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

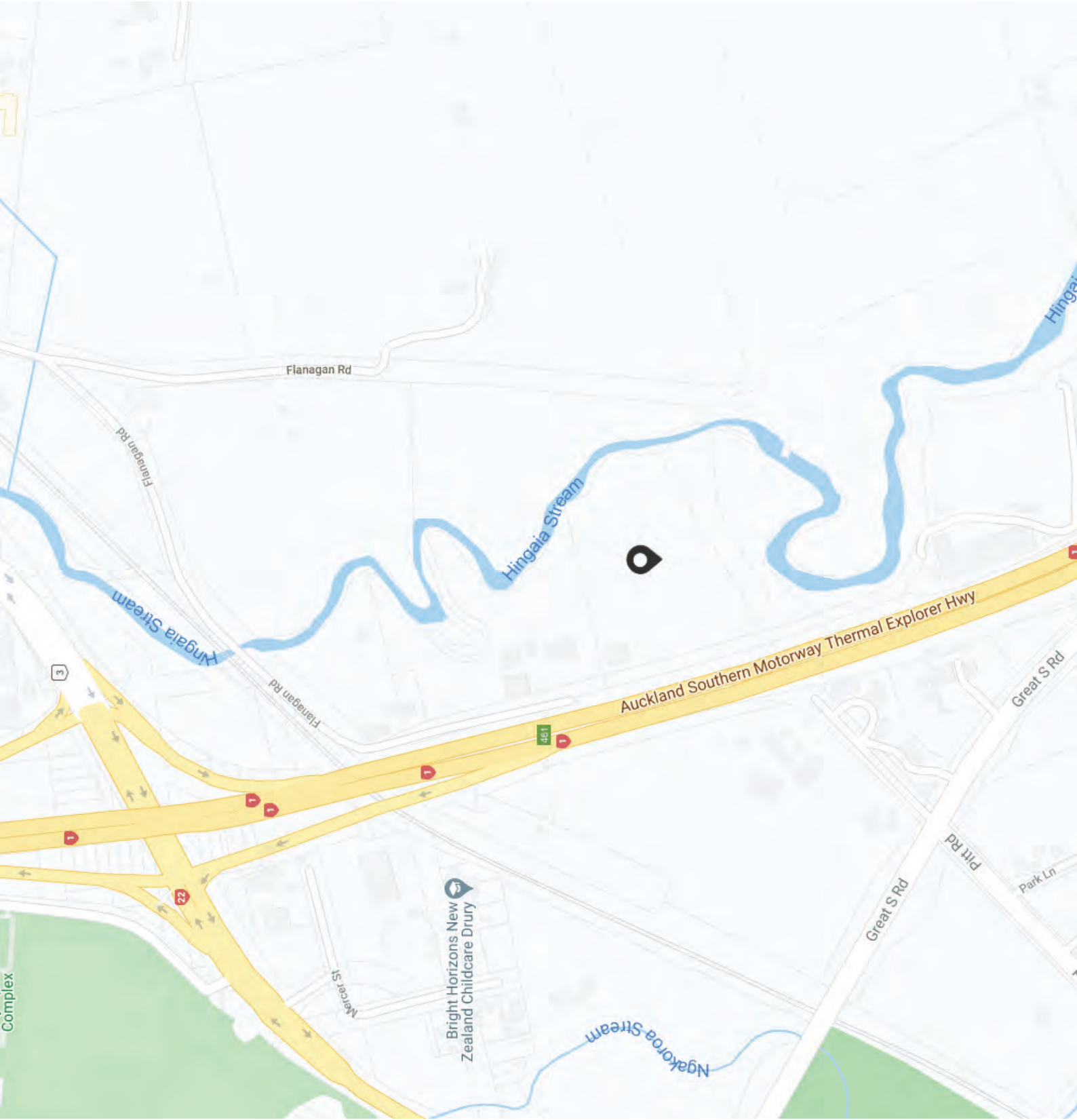
Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



BROOKFIELD ROAD LIMITED

PO Box 37680

Parnell

Auckland 1151

Submission on Proposed Private Plan Change 50 – Waihoehoe Precinct to the Auckland Unitary Plan (Operative in Part)

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

To: **Auckland Council**

1. SUBMITTER DETAILSName of Submitter: **Brookfield Road Limited**

This is a submission on Proposed Private Plan Change 50 (PC50) to the Auckland Unitary Plan – Operative in Part (AUP).

Brookfield Road Limited could not gain an advantage in trade competition through this submission.

2. BACKGROUND

Brookfield Road Limited has previously made submissions on the Drury Structure Planning process supporting the establishment of a Centre in the location proposed by Plan Change 48. Brookfield Road Limited has also previously supported the establishment of a range a residential zone to the east of the State Highway 1, and for those areas to be zoned and made development ready as soon as possible.

3. SCOPE OF SUBMISSION

The submission relates to PC 50 as a whole.

4. SUBMISSION

Brookfield Road Limited supports PC50 in its notified form.

Of particular relevance to Brookfield Road Limited submission, the following matters are noted:

- 1) The proposed plan change is consistent with the Drury-Opāheke Structure Plan that was supported by Brookfield Road Limited. This plan change is part of a wider strategy prepared in conjunction with PC 48 and PC 49 which will enable an integrated vision for Drury East to be developed in a coordinated manner;
- 2) A range of residential typologies have been proposed which respond to proximity to transport, local services and amenities. The proposed zoning pattern focuses the Residential Terrace Housing and Apartment Building zone close to public transport and the Metropolitan Centre proposed to be enabled through Plan Change 48. The Residential-Mixed Housing Suburban zone has been applied to provide a transition between the Mixed Housing Urban zone and the Countryside Living zone to the east;

- 3) The adverse effects of urban development on the natural environment, including the Fitzgerald Stream and its tributaries can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced;
- 4) The proposed re-zoning enables a clear and efficient roading network to be utilised. The proposed high-quality transport network will also provide for all transportation modes; and
- 5) The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

5. Decision Sought

Brookfield Road Limited seeks the following relief from Auckland Council on PC50:

- a) That PC50 be approved, as notified.

Brookfield Road Limited does not wish to be heard in support of this submission.

6.1

Submission on Proposed Private Plan Change 50 – Waihoehoe Precinct to the Auckland Unitary Plan (Operative in Part)

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

.....

To: **Auckland Council**

1. SUBMITTER DETAILS

Name of Submitter: **Oyster Capital**

This is a submission on Proposed Private Plan Change 50 (PC50) to the Auckland Unitary Plan – Operative in Part (AUP).

Oyster Capital could not gain an advantage in trade competition through this submission.

2. SCOPE OF SUBMISSION

The specific aspects and provisions of PC50 that this submission relates to are:

- a) Provide an update to the transport modelling which demonstrates that the development enabled by the Drury Centre, Drury East and Waihoehoe Plan Changes does not rely on the transport upgrades identified within the Drury Transport Investment Programme.
- b) Amend the stormwater policies to ensure consistency between the Waihoehoe Precinct and the Stormwater Management Plan;
- c) A new standard requiring the use of inert building materials to manage the quality of stormwater runoff within the precinct;
- d) Addition of matters of discretion and assessment criteria for Standard IX.6.6 Stormwater Quality and Standard IX.6.3 Riparian Margins;
- e) Amendments of Precinct Plan to spatially depict Sub-Precinct A and Sub- Precinct B;
- f) Deletion of proposed Policy 11;
- g) Amendments to Standard IX.6.2 Trip Generation Limit;
- h) Amendments to Standard IX.6.4 Building Setback along Waihoehoe Road;
- i) Addition of Purpose Statement to Standard IX.6.5 Maximum Impervious Area within Sub-Precinct B; and
- j) Minor amendments to clarify provisions.

3. SUBMISSION

3.1 Introduction

Oyster Capital has requested a Plan Change to rezone 48.9 hectares of Future Urban Zone land at Drury East after working together with Kiwi Property Limited and Fulton Hogan Land Development to develop a common vision for Drury East in the form of an agreed Structure Plan. This was used to inform the Council's Structure Plan process that was adopted in August 2019. Oyster Capital has continued to work with Kiwi Property Limited and Fulton Hogan Land Development to prepare Plan Changes 48-50 concurrently to allow a wider consideration of the future land use pattern proposed

within Drury East and an integrated approach to the planning and delivery of supporting infrastructure.

Consistent with other greenfield precincts within the Auckland Unitary Plan, the Plan Change proposes to apply the Waihoehoe Precinct which includes place-based provisions that create a spatial framework for development. The precinct provisions are appropriately focused on the layout of development necessary to achieve the objectives of the AUP, including:

- Achieving an appropriate urban layout;
- Providing an integrated and connected street network;
- Providing a network of open space which integrates with the natural features of the area;
- Enhancing riparian margins and freshwater quality; and
- Ensuring development integrates with public transport and that development coordinates with the required infrastructure upgrades.

In addition to the precinct, the Auckland-wide stormwater quality and Stormwater Management Area Flow 1 (SMAF 1) provisions will apply within the Plan Change area which will manage sediment and contaminant runoff which could make its way into the freshwater and coastal receiving environment.

Since notification Oyster Capital has identified three aspects of the proposed precinct provisions which need to be refined to clarify some of the provisions and provide for improved stormwater quality outcomes.

Amendments are now proposed to the precinct provisions from what was notified, as shown below and in **Attachment A**.

3.2 Additional Transport Modelling

The transport modelling that is attached to Appendix 8: Integrated Transport Assessment of the Plan Change application was completed in 2019 and based on the Strategic Growth Alliance decades and timing available at the time.

This modelling was undertaken prior to the announcement of the New Zealand Upgrade Programme (NZUP) in January 2020 which confirmed additional funding for transport upgrades in Drury, including:

- SH1 Papakura to Drury South Interchange (2025)
- Mill Road (2028)
- Drury Central and West Train Stations (2025)
- Papakura to Pukekohe Rail Electrification (2024)

The traffic modelling was also undertaken prior to the Drury Transport Investment Programme (DTIP) confirming the transport upgrades required to support the full building out of the Drury Opaheke Structure Plan area, including:

- Jesmond Rd Extension
- Waihoehoe Road WEST Upgrade

- Paerata Rail Station & Southern connector
- Jesmond Road Upgrade
- East West Arterial - Bremner Road realignment and bridge upgrades
- SH22 Improvements (4 laning)
- Waihoehoe Road EAST Upgrade
- Rail 4 Tracking
- Great South Road FTN upgrade to Papakura
- Burt Rd - Pukekohe Expressway
- Pukekohe Expressway Stage 1
- Opaheke North South Arterial

Therefore, as part of the Clause 23 response the Drury East developers produced revised transport modelling that incorporated the NZUP and DTIP upgrades. The updated modelling is included within the Request for Further Information Response: Transport notified with the Plan Change application. The revised transport modelling resulted in further understanding the transport upgrades necessary to support development enabled by the Drury Centre, Drury East and Waihoehoe Plan Changes. This has informed proposed development standards IX6.1 Staging of Development with Transport Upgrades and Standard IX6.2 Trip Generation Limit within the Waihoehoe Plan Change.

Since the updated modelling was undertaken, the Drury East developers have undertaken further transport modelling refer **Attachment B** to understand whether the DTIP upgrades are necessary to support development in the Plan Changes areas, and therefore manage the effects of development on the effectiveness and safety of the transport network (Objective 5). To understand this, Stantec undertook the following sensitivity tests:

- Sensitivity Test 1 – Without DTIP Upgrades (NZUP Only);
- Sensitivity Test 2 – Without DTIP Upgrades, but including transport upgrades required within the Drury Centre, Drury East, Waihoehoe and Drury 2 precincts.

This additional modelling for Sensitivity Test 1 demonstrates that development enabled by the Drury Centre, Drury East and Waihoehoe Plan Changes does not rely on the DTIP transport upgrades until 2048. Likewise, the additional modelling for Sensitivity Test 2 demonstrates that with the upgrade of the Waihoehoe/Great South Road intersection in place, development in the Drury Centre, Drury East and Waihoehoe Plan Change areas does not result in any notable traffic delays until 2048. Overall, the additional transport modelling concludes that development enabled by the Drury Centre, Drury East and Waihoehoe Plan Changes can be supported by the NZUP transport upgrades and the upgrades required within the Drury Centre, Drury East, Waihoehoe and Drury 2 precincts.

3.3 Amendments to the Stormwater Policies, Standards and Assessment Criteria

The proposed approach to managing stormwater within the Plan Change area is to utilise the existing AUP provisions. It is proposed to apply the Stormwater Management Area Control – Flow 1 (SMAF 1) across the Plan Change area to manage the increase in stormwater discharge to sensitive stream environments. In accordance with the Council’s recently approved Network Discharge Consent, a Stormwater Management Plan (SMP) has been prepared by Tonkin & Taylor, and is included at Appendix 9 to the Plan Change application. This SMP is proposed to be adopted by the Council to form part of the Network Discharge Consent and outline the stormwater management requirements in the Plan Change area.

Oyster Capital is proposing amendments to the Waihoehoe Precinct to clarify this approach to stormwater management within the Plan Change area. In particular it is proposed to add an additional policy and amend Standard IX6.6 Stormwater Quality. To improve the workability of the provisions it is proposed to insert matters for discretion and assessment criteria for any proposal to infringe Standard IX6.6 Stormwater Quality. The proposed amendments are set out in **Attachment A** and below:

Policy IX.3(12): Require subdivision and development to be consistent with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation. | 7.1

IX.6.6 Stormwater Quality

- (1) *The activity rules and standards in E9 apply to development in the Drury Centre precinct as if the reference to ‘high use roads’, was a reference to ‘all roads’.* | 7.2
- (2) *For all other impervious surfaces inert building materials should be used.*

IX.8.1 Matters of Discretion

...

- (5) *Infringements to standard IX6.6 Stormwater Quality* | 7.3
 - (a) *Matters of discretion E9.8.1(1) apply.*

IX.8.2 Assessment Criteria

...

- (5) *Infringement to IX.6.6 Stormwater Quality* | 7.4
 - (a) *Assessment criteria E9.8.2(1) apply.*

Analysis

Additional Stormwater Quality Policy

Currently the policies within the Waihoehoe Precinct do not provide specific direction for the approach to stormwater management within Drury Centre. There is no recognition that subdivision

and development will have to be in accordance with the SMP which is adopted under the Network Discharge Consent. The proposed policy will clarify this relationship and is consistent with the approach taken in Plan Change 51 - Drury 2 Precinct.

Inert Building Materials Standard

The SMP aims to align the proposed stormwater management approach for the Plan Change area with the requirements of the AUP, taking into account the catchment specific issues, constraints and opportunities. An integrated stormwater management approach has been proposed as a 'Stormwater Management Toolbox' which incorporates a range of measures to manage potential effects associated with the proposed change in land use and outlines the devices proposed within each of the proposed zones.

The 'Stormwater Management Toolbox' is proposing a higher standard of stormwater management than what is required within SMAF 1 and the AUP. In particular the SMP proposes to manage water quality through appropriately designed SMAF 1 devices, treatment of all roads (rather than just high use roads as required by Chapter E9 of the regional rules) and the use of inert building materials.

Standard IX6.6 Stormwater Quality is proposed to be included within the Drury Centre Precinct to recognise that a higher standard of stormwater treatment for roads than what is currently provided for within the AUP is proposed in Drury Centre. Chapter E9 of the AUP does not include provisions that require the use of inert building materials on impervious surfaces to manage the quality of stormwater runoff. As such Standard IX6.6 Stormwater Quality should be amended to recognise that the required use of inert building materials is also a higher standard of stormwater treatment than what is currently provided for within the AUP.

Matters of Discretion and Assessment Criteria for Infringements to Standard IX6.6 Stormwater Quality

Any proposal that infringes Standard IX6.6 Stormwater Quality will be a restricted discretionary activity. Therefore, it is proposed to add matters of discretion and assessment criteria to guide the assessment of any infringements. These matters and assessment criteria guide the applicant back to the standard provisions within Chapter E9 of the AUP.

4. Amendment of Precinct Plan to show Sub-Precinct A and Sub- Precinct B

The Plan Change as notified does not spatially depict the two different Sub-Precincts despite making reference to the Sub-Precincts within the Waihoehoe Precinct. Therefore, Oyster is proposing amendments to the Plan Change to insert a precinct plan that shows Sub-Precinct A and Sub-Precinct B. Sub-Precinct B applies to the northern portion of the precinct and applies a lower impervious area to manage the volume of stormwater runoff.

The proposed sub-precinct boundaries are set out in **Attachment A**.

7.5

5. Deletion of Policy 11

Oyster Capital is proposing to delete Policy 11. The proposed amendments are set out in **Attachment A** and below:

7.6

~~Policy IX.3(11) In addition to the matters in Policy E.3.3(13), recognise that there may be no practicable alternative to stream works, including culverting, diversion and/or reclamation, where they are required to construct critical infrastructure.~~

7.6

Analysis

Policy 11 was included in response to a further information request from Auckland Council that sought further clarification of the costs and benefits of mapping streams. As outlined in paragraph 1.1 of the Waihoehoe Plan Change Second RFI Response dated 30 April 2020:

Some stream reclamation may be required within Waihoehoe to facilitate efficient urban development, including for the construction of supporting infrastructure. Therefore, to accurately map the future stream network within Waihoehoe we need to undertake further work to understand the extent of this proposed reclamation and ensure that any mapped streams indicate areas where potential reclamation may be necessary.

Policy 11 was included within the precinct to signal this approach.

Oyster Capital is yet to progress a detailed design to determine if any stream works are required; but based on high level plans prepared to date watercourses and wetlands are intended to be retained. Any potential streamworks (if required) or any matters associated with the National Environmental Standards for Freshwater will be managed through the resource consent process in accordance with Chapter E3 of the AUP which effectively manages streams. Consequently given there is no further certainty in relation to this matter it is proposed to delete this policy. There is no resource management reason to spatially identify streams on a precinct plan given that it does not link with any specific method in the Waihoehoe precinct.

6. Amendments to Standard IX6.2 Trip Generation Limit

Oyster Capital is proposing amendments to Standard IX6.2 Trip Generation Limit to delete sub clause 2, add a date to the reference to the Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme and update Table IX6.2.2 to clarify the provisions. The proposed amendments are set out in **Attachment A** and below:

IX.6.2 Trip Generation Limit

(1) Development within the area shown on IX.10.2 Waihoehoe: Precinct Plan 2 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational.

~~*(2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for those activities that have a valid land use consent or a subdivision that has a 224c certificate for vacant lots less than 1200m².*~~

~~*(3) Table IX.6.2.1 sets...*~~

7.7

Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020 Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below.

Table IX.6.2.1 Threshold for Development with 'Access A' as shown on IX.10.2 Waihoehoe: Precinct Plan 2 not constructed

Inbound Trip Generation in vehicles per hour (vph)	Outbound Trip Generation in vehicles per hour (vph)	Transport Upgrades Required to Exceed the Trip Generation Thresholds
<i>Prior to any new dwellings, retail or commercial development</i>		<ul style="list-style-type: none"> Interim safety upgrade to the Waihoehoe / Great South Road <u>intersection</u> to provide safe crossing facilities for pedestrians and cyclists on all approaches.
AM Peak: 1,890 PM Peak: 2,860	AM Peak: 2,340 PM Peak: 2,470	<ul style="list-style-type: none"> Upgrade of the Waihoehoe / Great South Road intersection to signals.
AM Peak: 2,620 PM Peak: 3,730	AM Peak: 3,220 PM Peak: 3,270	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South <u>Rroad intersection</u> (western arm only).
AM Peak: 3,510 PM Peak: 4,910	AM Peak: 4,020 PM Peak: 4,560	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South <u>Rroad intersection</u> (on all approaches).

Table IX.6.2.2 Threshold for Development with 'Access A' as shown on IX.10.2 Waihoehoe: Precinct Plan 2 constructed

Inbound Trip Generation in vehicles per hour (vph)	Outbound Trip Generation in vehicles per hour (vph)	Transport Upgrades Required to Exceed the Trip Generation Thresholds
<i>Prior to any new dwellings, retail or commercial development</i>		<ul style="list-style-type: none"> Interim safety upgrade to the Waihoehoe / Great South Road <u>intersection</u> to provide safe crossing facilities for pedestrians and cyclists on all approaches.
AM Peak: 2,670 PM Peak: 3,870	AM Peak: 3,270 PM Peak: 3,410	<ul style="list-style-type: none"> Upgrade of the Waihoehoe / Great South Road intersection to signals.
AM Peak: 3,600 PM Peak: 4,990	AM Peak: 4,110 PM Peak: 4,640	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South <u>Rroad intersection</u> (western arm only).

7.8

Analysis

The amendments proposed are intended to clarify the application of Standard IX6.2 and improve the workability of the provisions.

7. Addition of Matters of Discretion and Assessment Criteria for Standard IX6.3 Riparian Margins

Oyster Capital is proposing amendments to the Waihoehoe Precinct to insert matters for discretion and assessment criteria for any proposal to infringe Standard IX6.3 Riparian Margins. The proposed amendments are set out in **Attachment A** and below:

IX.8.1 Matters of Discretion

...

(5) Infringements to Standard IX6.3 Riparian Margins

(a) Effects on water quality and stream habitat.

7.9

IX.8.2 Assessment Criteria

...

(5) Infringement to Standard IX.6.3 Riparian Margins

(a) Whether the infringement is consistent with Policy IX 3(8).

7.10

Analysis

Any proposal that infringes Standard IX6.3 Riparian Margins will be a restricted discretionary activity. Therefore, it is proposed to add matters of discretion and assessment criteria to guide the assessment of any infringements.

8. Amendments to Standard IX6.4 Building Setback along Waihoehoe Road

Oyster Capital is proposing amendments to Standard IX6.4 Building Setback along Waihoehoe Road to clarify that the setback is measured from the legal road boundary that existed as at the year 2020. The proposed amendments are set out in **Attachment A** and below:

IX.6.4 Building Setback along Waihoehoe Road

Purpose: To enable the future required widening of Waihoehoe Road.

- (1) A building or parts of a building must be set back from the ~~2020~~ Waihoehoe Road boundary by a minimum depth of 7.5m when measured from the legal road boundary that existed as at the year 2020.*
- (2) The building setback...*

7.11

Analysis

The amendments proposed are intended to clarify the application of Standard IX6.4 and improve the workability of the provisions.

9. Addition of Purpose Statement to Standard IX.6.5 Maximum Impervious Area within Sub-Precinct B

Oyster Capital is proposing amendments to Standard IX.6.5 Maximum Impervious Area within Sub-Precinct B to provide a purpose statement for this standard. The proposed amendments are set out in **Attachment A** and below:

IX.6.5 Maximum Impervious Area within Sub-Precinct B

Purpose: To appropriately manage stormwater effects generated within Sub-Precinct B.

7.12

(1) *Within Sub-Precinct B....*

Analysis

The amendments proposed are intended to clarify the purpose to Standard IX.6.5 Maximum Impervious Area.

10. Proposed Amendments to Clarify Provisions

Since notification Oyster Capital has picked up a number of naming, spelling and other minor errors throughout the proposed Waihoehoe Precinct. Amendments are now proposed to correct these errors, better align the Precinct with the standard AUP template and clarify the provisions.

7.13

The proposed amendments are set out in **Attachment A**.

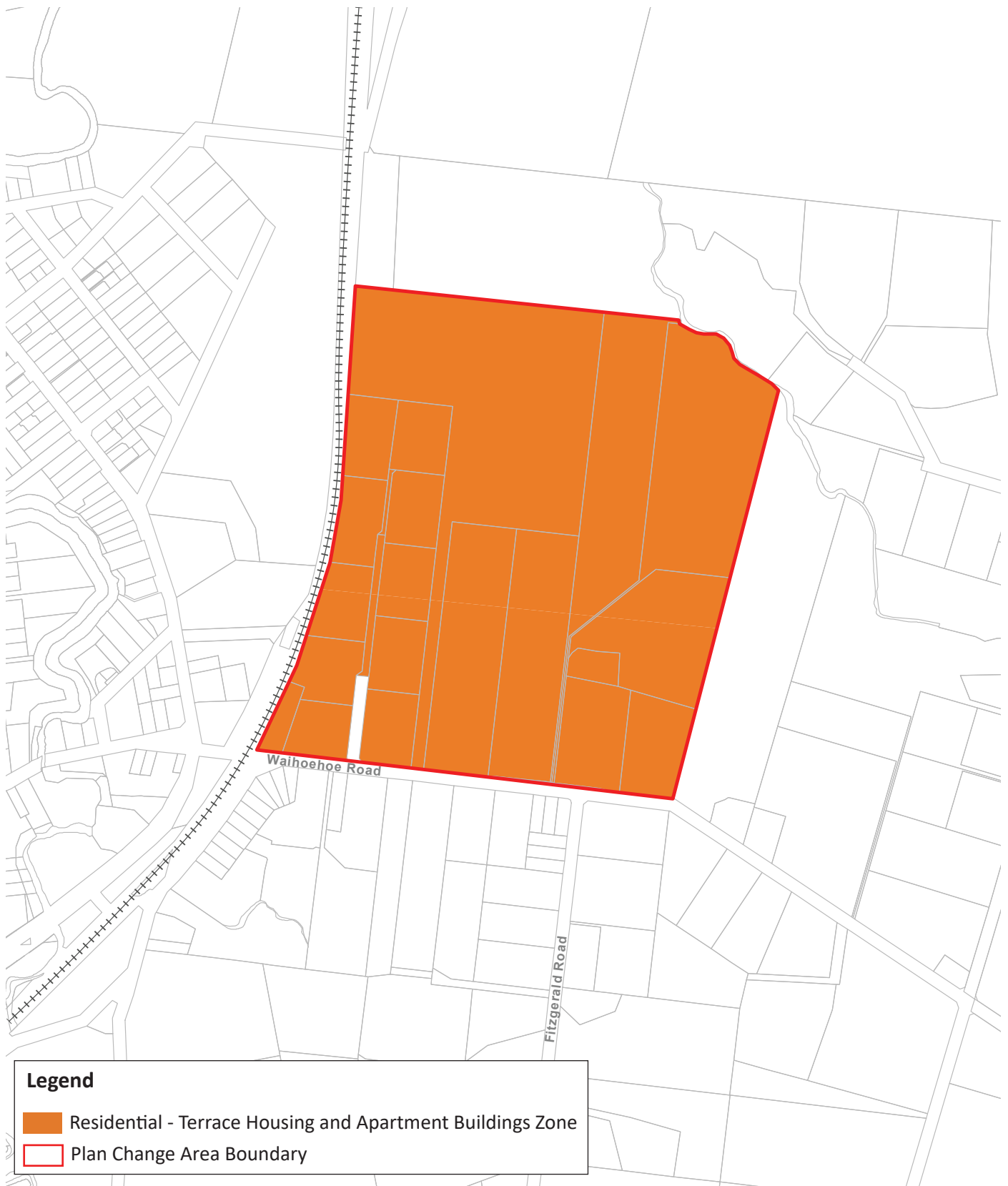
11. Decision Sought

Oyster Capital seeks the following relief from Auckland Council (or other relief or other consequential amendments as are considered appropriate or necessary to address the concerns set out in this submission):

- a) Amend the Waihoehoe Precinct as per the amendments set out within **Attachment A**.

Oyster Capital wishes to be heard in support of this submission. If others make a similar submission Oyster Capital will consider presenting a joint case with them at the hearing.

Waihoehoe Precinct - Zoning Plan

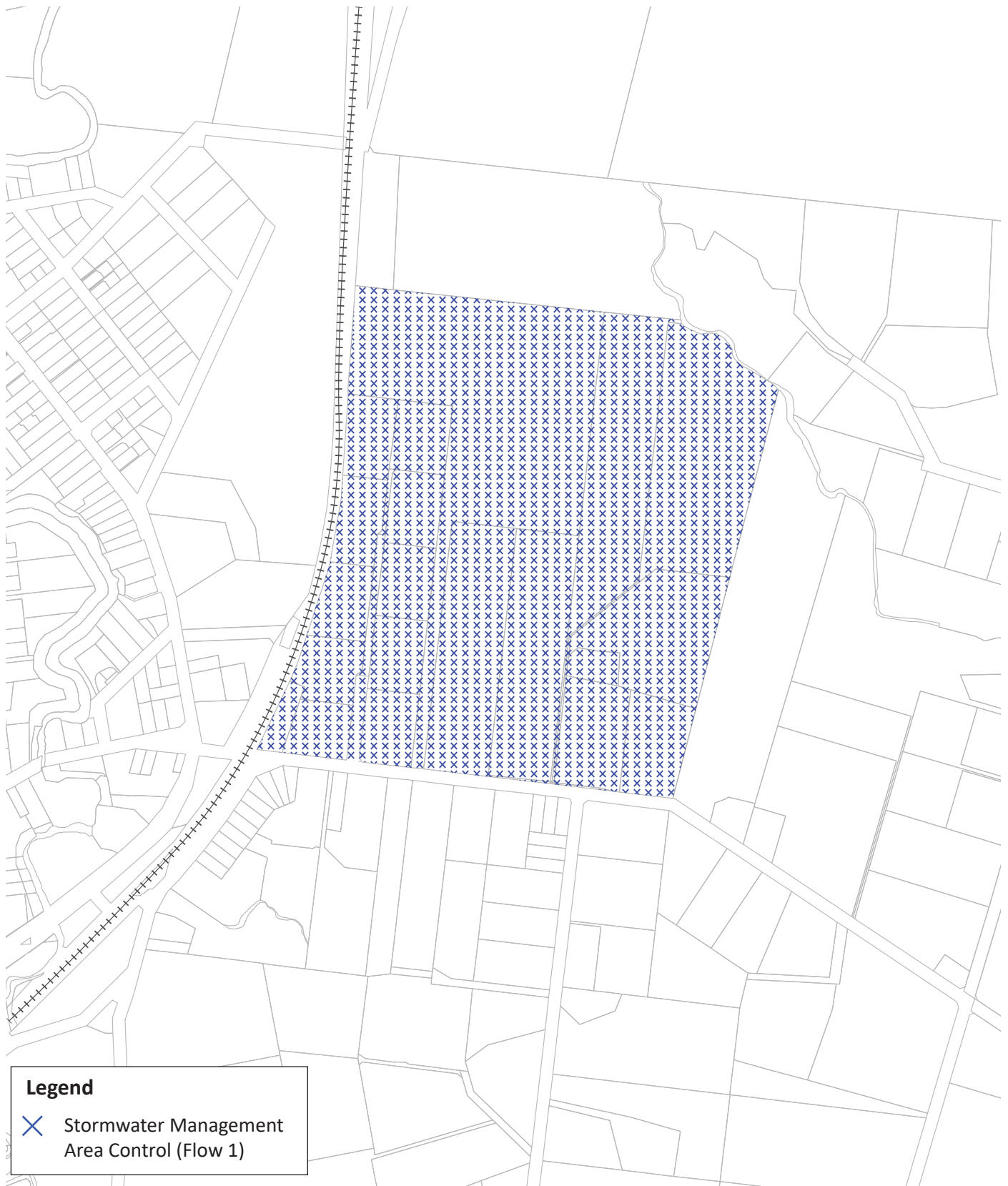


Waihoehoe Precinct - Precinct Plan



7.5

Waihoehoe Precinct - Stormwater Management Area Control (Flow 1)



IX. Waihoehoe Precinct

IX.1 Precinct Description

The Waihoehoe Precinct applies to approximately 49 hectares of land in Drury East generally bounded by Waihoehoe Road to the south and North ~~Auckland—Island Railway Network Main Trunk Line~~ to the west.

The purpose of the Waihoehoe Precinct is to provide for the development of a new, comprehensively planned residential community in Drury East that supports a quality compact urban form.

There are two Sub-precincts in the Waihoehoe Precinct:

- Sub-precinct A is zoned Residential - Terrace Housing and Apartment Building zone and provides for higher densities close to the Drury Centre and the future rapid and frequent public transport.
- Sub-precinct B is also zoned Residential - Terrace Housing and Apartment Building and lower impervious area applies to manage the volume of stormwater runoff.

7.13

The precinct emphasises the need for development to create a unique sense of place for Drury, by integrating existing natural features, responding to landform, and respecting Mana Whenua values. In particular there is a network of streams throughout Waihoehoe precinct, including the ~~Waihoehoe-Waihoihoi~~ stream. The precinct seeks to maintain and enhance these waterways and integrate them with the open space network as a key feature.

The transport network in Drury East will be progressively upgraded over time to support development in the wider area. The precinct includes provisions to ensure that the development of land for housing is coordinated with the construction of the transport network upgrades necessary to support it.

~~The zoning of the land within the Waihoehoe Precinct is Residential—Terrace Housing and Apartment Buildings.~~

All relevant overlay, Auckland-wide and zone provisions apply in this precinct unless otherwise specified below.

IX.2 Objectives

- (1) Waihoehoe Precinct is a comprehensively developed residential environment that integrates with the Drury Centre and the natural environment, supports public transport use, and respects Mana Whenua values.
- (2) Access to the precinct occurs in an effective, efficient and safe manner and manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network.
- (3) Development is supported by appropriate infrastructure.

- (4) Freshwater and sediment quality is progressively improved over time in the Waihoehoe precinct.

IX.3 Policies

- (1) Require collector roads to be generally in the locations shown in IX.10.X Waihoehoe: Precinct Plan 1 while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network.

- (2) Ensure that development provides a local road network that achieves a highly connected street layout that integrates with the collector road network within the precinct and the and surrounding transport network, and supports the safety and amenity of the open space and stream network.

- (3) Require streets to be attractively designed and appropriately provide for all transport modes.

- (4) In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contribute to a sense of place for Drury East Waihoehoe Precinct, by incorporating any distinctive site features and integrating with the stream network.

7.14

- (5) Ensure that the timing of development in Waihoehoe Precinct is coordinated with the transport infrastructure upgrades necessary to mitigate the adverse effects of development on the effectiveness and safety of the immediately surrounding transport network.

- (6) Ensure that development in Waihoehoe Precinct Drury East is coordinated with supporting stormwater, wastewater and water supply infrastructure.

7.14

- (7) Provide for the staging of pedestrian and cycling connections to the Drury Central train station to encourage the use of public and active modes of transport.

- (8) Support improvements to water quality and habitat, including by providing planting on the riparian margins of permanent and intermittent streams.

- (9) Limit the maximum impervious area within Sub-precinct B to manage the stormwater runoff generated by a development to ensure that adverse flooding effects are avoided or mitigated.

- (910) Provide opportunities to deliver a range of site sizes and densities in the Residential - Terrace Housing and Apartment Buildings zone.

- (110) In addition to the matters in Policy E1.3(8), manage erosion and associated effects on stream health and values arising from development in the precinct, and enable in-stream works to mitigate any effects.

- ~~(11) In addition to the matters in Policy E.3.3(13), recognise that there may be no practicable alternative to stream works, including culverting, diversion and/or reclamation, where they are required to construct critical infrastructure.~~

7.6

(12) Require subdivision and development to be consistent with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.

7.1

All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.

IX.4 Activity table

All relevant overlay, Auckland-wide and zone activity tables apply unless the activity is listed in Activity Table IX.4.1 below.

Activity Table IX.4.1 specifies the activity status of district land use activities and development in the Drury East Precinct pursuant to section(s) 9(3) of the Resource Management Act 1991 and the activity status for subdivision pursuant to section 11 of the Resource Management Act 1991.

7.15

~~Activity Table IX.4.1 specifies the activity status of district land use activities and development in the Waihoehoe Precinct pursuant to section(s) 9(2) / 9(3) / 11 / 12(1) / 12(2) / 12(3) / 13 / 14 / 15 of the Resource Management Act 1991.~~

Table IX.4.1 Activity table

Activity		Activity Status
Development		
(A1)	Development of public or private roads	RD
(A2)	Development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit	RD
(A3)	Development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades or Standard IX.6.2 Trip Generation Limit	D
(A4)	Development that does not comply with IX.6.4 Building Setback along Waihoehoe Road	D
Subdivision		
(A5)	Subdivision that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit	RD

(A6)	Subdivision that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades or Standard IX.6.2 Trip Generation Limit	D
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IX.5 Notification

- (1) An application for resource consent for a restricted discretionary activity for development of the indicative collector~~ive~~ road ~~listed in Activity Table IX.4.1 above and~~ in the location shown in IX.10.2 Waihoehoe: Precinct Plan 2 will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.
- (2) An application for resource consent for a restricted discretionary activity listed in Table E11.4.1, Table E11.4.2 and Table 12.4.1 will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.
- (3) An application for resource consent for a restricted discretionary activity to infringe E11.6.2 General Standards and E12.6.2 General Standards will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.
- (4) Any application for resource consent for an activity listed in Table IX.4.1 Activity table above and which is not listed in IX.5(1)–(3) will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (5) When deciding who is an affected person in relation to any activity for the purposes of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

IX.6 Standards

- (1) Unless specified in Standard IX.6(2) or IX6(4) below, all relevant overlay, Auckland-wide and zone standards apply to the activities listed in Activity Table IX.4.1 above.
- (2) The following Auckland-wide ~~and zone~~ standards do not apply to activities listed in Activity Table IX.4.1 above:
 - E27.6.1 Trip generation
- (3) When applying standards E38.8.1, E38.8.2 and E38.8.3 (Subdivision – Urban), the standards applying to the Residential - Mixed Housing Urban zone apply to the Residential Terrace Housing and Apartment Building Zone.

(4) The following ~~Auckland-wide and~~-zone standards do not apply within Sub-precinct B:

- H6.6.10 Maximum impervious area

IX.6.1 Staging of Development with Transport Upgrades

- (1) Development within the area shown on IX.10.2 Waihoehoe: Precinct Plan 2 must not exceed the thresholds in Table IX.6.1.1 and Table IX.6.1.2 until such time that the identified infrastructure upgrades are constructed and are operational.
- (2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for those activities that have a valid land use consent or a subdivision that has a 224C certificate for vacant lots less than 1200m².
- (3) Table IX.6.1.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Waihoehoe: Precinct Plan 2. Table IX.6.1.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Waihoehoe: Precinct Plan 2.

Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020 – Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below.

Table IX.6.1.1 Threshold for Development with 'Access A' as shown on IX.10.2 Waihoehoe: Precinct Plan 2 not constructed

New/ Additional Dwelling Threshold	New/ Additional Retail GFA Threshold	New/ Additional Commercial GFA Threshold	Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds
Prior to any new dwellings, retail or commercial development			<ul style="list-style-type: none"> • Interim safety upgrade to the Waihoehoe / Great South Road <u>intersection</u> to provide safe crossing facilities for pedestrians and cyclists on all approaches.
3,406	62,430m ²	34,800m ²	<ul style="list-style-type: none"> • Upgrade of the Waihoehoe / Great South Road intersection to signals.
4,640	83,960m ²	46,800m ²	<ul style="list-style-type: none"> • Capacity upgrade of the Waihoehoe / Great South <u>R</u>oad <u>inter</u>section (western arm only).
6,428	107,650m ²	60,000m ²	<ul style="list-style-type: none"> • Capacity upgrade of the Waihoehoe / Great South <u>R</u>oad <u>inter</u>section (on all approaches).

Table IX.6.1.2 Threshold for Development with 'Access A' as shown on IX.10.2 Waihoehoe: Precinct Plan 2 constructed

New/ Additional Dwelling Threshold	New/ Additional Retail GFA Threshold	New/ Additional Commercial GFA Threshold	Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds
Prior to any new dwellings, retail or commercial development			<ul style="list-style-type: none"> Interim safety upgrade to the Waihoehoe / Great South Road intersection to provide safe crossing facilities for pedestrians and cyclists on all approaches.
4,640	83,960m ²	46,800m ²	<ul style="list-style-type: none"> Upgrade of the Waihoehoe / Great South Road intersection to signals.
6,428	107,650m ²	60,000m ²	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South Road intersection to signals (on all approaches).

IX.6.2 Trip Generation Limit

(1) Development within the area shown on IX.10.2 Waihoehoe: Precinct Plan 2 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational.

~~(2) For the purpose of this rule ‘dwelling’ and ‘retail/commercial floorspace’ means buildings for those activities that have a valid land use consent or a subdivision that has a 224c certificate for vacant lots less than 1200m².~~

7.7

(3) Table IX.6.2.1 sets out the development thresholds if ‘Access A’ is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Waihoehoe: Precinct Plan 2. Table IX.6.2.2 sets out the development thresholds if ‘Access A’ is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Waihoehoe: Precinct Plan 2.

Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme [2020](#) – Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below.

Table IX.6.2.1 Threshold for Development with ‘Access A’ as shown on IX.10.2 Waihoehoe: Precinct Plan 2 not constructed

Inbound Trip Generation in vehicles per hour (vph)	Outbound Trip Generation in vehicles per hour (vph)	Transport Upgrades Required to Exceed the Trip Generation Thresholds
Prior to any new dwellings, retail or commercial development		<ul style="list-style-type: none"> Interim safety upgrade to the Waihoehoe / Great South Road intersection to provide safe crossing facilities for pedestrians and cyclists on all approaches.

AM Peak: 1,890 PM Peak: 2,860	AM Peak: 2,340 PM Peak: 2,470	<ul style="list-style-type: none"> Upgrade of the Waihoehoe / Great South Road intersection to signals.
AM Peak: 2,620 PM Peak: 3,730	AM Peak: 3,220 PM Peak: 3,270	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South <u>R</u>oad inter<u>s</u>ection (western arm only).
AM Peak: 3,510 PM Peak: 4,910	AM Peak: 4,020 PM Peak: 4,560	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South <u>R</u>oad inter<u>s</u>ection (on all approaches).

Table IX.6.2.2 Threshold for Development with ‘Access A’ as shown on IX.10.2 Waihoehoe: Precinct Plan 2 constructed

Inbound Trip Generation in vehicles per hour (vph)	Outbound Trip Generation in vehicles per hour (vph)	Transport Upgrades Required to Exceed the Trip Generation Thresholds
<u>Prior to any new dwellings, retail or commercial development</u>		<ul style="list-style-type: none"> Interim safety upgrade to the Waihoehoe / Great South Road <u>inter</u>section to provide safe crossing facilities for pedestrians and cyclists on all approaches.
AM Peak: 2,670 PM Peak: 3,870	AM Peak: 3,270 PM Peak: 3,410	<ul style="list-style-type: none"> Upgrade of the Waihoehoe / Great South Road intersection to signals.
AM Peak: 3,600 PM Peak: 4,990	AM Peak: 4,110 PM Peak: 4,640	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South <u>R</u>oad inter<u>s</u>ection (western arm only).

7.8

IX.6.3 Riparian Margin

- (1) Riparian margins of permanent or intermittent streams must be planted either side to a minimum width of 10m measured from the top of bank of the stream. This rule shall not apply to road crossings over streams.
- (2) A building, or parts of a building, must be setback at least 20m from the bank of a river or stream measuring 3m or more in width, consistent with the requirements of E38.7.3.2.

IX.6.4 Building Setback along Waihoehoe Road

Purpose: To enable the future required widening of Waihoehoe Road.

- (1) A building or parts of a building must be set back from the Waihoehoe Road boundary by a minimum depth of 7.5m when measured from the legal road boundary that existed as at the year 2020.
- (2) The building setback required by IX.6.4(1) is inclusive of the front yard required under H6.6.9(1) and a 6m requirement either side of Waihoehoe Road for future widening.

7.11

IX.6.5 Maximum Impervious Area within Sub-Precinct B

Purpose: To appropriately manage stormwater effects generated within Sub-Precinct B.

7.12

- (1) Within Sub-Precinct B the maximum impervious area must not exceed 60 per cent of the site area.
- (2) Within Sub-Precinct B the maximum impervious area within a riparian yard must not exceed 10 per cent of the riparian yard area.

IX.6.6 Stormwater Quality

- (1) The activity rules and standards in E9 apply to development in the Drury Centre precinct as if the reference to 'high use roads', was a reference to 'all roads'.
- (2) For all other impervious surfaces inert building materials should be used.

7.2

IX.7 Assessment – controlled activities

There are no controlled activities in this precinct.

IX.8 Assessment – restricted discretionary activities

IX.8.1 Matters of discretion

The Council will reserve its discretion to all of the following matters when assessing a restricted discretionary activity resource consent application, in addition to the matters specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

- (1) Development of public and private roads:
 - (a) Location and design of the collector street, local streets and connections with neighbouring sites to achieve an integrated street network;
 - (b) Provision of cycling and pedestrian networks;
 - (c) Location and design of connections to the Drury Central train station; and
 - (d) Matters of discretion IX.8.1(1) (a) - (b) apply in addition to the matters of discretion in E38.12.1.
- (2) Development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit:
 - (a) Effects on the transport network consistent with the trips generated by development specified in Table IX.6.2.1 or Table IX.6.2.2;
 - (b) The rate of public transport uptake and travel management measures; and
 - (c) The rate of coordination of retail, commercial and residential development in the wider Drury East area shown on Precinct Plan 2.

(3) Infringement to Standard IX6.3 Riparian Margins:(a) Effects on water quality and stream habitat.

7.9

(4) ~~(3)~~ Development that does not comply with Standard IX.6.5 Maximum Impervious Area within Sub-precinct B:

(a) Matters of discretion in H5.8.1(4) apply.

(5) Infringements to Standard IX6.6 Stormwater Quality(a) Matters of discretion E9.8.1(1) apply.

7.3

IX.8.2 Assessment criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities, in addition to the assessment criteria specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

(1) Development of public and private roads:

Location of roads

- (a) Whether the collector roads are provided generally in the locations shown on IX.10.1 Waihoehoe: Precinct Plan 1 to achieve a highly connected street layout that integrates with the surrounding transport network. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:
 - (i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads;
 - (ii) The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and
 - (iii) The constructability of roads and the ability for it to be delivered by a single landowner.
- (b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network.
- (c) Whether roads are aligned with the stream network, or whether pedestrian and/or cycle paths are provided along one or both sides of the stream network, where they would logically form part of an integrated open space network.
- (d) Where pedestrian and/or cycle paths are proposed within proposed open spaces, whether they are located adjacent to, and not within the 10m planted riparian area.
- (e) Whether subdivision and development provide for collector roads and local roads to the site boundaries to coordinate with neighbouring sites and support the integrated completion of the network within the precinct over time;

Design of Roads

- (f) Whether the design of collector and local roads are generally in accordance with the road cross sections provided in IX.10.1 Waihoehoe: Appendix 1.
 - ~~(g) Whether the design of collector and local roads are generally in accordance with the road cross sections provided in IX.10.1 Waihoehoe: Appendix 1.~~
 - (h) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network. As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 600m;
 - (i) Whether safe and legible pedestrian and cycle connections to the Drury Central train station are provided, via facilities on Waihoehoe Road and Flanagan Road/Drury Boulevard, from the Fitzgerald Rd extension to the Drury Rail Station. Or an alternative is provided that achieves an equal or better degree of connectivity. Where development precedes the upgrade of Waihoehoe Road and connecting roads, interim pedestrian and cycle facilities may be provided.
- (2) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit:
- (a) Whether the effects of the proposal on the transport network are consistent with the trips generated by development specified in Table IX.6.3.1 or Table IX.6.3.2;
 - (b) Whether increased use of public transport provides additional capacity within the transport network including by implementing travel demand management measures.
 - (c) Whether residential development is coordinated with retail and commercial development within the wider Drury East area shown on precinct Plan 2 to minimise trips outside of the precinct providing additional capacity within the transport network.
 - (d) The effect of the timing and development of any transport upgrades.

(3) Infringement to Standard IX.6.3 Riparian Planting

- (a) Whether the infringement is consistent with Policy IX.3(8).

(4) (3) Development that does not comply with Standard IX.6.5 Maximum Impervious Area within Sub-precinct B:

- (a) The assessment criteria within H5.8.2(10) apply.

(5) Infringement to Standard IX.6.6 Stormwater Quality

- (a) Assessment criteria E9.8.2(1) apply.

7.10

7.4

IX.9 Special information requirements

(1) Riparian Planting

An application for land modification, development and subdivision which adjoins a permanent or intermittent stream must be accompanied by a riparian planting plan identifying the location, species, planter bag size and density of the plants. Plant species should be native.

(2) Permanent and intermittent streams and wetlands

All applications for land modification, development and subdivision must include a plan identifying all permanent and intermittent streams and wetlands on the application site.

IX.10 Precinct plans

IX.10.1 Waihoehoe: Precinct plan 1 – Collector Road Network

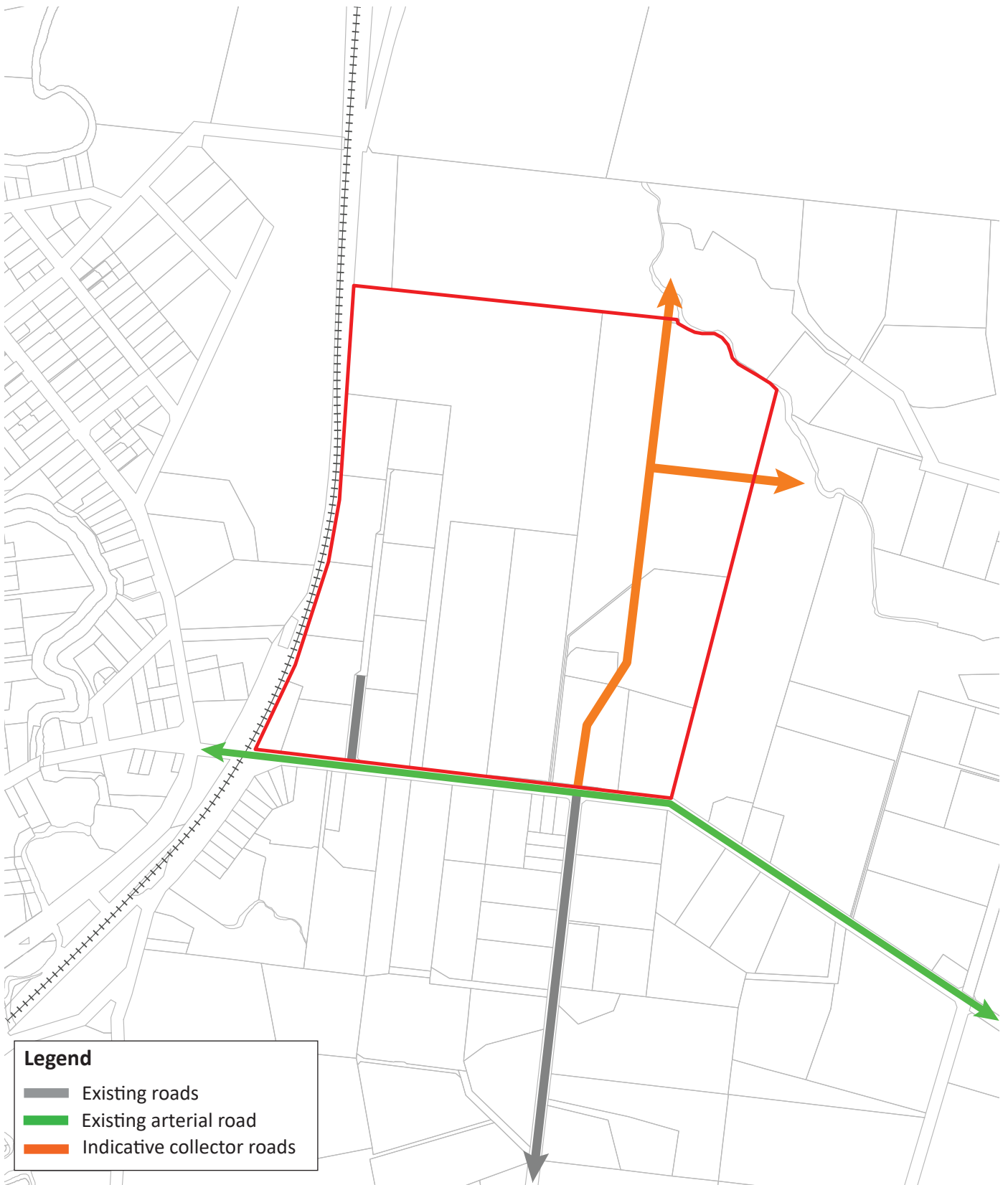
IX.10.2 Waihoehoe: Precinct plan 2 – Transport Staging Boundary

Appendices

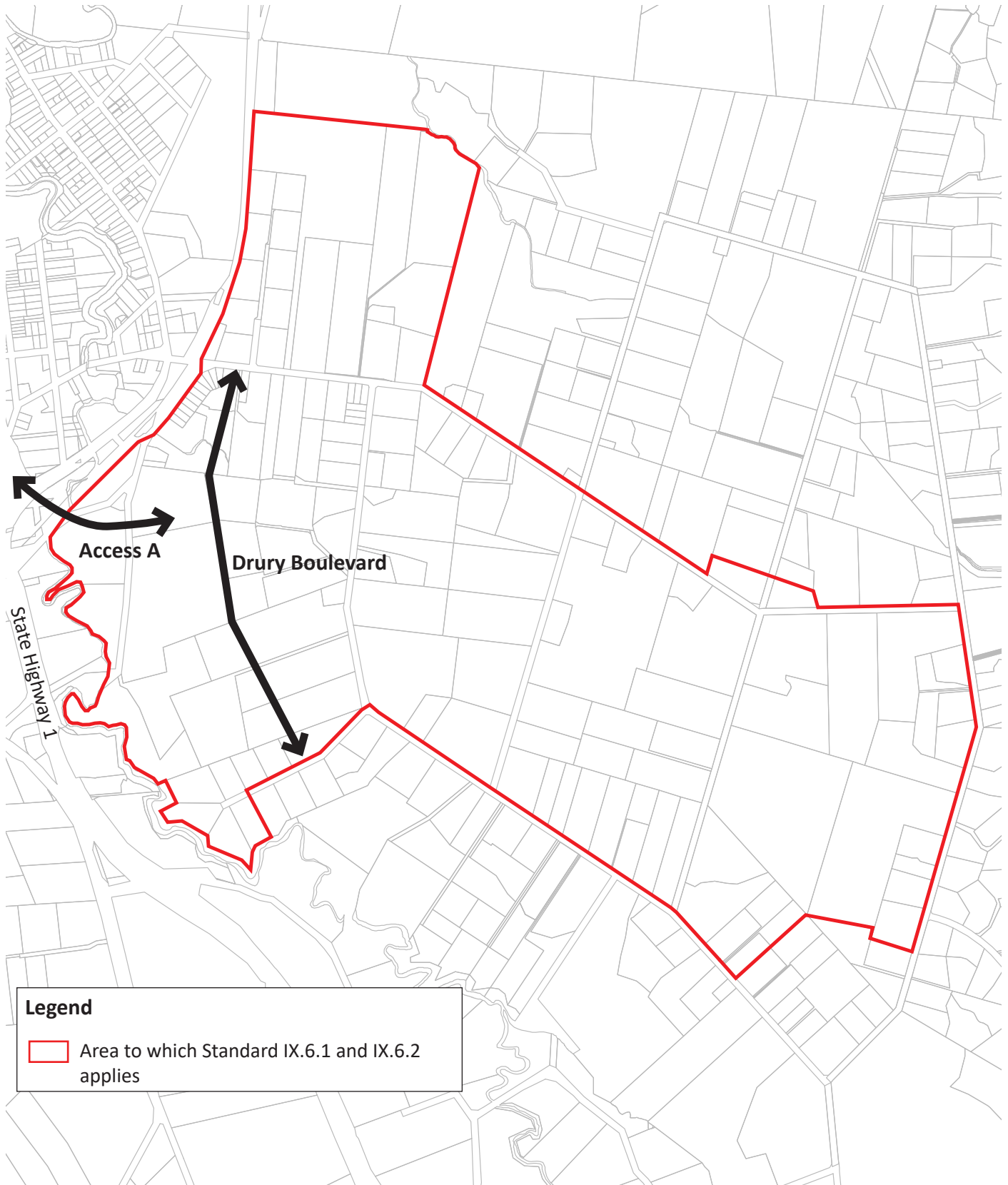
Appendix 1: Road Cross Section Details

Road type	Corridor width	Carriageway	Median	Cycle Paths	Street trees / Rain Garden / Parking	Footpath	Design Speed	Vehicle Access Restriction
Arterial Road (Waihoehoe Rd)	29.6m - 32m	12.4m – 14m	3m solid median	2.1m each side plus buffers	Trees / Rain garden with on-street parking interspersed between	2.4m each side	40-50kph	Yes – as per E27.6.4.1(3)(c)
Collector Road	23m - 23.5m	6.4m - 7m	Not required	1.8m each side plus buffers	Trees / Rain garden with on-street parking interspersed between	1.8m each side	40kph	No
Local Road	16m	6m	Not required	Not required	Trees / Rain garden with on-street parking interspersed between	1.8m each side	30kph	No
Local Road – Park Edge	13.5m	6m	Not required	3m reserve shared path	Trees / Rain garden with on-street parking interspersed between	1.8m on lot side	30kph	No

Waihoehoe Precinct Plan 1 - Road Network



Waihoehoe Precinct Plan 2 - Transport Staging Boundary



To: Nick Roberts
Barker & Associates

From: Daryl Hughes, Gabriela Surja
Stantec

File: Additional Traffic Modelling for Drury
East Private Plan Changes: No DTIP
Upgrades (July 2020)

Date: 15 October 2020

Subject: Additional Traffic Modelling for Drury East Private Plan Changes (PPC): No DTIP Upgrades

This memo documents the latest additional traffic modelling undertaken by Stantec for the three Private Plan Changes (PPC) by Kiwi Property No.2 Limited (Kiwi Property), Oyster Capital (Oyster), and Fulton Hogan Land Development (FHLD), to establish the reliance of the Drury East plan change development areas on any of the Drury Transport Infrastructure Programme Upgrades (DTIP Upgrades). The modelling results were presented to Auckland Council on 27 July 2020.

TRANSPORT MODELLING OVERVIEW

To assess the traffic effect of the proposed developments within Drury East, a series of transport modelling has been undertaken by Stantec on behalf of the PPC team. The transport modelling has been undertaken using a three-tiered approach, consisting of a macro strategic model (MSM), a mesoscopic project model (SATURN), and a localised intersection operational model (SIDRA). Figure 1 summarises the modelling that has been undertaken during the Plan Change process, with the latest additional traffic modelling highlighted orange and referred to as Sensitivity Test 1 (ST1) and Sensitivity Test 2 (ST2). This memo focuses on the assumptions and results of these sensitivity tests.

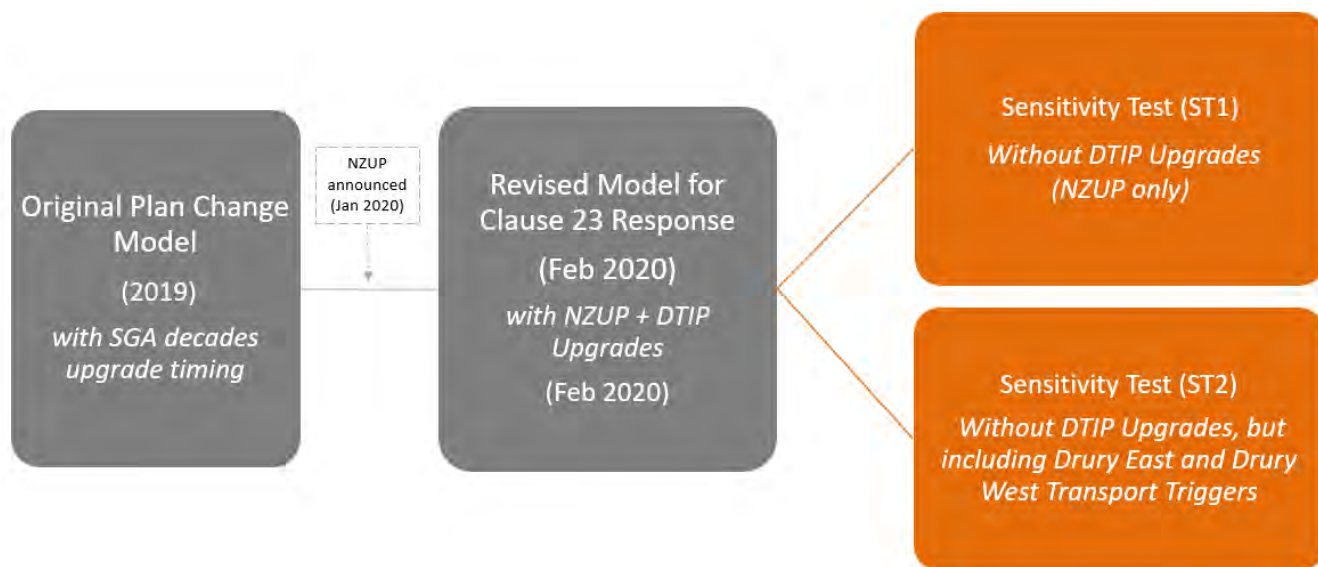


Figure 1: Transport Modelling Overview

ASSUMPTIONS

The sensitivity tests have been undertaken for 2028, 2038 and 2048, with the following network upgrade assumptions:

- ST1 (Sensitivity Test 1): with NZUP only and without any other upgrades to the existing network
- ST2 (Sensitivity Test 2): with NZUP and the Drury East and Drury West Transport Trigger Upgrades.

Note both ST1 and ST2 exclude the DTIP upgrade and the proposed direct connection to Drury East Town Centre.

Refer to Figure 2 and Figure 3 for details of what each upgrade package includes and for summary of modelling assumptions, respectively.

NZUP	DTIP (Council)	Plan Changes – Transport Triggers
<ul style="list-style-type: none"> • SH1 Papakura to Drury South Interchange (2025) • Mill Road (2028) • Drury Central and West Train Stations (2025) • Papakura to Pukekohe Rail Electrification (2024) 	<ul style="list-style-type: none"> • Jesmond Rd Extension • Waihoehoe Road WEST Upgrade • Paerata Rail Station & Southern connector • Jesmond Road Upgrade • East West Arterial - Bremner Road realignment and bridge upgrades • SH22 Improvements (4 laning) • Waihoehoe Road EAST Upgrade • Rail 4 Tracking • Great South Road FTN upgrade to Papakura • Burt Rd - Pukekohe Expressway • Pukekohe Expressway Stage 1 • Opaheke North South Arterial 	<ul style="list-style-type: none"> • Drury East: By 2038 - Signalisation of GSR/Waihoehoe Intersection • Drury West: Upgrade to SH22 / Jesmond Road intersection (roundabout or signal) prior to occupation of any dwelling + assumed Oira Rd – Jesmond Rd link

Figure 2: Relevant Transport Upgrades

Upgrades	2028		2038		2048	
	ST 1	ST 2	ST 1	ST 2	ST 1	ST 2
NZUP	●	●	●	●	●	●
DTIP						
Drury East : GSR/Waihoehoe Intersection Capacity Upgrade (Signal)				●		●
Drury West : SH22/Jesmond Intersection Upgrade		●		●		●

● Upgrade(s) Included

Figure 3: Assumptions for the Sensitivity Tests

MODELLING RESULTS

The key results of each sensitivity test for each model year are presented below and accompanied with the associated delay plots for AM peak (left) and PM peak (right).

SENSITIVITY TEST 1 RESULTS

ST1: 2028

- Drury East: No notable delay around Drury East. Great South Rd/Waihoehoe Rd roundabout works fine.
- Drury West: Substantial delays on Jesmond Rd and Oira Rd for traffic exiting to SH22.
- No notable delay on SH1.

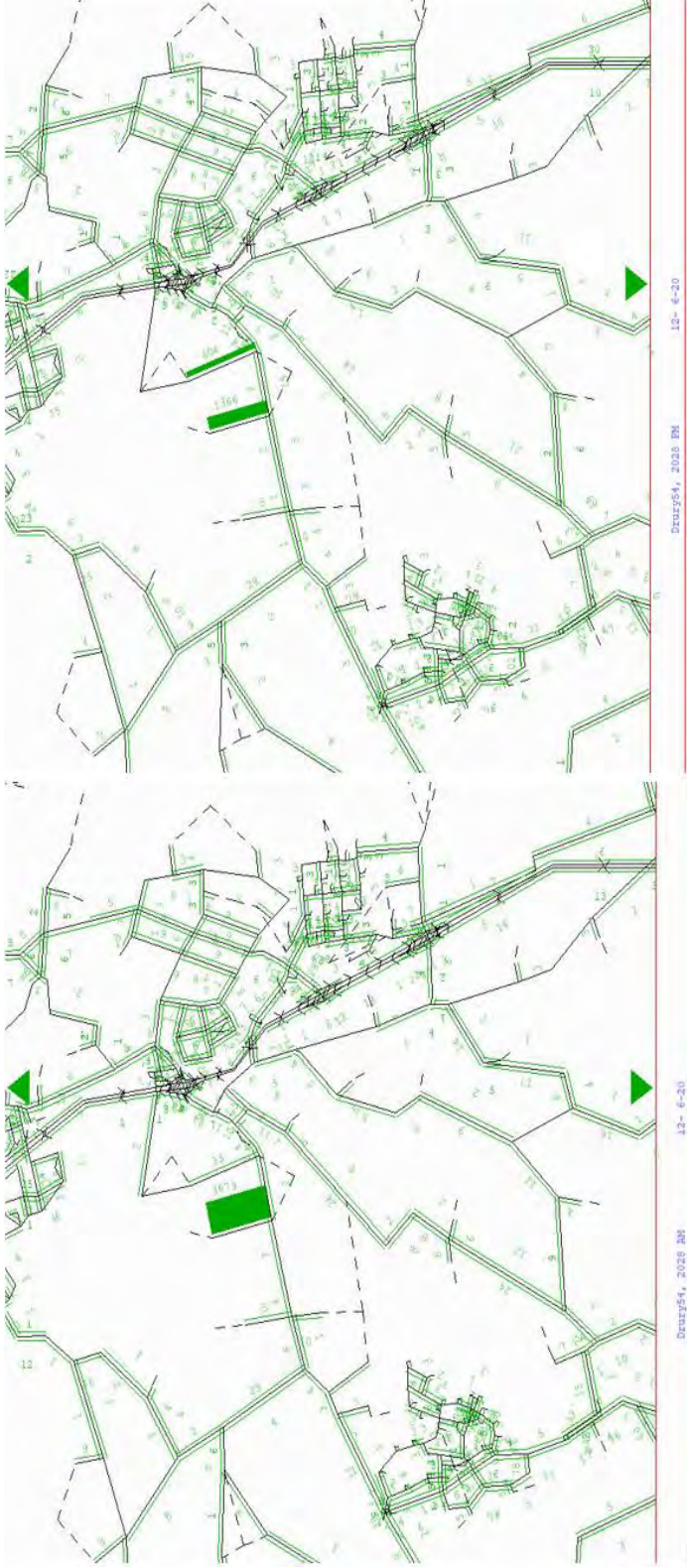


Figure 4: ST1Results -- Delay in 2028 (AM and PM)



ST1: 2038

- Drury East: Generally works fine, however minor delays at GSR/Waihoehoe Rd roundabout.
- Drury West: Major delays on Jesmond Rd and Oira Rd on approach to SH22, and SH22 between the two roads.
- SH1 delay between Ramarama and Bombay in PM Peak.
- AM peak shows major delay on Blackbridge Rd along its approach to SH22, and PM peak sees some delay forming on the southern end of Burr t Rd towards Paerata.

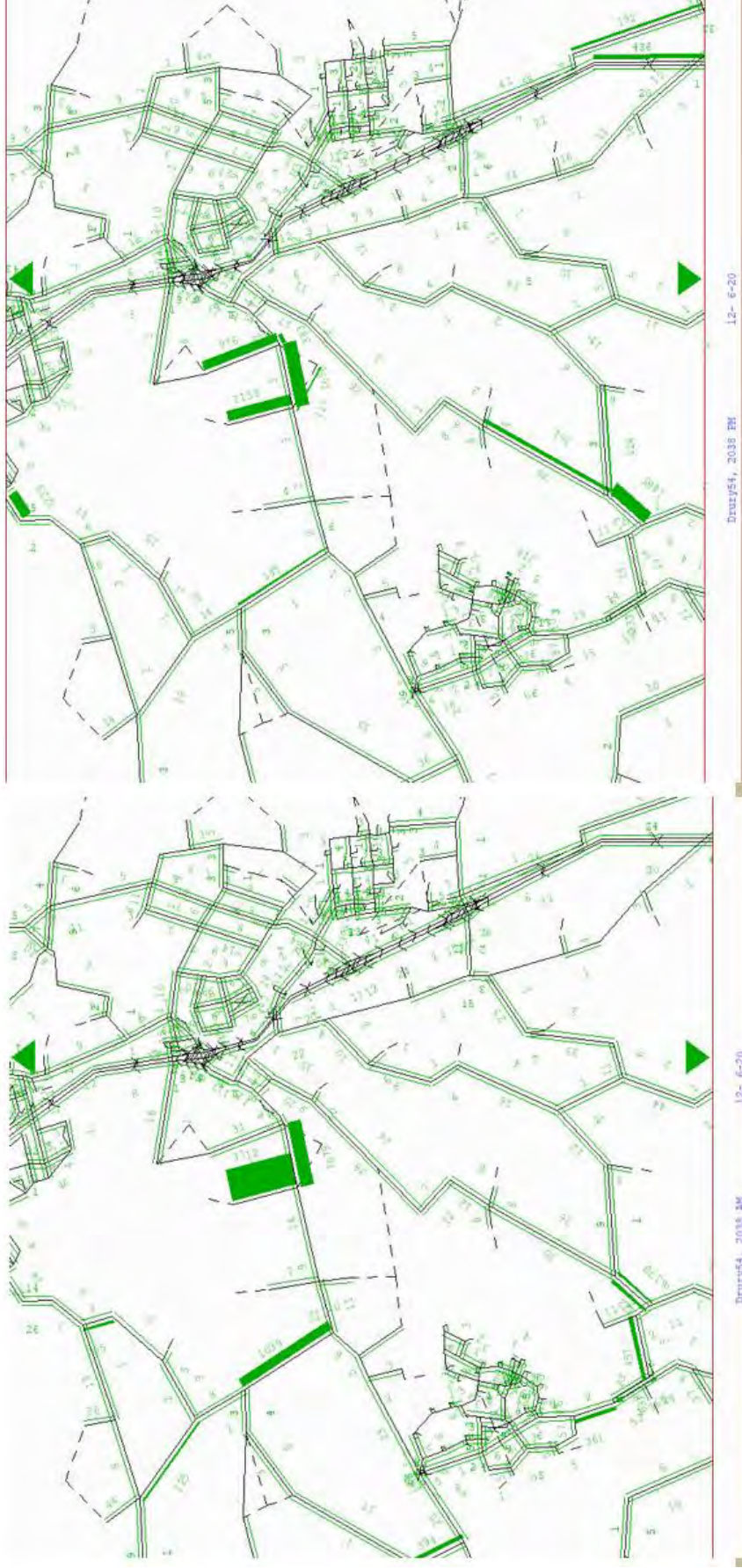


Figure 5: ST1 Results - Delay in 2038 (AM and PM)



ST1: 2048

- Drury East: Significant delays around the GSR/Waihoehoe roundabout, especially on the western approach (Norrie Rd) – A combined effect of all the developments in the area, but primarily due to the Drury West traffic that is unable to exit onto SH22 and therefore instead travelling northbound up Jesmond Rd and eastbound on Bremner Rd towards the GSR/Waihoehoe intersection.
- Drury West: Worsening delays on SH22 and its intersections.
- Delays on Burr Rd towards Paerata and SH1 south of Ramarama.



Figure 6: ST1 Results - Delay in 2048 (AM and PM)



SENSITIVITY TEST 2 RESULTS

ST2: 2028

- Drury East and Drury West work well.

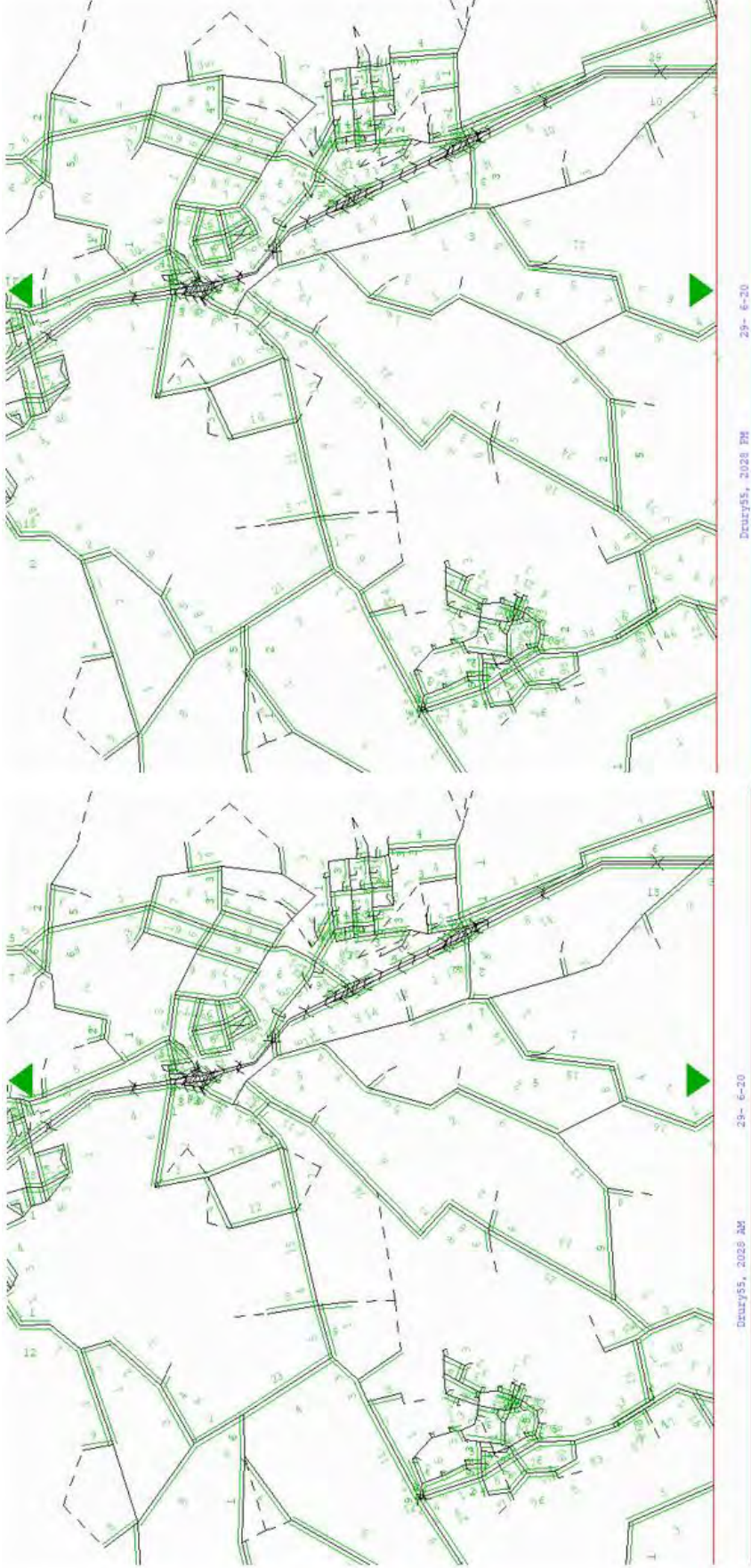


Figure 7: ST2 Results -- Delay in 2028 (AM and PM)



ST2: 2038

- No notable delays around Drury East and Drury West.
- No notable delay on SH1.
- Some delays further south around Paerata (similar to Sensitivity Test 1 results).

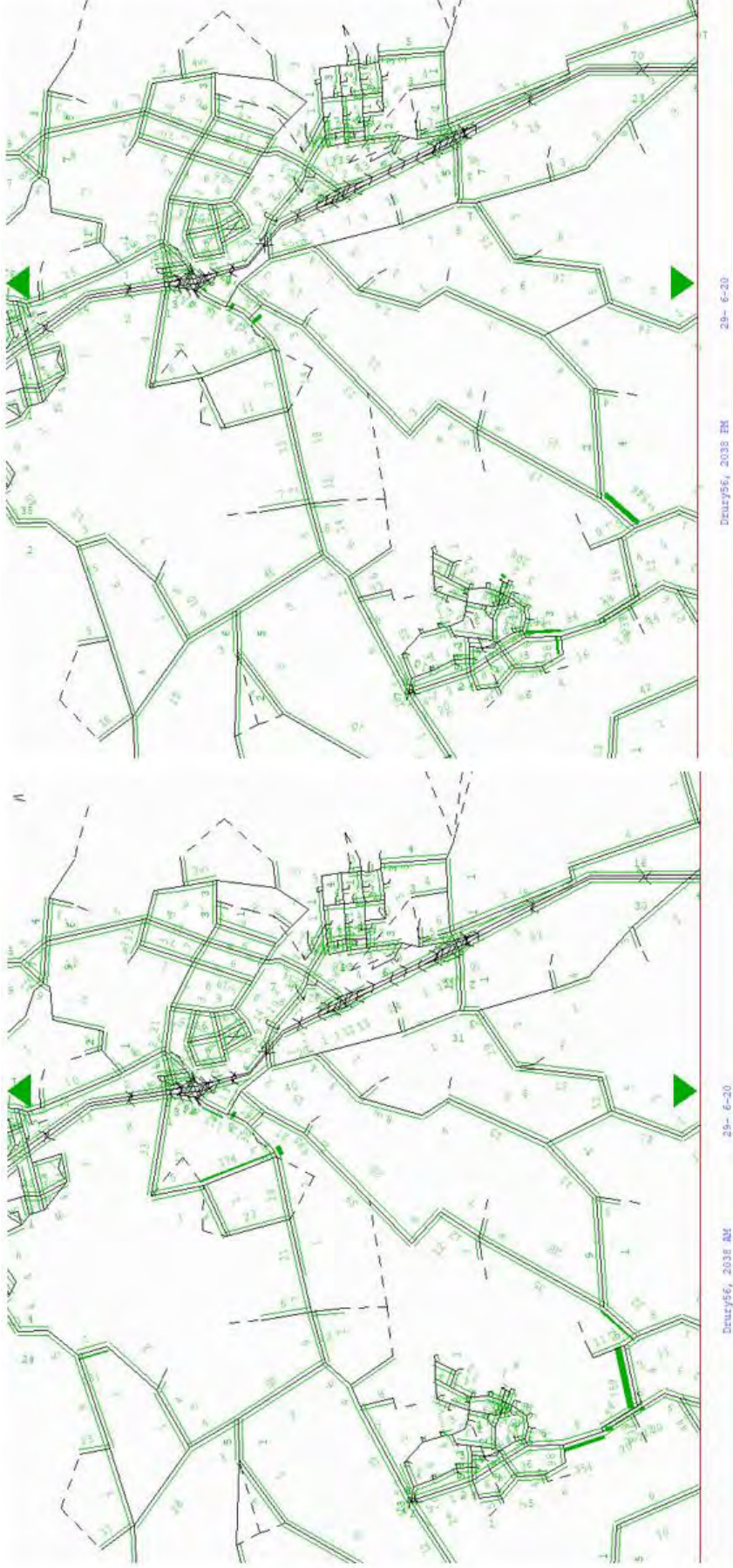


Figure 8: ST2 Results -- Delay in 2038 (AM and PM)

ST2: 2048

- No notable delays around Drury East and on SH1.
- Drury West works fine. There are some delays on Jesmond Rd and SH22, however the extent is much less significant than Sensitivity Test 1 results.



Figure 9: ST2 Results – Delay in 2048 (AM and PM)

SUMMARY OF SENSITIVITY TESTS

The results of the sensitivity tests can be summarised as follows:

Sensitivity Test 1 – with NZUP only, without DTIP or any other localised upgrades in Drury West and Drury East

- Drury East development does not rely on DTIP upgrades at least until 2048. By 2048, the upgrade to Great South Road / Waihoehoe Road intersection is required. It is noted that the reason the need for this upgrade has been pushed out as far as 2048 is due to the major delays in Drury West, which significantly restrain traffic flows to Drury East and result in overall suppressed demand in Drury East.
- The upgrade of SH22 and its intersections with Jesmond Rd and Oira Rd are critical to the viability of the Drury West development as early as 2028.

Sensitivity Test 2 – with NZUP and the following PC local upgrades: capacity upgrade of Great South Road / Waihoehoe Road intersection by 2038 (Drury East), capacity upgrade of SH22 / Jesmond Road by 2028 (Drury West), and new link between Oira Road and Jesmond Road.

- Drury East network works well with no notable delay through to 2048
- Drury West network works fine, with some acceptable delay by 2048 on Jesmond Rd and SH22 in AM peak
- The above local upgrades alleviate the congestion issues identified in Sensitivity Test 1.

In conclusion, both sensitivity tests demonstrate that the Drury East development does not rely on the DTIP upgrades. Alongside the NZUP schemes, Drury East and Drury West trigger upgrades are sufficient to support the developments. It is noted that although delays do exist throughout the network, especially by 2048, these are not to the extent where developments would be impeded. This is further demonstrated by the comparison between the results of Sensitivity Test 2 and the SGA modelling results of the same network.

COMPARISON BETWEEN THE SGA 2048+ AND PPC SENSITIVITY TEST 2

The volume to capacity (V/C) profiles on the Drury East and Drury West network, based on the SGA 2048+ modelling (as included in the SGA Drury-Opāheke Structure Plan ITA) and the Stantec's Sensitivity Test 2 is shown in Figure 10 and Figure 11, respectively for comparison.

SGA 2048+

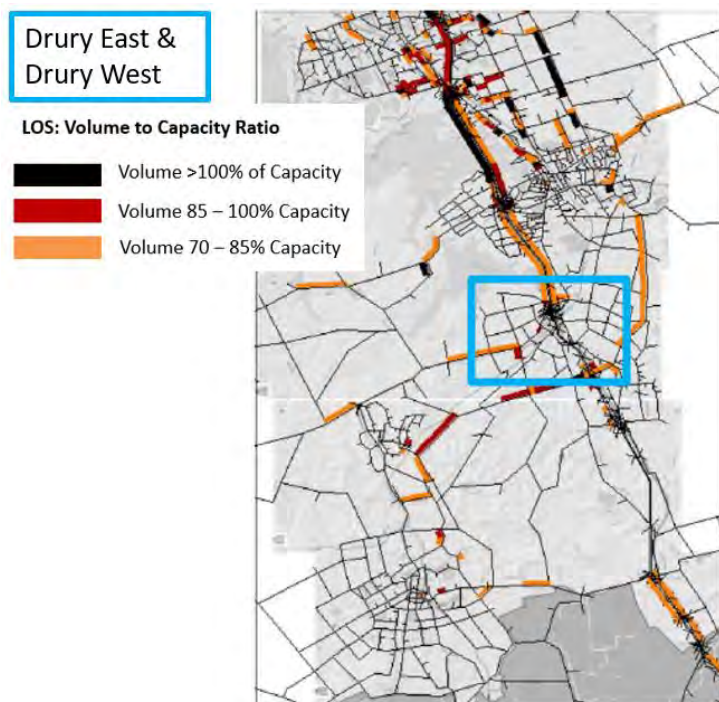


Figure 8-7 – 2048 AM Peak V/C

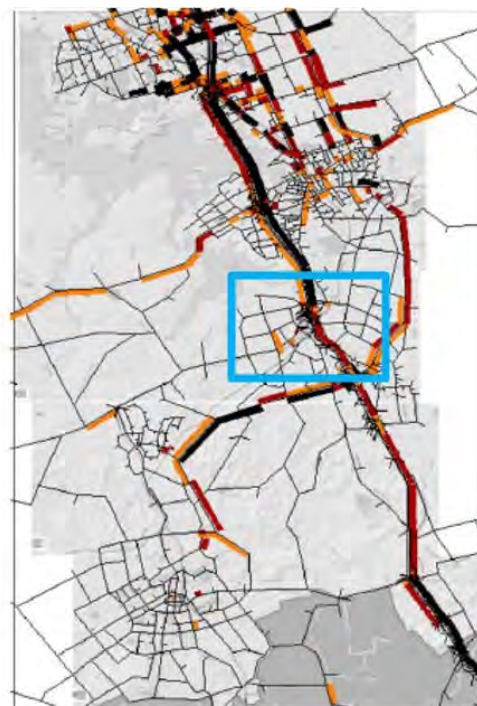


Figure 8-9 – 2048 PM Peak V/C

Figure 10: SGA 2048+ V/C Profile

The SGA 2048+ V/C Assessment indicates that:

- The arterial and collector network in Drury East and Drury West operates within capacity, except the localised congestion around the SH22/Jesmond Road intersection
- Some sections of SH1 operate at or beyond capacity, particularly in the southbound direction in the PM peak period - Note that this occurs across the extent of the plot, from Manurewa/Takanini to Bombay/Pokeno.

PPC Sensitivity Test 2 (2048)



Figure 11: Stantec's Sensitivity Test 2 (2048) V/C Profile

The V/C Assessment of the Sensitivity Test 2 results indicate that:

- The local network in Drury East and Drury West operate closer to capacity. Some localised delays around the SH22/Jesmond Road intersection, Bremner Rd and Waihoehoe/Fitzgerald Rd – Broadly aligned with SGA results
- Some differences along SH1, most notably in the PM peak in the southbound direction.

In summary, the following conclusions can be drawn from the above comparison between the SGA 2048+ and Stantec's Sensitivity Test 2:

- The congestion profile on the Drury West and Drury East local network is broadly comparable between the two models
- Stantec's Sensitivity Test 2 Model shows more local links operating near capacity (as expected), however the delays are localised and not considered uncommon during the peak period, especially given the scale of land use by 2048.
- This confirms that the NZUP and trigger upgrades can sustain the local developments.
- Delay and congestion on SH1 are influenced by a wider range of factors. Although some differences exist between the models, both models do not suggest that the Drury development traffic is a main contributor to the delay on SH1.

Stantec

Daryl Hughes
 Auckland Transportation Leader
 Phone: +64 9 531 4805
 daryl.hughes@stantec.com

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission (including personal details, names and addresses) will be made public.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Dong Leng

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

C/- Dodd Civil Consultants Ltd

PO Box 72.543, Papakura, 2244

Telephone:

09 2965543

Fax/Email:

kgiffney@doddcivil.co.nz

Contact Person: (Name and designation, if applicable) Ken Giffney

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 50

Plan Change/Variation Name

Waihoehoe Precinct

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify) Attached Appendix

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I **support** the specific provisions identified above

I **oppose** the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

The reasons for my views are:

see attached appendix

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

see attached appendix

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter
(or person authorised to sign on behalf of submitter)

21 October 2020
Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

APPENDIX TO SUBMISSION BY DONG LENG

To

PRIVATE PLAN CHANGE 50 – WAIHOEHOE PRECINCT

Introduction

I am the owner of the property at 160 Waihoehoe Road, Drury (Lot 2 DP 209359), which is adjacent to the eastern boundary of the PPC50 site.

I support the PPC50 zone change application subject to the following provisions and amendments.

The following is based on advice from Dodd Civil Consultants Ltd as my agent in this matter.

Zoning

I support the proposed PPC50 zoning on the proviso that it will not jeopardise the future rezoning of my property in accordance with the draft Drury-Opaheke Structure Plan, being Mixed Housing and Apartment Building Zone.

Planning

As currently proposed the Mixed Housing and Apartment Building Zone as set out in PPC50 has the potential to result in a degradation of the rural amenity currently enjoyed by 160 Waihoehoe Road. Should the zoning not be extended to my property the level of potential development within the area identified by PPC50 would have an adverse effect on the use of my land and further consideration needs to be given to the matters set out below.

In addition, further consideration should be undertaken in regard to the interface between the land forming PPC50 and my property to reduce any potential dominance that activities provided for by the PPC50 may have on my property should the zoning not be extended to cover my land. I have a general concern about the potential scale, form and character that the plan change promotes and request that further assessment be undertaken as to how to mitigate such effects on my property.

8.1

Stream Enhancement.

The Stream Enhancement Map indicates that the Waihoehoe Stream abutting the north eastern corner of the PPC50 site as not being an enhancement opportunity – please explain.

8.2

Floodplains

The PPC50 application does not explore the effects of minor filling within the floodplains where there could be opportunities to create more usable land without affecting flood levels. - please provide further analysis.

8.3

Overland Flow Paths

The PPC50 application does not address the existing overland flow path that runs immediately adjacent to the eastern boundary of the PPC50 site, within my property. Please assess if a drainage reserve will be required over this flow path and if the reserve would need to extend across the boundary into the PPC50 site.

8.4

Arterial Roads

Please confirm that intersection access to my property from Waihoehoe Road will not be restricted once it has been upgraded to an Arterial Road as proposed.

8.5

Collector Roads

The locations of the proposed collector roads shown in the PPC50 application are not in accordance with the draft Drury-Opaheke Structure Plan and therefore need to be relocated. Their locations, as shown, will also conflict with the streams to the north and east and will also not properly service the land beyond.

8.6

I therefore seek amendment to the locations of the proposed collector roads.

Stormwater Management

I do not support the proposed water quantity detention approach for 10 year to 100 year flows and propose that the whole catchment should be managed as “passing flows forward” in this regard.

I support the SMAF 1 retention and detention proposal although I would prefer that it was implemented via common, publicly owned, attenuation basins.

8.7

I do not support the implementation of water quality treatment for “all roads” in that it exceeds the Unitary Plans environmental water quality objectives.

I therefore seek amendments to the stormwater management proposal in these regards

Utility Services

The PPC50 application does not address the servicing of upstream catchments with utility services. I particularly request confirmation that the water supply network will be extended up to the Waihoehoe Road frontage of my property and that the wastewater network will also be extended to service my site.

8.8

Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission (including personal details, names and addresses) will be made public.

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- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Kenneth Giffney

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

60 Jack Paterson Road, Papakura

Telephone:

09 2997969

Fax/Email:

kandcgiffney@xtra.co.nz

Contact Person: (Name and designation, if applicable) Mr Ken Giffney

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 50

Plan Change/Variation Name

Waihoehoe Precinct

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify) Attached Appendix

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

see attached appendix

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

see attached appendix

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter
(or person authorised to sign on behalf of submitter)

21 October 2020
Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

APPENDIX TO SUBMISSION BY KENNETH GIFFNEY

To

PRIVATE PLAN CHANGE 50 – WAIHOEHOE PRECINCT

Introduction

I am the owner of the property at 60 Jack Paterson Road and I was individually notified of this application.

I support the PPC50 zone change application subject to the following provisions and amendments.

Zoning

I support the proposed PPC50 zoning on the proviso that it will not jeopardise the future rezoning of my property in accordance with the draft Drury-Opaheke Structure Plan.

Floodplains

The PPC50 application does not explore the effects of minor filling within the floodplains where there could be opportunities to create more usable land without affecting flood levels.
- please provide further analysis.

9.1

Collector Roads

The locations of the proposed collector roads shown in the PPC50 application are not in accordance with the draft Drury-Opaheke Structure Plan and therefore need to be relocated. Their locations, as shown, will also conflict with the streams to the north and east and will also not properly service the land beyond.

9.2

I therefore seek amendment to the locations of the proposed collector roads.

Stormwater Management

I do not support the proposed water quantity detention approach for 10 year to 100 year flows and propose that the whole catchment should be managed as “passing flows forward” in this regard.

I support the SMAF 1 retention and detention proposal although I would prefer that it was implemented via common, publicly owned, attenuation basins.

9.3

I do not support the implementation of water quality treatment for “all roads” in that it exceeds the Unitary Plans environmental water quality objectives.

I therefore seek amendments to the stormwater management proposal in these regards

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

MR CHUNFENG WANG AND MS XIAOLING LIU by

Organisation Name (if submission is made on behalf of Organisation)

their agent WILSON MCKAY SOLICITORS per ROGER DAVID CANN

Address for service of Submitter

111A ST VINCENT AVENUE, REMUEKA, AUCKLAND 1060
(PO BOX 28 347)

Telephone:

09 520 4544

Fax/Email:

rogercann@wilsonmckay.co.nz

Contact Person: (Name and designation, if applicable)

ROGER CANN, SOLICITOR

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC 50

Plan Change/Variation Name

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

PLAN CHANGE (PRIVATE) 50 - OYSTER CAPITAL LIMITED

Or

Property Address

WAIHOEHOE PRECINCT, DRURY

Or

Map

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

The reasons for my views are:

SEE ATTACHED - letter expressing reservations about the future development of this property.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing


Signature of Submitter
(or person authorised to sign on behalf of submitter)

21 OCTOBER 2020
Date

Notes to person making submission:
 If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could / could not gain an advantage in trade competition through this submission.
 If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

WILSON | McKAY

BARRISTERS & SOLICITORS

21 October 2020

Partner Reference
R D Cann

Auckland Council

E-Mail: unitaryplan@aucklandcouncil.govt.nz

Private Plan Change Request 50 – Oyster Capital Limited – Drury East, South Auckland
Our Client: C Wang & X Liu – Owners of a Property at 27 Kath Henry Lane, Drury

We act for Mr C Wang and his wife Mrs X Liu, known as Mr and Mrs Wang. They are owners of the property at 27 Kath Henry Lane, Drury and they have received your notification of Plan Change 50 dated 27th August 2020. This letter responds to that notification.

Mr and Mrs Wang support the Application but in doing so wish to make clear that they will have submissions and specific proposals of their own in relation to any future Resource Consent Applications for the Plan Change Area. Their particular concerns relate to the treatment of natural features including water courses and drainage patters, and the location of roads and services. Mr and Mrs Wang do not agree with the Applicant's submission that one third of the Plan Change Site (18.2 hectares) is required to be retained as open space (drainage reserve). Or that their property in particular should be regarded as a flood plain, which by implication, means that it may not be capable of future development. In the event the Applicant seeks to intensively develop its own portion of the Plan Change Area, there is likely to be increased water runoff and drainage requirements that may adversely affect adjoining properties including those of Mr and Mrs Wang. It is their view that any adverse effects of intensive development of the Applicant's land should be absorbed within the Applicant's land and not directed to the land of adjoining owners within the Plan Change Area.

10.1

Yours faithfully
WILSON McKAY


R D Cann
Consultant

email: rogercann@wilsonmckay.co.nz
Direct Dial: 523 0759

RDC-241271-12-3-V1

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PHILIP M, KHOURI, BA, LL B (Hons)

CONSULTANTS
JOHN W APPELBY, LL B AAMINZ
THOMAS R PIGGIN, LL B

Tony Chien & Zhenhao Tang
 113 Fitzgerald Road
 Drury
 Auckland, 2577

October 20 2020

Auckland Council
 Plans and Places Team

By email: unitaryplan@aucklandcouncil.govt.nz

To Whom it May Concern,

Re: Private Plan Change 50 – Waihoehoe Precinct

This letter provides feedback on Private Plan Change 50 (PC50) as it specifically affects our property (**Figure 1**). We are aware of the proposal from Oyster Capital to develop a new residential development in close proximity to our site, and we fully support their proposed plan change.



Figure 1: 113 Fitzgerald Road outlined in blue.

Submission

- The proposed plan change is consistent with the Drury Opaheke Structure Plan which I supported in 2019. This will enable my land to be developed in coordination with the wider area;
- A range of residential uses will be provided in close proximity to the motorway and public transport. Much of this infrastructure has already been funded by the NZUP programme;
- The proposed re-zoning enables a clear and efficient roading network to be utilised. The proposed high-quality transport network will also provide for all transportation modes; and

- The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

Decision Sought: That PC49 be approved, as notified.

11.1

I do not wish to be heard in support of this submission, and I could not gain an advantage in trade competition through this submission.

Kind Regards,

Tony Chien & Zhenhao Tang

Submission on Proposed Private Plan Change 50 – Waihoehoe Precinct to the Auckland Unitary Plan (Operative in Part)

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

.....

To: **Auckland Council**

Name of Submitter: **Kiwi Property Holdings No.2 Limited (Kiwi Property)**

1. SUBMITTER

- 1.1 This is a submission on Proposed Private Plan Change 50 (PC50) to the Auckland Unitary Plan – Operative in Part (AUP) on behalf of Kiwi Property Holdings No.2 Limited (Kiwi Property).
- 1.2 Kiwi Property could not gain an advantage in trade competition through this submission.

2. BACKGROUND

- 2.1 Kiwi Property has requested a Plan Change to rezone 95 hectares of Future Urban Zone land at Drury East after working together with Fulton Hogan Land Development and Oyster Capital to develop a common vision for Drury East in the form of an agreed Structure Plan. This was used to inform the Council’s Structure Plan process that was adopted in August 2019. Kiwi Property has continued to work with Fulton Hogan Land Development and Oyster Capital to prepare Plan Changes 48-50 concurrently to allow a wider consideration of the future land use pattern proposed within Drury East and an integrated approach to the planning and delivery of supporting infrastructure.

3. SCOPE OF SUBMISSION

- 3.1 The submission relates to PC 50 as a whole.

4. SUBMISSION

- 4.1 Kiwi Property supports PC50 in its notified form.
- 4.2 Of particular relevance to Kiwi Property’s submission, the following matters are noted:
- a) The proposed zoning pattern is consistent with the Drury-Opāheke Structure Plan and the three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East;
 - b) A variety of residential typologies and densities are enabled within the Terrace Housing Apartment Building zone. The proposed zoning pattern applies the Terrace Housing Apartment Building zone close to public transport and Kiwi’s proposed Metropolitan Centre.
 - c) The adverse effects of urban development on the natural environment, including the Waihoehoe Stream and its tributaries can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced;
 - d) The zoning pattern and proposed Precinct enables a connected and high-quality road network to be established that provides appropriately for all transportation modes; and
 - e) The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

5. Decision Sought

5.1 Kiwi Property seeks the following relief from Auckland Council on PC50:

a) That PC50 be retained and approved, as notified.

5.2 Kiwi Property wishes to be heard in support of this submission. If others make a similar submission Kiwi Property will consider presenting a joint case with them at the hearing.

12.1

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name) SUE SIMONS

Organisation Name (if submission is made on behalf of Organisation) FULTON HOGAN LAND DEVELOPMENT LTD

Address for service of Submitter BERRY SIMONS, PO BOX 3144, SHORTLAND ST, AUCKLAND 1190

Telephone: 09 969 2300 Fax/Email:

Contact Person: (Name and designation, if applicable) SUE SIMONS

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number PC 50

Plan Change/Variation Name Waihoehoe Precinct

The specific provisions that my submission relates to are:
(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s) SEE ATTACHED SUBMISSION

Or Property Address

Or Map

Or Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

SEE ATTACHED SUBMISSION

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing



Signature of Submitter
(or person authorised to sign on behalf of submitter)

22/10/20

Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could / could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

IN THE MATTER of the Resource Management Act 1991
 ("**the Act**")

AND

IN THE MATTER of a submission pursuant to Clause 6 of
 Schedule 1 of the Act in respect of
PLAN CHANGE 50 to the **AUCKLAND
 UNITARY PLAN**

**SUBMISSION ON PLAN CHANGE 50 (WAIHOEHOE PRECINCT) TO THE AUCKLAND
 UNITARY PLAN**

TO: Auckland Council
 Private Bag 92300
 Auckland 1142

Name of submitter: Fulton Hogan Land Development Limited

1. INTRODUCTION

- 1.1 This is a submission on Plan Change 50 ("PC 50") to the Auckland Unitary Plan ("AUP").
- 1.2 Fulton Hogan Land Development Limited ("FHLD") is one of New Zealand's largest residential land development companies and has made a significant contribution to housing supply in the Auckland region over the past 20 years through developments such as Dannemora, Millwater, and more recently Milldale. FHLD is also developing land for housing at Pokeno and One Tree Point in conjunction with Joint Venture partners and in the South Island around Christchurch.
- 1.3 FHLD is the proponent of Plan Change 49 to the AUP which seeks to rezone 184 hectares of Future Urban Zone land at Drury East, adjacent to the PC 50 land to enable urban development.
- 1.4 FHLD has worked with Oyster Capital and Kiwi Property Limited (the proponent of Plan Change 48 (Drury Centre)) to develop a common vision for Drury East in the form of an agreed Structure Plan. The agreed structure plan was used to inform the Council's structure planning process which culminated in the adoption of the Drury-Opāheke Structure Plan in August 2019.

- 1.5 Plan Changes 48-50 have been prepared concurrently to enable holistic consideration of the future land use pattern proposed for Drury East and an integrated approach to the planning and delivery of supporting infrastructure.
- 1.6 This submission relates to PC 50 in its entirety.
- 1.7 FHL D supports PC 50 in its notified form. In particular, the following matters are noted:
- (a) The proposed zoning pattern is consistent with the Drury-Opāheke Structure Plan and has been prepared concurrently with PC 48 and 49 to allow holistic consideration of the future land use pattern proposed for Drury East;
 - (b) A variety of residential typologies and densities are enabled in the Terrace Housing and Apartment Buildings zone. The proposed zoning pattern applies the Terrace Housing and Apartment Buildings zone close to public transport and the Metropolitan Centre proposed via PC 48;
 - (c) Any adverse effects of urban development on the natural environment, including the Waihoehoe Stream and its tributaries, can be effectively managed and key natural features within the PC 50 area will be maintained and enhanced;
 - (d) The zoning pattern and proposed Waihoehoe Precinct enable a connected and high-quality road network to be established that provides appropriately for all transportation modes; and
 - (e) The PC 50 area is able to be serviced by infrastructure, with appropriate upgrades in place.

Decision Sought

- 1.8 FHL D seeks the following relief from Auckland Council on PC 50:
- (a) That PC 50 be approved; and
 - (b) Any further or alternative relief that may be required to address the matters raised in this submission.

13.1

2. FHL D could not gain an advantage in trade competition as a result of this submission.
3. FHL D wishes to be heard in support of its submission. If others make a similar submission FHL D will consider presenting a joint case with them at the hearing.

DATED at **AUCKLAND** this 22nd day of October 2020

FULTON HOGAN LAND DEVELOPMENT LIMITED

by their solicitors and duly authorised agents
BERRY SIMONS



S J Simons / K A Storer

Address for service of Submitter:

Berry Simons
PO Box 3144
Shortland Street
AUCKLAND 1140

Telephone: (09) 969 2300
Facsimile: (09) 969 2303
Email: sue@berrysimons.co.nz
Contact: Sue Simons

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Fiona Matthews

Organisation name: Spark New Zealand Trading Limited

Agent's full name:

Email address: fiona.matthews@spark.co.nz

Contact phone number: 021772005

Postal address:
Private Bag 92028

Auckland 1010

Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:
Refer to the attached submission

Property address:

Map or maps:

Other provisions:
Refer to the attached submission

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Refer to the attached submission

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Refer to the attached submission

Submission date: 22 October 2020

Supporting documents
Spark submission Private Plan Change 48 49 50_20201022100306.074.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Form 5
Submission on publicly notified Plan Change (Private) 48 49 & 50.
Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1142

Name of submitter: Spark New Zealand Trading Limited
Private Bag 92028
Auckland 1010

This is a submission on the following proposed private plan change(s) 48, 49 & 50: **Drury Centre Precinct; Drury East Precinct & Waihoehoe Precinct**

Spark New Zealand Trading Limited could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that the submission relates to, the submission points, reasons and decisions sought are detailed in the attached submission. Spark seeks the specific relief sought in the submission, or relief of like effect, including any consequential changes to the Proposed Private Plan Change(s) that may be required.

Spark New Zealand Trading Limited wishes to be heard in support of its submission. If others make a similar submission, Spark New Zealand Trading Limited will consider presenting a joint case with them at a hearing.


Signed:
On behalf of Spark New Zealand Trading Limited

Dated at Auckland this 22 day of October 2020.

Address for Service:
Spark New Zealand Trading Limited
L6 Mayoral Drive Building
31 Airedale Street
Auckland

Contact Details:	Alternate contact details
Attention: Fiona Matthews	Graeme McCarrison
Telephone: 021772005	027 4811 816
E-mail: fiona.matthews@spark.co.nz	graeme.mccarrison@spark.co.nz



Introduction

Spark is New Zealand's largest telecommunications and digital services company. Through the products and services, we provide, we connect, empower and support our customers to adapt, grow and become more sustainable through technology.

The New Zealand mobile market is growing, with consumers using significantly more data than previous years whilst also demanding greater speeds. In 2019, New Zealand mobile data average usage increased 35% compared to 2018¹. Success in wireless-based products and services is underpinned by our investment in the mobile network.

In November 2019, Spark started our 5G rollout and we have now launched 5G in Palmerston North and an additional 6 South Island towns. The deployment of 5G is crucial for NZ's future growth and is a big driver of innovation, faster speeds, mass connectivity and network reliability. Spark has also rolled out 4.5G to 315 locations across the country, bringing customers faster speeds and adding capacity to the network. 98% of customers are reached by our 4G network and we currently provide 2.519 million mobile connections and 709,000 broadband connections around the country.

Telecommunications networks are essential and critical national infrastructure that underpin urban development by ensuring New Zealanders are digitally connected to each other and the world. The economic and social benefits of this connectivity have been widely acknowledged. The applications and services that these networks enable are rapidly becoming indispensable for businesses and residential users who expect high speed and reliability wherever they are and whatever they are doing. New developments are likely to make use of internet of things (IoT) technology, using smart devices and remote probes which communicate in real time over telecoms networks for a range of applications including road management and environmental monitoring.

Telecommunications is a regulatory industry partly to ensure that customers have access to a choice of service providers, competitive pricing and fixed and wireless service options. Within an urban development, customers have an expectation there will be choose of service.

The *Resource Management (National Environmental Standards for Telecommunications Facilities) Regulations 2016* (NESTF) came into force on 1 January 2017. These replaced the 2008 regulations and broadened their scope to enable network operators as determined under the Telecommunications Act to ensure networks can be upgraded with new technology. The 2008 regulations provided permitted activity rules for upgrading/replacement of existing poles in road reserve to enable attachment of antennas, telecommunications cabinets in road reserve, and radio frequency exposures inside and outside of roads. In summary the 2016 regulations now provide for the following as permitted activities in all district plans subject to standards:

¹ Commerce Commission Annual Telecommunications Monitoring Report 2019

- Telecommunications cabinets in all locations;
- Antennas on existing poles in road reserve (including pole replacement e.g. a streetlight integrated to include antennas);
- Antennas on new poles in road reserve;
- Antennas on existing poles outside of road reserve, including pole replacements if required (i.e. upgrades to existing telecommunication facilities outside of roads);
- New poles and attached antennas in rural zones;
- Antennas on buildings (this excludes any residential zones unless the point of attachment to the building is at least 15m above ground level);
- Small cell units (integrated radio equipment and antennas not exceeding 0.11m³);
- Customer connection lines (excluding new support poles);
- Underground telecommunications lines; and
- Radio frequency exposures in all locations.

The limitations of the NESTF are that the range of permitted activities as described above do not extend to include new facilities/cell tower outside the road reserve in urban areas means that Spark relies on Auckland Unitary Plan Chapter E26 Infrastructure. Regarding the proposed plan changes Spark would be relying on provisions from both the NESTF 2016 and Chapter E26 Infrastructure to build new facilities.

Development Planning

Engagement with telecommunication operators at the early planning stages of development is essential to ensure future generations of property owners can obtain the telecommunication services they reasonably expect. It is also critical for the deployment of affordable infrastructure solutions that consider the telecommunications market, technological developments, or the ongoing requirements for managing telecommunications infrastructure.

A key consideration for developments is recognising where existing infrastructure is in situ, as moving it is often extremely expensive and if there is no alternative this needs to be factored into the developer's costs. The location of telecommunications infrastructure does not necessarily influence development, but sufficient capacity will support growth by facilitating connectivity (with associated economic and social benefits). For urban areas – telecommunication reticulation should be implicit in development plans.

The location of development relative to other supporting and enabling telecommunications infrastructure can significantly influence the cost of providing telecommunications services. It is

important that these costs are considered at the early stages of development and not left to be borne by individual property owners. Where connection is deferred there are additional costs and disturbances where ducting is required to be laid in newly formed road reserve/ footpaths.

Plan Change 48, 49 & 50.

The three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East and an integrated approach to the planning and delivery of supporting infrastructure. This approach is unique and demonstrates a commitment on behalf of the developers to work together. As the plan change requests have been prepared concurrently this submission covers all three private plan changes.

Purpose of the plan changes have been outlined as:

Plan Change 48 - is to enable the development of a new, comprehensively planned and transit-orientated centre at Drury that supports a quality compact urban form. The Plan Change also seeks to provide additional land for housing along with a network of open spaces. Kiwi Property intends to develop their landholdings to increase the supply of retail, commercial and residential capacity within the southern part of Auckland.

Plan Change 49 - is to provide additional land for housing in Drury with a supporting network of open spaces and a small-scale commercial centre to meet the local day-to-day needs of residents, consistent with the Council's Drury-Opāheke Structure Plan. FHLD is a large-scale residential land developer and they are seeking to rezone the land to increase the supply of high-quality housing in the southern part of Auckland.

Plan Change 50 - is to provide for additional housing within Drury, consistent with the Council's draft Drury-Opāheke Structure Plan.

Each plan change incorporates the following objective:

- Development is supported by appropriate infrastructure.

However, none of the Section 32 reports mention telecommunications infrastructure other than to say it will be provided for at a later stage of development. Engagement with Spark and other telecommunications providers at the early planning stages of development is vital to ensure new growth areas receive the level of telecommunications services that a property or business owner purchasing within new development would expect.

Funding

The Drury East developers intend to develop an infrastructure funding agreement between themselves, the Council and other relevant parties addressing required local transport upgrades.

The developers have already reached agreement with Watercare around network upgrades required to be installed and these works have physically commenced. Ensuring telecommunications facilities are included in a funding agreement between the developer and Spark will ensure infrastructure can be incorporated in an efficient and sustainable manner.

Planning

Section 5.1 The description of the proposal states that precinct provisions are appropriately focused on the layout of development necessary to achieve the objectives of The Auckland Unitary Plan including – ensuring development integrates with public transport and that development coordinates with the required infrastructure upgrades.

The Regional Policy Statement places a strong emphasis on delivering integrated urban development in Future Urban areas (B2.2.1(5)² and B2.2.2(7)(c)³. This requires that the infrastructure needed to support urban development is delivered at the same time as housing and jobs. Analysis prepared to support this Plan Change demonstrates that the area can be serviced with targeted transport infrastructure upgrades in place. The Plan Change area can also be serviced with targeted upgrades to the water supply, wastewater and stormwater networks. No provision has been allocated to telecommunication infrastructure.

The National Policy Statement on Urban Development 2020 (NPSUD) which came into effect on 20 August 2020 replaces the National Policy Statement on Urban Development Capacity 2016 (NPS UDC) which was in effect from 1 December 2016. The NPS UDC recognised the national significance of urban environments and provides direction to decision-makers on planning for urban environments. The NPSUD and NPS UDC focus similarly to ensure there is sufficient development capacity for housing and business with a suite of objectives and policies to guide decision making in urban areas. There is an emphasis on integrated planning of land use, development, and infrastructure provision.

NPSUD Objective 1 seeks to ensure:

“well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.”

² 12 B2.2.1(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.

³ B2.2.1(5)(c) Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all the following: ... integrate with the provision of infrastructure.

NPSUD Objective 6 seeks to deliver local authority decisions on urban development integrate with infrastructure planning and funding decisions. Policy 10 requires the local authorities to engage with providers of infrastructure (telecommunications is included as “*additional infrastructure*” provides to achieve integrated landuse and infrastructure planning.

NPSUD 3.11(1) provides direction when making plans or changing plans to ensure that development achieves well-functioning urban environments. Reference to additional infrastructure NPS UD 3.5 “Availability of additional infrastructure” requires that local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available. This means that providers of additional infrastructure, in our case telecommunications are required to be engaged with.

The council’s Future Urban Land Supply Strategy (FULSS), refreshed in July 2017, implements the Auckland Plan and gives effect to the NPS on Urban Development Capacity by identifying a programme to sequence future urban land over 30 years. The strategy relates to greenfield land only and ensures there is always 20 years of supply of development capacity and a seven-year average of unconstrained and ready to go land supply. ‘Ready to go’ land is land with operative zoning and bulk services in place such as the required transport and water infrastructure.

The sequencing of the release of land for urban development with the delivery of the required infrastructure is incorporated into the Plan Change through the inclusion of rules that trigger the staged release of development capacity with the delivery of supporting infrastructure. Telecommunications infrastructure should be included within triggers for the staged release of development.

14.5

Section 10.7.3 of Section 32 report for Plan Change 48 states that:

Other Utilities In terms of power, telecommunications and gas infrastructure, the Plan Change area can be serviced with overhead reticulated telecommunications infrastructure, as well as piped underground gas reticulation. Network upgrades will be required to fully service development within the Plan Change area, however, Utility Supply Authorities have confirmed that there are no constraints or issues with undertaking these upgrades progressively as development occurs.

Whilst Plan change 50, makes mention of telecommunication infrastructure already on Waihoehoe Rd – it is not a Spark site. There is no evidence of engagement with telecommunication providers to determine what services are currently available or in future planning, and if the existing networks have capacity to meet the demand created by the development. Overall telecommunications facilities need to be incorporated at the early stages of development, to ensure staging of infrastructure and network capacity is appropriate and delivered within the development.

Overall, the Plan Change areas allow for a total of approximately 106 hectares of land to be developed in stages, split into different precincts and rezoned to allow for a mixture of residential, commercial and open space activities. The NESTF whilst allowing for telecommunications infrastructure to be lawfully established in roads and other areas becomes complex and difficult when areas that are zoned for high intensity residential uses such as the THAB zoning, which permits taller housing developments and adds complexity to develop mobile sites. The plan changes as proposed, do not adequately cater for telecommunications infrastructure. As proposed in the Plan Changes there is risk that the developments will not have adequate access to a range of telecommunication services that customers expect. We consider that it is in the interest of the developments to fund and integrate telecommunications into the layout and potentially buildings to ensure customers have access to the services to achieve a well-functioning community. It is our experience that future customers expect to know what telecommunications are or will be available and where they are located when purchase or lease a property. The NESTF and Unitary Plan within provide reasonable opportunity to build new infrastructure, especially in the road reserve, however new owners of properties are unlikely to be accepting of such facilities even if permitted, hence identifying where infrastructure will be located in development planning is crucial.

Current Spark Assets

There is currently only 1 mobile site provided for in the Drury vicinity (as shown in Figure 1). Spark undertakes regional planning throughout the year but requires developers to work with our engineers to ensure sufficient coverage and capacity demands can be met within new developments. By way of reference for an area that will roughly accommodate or will allow for what the Drury East Development proposes; approximately 19,000 residents, 3 schools and a rail and bus station, we could compare that to an area like Takapuna in Auckland's North Shore, which has 8 mobile sites, and/or Westgate and Massey which has 7 mobile sites.

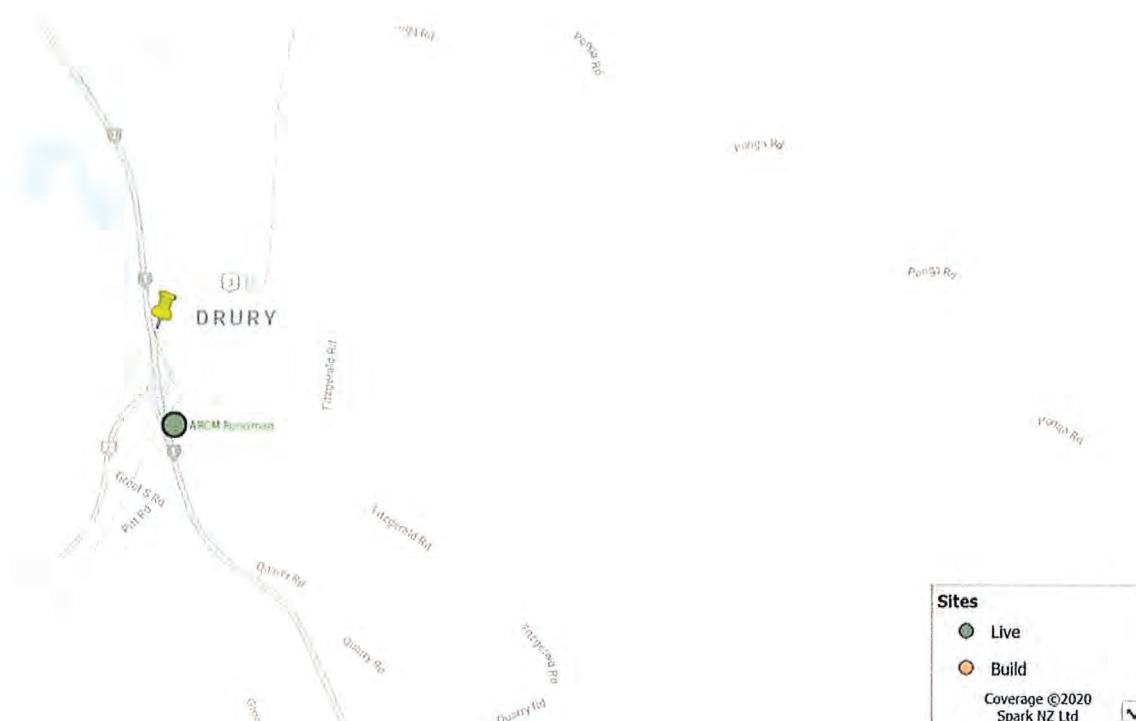


Figure 1. Drury Mobile site (Spark) (Source: Ventura GIS Mapping)

Future Development Strategy

A Development Strategy that appropriately recognises and facilitates investment in infrastructure, while responding to the demands and complexities facing urban areas, will in turn encourage further investment by the telecommunications industry. This will assist the industry deliver to the Government’s goal of 95 percent of New Zealanders having access to broadband with speeds greater than 50 Mbps by 2025, an objective which will support positive social, economic, environmental and cultural outcomes for New Zealand.

This submission offers general feedback consistent with Sparks’ view that: Generally supports the purpose and objectives of the plan changes however submits that telecommunications should be recognised essential infrastructure that forms part of an integrated approach to growth management and development planning; Early engagement with telecommunications providers is necessary to ensure that investment in telecommunications infrastructure can be made efficiently and with as much certainty as possible.

Submission

1. Spark supports the Plan Changes but is concerned that telecommunication infrastructure has not been adequately considered and planned for within the development.

- 2. Spark and the other telecommunication network providers are consulted with throughout the Plan Change Process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD. 14.1
- 3. Spark and the other telecommunication network providers are consulted to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development/s proposed in Plan Changes 48, 49 and 50. 14.2
- 4. Spark and the other telecommunication network providers are consulted to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development/s. 14.3
- 5. Spark and the other telecommunication network providers are consulted with to ensure funding is available through the infrastructure funding agreements. 14.4

Conclusion

Spark provides essential telecommunications services that support and enable the social, economic and cultural wellbeing of our people and communities and future generations as growth occurs. Early engagement with Spark and other telecommunication providers at the early planning stages of development is necessary to ensure new growth areas receive the level of telecommunications services that these communities reasonably expect, and that investment in telecommunications infrastructure can be made efficiently and with as much certainty as possible.

Currently the three private plan changes (Plan Change 48,49 & 50) do not adequately provide for telecommunications infrastructure. Including Spark and other telecommunications providers into the early stages of development will result in positive outcomes for the community and developer, ensuring telecommunications infrastructure is appropriate for the setting it is designed to serve.

Yours sincerely,



Fiona Matthews
Senior Environmental Planner

The address for service and contact details are:

Fiona Matthews

Spark New Zealand Trading Limited
Private Bag 92028
Auckland 1010

Fiona.matthews@spark.co.nz
021772005

Contact details

Full name of submitter: Mitchell Tweedie

Organisation name: Fletcher Residential Limited

Agent's full name:

Email address: mtweedie@frl.co.nz

Contact phone number: 021453331

Postal address:
810 Great South Road
Penrose
Auckland 1061

Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:
All Plan Change rules

Property address: Total Plan Change Area

Map or maps: Total Plan Change Area

Other provisions:
All Plan Change provisions

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? No

The reason for my or our views are:
Fletcher Living seeks that PC48 be retained and approved, as notified.

I or we seek the following decision by council: Approve the plan change without any amendments

15.1

Details of amendments:

Submission date: 22 October 2020

Supporting documents
201022 Fletcher Submission - Waihoehoe Plan Change.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Submission on Proposed Private Plan Change 50 – Waihoehoe Precinct to the Auckland Unitary Plan (Operative in Part)

Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

.....

To: **Auckland Council**

1. SUBMITTER DETAILS

Name of Submitter: **Fletcher Residential Limited trading as Fletcher Living**

This is a submission on Proposed Private Plan Change 50 (PC50) to the Auckland Unitary Plan – Operative in Part (AUP).

Fletcher Residential Limited (Fletcher Living) could not gain an advantage in trade competition through this submission.

2. BACKGROUND

Fletcher Living is the residential development and delivery arm of Fletcher Building. It is one of the largest developers of new residential communities in New Zealand, having built and sold thousands of homes in the last 5 years providing a significant contribution to housing supply across Auckland and Canterbury.

3. SCOPE OF SUBMISSION

The submission relates to PC 50 as a whole.

4. SUBMISSION

Fletcher Living supports PC50 in its notified form.

Of particular relevance to Fletcher Living's submission, the following matters are noted:

- a) The proposed zoning pattern is consistent with the Drury-Opāheke Structure Plan and the three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East;
- b) A variety of residential typologies and densities are enabled within the Terrace Housing Apartment Building zone. The proposed zoning pattern applies the Terrace Housing Apartment Building zone close to public transport and Kiwi's proposed Metropolitan Centre.
- c) The adverse effects of urban development on the natural environment, including the Waihoehoe Stream and its tributaries can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced;
- d) The zoning pattern and proposed Precinct enables a connected and high-quality road network to be established that provides appropriately for all transportation modes; and
- e) The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

5. Decision Sought

Fletcher Living seeks the following relief from Auckland Council on PC50:

- a) That PC50 be retained and approved, as notified.

| 15.1

Fletcher Living wishes to be heard in support of this submission. If others make a similar submission Fletcher Living will consider presenting a joint case with them at the hearing.

Contact details

Full name of submitter: Phil Hogan

Organisation name: Britmat Holdings Ltd

Agent's full name: Integrated Planning Solutions Ltd c/- Paul Sousa

Email address: paulsousa@xtra.co.nz

Contact phone number: 0272595070

Postal address:
12A Mace Terrace
Oakura
New Plymouth 4314

Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:
The Rezoning of the subject Future Urban zoned land outside of the existing Drury Centre.

Property address: 1A East Street, Drury

Map or maps: The proposed Waihoehoe Precinct Zone Plan

Other provisions:

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
The change of zoning should follow a logical sequencing with land located immediately adjacent to existing urban zones and which can be fully serviced to be rezoned and developed ahead of rural land to avoid piecemeal zonings and incoherent land use patterns. Accordingly the land at East Street, in particular 1A East Street,

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: That the property at 1A East Street Drury, currently zoned Future Urban Zone be included in the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.

16.1

Submission date: 22 October 2020

Supporting documents

Amended Location Diagram for 1A East Street Drury_20201022105011.777.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**Submission on Proposed Private Plan Change 50 – Waihoehoe Precinct,
Auckland Unitary Plan**

Clause 6. Schedule 1 to the Resource Management Act 1991

To: Attn: Planning Technician
Auckland Council,
Level 24, 135 Albert Street
Private Bag 92300,
Auckland 1142
By Email:unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: Mrs Josephine Kleinsman (“**Kleinsman**”), c/- the address for service set out below.

1. This is a submission on the Proposed Private Plan Change 50 – Waihoehoe Precinct (“**the Plan**”).
2. This is a submission in support of and in opposition to the Proposed Private Plan Change 50 – Waihoehoe Precinct.
3. KLEINSMAN could not gain an advantage in trade competition through this submission. In any event, KLEINSMAN is directly affected by effects of the subject matter of the submission that:
 - (a) Adversely affect the environment; and
 - (b) Do not relate to trade competition or the effects of trade competition.
4. The specific provisions of the Unitary Plan that this submission relates to are:
 - (a) The proposed Private Plan Change 50 – Waihoehoe Precinct
5. KLEINSMAN ’s submission is as follows:
 - (a) The submitter is the owner of Number 112 Waihoehoe Road.

- (b) The submitter has owned the land for over 34 years and the property has been utilised as the family residence.
- (c) The submitter is not a developer and does not intend developing the land.
- (d) The submitter while not intending to develop their land has no desire to restrict or interfere with other landowners who may choose to develop their land.
- (e) The submitter in while acknowledging that other landowners may take up the option of accepting the Proposed Private Plan as put forward by Oyster Capital "OC", the submitter opposes the Proposed Private Plan. The submitter is aware that the Proposed Plan will affect
 - a) their existing use and enjoyment of the land
 - b) the future use and value of the property
 - c) the land will be physically impacted by the proposed development

6. The submitter OPPOSES the Proposed Private Plan Change because;

- (a) The Proposed Plan includes the submitters land and has been included by OC without the submitters consent.
- (b) The submitter has never been consulted by OC on the form and content of the Proposed Private Plan.
- (c) The applicants Consultation Report contained in Appendix 15 of the Plan Change Documentation only records communication with Iwi. There is no reported record of the Applicant communicating with the owner of 112 Waihoehoe Road.

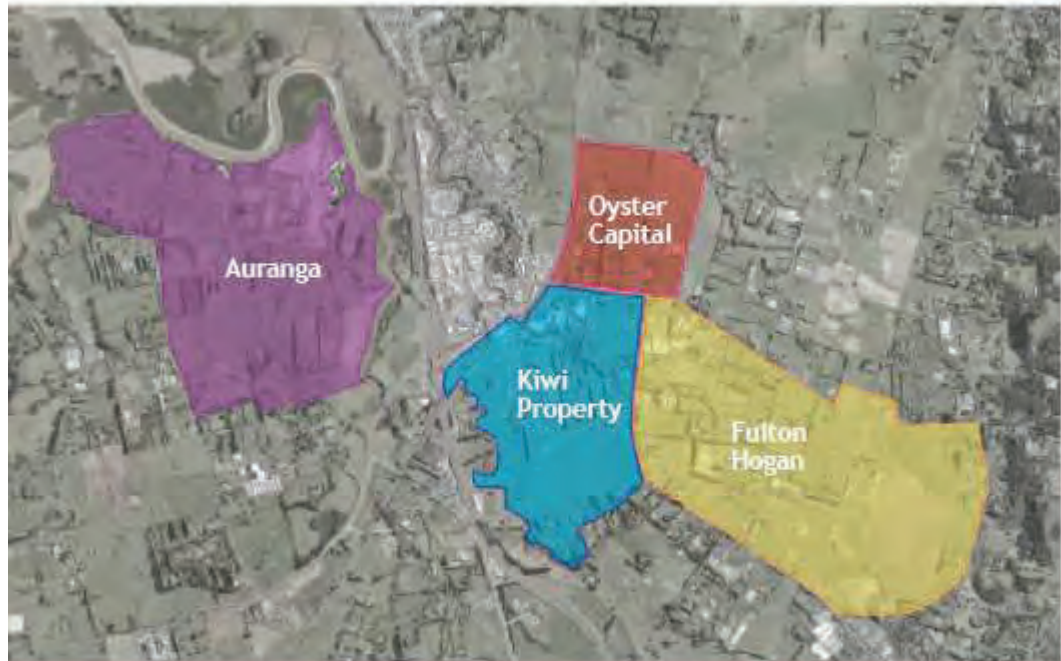


Figure 04 - Current & Future Surrounding Developments

- (d) The impression given by the above plan is that Oyster Capital is the developer.
- (e) The submitter has never been approached by OC for access to the land to enable technical reporting to be prepared for the Proposed Plan Change.
- (f) With no access to the land requested or granted all of the reporting prepared in support of the Proposed Plan by OC is technically deficient.
- (g) OC as the applicant for the Proposed Private Plan Change owns 18.473 Ha or 38% of the plan change site as shown on the plan below and the properties listed in Appendix 1.



- (h) Some of the key aspects of the OC land is that it is at the upper reaches of the stormwater sub catchment and it is separated by the Western Sites from the main transport corridors including SH1, Great South Road and the North Island Main Trunk Railway.
- (i) The Plan has the stated general objective of providing a development that is an “exemplar” of its type through creating healthy living environments. This is to be achieved by respecting the environment, proposing appropriate development controls, establishing a network of roads, parks and community facilities to support the future community and connections to local and regional amenities and functions. And to be developed in a “Comprehensive” and “Integrated” way to provide a compatible mix of residential living and employment that respects and enhances the environment.
- (j) These elements are considered essential and fundamental to the success of the “Plan” as shown below extracted from the OC Urban Design Report as follows with the line indicating the boundary between the OC land and Western sites;

Figure 10
Proposed Structure
Plan

- Plan Change Area Boundary
- Southern SW sub-catchment coverage control area
- Northern SW sub-catchment coverage control area
- Collector Road
- Local Road
- Park Edge Road
- Signalled Intersection
- Drainage Reserve (to be defined through detail design)
- Existing Wetlands
- Green Link / Swale
- ▨ Potential Waiohohoe Rd widening. Depth and dimension to be confirmed at a later



- (k) This indicates that the majority of the “Community” elements such as the ecological corridors, cycle ways and green space are located on the Western Sites, not OC’s land.
- (l) The applicants Ecological Report is used as a key input for determining the Urban Development form. The Ecological Report has only reported on visiting OC’s land and extrapolated its recommendations across the entire site. Overland Flow Paths have been described as Intermittent streams when they are more properly described as ephemeral. As ephemeral they do not warrant any recognition on the Structure Plan or the same level of treatment as proposed by OC’s Development Plans. They will not materialise in the final development and should be omitted.
- (m) The extent of flooding indicated on the Structure Plan on the western edge is a result of an undersized 900mm culvert. OC is not proposing any upgrade of this

17.2

culvert to eliminate this flooding. Instead they are proposing to retain the post development stormwater within the Waihoehoe Precinct.



- (n) It is noted that the other development groups, Kiwi Property and Fulton Hogan are proposing to upgrade culverts. The provision of an upgraded culvert would eliminate the flooding caused by the railway embankment and allow better utilisation of the Western Sites.
- (o) The OC Plan also proposes to downgrade the proposed extension of Fitzgerald Road from an Arterial to a Collector Road despite the road being part of Auckland Council’s future arterial road network. This road is included in the Drury – Opaheke Structure Plan, attached as Appendix 2 which is based on Auckland Council’s transport modelling requiring the arterial road to link to the northern part of the structure plan area.
- (p) The applicant’s rationale for it being downgraded is that the cost of construction is prohibitive.
- (q) As a consequence of the road being downgraded to a collector in the Development Concept Plan proposed by OC in the Urban Design Report will not be workable when

17.3

the road has to revert to an arterial. The road corridor would not have sufficient width, all properties taking access from the road would not be acceptable and all the buildings constructed to setbacks as permitted would all lose their yards.

- (r) The applicant, OC should be required to comply and provide the arterial road in accordance with the Drury –Opaheke Structure Plan

17.4



Figure 21 - Illustrative Masterplan

Note: This Illustrative Masterplan shows how the Plan Change Area could potentially look once fully developed in accordance to the Proposed Structure Plan and planning controls. This is only one possible outcome of many possible solutions.

- (s) The Plan also generates a number of development difficulties. When considering the submitter’s land, 112 Waihoehoe Road as outlined on the plan above, these difficulties include awkwardly shaped development blocks, isolated development

areas accessed across third party land and a requirement to rely on future development road access from either 76 or 116 Waihoehoe Road.

- (t) The Waihoehoe Precinct – Zoning Plan indicates the proposed zoning is Residential Terrace Housing and Apartment Building Zone (“THAB”).
- (u) However, the Engineering and Infrastructure Reporting along with others is based on two residential zones being proposed being the THAB and Residential Mixed Housing Urban. There appears to be an unresolved conflict in the planning documentation as to what is proposed. 17.5
- (v) The proposed stormwater management solution indicates there are two development areas with differing impermeable surface area limitations. There is no plan within the Proposed Plan Change to indicate how this is achieved. 17.6
- (w) The Proposed Plan also seeks to further extend the presumption of non-notification, in particular for Restricted Discretionary Activities. This proposed change is not supported as it will allow development without any co-ordination or co-operation between neighbours to occur. 17.7
- (x) The water supply is to be sourced from the Flanagan BSP and run along the northern side of Waihoehoe Road. The planning document proposes 6m road widening to both sides of Waihoehoe therefore the timing of the installation of the new watermain will be dependent on the land take along the entire southern edge of the plan change area being complete such that the watermain is laid in the correct position giving consideration to the future formation of the arterial road.
- (y) It would also be beneficial for the road cross sections to include the proposed locations of the underground services as the usual lay position conflicts with the proposed rain gardens. 17.8
- (z) The report continues to describe the provision of wastewater with 2 wastewater pump stations and temporary riser mains. The ultimate solution is for the riser mains and pump stations to be decommissioned and the entire plan change area to gravity to a new regional wastewater pump station to the north.
- (aa) It is surprising that 2 wastewater pump stations are required when the permanent solution is for all the plan change area to gravity northwards. A single pump station 17.9

with storage that could be upsized as demand increased with a single riser main following the NIMT Railway alignment.

- (bb) When the temporary wastewater pump stations and riser mains are to be decommissioned and removed how is this to be achieved when the access is likely to be restricted with new dwellings?
- (cc) The Wastewater Plan is proposed in two stages, with OC's land to be serviced first and the Western land to follow. There is no explanation of how the individual land parcels are to receive service and when.

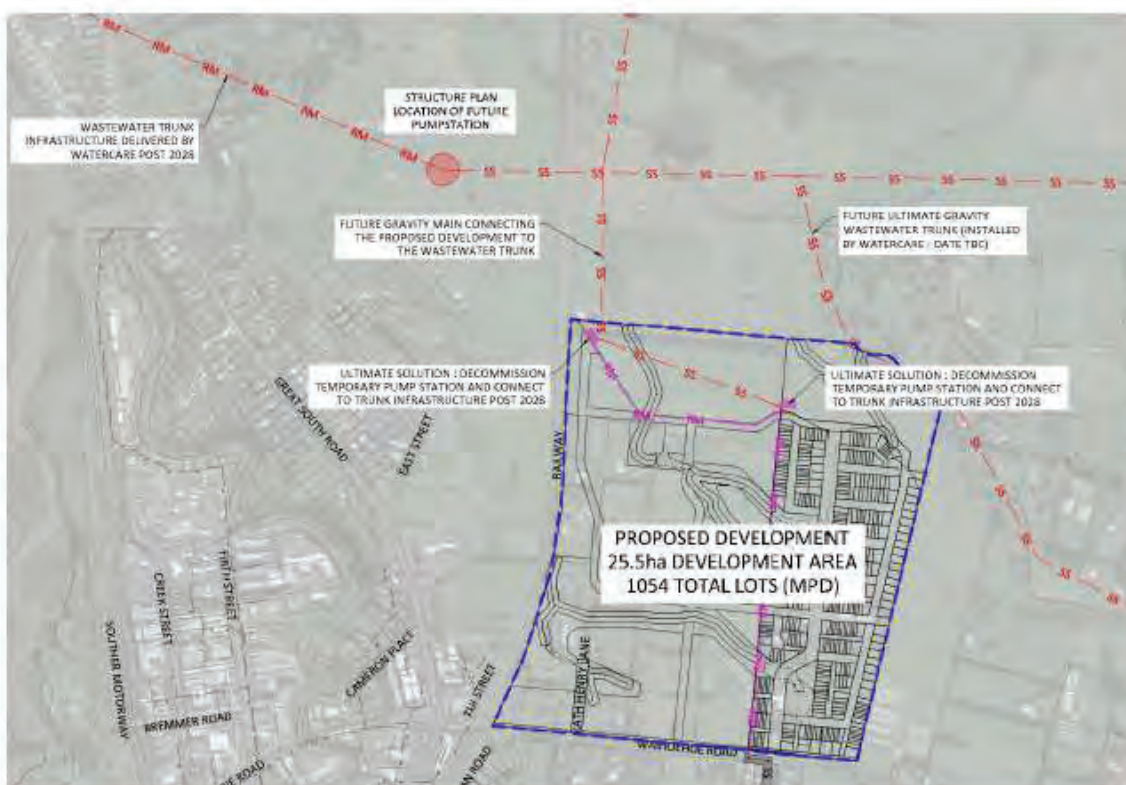


Figure 5 - Permanent Wastewater Servicing Solution

- (dd) The contours on the plan taken from Auckland Council Maps below suggest it is worth considering.



- (ee) The OC Proposed Plan is therefore not correct when it states it will make efficient use of land.
- (ff) The OC Proposed Plan also states the funding of infrastructure is critical to achieving the comprehensive and co-ordinated approach to development however it advises there is no Development Agreement or other funding proposal in place.
- (gg) OC in its proposed plans will be in part reliant on others acceptance for items such as, earthworks along boundaries, land for road widening, stormwater discharges, improvements to external infrastructure.
- (hh) OC in its infrastructure provision report further advises there are sufficient existing mechanisms to ensure that appropriate funding arrangements are in place for development and that a decision on the plan change should not be dependent on a funding agreement being in place. This view is not supported as once the zoning is approved then where in the proposed plan change the policies to ensure desired outcome is achieved.
- (ii) The applicant has advised there is an urgent need for development of this type to be enabled to meet the needs of the Auckland Region.

17.10

- (jj) This is not a full picture of the development opportunities in the Southern part of the Auckland Region. The Auckland Region is seeking affordable housing and wanting to redevelop existing urban land to higher densities as a higher priority than developing greenfield land.
- (kk) The Auckland Regional Growth Strategy (“ARGS”) in place since November 1999 and progressively being implemented since 2000. There are the developments in Hingaia, Takanini and Papakura where zoning is in place, infrastructure in place and augmentation planned for and underway in stages. These areas are requiring further support and investment.
- (ll) The Auckland Unitary Plan has taken the ARGS and expanded the proposed urbanised area with the use of future urban zones to indicate the future direction of Auckland’s growth. The FUZ sets out the timing of the land being released and the provision of funding to enable the zones to be developed
- (mm) This proposal by OC is diverting and adding pressure on those resources and adding further demands in a location out of sequence and in a more remote area when a denser urban Auckland is desired closer to the centre.

7. The submitter believes that the proposed Plan will not achieve or meet the above stated objectives for the following reasons

- (a) There has been inadequate consultation on the proposed land use and provision of infrastructure.
- (b) OC as the Private Plan Change applicant only has control of 38% of the land
- (c) The Proposed Plan does not clearly describe the objectives and policies that are to apply.
- (d) The location of the land is at the upper end of the stormwater sub-catchment. Their proposal is to contain concentrated post development flows within their land.
- (e) Their concentrated flows will impact on downstream properties and OC has no intention of providing for any downstream upgrading works such as upgrading the existing 900mm culvert under the NIMT which would alleviate flooding caused by the railway embankment.

- (f) The location of OC's land is distant from transport corridors of SH1, Great South Road and the railway. Other than paying a contribution OC is taking no responsibility for upgrading any external infrastructure.
- (g) That contribution will only be a minor proportion of the full cost. The larger cost will fall on others and the community will be required to tolerate a reduced level of service until those funds become available.
- (h) There is no means or mechanisms proposed within the Plan to ensure and guarantee comprehensive and co-ordinated development will occur. For example; how is the provision of and access available to all infrastructure by all landowners to be provided and for the cost of this necessary infrastructure to be equitably and fairly distributed across multiple landowners when there is no means provided for in the plan to bring multiple landowners together to share the provision of land and construction?
- (i) With consideration to all the matters discussed above the plan as proposed is incomplete and premature.
- (j) In the absence of any such provisions within the Proposed Plan provisions they will not:
 - (i) Promote the sustainable management of resources;
 - (ii) Otherwise be consistent with Part 2 of the Resource Management Act 1991 ("**RMA**"); or
 - (iii) Be appropriate in terms of section 32 of the RMA

8. KLEINSMAN seeks the following relief from Auckland Council:

- (a) That the Plan be WITHDRAWN in its entirety, or
- (b) Any such other relief or other consequential amendments as are considered appropriate or necessary to address the concerns set out in this submission.

9. KLEINSMAN would welcome an opportunity to be heard in support of this submission.

17.1

10. If others make a similar submission, KLEINSMAN will consider presenting a joint case with them.

Dated this 22nd day of October 2020

Mrs Josephine Kleinsman



By Nigel Hosken on behalf of Josephine Kleinsman

ADDRESS FOR SERVICE: The offices of Hosken & Associates Ltd, 99 Gloria Avenue, Te Atatu Peninsula, Auckland 0610, Tel 09 834 2571, Mob 0274 770 773,

E-mail nigel@hosken.co.nz

Appendix 1.

PC 50 WAIHOEHOE PRECINCT LAND AREA

		Property Address	Land Area	
			Ha	%
Oyster Capital				
1		116 Waihoehoe Road	15.1565	
2		136 Waihoehoe Road	1.7945	
3		140 Waihoehoe Road	1.5220	
Sub Total			18.4730	38%
Western Sites				
4		112 Waihoehoe Road	4.0231	
5		76 Waihoehoe Road	4.1991	
6		76A Waihoehoe Road	11.9877	
7		44 Waihoehoe Road	1.0000	
8		28 Waihoehoe Road	0.8468	
9		18 Waihoehoe Road	0.3760	
10		15 Kath Henry Lane	1.0000	
11		18 Kath Henry Lane	1.0000	
12		27 Kath Henry Lane	1.0000	
13		34 Kath Henry Lane	1.0000	
14		45 Kath Henry Lane	1.0000	
15		44 Kath Henry Lane	1.0000	
16		49 Kath Henry Lane	1.0000	
17		50 Kath Henry Lane	1.0000	
Sub Total			30.4327	62%
TOTALS			48.9057	1.0000

Appendix 2

6

Draft Drury-Opāheke Structure Plan 2019



Figure 1: The Drury-Opāheke Structure Plan 2019 land use map (2019)

SUBMISSION ON PLAN CHANGE 50 (PRIVATE): WAIHOEHOE PRECINCT

To: Auckland Council

Name of Submitter: Lomai Properties Limited (**Lomai** or the **Submitter**)

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 50: Waihoehoe Precinct (**PPC50** or the **Plan Change Request**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. Lomai could not gain an advantage in trade competition through this submission.
3. This submission relates to the entire Plan Change Request; however, the Submitter is particularly interested in:
 - (a) the proposed alternative staging for Drury that PPC50 relies on; and
 - (b) the potential traffic effects arising from PPC50.
4. Lomai opposes PPC50 for the reasons outlined in this submission.
5. Lomai could potentially support PPC50 if it did not have adverse implications for the timing and cost of giving effect to Stage 1 of the Drury-Opāheke Structure Plan and it can be demonstrated that any adverse traffic effects are appropriately avoided, remedied or mitigated.

BACKGROUND

Lomai Properties Ltd

6. Lomai owns a 56 ha block of land on Karaka Road in Drury West. The land is zoned Future Urban Zone in the AUP and is within the Drury-Opāheke Structure Plan (the **Structure Plan**) area.
7. Lomai's land is identified in the Auckland Future Urban Land Supply Strategy 2017 (**FULSS**) and in the Structure Plan as being 'development ready' from 2022 (the first half of Decade 1).
8. Lomai have lodged a private plan change request with Auckland Council seeking to rezone its land to a mixture of Residential – Terrace Housing and Apartment Building, Residential – Mixed Housing Urban, Business – Neighbourhood Centre and Open Space zones. The development has been named by Mana Whenua as Waipupuke, meaning "*where the streams meet*".
9. The Waipupuke development is generally in accordance with the Structure Plan. In particular, it is in accordance with the staging of development in the Structure Plan which identifies Waipupuke as a Decade 1 development. Lomai supports this staging.

Proposed Plan Change 50 (Waihoehoe Precinct)

10. PPC50 is one of three plan change requests that have been submitted simultaneously by three separate developers Oyster Capital Ltd (**Oyster Capital**), Fulton Hogan – Land Development Ltd and Kiwi Property No. 2 Ltd. Together, the three plan change requests seek to develop 328ha of land in Drury East to enable approximately 7,000 new dwellings, 58,000m² GFA of new office space and 119,000m² GFA of new retail space, among other facilities and services.
11. All three plan change requests are within the Structure Plan area, but are identified in the FULSS and the Structure Plan as being 'development ready' in the first half of decade two (2028-2032).
12. The current Plan Change Request, PPC50, has been lodged by Oyster Capital and seeks to rezone 48.9 hectares of land in Drury East from Future Urban to Terrace Housing and Apartment Building zone. PPC50 provides capacity for at least 1,133 dwellings.
13. The effect of PPC50 would be to create a high density residential area.

REASONS FOR SUBMISSION

14. Lomai does not, in principle, oppose development of Drury East at some point. The future development of this land as a centre has been signalled in the Structure Plan.

Alternative Staging

15. A key feature of PPC50 is to vary the staging in the Structure Plan to bring forward development of land in Drury East, and to defer development of land west of Jesmond Road, to the south, west and east of Pukekohe, and within flood plains in the Slippery Creek catchment. This is a significant concern of Lomai, who are currently in the process of seeking to rezone land west of Jesmond Road and who do not believe their legitimate right to develop as part of Stage 1 should be forsaken so that Oyster Capital can bring forward the development of their land into Stage 1. Should Oyster Capital wish to do so they simply need to confirm that they will provide the transport and other infrastructure requirements to service their development and not justify their approach based on deferral of Stage 1 development.
16. Lomai opposes the proposed early release of land in Drury East, and the deferral of development to the west of Jesmond Road to Decade 2.
17. Lomai disagrees with the analysis included in the Plan Change Request that supports this alternative staging. Specifically:
 - (a) The premise that Drury East is more connected to existing urban areas than Drury West (and therefore more suitable for immediate development) is unfounded. Drury Village is very small. PPC50 will not extend the village but rather it is likely to adversely affect it. In contrast, Drury West is strategically located on State Highway 22 (which is to be upgraded) and is also connected to Karaka and the existing Metropolitan area of Pukekohe.
 - (b) The Metropolitan Centre could be damaging to the Drury, Papakura and Takanini commercial centres by detracting customers away from them. The Structure Plan carefully managed this risk by staging residential

development before commercial centres, so as to increase the population first.

- (c) Development of Drury West would not create an “urban island” as is suggested by the Plan Change Request. Development of Drury West is already underway and the area is well connected to existing development through State Highway 22 and to the north of the Waipupuke site. The Structure Plan also anticipates a range of land uses in Drury West, many of which are already underway. These land uses create opportunities for employment, recreation, shopping and education, reducing the degree to which residents in Drury West would need to travel for these services.
- (d) For example, housing in Waipupuke is within walking distance from both a primary and a secondary school that have been confirmed by the Ministry of Education. The Waipupuke development itself is expected to contain several pre-schools.
- (e) Contrary to assertions made in the Plan Change Request, Drury West is not fragmented, or is no more fragmented than Drury East. There are several large blocks of land in Drury West that are held in single ownership – including the 56ha Waipupuke site that is owned in full by the Submitter. Drury West is perfectly positioned to deliver housing and employment on a large scale, evidenced by the fact that the Submitter has lodged a private plan change request to live zone the Waipupuke site.
- (f) We also note that the land east of Jesmond Road is not all owned or controlled by MADE and is in fact highly fragmented itself. It is therefore no better placed for immediate development than Drury West is (and in the Submitter’s view, is worse placed).
- (g) The Structure Plan was prepared under provisions of the Local Government Act 2002 and in accordance with structure plan guidelines in the AUP. It has been through an extensive consultation process with all major landowners in the area, and was subject to technical analysis. The Council had the opportunity to change the staging of development contained in the FULSS through this extensive process, and chose not to.
- (h) Importantly, the owners of land in Drury East had the opportunity to, and did, contribute to this process. Their ‘alternative staging’ has already been considered by the Council alongside other input. After weighing all relevant considerations, the Council determined that it was appropriate for Drury East to be developed in Decade 2, and Drury West to be developed in Decade 1.
- (i) The alternative staging proposed in PPC50 contradicts the community’s expectations of what and when development will occur in Drury. For the Council to adopt this alternative staging after the significant public consultation process has concluded would undermine the trust that the community (both local residents and developers) has in the Council’s plan making and consultation processes.
- (j) It would also undermine the extent to which developers can rely on, and make decisions based on, the Council’s planning documents generally. This could have significant implications for the effectiveness and efficiency of the Council’s planning documents.

- (k) The analysis in PPC50 fails to factor in the significant investment decisions that have already been made on the basis of the staging adopted in the Structure Plan. Its assessment of development of Drury East is undertaken in a vacuum which appears to assume that no development would occur if the Plan Change was not approved. From a section 32 perspective, this kind of analysis is insufficient.

18. Overall, the alternative staging proposed in PPC50 is not the most efficient and effective method for achieving the sustainable management purpose of the RMA and the Regional Policy Statement.

Traffic Effects

19. Putting the alternative staging proposal to one side, the Submitter is concerned that PPC50 would result in adverse traffic effects on the broader Drury roading network. The Submitter is concerned that Oyster Capital has not provided sufficient modelling to demonstrate that the proposed trigger rules would adequately avoid, mitigate or remedy adverse traffic effects to an appropriate level.
20. Lomai seeks greater clarification that the adverse traffic effects external to the PPC50 site will be appropriately avoided, remedied or mitigated.

DECISION SOUGHT

21. Lomai seeks the following decision from Auckland Council: Decline PPC50, unless the matters relating to alternative staging of development, provision of all required infrastructure and traffic are adequately resolved. | 18.1
22. Lomai wishes to be heard in support of its submission.
23. Lomai would consider presenting a joint case if others make similar submissions.

22 October 2020



Bill Loutit / Rachel Abraham
On behalf of Lomai Properties Limited

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**Submission on notified proposals for Private Plan Changes 48-50 – Drury under Clause 6
of Schedule 1
Resource Management Act 1991**

22 October 2020

Auckland Council
Plans and Places
Private Bag 92300
Auckland 1142
Attn: John Duguid

mail: unitaryplan@aucklandcouncil.govt.nz

**Name of submitters: The Ministry of Housing and Urban Development (HUD), Te Puni
Kōkiri and the Department of Corrections**

This is a submission on Private Plan Changes 48-50 (**Plan Changes**) to the Auckland Unitary Plan (operative in Part).

The submitters could not gain an advantage in trade competition through this submission.

HUD leads New Zealand's housing and urban development work programme. We are responsible for strategy, policy, funding, monitoring and regulation of New Zealand's housing and urban development system. We are working to:

- address homelessness
- increase public and private housing supply
- modernise rental laws and rental standards
- increase access to affordable housing, for people to rent and buy
- support quality urban development and thriving communities.

We work closely with other central and local government agencies, the housing sector, communities, and iwi. Our purpose is thriving communities where everyone has a place to call home – he kāinga ora, he hapori ora.

Wider Context

Auckland Housing and Urban Growth Programme

HUD's particular interest in the Plan Changes stem from its role in co-leading the New Zealand Urban Growth Partnership Programme, and specifically the joint Council-Crown Auckland Housing and Urban Growth Programme that has identified Drury as one of four priority development areas in the region.

Drury is currently the largest urban development area in New Zealand, and its strategic location within the Hamilton-Auckland Corridor makes its successful development a matter of national

importance. HUD wishes to ensure that all plan changes in Drury-Opāheke appropriately reflect the area's national and regional significance and its status as a joint priority development area for both the Government and Council.

The National Policy Statement on Urban Development

The National Policy Statement on Urban Development (NPS-UD) came into effect on 20 August 2020. The NPS-UD includes objectives and policies to ensure that New Zealand has well-functioning urban environments.

To implement the NPS-UD, local authorities must comply with specific policies within specified timeframes including changes to regional policy statements and district plans. Policy three and Subpart six of the NPS-UD directs Tier One local authorities to enable intensification. HUD has a co-lead role with the Ministry for the Environment in overseeing its successful national implementation and wishes to ensure that all plan changes in Drury-Opāheke (and elsewhere) appropriately implement the NPS-UD.

Transit-orientated development

The Auckland Plan, Auckland Unitary Plan, Government Policy Statement on Land Transport and NPS-UD all place public transport, and in particular rapid transit networks, at the very core of urban form and structure. This transit-orientated approach to urban development is also reflected in the *Hamilton-Auckland Corridor Statement of Shared Spatial Intent* (which extends from Papakura and Drury in the north to Hamilton and Cambridge in the south) in which the relevant councils, iwi, and the Government commit to a 'radical re-orientation of urban development to public transport.'

In practical terms this means concentrating intensive employment, housing, civic and high trip-generating amenities around rapid transit interchanges and supplying important levels of connectivity to the stations and surrounding areas for active modes and supporting public transport services. As part of a new national task group set up to realise Transit-Orientated Development, HUD wishes to ensure that plan changes in Drury-Opāheke support the national and regional policy aims for transit-orientated development.

Drury-Opāheke Structure Plan

HUD and other government agencies supported the Drury-Opāheke Structure Plan (the Structure Plan) which Auckland Council adopted in August in 2019. The Structure Plan sets out a bold vision and spatial framework for a well-integrated community that, amongst many other attributes, will reduce dependency on private motor vehicles by placing active modes and public transport at the heart of the land use planning and structure planning. HUD wishes to ensure that all plan changes in Drury-Opāheke give effect to the Structure Plan's vision, policy, and spatial framework.

NZ Upgrade Programme

The Government's NZ Upgrade Programme has allocated significant funding towards the extension and enhancement of bulk transport networks in and around the Drury-Opāheke area. Given the above context the most essential element of the programme (from an urban development perspective) is the extension of Auckland rapid transit network from Papakura to Pukekohe, including new stations at Drury Central and Drury West.

The early construction of these stations will allow the Drury-Opāheke area to develop in a highly transit-orientated manner from the start. This is a significant departure from the traditional greenfield development patterns in New Zealand where high-capacity and high-frequency public transport is absent. HUD wishes to ensure that any plan changes in Drury-Opāheke are highly supportive of this innovative early provision of high-quality public transport and contribute to realizing the benefit of this significant investment.

Auckland Future Urban Land Supply Strategy

The *Auckland Future Urban Land Supply Strategy (FULSS)* is a companion policy to the Auckland Plan and Auckland Unitary Plan. It sets out Council's preferred sequence and timing of development linked to the provision of the leading and enabling transport, network and social infrastructure and services. Whilst HUD supports the need for integrated planning, we are more focused on the principle, which is that successful development requires supporting public sector investment at the right time, scale, and quality.

The NZ (New Zealand) Upgrade Programme has allocated significant funding to the Drury-Opāheke area to enable development at an increased pace and scale to what was anticipated in the FULSS (Future Land Supply Strategy). HUD wishes to ensure that developers in and around the area can take advantage of this significant and ground-breaking investment through appropriate rezoning and development.

Scope of Submission

The submission relates to the Plan Changes in their entirety.

The Submission is in parts A-C below:

PART A: Joint Comments on the entire Plan Changes

HUD, Te Puni Kōkiri and the Department of Corrections generally support these plan changes. We would like to emphasise the importance of:

1. Ensuring social outcomes are provided for, particularly by providing for a range of housing typologies including supported housing
2. Ensuring sufficient infrastructure is funded and provided for the planned development, and that the development is consistent with the NZ Upgrade Programme and local infrastructure provision
3. Protection and sustainability of the ecology, protection of Māori sites of significance, social/local procurement, and circular economy-type propositions
4. Ensuring outcomes such as density, transport and timing are delivered rather than just enabled.

PART B: Comments from HUD

HUD generally supports the zoning changes proposed by these Plan Changes, which seek to rezone land within the spatial extent of the proposed Drury East Precinct from Future Urban Zone ('FUZ') to a combination of Residential - Terrace Housing and Apartment Buildings zone ('THAB'), Residential – Mixed Housing Urban zone ('MHU') and Residential Mixed Housing Suburban zone ('MHS'), along with a small Business – Mixed Use zone ('MU') area.

HUD supports the proposed zonings within the spatial extent of the proposed Drury East Precinct, which are generally aligned with the zoning indicated on the Drury-Opāheke Structure

Plan 2019. The proposed zoning and corresponding Precinct Provisions will promote and enable a compact urban form that is supported by the Precinct's transportation connectivity in the form of State Highway One and the planned and funded Drury East Rail Station, consistent with Chapter B2 of the Auckland Regional Policy Statement.

Although HUD generally supports the plan changes ahead of FULSS and in line with the Drury-Opāheke Structure Plan, we see a further need for master-planning of the developments.

HUD requests that further open space is zoned

Due to the intensity of the collective zonings proposed across PC48, 49 and 50, it is appropriate that a form of public open space is incorporated into the PC49 area to support the Urban and Suburban environments sought to be established. Open space has been noted in the Section 32 report, but not provisioned through a Recreation zone as required to give effect to the Drury-Opāheke Structure Plan 2019.

HUD seeks the establishment of a Business – Neighbourhood Centre ('NC') Zone rather than the Business – Mixed Use ("MU") Zone as notified within PC49

The MU zoning is not well-suited to achieving the outcomes specified in the precinct description to provide a centre for local day-to-day needs in a central location.

1. MU zoning supports a range of commercial and residential land use activities without prescribing any particular mix or location of residential and commercial activities to ensure that the planned 'centre' and supporting commercial activities are achieved.
2. As the MU zone enables 'dwellings' as a permitted activity, there is the potential for future development to focus on residential development and not sufficiently-cater to 'day-to-day' needs.
3. The precinct provisions do not hold standards or criteria (in addition to those within H13 Business – Mixed Use Zone of the AUP(OP)) to ensure the planned outcome of supporting the 'day-to-day' needs of residents.
4. The height and scale of built development otherwise enabled within the MU zone is at odds with the surrounding MHS zoning, despite the controls within the MU zone relating to development next to lower-intensity zones.

It would be more appropriate for this area to be NC zoned, which is better aligned with the stated purpose of providing a Business zoning within the PC49 spatial extent; in particular:

1. New development within the zone requires assessment to ensure that it is designed to a high standard which enhances the quality of streets within the area and public open spaces.
2. NC zoning applies to single corner stores or small shopping strips found in residential neighborhoods, to provide residents and passers-by with frequent retail and commercial service needs, while discouraging dwellings at the ground floor.
3. NC zoning will support the provision and location of the planned Collector road, which would be necessary to provide transportation connections (including public transport and walking/ cycling) to the convenience-type activities sought to be established in this location.
4. NC zoning also seeks to discourage large scale commercial activities, which is important within the wider context of the Metropolitan Centre sought to be established through PC48.

We recommend the plan changes are revised to fully implement the NPS-UD

The Plan Changes should be revised to be consistent with the requirements of the NPS-UD. There are several elements of the plan changes that will not be consistent with the requirements of the NPS-UD. For example, the intensification policies and removal of minimum car parking rates must be implemented within two years and 18 months respectively of the NPS-UD commencement date of 20 August 2020. The requirements of the NPS-UD should be implemented prior to the urbanisation of the area.

19.1

Policy three of the NPS-UD is relevant to the intensity of the land use proposed within the Plan Changes. This policy requires building heights of at least six storeys to be enabled within a walkable catchment of existing and planned rapid transit stops and the edge of metropolitan centre zones (amongst other requirements). In relation to the planned establishment of the Drury East Rail Station, it would be appropriate to investigate the height limits of the proposed THAB zone to ensure that a building height of six storeys is enabled.

Decisions Sought

HUD generally supports the Plan Changes, but seeks the following amendments:

1. The Business – Mixed Use Zone as notified within PC49 is changed to a Business – Neighbourhood Centre ('NC') Zone
2. Further open space is enabled through zoning
3. Amendments are made across the provisions of the Plan Changes to implement the requirements of the NPS-UD to ensure a well-functioning urban environment
4. Any other alternative or consequential relief to give effect to this submission.

19.2

19.1

PART C: Comments from Te Ara Poutama, Department of Corrections

Te Ara Poutama generally supports the zoning changes provided by the Plan Changes, however notes that in providing for urban growth, Council should ensure that a range of housing is provided to in order to achieve social well-being outcomes. In particular, Te Ara Poutama requests that particular consideration be given to whether the Council provides for housing where supervisory or rehabilitative support is present (where not of a healthy or disability nature) or whether the District Plan, through its definitions and Council interpretation, does not support residential accommodation of that nature.

Hearings

HUD wishes to be heard in support of its submission. If others make a similar submission, HUD will consider presenting a joint case with them at a hearing.

Te Ara Poutama wishes to be heard in support of its submission. If others make a similar submission, Te Ara Poutama will consider presenting a joint case with them at a hearing.

Signature of person authorized to sign on behalf of submitters:



Brad Ward

Deputy Chief Executive
Place-based Policy & Programmes
Ministry of Housing and Urban Development

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SUBMISSION ON PLAN CHANGE 50 (PRIVATE): WAIHOEHOE PRECINCT

To: Auckland Council

Name of Submitter: Ngāti Te Ata Waiohua (the **Submitter**)

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 50: Waihoehoe Precinct (**PPC50**) by Oyster Capital Ltd (**applicant**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. PPC50 seeks to rezone 48.9 hectares of land in Drury East from Future Urban to Terrace Housing and Apartment Building zone. PPC50 provides capacity for at least 1,133 dwellings.
3. PPC50 is one of three private plan change requests that have been prepared and lodged by three separate developers, but which are interrelated. The net result of the three plan change requests is a proposed large development constituting approximately 7,000 new dwellings, 19,000 new residents and 58,000m² GFA of new office space, among other outcomes. The Submitter has lodged separate submissions of each of the three plan change requests.
4. The Submitter could not gain an advantage in trade competition through this submission.
5. This submission relates to the entire PPC50.
6. The Submitter's key interests are to ensure the protection, preservation and appropriate management of natural and cultural resources in a manner that recognises and provides for Mana Whenua interests and values and enables positive environmental, social and economic outcomes.
7. As the proposal currently stands, the Submitter **opposes** PPC50 on the basis that:
 - (a) The applicant's engagement with Mana Whenua has been too little and too late and not met our expectations of a meaningful partnership; and
 - (b) As a result, Mana Whenua have not had the opportunity to provide input into the design and detail of the proposal to ensure that their values are reflected in PPC50, and that adverse environmental, social and cultural effects are avoided, remedied or mitigated.
8. Ngāti Te Ata Waiohua prepared a Cultural Values Assessments for the applicant which set out in detail the cultural connections Ngāti Te Ata Waiohua has with the PPC50 land and the surrounding Drury-Opāheke area. We do not repeat this detail provided in the CVA.

SUBMISSION

9. The Submitter considers that PPC50 is inconsistent with Part 2 of the RMA, including:

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- (a) The purpose of the RMA to promote the sustainable management of natural and physical resources, including by safeguarding the life-supporting capacity of air, water, soil and ecosystems;
 - (b) Section 6(a) the preservation of the natural character of the coastal environment, wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development;
 - (c) Section 6(e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other Taonga;
 - (d) Section 6(f) the protection of historic heritage from inappropriate subdivision, use and development;
 - (e) Section 6(g) the protection of protected customary rights;
 - (f) Section 7(a) which requires all persons exercising functions and powers under the RMA to have particular regard to kaitiakitanga; and
 - (g) Section 8 which requires all persons exercising functions and powers under the RMA to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
10. It is vital for the people of Ngāti Te Ata Waiohū that the mana of the land subject to PPC50 is upheld, acknowledged and respected and that their people have rangatiratanga (opportunity to participate and be involved in decision making) over their ancestral land and Taonga. In addition, the people of Ngāti Te Ata Waiohū (alongside other iwi holding Mana Whenua) have responsibility as kaitiaki to fulfil their obligation and responsibilities to the environment in accordance with customs passed down, and to be accountable to the people (current and future generations) in these roles as custodians.
11. The Submitter is concerned that PPC50 will result in adverse environmental and cultural effects, as it is currently proposed by the applicant. Specifically:
- (a) Wai (Water): PPC50 does not give effect to Te Mana o te Wai and risks damaging the mauri of wai within the project area. This includes through PPC50's proposed treatment of waterways and its proposed stormwater and wastewater solutions. 20.6
20.7
20.8
20.9
 - (b) Sustainable Management: The Submitter considers that PPC50 should in some, if not most ways, be self reliant and self sustainable. Sustainable management has not been adequately given effect to in PPC50. 20.12
 - (c) Native Trees and Plants: The Submitter supports whakapapa sourced trees and plants within the PPC50 site. 20.10
 - (d) Te Aranga Design Principles: These principles have been developed by Auckland Council and Tamaki Makaurau iwi over a number of projects. The principles include mana (treaty based relationships), whakapapa (naming), tohu (acknowledgement of wider cultural landscape), taiao (bringing natural landscape elements into urban environments), mauri tu (environmental health of the site including wai and whenua), mahi toi (inscribing Māori narratives into architecture and design), and ahi ka (living presences for iwi and hapu to undertake their kaitiaki roles). Te Aranga Design Principles have not been incorporated into PPC50. 20.3

- (e) Landscapes: The Submitter seeks that PPC50 identifies and preserves landscapes, including view shafts, hilltops, tuff rings and ridge lines. | 20.5

RELIEF

12. The Submitter requests a decision on PPC50 that confirms, at a minimum, the following:
- (a) Ongoing participation, consultation and engagement in the project; | 20.1
 - (b) Acknowledgement within the project design of the history of Mana Whenua in the PPC50 area; | 20.2
 - (c) Te Aranga Principles incorporated in design concepts; | 20.3
 - (d) Iwi monitoring; | 20.4
 - (e) Natural and cultural landscaping accounted for in the project design; | 20.5
 - (f) A minimum of 20 metre riparian margin for all waterways especially those to contain walkways / cycleways; | 20.6
 - (g) A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway; | 20.7
 - (h) Roof capture for reuse and groundwater recharge; | 20.8
 - (i) Park edge design adjacent to all waterways; | 20.9
 - (j) Native trees and plants only within the precinct; | 20.10
 - (k) Ridgelines hilltops and wetlands protected; and | 20.11
 - (l) Sustainable development reflected in the design and outcomes. | 20.12
13. The Submitter seeks the following decision from Auckland Council:
- (a) **Reject** PPC50 unless the issues addressed in this submission can be adequately addressed.
14. The Submitter wishes to be heard in support of its submission.
15. The Submitter would consider presenting a joint case if others make similar submissions.

22 October 2020



Bill Loutit / Rachel Abraham
On behalf of Ngāti Te Ata Waiohū

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IN THE MATTER of the Resource
Management Act 1991
(**RMA**)

A N D

IN THE MATTER of a submission under clause
6 of the First Schedule to the
RMA on Plan Change 50 –
Waihoehoe Precinct

**SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 50 –
WAIHOEHOE PRECINCT (PC 50)**

To: Auckland Council
Name of Submitter: **Auckland Council**
Address: 35 Albert Street
Private Bag 92300
Auckland 1142

Introduction

1. This is a submission on the following proposed private plan change by Oyster Capital Ltd ("**OCL**"):

Plan Change 50 – Waihoehoe Precinct ("**PC 50**")
2. Auckland Council could not gain an advantage in trade competition through this submission.
3. This submission relates to PC 50 in its entirety and all provisions of PC 50 including:
 - a. the IX Waihoehoe Precinct
 - b. the Auckland Unitary Plan Maps.
4. PC 50 has been notified contemporaneously with three other proposed private plan changes, Plan Change 48 (Drury Centre Precinct) by Kiwi Property No.2 Ltd, Plan Change 49 (Drury East Precinct) by Fulton Hogan Development Ltd and Plan Change 51 (Drury 2 Precinct) by Karaka and Drury Ltd (together with PC 50 "**the Drury Plan Changes**"). Auckland Council has also made submissions on these plan changes.

General reasons for the submission

5. Future urban areas, such as the PC 50 land, play an important role in Auckland's future growth. Auckland Council supports the future urbanisation of the land subject to the Drury Plan Changes, acknowledges the commitment made by the Government to the Drury area through the New Zealand Upgrade Programme, and is working with the Drury Plan Change applicants,

others landowners and the Government to jointly tackle the significant infrastructure funding shortfall (both capital and operating cost) that remains.

6. However, Auckland Council has significant concerns with PC 50 in its present form in its entirety as it:
 - a. does not promote sustainable management of resources, will not achieve the purpose of the RMA, and is therefore inconsistent with Part 2 of the RMA;
 - b. does not manage or enable the efficient and integrated use, development and protection of natural and physical resources;
 - c. does not avoid, remedy or mitigate adverse effects;
 - d. is inconsistent with, or fails to give effect to, provisions of relevant planning instruments;
 - e. does not meet the requirements of section 32 of the RMA; and
 - f. does not meet the requirement of section 75 of the RMA.

SPECIFIC REASONS FOR THE SUBMISSION

7. In particular, but without limiting the generality of the above, Auckland Council has significant concerns with PC 50 in its entirety for the reasons stated below.

PC 50 fails to integrate infrastructure planning / funding with land use

8. A key concern for the Auckland Council is that PC 50 does not provide for the strategic integration of infrastructure (transport, three waters, and community infrastructure), and the planning and funding of such infrastructure, with land use. The provision of such infrastructure works – which are of course physical resources in terms of the RMA – will not be achieved at a rate with which the council (representing the community) can physically and economically cope. This concern is exacerbated by the combined infrastructure requirements of the Drury Plan Changes.
9. The council acknowledges the funding for Drury transport infrastructure made available by the Government through the New Zealand Upgrade Programme. However, there remains a significant infrastructure funding shortfall. In short, PC 50 is reliant on major infrastructure projects to service development which are not financed or funded (both capital and operating costs). There is no certainty as to the timing of delivery of these projects. PC 49 would thus enable urban development which will not be serviced by adequate infrastructure and would fail to ensure a quality built and transit-orientated environment.
10. Matters concerning the funding and timing of infrastructure are directly relevant to decisions on zoning, and it is poor resource management practice and contrary to the purpose of the RMA to zone land for an activity when the infrastructure necessary to allow that activity to occur without adverse effects on the environment does not exist.¹ Discussions between the council, the applicant, other landowners in the Drury area and the Government on this fundamental issue are ongoing. However, at this stage a solution to the infrastructure funding and financing shortfall is not in place.

¹ See, for instance, **Foreworld Developments Ltd v Napier City Council**, W8/2005.

PC 50 is inconsistent with relevant planning instruments

11. Until an infrastructure funding and financing solution is found, PC 50 is inconsistent with, and fails to give effect to, relevant RMA and Council strategic planning instruments, including:
 - a. the National Policy Statement on Urban Development 2020 (**NPS-UD**);
 - b. Regional Policy Statement (**RPS**) provisions of the Auckland Unitary Plan (**AUP**);
 - c. the Auckland Plan 2050 (**Auckland Plan**);
 - d. the Long Term Plan 2018-2028 (**LTP**); and
 - e. the Regional Land Transport Plan 2018-2028 (**RLTP**).

NPS-UD

12. PC 50 is inconsistent with, and fails to give effect to, Objective 6 of the NPS-UD which requires local authority decisions on urban development that affect urban environments to be *“Integrated with infrastructure planning and funding decisions”*.

AUP RPS

13. PC 50 is inconsistent with, and fails to give effect to, relevant provisions of the AUP RPS. This includes the following provisions of Chapter B2 – Urban Growth and Form, which require the integration of infrastructure provision with urbanisation on a timely and efficient basis:
 - a. B2.2.1 Objective (1)(c): *“A quality compact urban form that enables ... (c) better use of existing infrastructure and efficient provision of new infrastructure”*;
 - b. B2.2.1 Objective (5): *“The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure”*;
 - c. B2.2.2. Policy 7(c), which requires rezoning of land within the Rural Urban Boundary to: *“integrate with the provision of infrastructure”*;
 - d. B2.4.2 Policy (6) in relation to urban intensification: *“Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification”*;
 - e. B2.9. Explanation and Principal Reasons for Adoption, states:

In addressing the effects of growth, a key factor is enabling sufficient development capacity in the urban area and sufficient land for new housing and businesses over the next 30 years. The objectives and policies guide the location of urban growth areas. They identify how greenfield land which is suitable for urbanisation will be managed until it is re-zoned for urban development. They encourage provision for Mana Whenua to develop and use their resources. They also set out the process to be followed to ensure that urban development is supported by infrastructure on a timely and efficient basis.

They should be considered in conjunction with the Council's other principal strategic plans such as the Auckland Plan, the Long-term plan and the Regional Land Transport Plan. The strategies and asset management plans of infrastructure providers will also be highly relevant.

[Emphasis added]

14. The provisions of RPS Chapter B3 – Infrastructure, Transport and Energy similarly require integration of the provision of transport infrastructure with urban growth:
 - a. B3.3.1. Objective (1)(b): *“Effective, efficient and safe transport that: ... (b) integrates with and supports a quality compact urban form”*;
 - b. B3.3.2. Policy (5), Integration of subdivision, use and development with transport: *“Improve the integration of land use and transport by: (a) ensuring transport infrastructure is planned, funded and staged to integrate with urban growth”*.
15. B1.2 of the AUP details the range of regulatory and non-regulatory methods to implement the objectives and policies in the RPS, including:
 - a. Auckland Plan;
 - b. The LTP; and
 - c. The RLTP.

Auckland Plan

16. PC 50 is inconsistent with relevant provisions of the Auckland Plan, such as Our Development Strategy - Auckland’s Infrastructure, Coordinating investment and planning to enable growth:²

Ensuring that infrastructure networks have sufficient capacity to service growth is critical. The sequencing of future urban and development areas influences the timing of investment in the strategic networks needed to service these areas. Further investment in local infrastructure will be needed as these areas grow. This will require alignment between the expansion of strategic water and transport networks, and investment in local infrastructure, particularly to service development areas and future urban areas.

17. The Auckland Plan 2050: Development Strategy details the sequencing and timing of future urban land for development readiness. This recognises that sound resource management practice requires advanced planning and sequencing to ensure co-ordination between infrastructure providers and land release. The Opāheke Drury area is sequenced for development in 2028 – 2032. PC 50 is therefore 8 years early and out of step with the Development Strategy sequencing. It is therefore critical that a comprehensive infrastructure funding and financing solution is found before the PC 50 land is rezoned.

LTP

18. PC 50 is inconsistent with Council’s LTP. The LTP budgets for Council expenditure, including infrastructure investment, for the next 10 years through to 2028. The infrastructure required to service the development proposed by PC 50 is not budgeted for in the LTP.

RLTP

19. The RLTP is a 10-year investment programme for transport in Auckland, developed by Auckland Transport (**AT**) together with Waka Kotahi New Zealand Transport Agency (**NZTA**) and KiwiRail to respond to growth and challenges facing Auckland over the next decade. The infrastructure required to service the development proposed by PC 50 is not included in the RLTP.

² Auckland Plan, Our Development Strategy - Auckland’s Infrastructure, Coordinating investment and planning to enable growth, at page 238.

Effects of failure to integrate infrastructure and land use

20. The effects of the failure of PC 50 (and the Drury Plan Changes) to integrate with infrastructure provision are a strategic and whole of Auckland issue. Out of sequence development would require infrastructure funding be removed / re-allocated from other parts of Auckland.
21. Auckland is highly constrained in its ability to finance and fund infrastructure across the region to support growth. With limited funding ability, scarce funding must be utilised in the most efficient way to enable region wide growth. Strategically, there is a need to open up land in a co-ordinated and joined up fashion when capacity is needed across Auckland, and where infrastructure delivery and funding is integrated.
22. PC 50, and the Drury Plan Changes, are out of sequence with the coordinated and integrated approach to infrastructure provisions to support urban growth set out in the Auckland Plan, LTP and RLTP. Out of sequence development will have major funding implications for infrastructure providers, will affect their ability to co-ordinate delivery and is likely to have major implications for the ability to service other areas. This in turn will undermine the ability to deliver infrastructure to support development capacity in other growth areas of Auckland.

Further specific reasons

23. Without derogating from the generality of the above and the submitter's opposition to PC 50, further specific reasons for this submission (and alternative relief) are set out in the **Schedule** to this submission.

RELIEF SOUGHT

24. Auckland Council seeks the following relief:
 - a. Auckland Council is engaged in discussions with OCL and the other Drury Plan Change developers in an effort to find a solution to its concerns. However, at this point in time, the fundamental issues raised in this submission remain unresolved. Accordingly, as matters stand, the primary relief sought by Auckland Council is to decline PC 50 in its entirety until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region; or
 - b. In the alternative to the primary relief of declining PC 50, amend PC 50 and retain provisions as set out in the **Schedule** to this submission; and
 - c. Such further, other, or consequential relief, including in relation to PC 50's objectives, policies, rules, methods, and maps, that reflects or responds to the reasons for this submission.

21.32

Conclusion

25. Auckland Council wishes to be heard in support of its submission.
26. If others make a similar submission Auckland Council would be prepared to consider presenting a joint case with them at any hearing.

DATED 22nd October 2020

On behalf of Auckland Council:

Councillor Chris Darby, Chairperson of the Planning Committee



Councillor Josephine Bartley, Deputy Chairperson of the Planning Committee



Councillor Desley Simpson, Chairperson of the Finance and Performance Committee



Tau Henare, Independent Māori Statutory Board member



Signatures of persons authorised to sign on behalf of submitter

SCHEDULE – FURTHER SPECIFIC REASONS FOR THE SUBMISSION AND ALTERNATIVE RELIEF

Infrastructure funding and timing

Row	Specific Reasons for the Submission	Relief Sought
1.	<p>PC 50 is reliant on major infrastructure projects to ensure the area can be developed. However, there is no clear indication of how the infrastructure would be financed and funded.</p> <p>There is a substantive amount of unfunded infrastructure required to service the anticipated development in the Drury Future Urban Zone Land. A lack of council funding for infrastructure means that it is unlikely that the infrastructure (except for Government NZUP funded projects) required to support the development will be available when required. In the short term there is not adequate infrastructure to support the development and in the medium term the necessary infrastructure to support the development is not funded through the LTP or RLTP. Council is reviewing the Long-Term Plan which includes the 10-year budget. It is too early to predict any change to infrastructure funding.</p> <p>Sections of the existing transport network are heavily congested and cannot convey more traffic until upgraded, without causing high travel time delay, costs and safety risks.</p> <p>Even where proposed infrastructure is funded, it will take years to permit, design and construct.</p> <p>The location of some key transport infrastructure is still to be determined and is subject to notice of requirement</p>	<p>Ensure that the council's concerns about infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <ol style="list-style-type: none"> a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded. b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects. c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include: <ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or

21.1

	<p>processes that are still to be initiated. This affects the ability to determine appropriate land uses and zoning.</p> <p>The proposed infrastructure threshold and staging rules are not adequate to address the issue.</p> <p>There is no co-ordinated plan to stage development and infrastructure.</p>	<p>developers and there is no agreement to apportion costs and benefits in place.</p> <ul style="list-style-type: none">• Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems).• Threshold rules are not used in circumstances where the extent and location of works have not been determined yet.• Use of prohibited activity status for infringement could be considered. <p>d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.</p>
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21.1

Stormwater, water quality, streams, flooding and biodiversity

Row	Specific Reasons for the Submission	Relief Sought
2.	The precinct is not fully consistent with the objectives and policies of the National Policy Statement for Freshwater Management 2020 (NPS-FM).	Include more policies and rules to give full effect to the direction in the NPS-FM, including but not limited to Te mana o te wai. 21.2
3.	<p>Stormwater Management Plans (SMP(s)) identify effects of stormwater and how effects should be managed both to achieve the RPS, NPS-FM and regional plan and to be in accordance with the region-wide Network Discharge Consent (NDC) granted by the Environment Court on 30 October 2019. Without an SMP approved by the Network Utility Operator there is uncertainty if the SMP adequately manages effects and if there are sufficient provisions to enact the direction that the SMP would provide.</p> <p>Policy and matters of discretion/assessment criteria are required to ensure that consenting of subdivision and land uses is consistent with the SMP in its final adopted form which may be included in the council's NDC.</p>	<p>Amend precinct to include additional policies and rules to manage the effects of stormwater as described in the SMP.</p> <p>This includes:</p> <ol style="list-style-type: none"> a. New policy: <u>Require subdivision and development to be assessed for consistency with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.</u> b. Additional matters of discretion/assessment criteria that would apply to any restricted discretionary activity in the area of the precinct to ensure that new development and subdivision can be assessed for consistency with the NDC and SMP. <p>Any other rules necessary to give specific effect to the SMP during development.</p>
4.	Stormwater management area flow 1 (SMAF 1) as proposed in PC 50, is a control which provides a framework for hydrology mitigation where there will be discharges into a stream environment. SMAF 1 has both a retention and detention volume and the combination of these is intended to reduce erosive flows in streams, maintain stream baseflow and support the recharge of aquifers. It is the default minimum required under the	Retain application of SMAF 1 to the plan change area. 21.4

	<p>region wide NDC and based on current knowledge is the most practicable option for Drury East.</p>		21.5
5.	<p>Flood modelling provided for the Drury Plan Changes suggests a reliance on culvert upgrades to manage flood flows, particularly in the Fitzgerald Rd area and under the North Island Main Trunk line. If culverts are not upgraded prior to development of impervious surfaces, then attenuation of flood volume will be needed.</p>	<p>Retain policy IX.3(6), however amend the policy to refer to the Waihoehoe Precinct (rather than Drury East).</p>	21.5
6.	<p>A new policy is required to ensure that flood attenuation is provided until such time that infrastructure is upgraded to provide sufficient flood conveyance capacity and there is no downstream effect.</p>	<p>Insert a new policy to the following effect: <u>Provide sufficient floodplain storage within the Waihoehoe precinct to avoid increasing flood risk upstream and downstream, and manage increased flood risk within the precinct unless downstream infrastructure capacity means this is not required. This is subject to the upgrade of the downstream culvert upgrade.</u></p> <p>Insert rules to give effect to this.</p>	21.6
7.	<p>A new policy relating to the treatment of impervious surfaces is requested to give effect to the SMP and protect the receiving environment of the Te-Manukanuka-O-Hoturoa (Manukau Harbour).</p>	<p>Insert a new policy to the following effect: <u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u></p>	21.7
8.	<p>Proposed standard IX6.6 (1) Stormwater Quality is supported in principle but cross references to the activity rules and standards in E9, including the parent AUP rule 9.6.1.4 which has additional, and in some cases, confusing exemptions. These undermine its effectiveness because many roads, private roads and carparks may not be required to have stormwater treatment. Consequently, it is not sufficient to protect the upper Te-Manukanuka-O-Hoturoa (Manukau Harbour) from contaminant</p>	<p>Retain and amend standard IX6.6 (1) Stormwater Quality but amend it to read as follows (including a correction to the precinct reference): The activity rules and standards in E9 apply to development in the Drury-Centre <u>Waihoehoe</u> precinct as if the reference to 'high use roads', was <u>were</u> a reference to 'all <u>existing, new, upgraded or redeveloped</u> roads, <u>accessways and carparks</u>' or other amendments that would achieve the same environmental outcome.</p>	21.8

	<p>accumulation from the combined contaminant discharges from all the new, existing or upgraded roads, access ways and parking areas. The requested amendment includes all these areas in the precinct rules to provide for treatment of these areas. Alternative methods of achieving the same outcome could be considered. This gives effect to the RPS B7.3 objectives and policies relating to freshwater systems, RPS B7.4 objectives and policies relating to coastal water and freshwater, the NPS-FM, and the New Zealand Coastal Policy Statement 2010.</p> <p>Additional matters of control or discretion are proposed to ensure that stormwater treatment assets are collectively constructed to be efficient and have low long term operating costs.</p>	<p>Insert new matters of control and discretion, in addition to those in E9, to the effect of:</p> <ul style="list-style-type: none"> • <u>How the location and design of stormwater treatment assets reduces their operating costs.</u> • <u>The consolidation and community scale of stormwater treatment assets.</u> • <u>The location of stormwater treatment assets where they will be most effective in reducing contaminants.</u> 	21.8		
9.	<p>The receiving environments downstream of the plan change sites are highly sensitive to additional contaminants and are Significant Ecological Areas (SEAs). The NPS-FM requires that the health of freshwater receiving environments is prioritised above other uses and needs. This and other existing AUP objectives and policies direct that freshwater quality is maintained where it is good and enhanced where degraded. The existing provisions do not go far enough to achieve this. The SMP notes a mix of methods will be used including treatment of roads and use of inert building materials. A new standard relating to the exterior materials on buildings is requested.</p>	<p>Include a new standard to the effect that:</p> <p><u>Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.</u></p>	21.9		
10.	<p>Extended 20m riparian building setbacks are appropriate on permanent streams for the following reasons:</p> <ul style="list-style-type: none"> o 20m riparian margins are recommended in the Drury-Opāheke Stormwater Management Plan 2019 o it is important to maintain and enhance freshwater quality, systems and processes 	<p>Replace standard IX.6.3(2) with a new standard and consequential amendments to effect that the riparian yards set for buildings in table H6.6.9.1 Yards read as follows:</p> <table border="1" data-bbox="1329 208 1406 1003"> <tr> <td data-bbox="1329 622 1406 1003">Riparian</td> <td data-bbox="1329 208 1406 622">4020m from the edge of all</td> </tr> </table>	Riparian	4020m from the edge of all	21.10
Riparian	4020m from the edge of all				

	<ul style="list-style-type: none"> o to allow stream meander paths and floodplains to evolve with less risk to property or intervention to protect property o it provides space for flood conveyance management and higher stream flows due to increased rainfall o it provides space for stormwater infrastructure and potential future instream works to stabilise banks so that instream erosion and sediment loss is managed o to protect the Manukau Harbour o to maintain mana whenua cultural values o many streams will not qualify for esplanade reserves, much of the original biodiversity of the area has been lost and this creates an opportunity for restoration and ecological linkages between the Manukau Harbour and natural areas within the Hunua Ranges o it provides space for mature trees in the future surrounding high to medium density urban environment. <p>10m setbacks are required from all intermittent streams.</p>	<p>permanent streams and 10m from the edge of all intermittent streams</p>	<p>21.10</p>
<p>Other yards in these tables are not amended.</p>			
<p>11.</p>	<p>There are no matters of discretion for assessing infringements of standard IX.6.3 referred to above.</p>	<p>Add the following matters of discretion to IX.8.1:</p> <ul style="list-style-type: none"> (a) Effects on water quality and stream habitat. (b) <u>Effects on floodplain management taking into account maximum probable development, climate change and the roughness coefficient of existing and planned planting.</u> (c) <u>Effects on stream bank stability taking into account the cohesiveness of the soil and steepness of the bank angle.</u> (d) <u>Effects on the ability to provide for any proposed paths, cycleways, infrastructure and facilities outside the 10m wide strip of riparian planting.</u> 	<p>21.11</p>

		Add related assessment criteria at IX.8.2.	21.11
12.	<p>The council has found that maintenance and enhancement of permanent and intermittent streams is more likely to be achieved on development if indicative permanent and intermittent streams are shown on precinct plans. The Drury 1 precinct is an example of this practice. This helps to implement the RPS B7.3 and 7.4 and other regional provisions of the AUP. These streams can easily be mapped from the information in the applicant's technical reports, or alternatively, the water assessment technical reports prepared for the Drury – Opāheke Structure Plan.</p>	<p>Include indicative permanent and intermittent streams and wetlands on the precinct plan.</p>	21.12
13.	<p>Including the blue-green linkages from urban concept planning can help reinforce the importance of connections.</p>	<p>Include the indicative blue-green corridor within the precinct plan based on the urban concept in the Urban Design Statement.</p>	21.13
14.	<p>It is important to focus on improving biodiversity as distinct from just planting.</p> <p>It is also important to provide for ecological corridors.</p> <p>A new policy and amendments to proposed policy IX.3(8) are proposed to address these matters.</p>	<p>Provide for improved biodiversity and ecological corridors (blue-green network) by amending IX.3(8), and adding a new policy as follows, together with any other amendments that may be required to give effect to these matters:</p> <p>Support<u>Ensure</u> improvements to water quality, and<u>and</u> habitat <u>and biodiversity</u>, including by providing planting on the riparian margins of permanent and intermittent streams.</p> <p><u>Enable a network of open space, riparian corridors and park edge roads that provides for:</u></p> <ul style="list-style-type: none"> • <u>potential ecological corridors along streams between Te-Manukanuka-O-Hoturoa (Manukau Harbour) and the Hunua;</u> • <u>improvement of freshwater and coastal water systems; and</u> • <u>a safe and attractive walking and cycling network.</u> 	21.14

15.	<p>Policy IX.3(9) is necessary to manage stormwater. Attenuation for flooding would likely still be required in this catchment until culverts are upgraded.</p>	<p>Retain policy IX.3(9) and consider whether additional rules are necessary to give effect to this.</p>	21.15
16.	<p>Proposed policy IX.3(10) recognises that urban development fundamentally alters stream health including significant changes to hydrology and interventions other than hydrology mitigation may be needed to manage effects and protect the functioning of the stream.</p>	<p>Retain policy IX.3(10).</p>	21.16
17.	<p>Policy IX.3(11) is unnecessary. It is better to rely on the existing AUP E3 framework and the Resource Management (National Environmental Standards for Freshwater) Regulations 2020. Policy E3.3(13) provides an adequate policy framework for where reclamation may be sought for development of infrastructure.</p>	<p>Delete policy IX.3(11).</p>	21.17
18.	<p>Riparian planting is important to maintain and enhance the life-supporting capacity of freshwater systems and restore biodiversity. Cross-referencing in standard IX.6.3 (1) to Appendix 15 of the AUP will assist in ensuring good outcomes.</p>	<p>Retain and amend IX.6.3 (1) by including a cross reference to the matters in Appendix 15.6(3)(b-f) and (4) of the Auckland Unitary Plan.</p>	21.18

Open Space

Row	Specific Reasons for the Submission	Relief Sought
19.	Auckland Council has criteria for purchase or other acquisition of land for public open space. These are set out in policy documents. It is important that these criteria are considered early during planning of public open space if public ownership of the land is intended. The council will not necessarily agree to purchase or receive proposed open space that does not meet these criteria.	Amend policy IX.3(4) to read: In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contribute to a sense of place for Drury East, by incorporating any distinctive site features and integrating with the stream network. <u>Also, if Auckland Council ownership is proposed, the open spaces must be consistent with the council's open space and parks acquisition and provision policies.</u>
20.	To provide a transparent starting point for discussion between the council and landowners/developers it is recommended that indicative public open spaces are shown on the precinct plan. The plan attached to this submission (Attachment 1) indicates approximate location, type and quantum of public open space for civic, neighbourhood and suburb scale parks consistent with Auckland Council open space policies and supportable for acquisition by the council (subject to political approval).	Include indicative open spaces in the precinct plan as shown in Attachment 1 to this submission.

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Rules_general

Row	Specific Reasons for the Submission	Relief Sought
21.	The activities referenced in IX.5 Notification rules (1) to (3) (mis-numbered I1.1 in PC 50), which require non-notification of certain activities, may have significant adverse effects and it is more appropriate to rely on the standard notification provisions in the Resource Management Act 1991 (RMA).	Amend the IX.5 Notification rules (1) to (3) which require non-notification to apply the normal tests for notification under the relevant sections of the RMA. Also correct the numbering to IX.5.
22.	The various categories of consent activity status and matters of discretion/assessment criteria should be reviewed to ensure that they are the most appropriate to give effect to objectives and policies and decision making on submissions.	Ensure that the consent categories in IX4.1 Activity table, matters of discretion in IX.8.1, and assessment criteria in IX.8.2, are the most appropriate to give effect to: matters raised in this submission, the objectives and policies of the precinct, the RPS and any national policy statement.

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Land use

Row	Specific Reasons for the Submission	Relief Sought
23.	<p>To correct an omission in the precinct plan. The Precinct Description at IX.1 refers to two sub-precincts (A and B). These are not depicted on the precinct plan.</p>	<p>Amend the precinct plan to include the sub-precincts referred to in the text of the precinct.</p> <p>This includes any additional changes necessary to respond to the council's other submission points.</p>
24.	<p>To correct an error in the zoning plan. The legend on the zoning plan for PC 50 suggests that some land within the plan change area is zoned Mixed Housing Urban (MHU). It is understood that all land within this precinct is to be zoned Terrace Housing and Apartment Building zone.</p>	<p>Amend the legend of the zoning plan to delete the reference to MHU zone.</p>
25.	<p>The National Policy Statement on Urban Development 2020 (NPS-UD), the RPS and the Drury – Opāheke Structure Plan August 2019 aim to achieve high densities within walkable catchments of rapid transit network (RTN) stations.</p> <p>Walkable distances are not defined in the RMA or RMA documents. However, this matter was investigated in preparation of Drury – Opāheke Structure Plan August 2019 in relation to RTN train stations. This is expressed as an 'extended walkable' distance in the requested provisions to enable further discussion of an appropriate distance as this is not an exact science.</p> <p>The local road network does not fully exist yet in these greenfield locations so actual walking distances along road footpaths cannot be measured yet. Instead it is appropriate to use a walkable radius from the proposed train station as a proxy for median actual walkable distances.</p>	<p>Add a policy and standards to provide for increased density near RTN stations including:</p> <ol style="list-style-type: none"> Adding a policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within and extended walkable radius of a rapid transit network station.</u> Building height standards enabling at least the Metropolitan Centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7-8 storey building height within and extended walkable radius of the RTN station. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone. Any alterations to other building standards to respond to increased building height.

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It is also appropriate to consider an additional shorter radius as being an area where a much higher (above median) level of walkability can potentially be achieved. This is expressed as a 'short walkable' radius in the requested provisions to enable further discussion of the appropriate distance. The council will be able to contribute information on specific distances at the hearing.

The actual position of the Drury east station has not been confirmed at the time of writing. But it is likely that a large part of the PC50 area will be within the station walkable catchment. Therefore, increased density should be enabled in this area.

The NPS-UD prioritises increased densities within a walkable distance of RTN stations with a focus on use of tall buildings to achieve this. At least six storeys are to be enabled but more is preferred by the NPS-UD Policy 3.

It is considered that there is not a large difference in potential adverse effects of height between 6, 7, or 8 storeys. Therefore, it is recommended that a building height control that provides for 7 to 8 storeys be applied within an extended walkable radius of the RTN station to enable greater density. This can be given effect to by applying the AUP 27m height variation control within an extended walkable radius of the station. Some adjustment beyond this distance may be appropriate to better align with property boundaries.

At still higher building heights, adverse effects can become more significant and a different range of standards are appropriate to address that. Overall, it is considered that with short walkable radius of an RTN station, where high walkability is possible, taller buildings should be provided

e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.

Also delete standard IX.6(3) in its entirety, and delete the last sentence of policy IX.3(9) as follows:

Limit the maximum impervious area within Sub-precinct B to manage the stormwater runoff generated by a development to ensure that adverse flooding effects are avoided or mitigated. ~~Provide opportunities to deliver a range of site sizes and densities in the Terrace Housing and Apartment Buildings zone.~~

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	<p>to enable higher density. This is subject to additional or amended standards that address the effects of towers. The building height standard of 72.5m (about 23 storeys) as used in the Metropolitan Centre Zone is considered an appropriate standard for land within short walkable radius of an RTN Station to give effect to the NPS-UD.</p> <p>The requested information standard would ensure that resource consent applications provide sufficient information to assess whether the development is consistent with the policy.</p> <p>Proposed standard IX.6(3) and policy IX.3(9) appear to be intended to enable low density development in the Terrace Housing and Apartment Buildings Zone. This is not appropriate, particularly within the walkable catchment of the RTN station.</p> <p>The requested amendments provide for policy and standards to enable increased density and walkability near the RTN stations.</p>	
26.	<p>The proposed building setback standard IX.6.4 is to protect the future corridor for widening of Waihoehoe Road. However, if a notice of requirement has been lodged for the road upgrade, the proposed rule is not necessary.</p>	<p>Review the need for IX.6.4 if a notice of requirement has been lodged for the upgrade of Waihoehoe Road.</p>

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Mana whenua

Row	Specific Reasons for the Submission	Relief Sought
27.	Mana whenua values and traditions should be reflected in the new development with their participation.	Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development taking into account the recommendations in the cultural values assessments. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.
28.	It is important to ensure that Māori can benefit from the potential opportunities for housing and social services provided by the proposed developments. This gives effect to Directions 1-4 and Focus Area 7 of the Māori Identity and Wellbeing Section of the Auckland Plan.	Enable and provide for accessible and affordable social housing for Māori.

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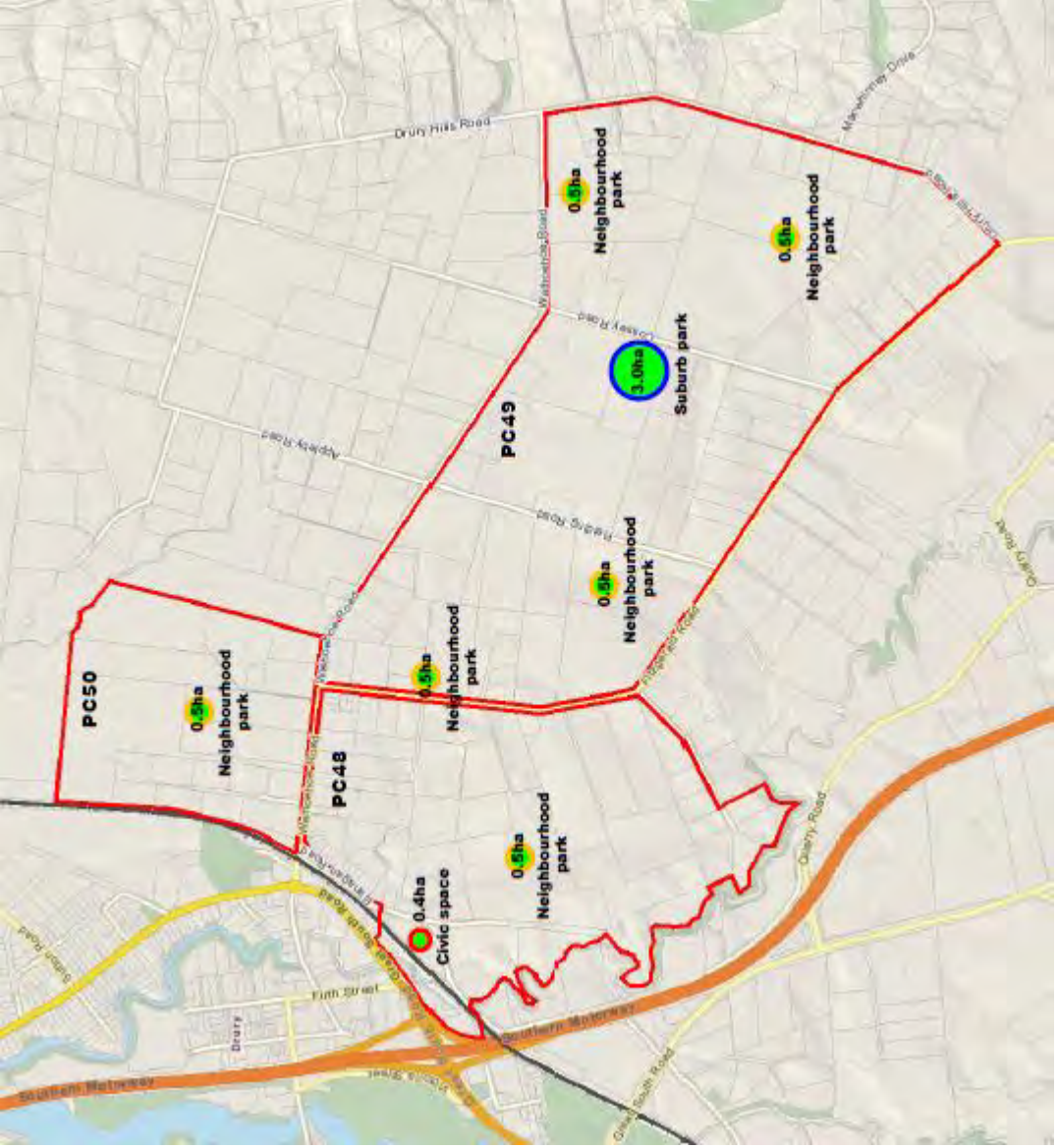
Natural heritage

Row	Specific Reasons for the Submission	Relief Sought
29.	Surveying for potential notable trees and scheduling of any trees that meet the criteria is standard practice for a plan change to urbanise land. This does not appear to have been done.	Provide a notable tree assessment and scheduling of any notable trees identified in that assessment.

21.31

Attachment 1

Map of 'indicative open space' to be included in the precinct plan and recorded as such in the legend.



22 October 2020

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142
Attn: Planning Technician

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Proposed Private Plan Change 50 – Waihoehoe Precinct

Please find attached Auckland Transport's submission on the Proposed Private Plan Change 50 from Oyster Capital.

If you have any queries in relation to this submission, please contact Josephine Tam, Principal Transport Planner, on 09 448 7271 or Josephine.Tam@at.govt.nz.

Yours sincerely



Josephine Tam

Principal Planner, Land Use Policy and Planning Central/South

cc:

Barker and Associates Ltd
PO Box 1986
Shortland Street
Auckland 1140

Attention: Rebecca Sanders
Via email: RebeccaS@barker.co.nz

Encl: Auckland Transport's submission on Proposed Private Plan Change 50 – Waihoehoe Precinct



**FORM 5 – SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 50
WAIHOEHOE PRECINCT UNDER CLAUSE 6 OF SCHEDULE 1, RESOURCE
MANAGEMENT ACT 1991**

To Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

From Auckland Transport
Private Bag 92250
Auckland 1142

Introduction

- 1.1 Oyster Capital (**the applicant**) has lodged private plan change 50 (**PPC 50** or **the plan change**) to the Auckland Unitary Plan: Operative in Part (**AUPOP**) to rezone 49 hectares of land in Drury from Future Urban zone to Residential – Terrace Housing and Apartment Buildings zone. PPC 50 also seeks to introduce a new Waihoehoe Precinct for the plan change area.
- 1.2 Auckland Transport is a Council Controlled Organisation of Auckland Council (**the Council**) and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'¹. In fulfilling this role, Auckland Transport is responsible for:
- a. The planning and funding of most public transport;
 - b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle);
 - c. Operating the roading network; and
 - d. Developing and enhancing the local road, public transport, walking and cycling networks.
- 1.3 Auckland Transport is part of Te Tupu Ngātahi Supporting Growth (**SG**) which is a collaboration between Auckland Transport and Waka Kotahi NZ Transport Agency (**Waka Kotahi**) to plan and route protect the preferred transport network in future growth areas such as Drury. In reviewing this plan change, Auckland Transport has had regard to the draft Integrated Transport Assessment dated April 2019, which complemented the Drury – Opāheke Structure Plan. The Drury – Opāheke Structure Plan was prepared by the Council and went through a robust process, including three phases of consultation, before being adopted by Auckland Council's Planning Committee in August 2019. The structure plan sets out a pattern of land uses and the

¹ Local Government (Auckland Council) Act 2009, section 39.



supporting infrastructure network for approximately 1921 hectares of Future Urban zoned land around Drury and Opāheke.

1.4 The Integrated Transport Assessment completed for the Drury – Opāheke Structure Plan identified a strategic transport network for the area and the transport projects it identifies that are relevant to this plan change include, but are not limited to, a new rail station at Drury Central with a park and ride facility, connector bus network, upgrade of Waihoehoe Road and Great South Road (State Highway 22), and a new Opāheke North-South Arterial. In particular, the Drury Central rail station is included in the New Zealand Upgrade Programme (**NZUP**) with funding planned and work expected to start in 2023.

1.5 Auckland Transport could not gain an advantage in trade competition through this submission.

2.0 Auckland Transport’s submission is:

2.1 The key overarching considerations and concerns for Auckland Transport are described as follows:

Auckland Plan 2050

2.2 The Auckland Plan 2050 (**Auckland Plan**) is a 30-year plan for the Auckland region outlining the long-term strategy for Auckland’s growth and development, including social, economic, environmental and cultural goals. The Auckland Plan is a statutory spatial plan required under section 79 of the Local Government (Auckland Council) Act 2009. The plan provides for between 60 and 70 per cent of total new dwellings to be built within the existing urban footprint. Consequently, between 30 and 40 per cent of new dwellings will be in new greenfield developments, satellite towns, and rural and coastal towns.

2.3 Transport outcomes identified in the Auckland Plan to enable this growth includes providing better connections, increasing travel choices and maximising safety. To achieve these outcomes, focus areas outlined in the Auckland Plan include targeting new transport investment to the most significant challenges, making walking, cycling and public transport preferred choices for many more Aucklanders and better integrating land use and transport. The high-level direction contained in the Auckland Plan informs the strategic transport priorities to support growth and manage the effects associated with this plan change.

Managing Auckland-wide growth and rezoning

2.4 The high-level spatial pattern of future regional development is represented in the Auckland Plan by the Future Urban zone in is enabled by the zoning provided for under the AUPOP and further defined through sub-regional level planning including



the Drury – Opāheke Structure Plan, to then be enabled through appropriate plan change processes. At the regional level, PPC 50 and the proposed Waihoehoe Precinct is one of the major greenfield areas contributing to the overall growth in transport demands in parallel with the on-going smaller scale incremental growth that is enabled through the AUPOP.

- 2.5 This wide scale growth across the region places greater pressure on the available and limited transport resources that are required to support the movement of additional people, goods and services. In this regard, the alignment of the AUPOP enabled growth and plan changes with the provision of transport infrastructure and services is contingent on having a high level of certainty around the funding and delivery of the required infrastructure and services. Without this certainty, Auckland Transport is concerned that there will continue to be a significant transport network deficiency in the provision and coordination of transport responses to the dispersed growth enabled across the region.

Sequencing of growth and alignment with the provision of transport infrastructure and services

- 2.6 Guidance on the sequencing and timing of future urban land identified in the Auckland Plan (i.e. “unzoned” greenfield areas of development) was discussed in the Future Urban Land Supply Strategy 2017 (**FULSS**), subsequently incorporated into the updated Auckland Plan in 2018. This document sets out the anticipated timeframes for “development ready” areas over a 30-year period. The FULSS helps to inform infrastructure asset planning and funding priorities, and in turn supporting development capacity to ideally be provided in a coordinated and cost-efficient way via the release of “development ready” land.
- 2.7 The urbanisation of future urban land enabled through plan changes (such as PPC 50) that precedes the wider staging and delivery of planned infrastructure and services requires careful consideration of the transport needs. This includes the requirement for applicants/developers to mitigate the transport effects associated with their developments and to provide transport infrastructure needed to service their developments. In addition, there is the need to provide for strategic transport infrastructure to service the whole growth area identified in FULSS or Supporting Growth network that needs to be brought forward because of their development. Any misalignment between the timing to provide infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is “development ready”.
- 2.8 Addressing the effects arising from development occurring ahead of the provision of the required transport network improvements and services is dependent on funding to support the planning, design, consenting and construction of the transport infrastructure, services and improvements. There is a need to assess and clearly define the responsibilities relating to the required infrastructure and the potential



range of funding and delivery mechanisms including the role of applicants/developers, and the financially constrained environment that Auckland Council and Auckland Transport are operating within. Discussions between the Council, the applicant, other landowners in the Drury area and the Government on this fundamental issue are ongoing, and Auckland Council and Auckland Transport are hopeful that a solution to the infrastructure funding and financing issues can be found. However, at this stage such a solution is not in place.

- 2.9 The plan change proposal (i.e. the amended provisions and the resulting anticipated development enabled by these amendments) will lead to urbanisation in the Drury area and requires bringing forward the provision (including funding and delivery) of the transport infrastructure and services to the area. The need to coordinate urban development with infrastructure planning and funding decisions is highlighted in the objectives of the National Policy Statement on Urban Development 2020 (**NPS-UD**) which are quoted below (with emphasis in bold):

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) the area is in or near a centre zone or other area with many employment opportunities*
- (b) **the area is well-serviced by existing or planned public transport***
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) **integrated with infrastructure planning and funding decisions;***
and
- (b) strategic over the medium term and long term; and*
- (c) responsive, particularly in relation to proposals that would supply significant development capacity.*

- 2.10 The Regional Policy Statement (**RPS**) objectives and policies in the AUPOP place similar clear emphasis on the efficient provision of infrastructure and on the integration of land use and development with infrastructure, including transport infrastructure. Refer, for instance, to Objectives B2.2.1(1)(c) and (5) and B3.3.1(1)(b), and Policies B2.2.2(7)(c), B2.4.2(6) and B3.3.2(5)(a) (e.g. Policy B3.3.2(5)(a) is to: *“Improve the integration of land use and transport by... ensuring transport infrastructure is planned, funded and staged to integrate with urban growth”*).



- 2.11 Auckland Transport considers that the lack of alignment between the planned staging, timing of supporting infrastructure and services and “early release” of the subject site is a key issue in assessing the effects associated with the proposal. It is important to ensure that any adverse transport effects can be appropriately mitigated. The assessment of effects should also consider whether it is necessary to limit the scale of growth that can be realistically supported in the initial stages of development based on the extent of mitigation provided by the applicants/developers.

Supporting transport and land use integration opportunities

- 2.12 The integration of transport and land use is a prerequisite to manage potential and actual adverse transport effects, as well as encouraging positive transport effects. In the context of PPC 50 and other plan changes in the Drury area, such as PPC 48 (Drury Centre Precinct), PPC 49 (Drury East Precinct) and PPC51 (Drury 2 Precinct), the investigation, planning and delivery of the strategic transport infrastructure and services needed to support the wider growth identified in the Drury – Opāheke Structure Plan area is being undertaken through the Supporting Growth Programme².
- 2.13 The planned transport investments facilitated by planning being undertaken by SG represent a significant investment in new and upgraded transport infrastructure and services. To realise and optimise the benefits of these transport investments, there is a need to assess and provide or safeguard for the integration of the land use development enabled by the plan change with the immediate and wider transport network and facilities. This integration may take the form of supporting the mutually reinforcing benefits of increased intensity along high quality and accessible public transport corridors, safeguarding the future connectivity of the wider transport network or providing for street frontages and facilities that are consistent with the wider planned transport network requirements.

Cumulative effects

- 2.14 Cumulative adverse effects on the transport network can result from multiple developments that may individually have minor effects but in combination with others result in significant effects. In this case, the transport effects of PPC 50 should be considered in conjunction with the potential effects from PPC 48 (Drury Centre Precinct), PPC 49 (Drury East Precinct), and PPC 51 (Drury 2 Precinct). These plan changes have been notified concurrently with PPC 50 and also seek to rezone Future Urban zoned land within the Drury – Opāheke Structure Plan area for urban developments that will potentially start at around the same time. Therefore, these plan changes should be read and considered together. PPC 46 (Drury South) to rezone land in the wider Drury area for urban developments or higher development yields

² The Supporting Growth Programme is a collaboration between Waka Kotahi NZ Transport Agency, Auckland Transport and Auckland Council.



has also been notified by the Council recently. The estimated yield of dwellings enabled by the lodged and notified Drury plan changes is around 19,000 dwellings.

- 2.15 In addition to the suite of Drury plan changes currently under consideration, over time it is expected that other land holdings will seek to rezone their sites to enable further incremental urbanisation. From the transport viewpoint, this approach of responding to the piecemeal development of non-contiguous and fragmented land ownership patterns is potentially problematic in regard to planning for and securing an integrated transport network. This includes the need to address cross-boundary transport network mitigation requirements and determining the responsibility for the delivery of transport related mitigation where there are multiple frontages under different land ownership.

Assessment and identification of effects and mitigation

- 2.16 In the context of PPC 50, the extent, scale and intensity of potential transport effects and the methods for mitigating these effects will require a combination of both wider strategic transport network connections, upgrades and facilities that are programmed in the Drury – Opāheke Structure Plan area and developer mitigation.
- 2.17 The capacity to address the transport effects of PPC 50 is reliant and dependent on a suite of wider strategic transport network connections, upgrades and facilities that are programmed to support the Drury – Opāheke Structure Plan area. The identification and programming of these transport network improvements is being undertaken as part of the Supporting Growth Programme and is subject to a separate investigation, planning and delivery process. Ideally, these transport network improvements would be in place before the land use development is implemented. The scale of the Supporting Growth Programme means that there will be a lag time relating to the planning, design, consenting and construction of the strategic transport network connections, upgrades and facilities.
- 2.18 Given this inter-dependency on a separate process where there is no certainty around funding for all the identified network improvements, there is a need to consider a range of mitigation methods including the potential deferral of development or a review of land development staging to ensure coordination and alignment with the required transport network mitigation.
- 2.19 The above overarching considerations have informed the following specific submission points addressed in Auckland Transport's submission.

3.0 Specific parts of the plan change that this submission relates to:

- 3.1 Auckland Transport's submission seeks to ensure that PPC 50 appropriately manages the effects of the proposal (i.e. the amended provisions and the resulting



anticipated development enabled by these amendments) on the local and wider transport network. The specific parts of the plan change that this submission relates to are set out in the main body of this submission and in **Attachment 1** and include the following:

- Lack of infrastructure funding to support 'out of sequence' development;
- Development triggers / provision of transport upgrades and mitigation;
- State Highway 1 Drury Interchange direct access ('Access A');
- Land use integration with public transport networks;
- Opāheke North-South Arterial;
- Waihoehoe Road route protection;
- Development of new roads / road cross section / arterial road control;
- Consistency of approach and provisions across Drury Private Plan Changes; and
- Noise mitigation.

3.2 Auckland Transport acknowledges and appreciates the responses that the applicant provided to a number of queries prior to the notification of the private plan change. However, a number of key concerns are yet to be fully addressed as detailed in **Attachment 1**.

3.3 Although all four plan changes (PPCs 48, 49, 50 and 51) have been notified by the Council at the same time, they are being processed separately. This is a key concern for Auckland Transport, as this fragmentation will not lead to sound and integrated planning and decision making. Good planning outcomes, particularly those in relation to the transport network, rely on the need to consider effects of all four private plan changes in an integrated manner to ensure sound and integrated planning and decision making. For this purpose, Auckland Transport's submission on these four private plan changes should be read and considered along with each other. Copies of Auckland Transport's submissions on PPC 48, PPC 49 and PPC 51 are included in **Attachment 2**.

3.4 Auckland Transport **opposes** the private plan change, **unless** the matters/concerns raised in this submission (including the main body and **Attachment 1**) are appropriately addressed, and any adverse effects of the proposal on the transport network can be adequately avoided or mitigated.

4.0 Decisions sought from the Council

4.1 Auckland Transport's primary position at this time is that Council should decline PPC 50, unless the concerns raised in this submission including the main body and **Attachment 1** are appropriately addressed and resolved.

4.2 Attachment 1 provides further detail of the decisions sought from the Council, including alternative relief in the event that Auckland Transport's primary relief (that PPC 50 be declined) is not accepted.



- 4.3 In all cases where amendments to the plan change are proposed, Auckland Transport would consider alternative wording or amendments to the objectives, policies, rules, methods and maps which address the reason for Auckland Transport's submission. Auckland Transport also seeks any further, other or consequential relief required to respond to the reasons for this submission and/or give effect to the decisions requested.
- 4.4 Auckland Transport is available and willing to work through the matters raised in this submission with the applicant.
- 5.0 Appearance at the hearing**
- 5.1 Auckland Transport wishes to be heard in support of this submission.
- 5.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

Name: Auckland Transport

Signature:

A handwritten signature in black ink, appearing to read 'CR.' or similar initials.

Christina Robertson
Group Manager Strategic Land Use and Spatial Management
Planning and Investment

Date: 22 October 2020

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Attachment 1

The following table sets out where amendments are sought to the PPC 50 Waihoehoe Precinct provisions and also identifies those provisions which Auckland Transport supports.

Italics = *PPC 50 notified text*

Strikethrough = ~~proposed deletions~~

Bold and underline = **proposed additions**

Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
Lack of infrastructure funding to support 'out of sequence' development	Entire Plan Change	Oppose	<p>Auckland Transport is concerned that Proposed Plan Change 50 provides no clear indication of how transport infrastructures required to support the plan change proposal would be financed and funded. Proposed Plan Change 50 is reliant on major transport infrastructure projects (i.e. both bulk infrastructure as well as upgrades to existing infrastructures that are not currently built to urban standard or upgrades to operation services) to be provided by third parties, in order to service and support the rezoning of the precinct area from Future Urban Zone to a mix of Business and Open Space zones.</p> <p>As outlined in the submission above, the Future Urban Zone land in the precinct area is not planned for urbanisation until 2028 and beyond. While a number of the NZUP projects and other wider transport infrastructure improvements have been planned, the Regional Land Transport Plan 2018-2028 has not identified or allocated funding for major transport infrastructures to support the urbanisation in Drury area before 2028.</p> <p>Developments happening ahead of any supporting transport infrastructure being in place is not sound resource management practice and is contrary to, and does not give effect to, the NPS-UD which supports out of sequence only when the funding and delivery of transport</p>	<p>Auckland Transport's primary position at this time is that PPC 50 should be declined unless the reasons for this submission, as outlined in the main body of the submission above and in this table, including Auckland Transport's concerns about the funding, financing and delivery of required transport infrastructure and network improvements and services to support the 'out of sequence' development proposed by this plan change, are appropriately addressed and resolved.</p>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
Development triggers / provision of transport upgrades and mitigation	Entire plan Change	Oppose	<p>infrastructures/upgrades are available and being provided to support the development. Moreover, uncoordinated transport infrastructure provision will not result in well-functioning urban environments as anticipated by the NPS-UD and will lead to poor land use-transport integration outcomes.</p> <p>Given that there is no certainty around funding and delivery for required infrastructure improvements, if PPC 50 is not declined, there is a need to consider a range of mitigation methods including the potential deferral of development or a review and implementation of land development staging to ensure coordination and alignment with the required transport network mitigation.</p>	
22.2			<p>The aim of the proposed infrastructure threshold and staging rules in Proposed Private Plan Change 50 is to enable transport infrastructure to be provided in a staged manner to support the rezoning. However, Auckland Transport is of the opinion that the proposed rules are not adequate to address the transport infrastructure funding and provision issues as outlined in the submission above.</p> <p>Auckland Transport believes that pure reliance on development triggers to stage transport infrastructure provision in the absence of a development staging plan will result in piecemeal and uncoordinated development and will not achieve the transit-oriented development outcome this plan change seeks to achieve.</p> <p>More specifically, private vehicle dependencies are likely to occur when large areas of residential land uses are being developed prior to the development of any commercial and employment land uses in the same area. With limited employment land uses in the local area more people will be required to commute to work using private vehicles as</p>	<p>Auckland Transport's primary position at this time is that PPC 50 should be declined unless the transport infrastructure funding and provision concerns identified in the main body of this submission and in this table, including its concerns about reliance on development triggers to stage transport provision, are appropriately addressed and resolved.</p> <p>In the alternative:</p> <ul style="list-style-type: none"> (a) Amend the plan change to include alternative mechanisms/provisions (including alternative objectives, policies, rules, methods or maps) to address Auckland Transport's concerns; and/or (b) Include amendments to relevant plan change provisions as required by Auckland Transport and outlined below.



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>opposed to alternative modes of transport (i.e. public transport, walking and cycling).</p> <p>It is also important to note that the applicant's Integrated Transport Assessment has relied upon a modal shift at around 14% when assessing the overall trip generation potential from the onset. If this is not achieved, then the impacts of the proposal (i.e. the plan change provisions and the resulting anticipated development enabled by these amendments) will be greater than assessed and the timing of the recommended development triggers as stated under the proposed Standards IX6.1 and IX.6.2 would also be incorrect.</p> <p>Moreover, Auckland Transport is concerned that the proposed rezoning will bring about adverse effects on the existing transport network that will not be fully mitigated through the proposed plan change provisions.</p>	
22.3	IX.1 Precinct Description	Oppose	<p>The proposed precinct description, objectives and policies do not recognise the need for both subdivision and development to be coordinated with the provision (including funding and delivery) of the transport infrastructure and services that are required to support the precinct and connecting it to the wider network. In this respect, these provisions do not give effect to higher order NPS-UD and RPS provisions. Importantly, coordination is required to avoid, remedy and mitigate adverse effects on the transport network and to achieve integration of land use and transportation. Therefore, wording supporting the above should be explicitly stated in the objectives and policy.</p>	<p>Amend the Precinct Description as follows: <u>The transport network in the wider Drury East area as defined on Precinct Plan 2 will be progressively upgraded over time to support development in the wider area. The precinct includes provisions to ensure that the any subdivision and development of land for business and housing is coordinated with the funding and construction of the transport network upgrades in order to avoid, remedy and mitigate adverse effects on the local and wider transport network necessary to support it.</u></p>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
22.4	IX.2 Objectives (2) and (3)	Oppose		<p>Amend Objectives IX.2 (2) and (3):</p> <p>(2) Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network. A transport network that facilitates the safe and efficient movement of people, goods and services and manages effects on the safe and efficient operation of the surrounding transport network.</p> <p>(3) Development is supported by appropriate infrastructure. Subdivision and development are supported by the timely and coordinated provision of robust and sustainable transport, stormwater, water, wastewater, energy and communications infrastructure networks.</p>
22.5	IX.3 Policy (5)	Oppose		<p>Amend Policy IX.3 (5) as follows and add a new policy as follows:</p> <p>(5) Ensure that the timing of subdivision and development in the wider Drury area with is coordinated with the funding and delivery of transport infrastructure upgrades necessary to avoid, remedy and mitigate the adverse effects of urbanisation development on the safe and efficient operation effectiveness and safety of the immediately surrounding and wider transport network.</p> <p><u>(x) Avoid any subdivision and development in the wider Drury area as defined on Precinct Plan 2 until the required transport infrastructure is in place.</u></p>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought						
22.8	IX.4.1 Activity table	Oppose	<p>As proposed by the applicant, the activity status for development and subdivision within the precinct is determined based on compliance with Standards IX.6.1 and/or IX.6.2. These standards set out the transport upgrades required to exceed specified development and trip generation thresholds.</p> <p>Auckland Transport acknowledges the intention of the proposed rules is to manage and mitigate adverse effects of subdivision and development on the transport network, and hence Auckland Transport considers that failure to comply with both standards (i.e. allowing subdivision and development to advance before the required transport upgrades are implemented) will have the potential to result in significant adverse effects on the transport network.</p> <p>Auckland Transport therefore seeks a non-complying activity status for development and subdivision which fail to comply with both Standards IX.6.1 and IX.6.2. This will make sure that such consents can only be granted if the adverse effects will be minor or if the activity will not be contrary to the relevant objectives and policies.</p> <p>Auckland Transport also seeks the combination of Rules IX.4.1 (A5) with (A2) and (A6) with (A3) to avoid duplication.</p>	<p>Amend Rules IX.4.1 (A2), (A3), (A5) and (A6) to introduce more onerous activity status for any development and/or subdivision not complying with Standards IX.6.1 Staging of Development and IX.6.2 Trip Generation Limit (such as non-complying activity status).</p> <p>In the alternative, amend Rules IX.4.1 (A2) with (A3) as follows:</p> <table border="1" data-bbox="527 1360 998 1879"> <tr> <td data-bbox="527 1360 771 1522">(A2)</td> <td data-bbox="527 1522 771 1879">Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit <u>as confirmed in the Integrated Transport Assessment submitted with application for consent.</u></td> <td data-bbox="527 1879 771 2005">RD</td> </tr> <tr> <td data-bbox="771 1360 998 1522">(A3)</td> <td data-bbox="771 1522 998 1879">Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades <u>and</u> of Standard IX.6.2 Trip Generation Limit <u>as confirmed in the Integrated Transport Assessment submitted with application for consent.</u></td> <td data-bbox="771 1879 998 2005">NCP</td> </tr> </table> <p>As a consequential amendment, delete Rules IX.4.1 (A5) and (A6).</p>	(A2)	Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit <u>as confirmed in the Integrated Transport Assessment submitted with application for consent.</u>	RD	(A3)	Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades <u>and</u> of Standard IX.6.2 Trip Generation Limit <u>as confirmed in the Integrated Transport Assessment submitted with application for consent.</u>	NC P
(A2)	Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit <u>as confirmed in the Integrated Transport Assessment submitted with application for consent.</u>	RD								
(A3)	Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades <u>and</u> of Standard IX.6.2 Trip Generation Limit <u>as confirmed in the Integrated Transport Assessment submitted with application for consent.</u>	NC P								
22.9	IX.5 Notification	Oppose	<p>IX.5 Notification rules (1) to (3) require non-notification of certain activities. The activities referenced in these rules may have significant adverse effects and it is more appropriate to rely on the standard notification provisions in the Resource Management Act 1991 (RMA).</p> <p>Note this provision is incorrectly labelled "1.1.1. Notification" in the precinct text.</p>	<p>Amend the IX.5 Notification rules (1) to (3) which require non-notification to require the normal tests for notification under the relevant sections of the RMA.</p>						



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
22.10	IX.6 Standards	Oppose	<p>Standard IX.6 (2) is not required because it is explicitly stated under Rule E27.6.1 (2)(b) that Standard E27.6.1(1) does not apply where development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment.</p>	<p>Delete Standard IX.6 (2) as follows:</p> <p>(2) The following Auckland-wide and zone standards do not apply to activities listed in the Activity Table IX.4.1 above:</p> <ul style="list-style-type: none"> E27.6.1 Trip generation
22.11	IX.6.1 Standard	Oppose	<p>Amendment is sought to Standard IX.6.1 (1) to ensure that both subdivision and development are covered.</p> <p>Standard IX.6.1 (2) proposed by the applicant implies that subdivision of vacant lots of 1200m² or greater will not have any impacts on the transport network. However, it is Auckland Transport's view that all subdivision (including vacant lots) and any development of land which precedes a subdivision (e.g. earthworks) will generate construction traffic which can in turn affect both the network capacity and road conditions (e.g. provision of a safe pavement condition). Auckland Transport therefore seeks to amend Standard IX.6.1 (2) to ensure that the requirements under this standard will apply to all subdivision.</p> <p>Auckland Transport seeks to delete Standard IX.6.1 (3). As outlined below, the need for Access A has not been adequately justified, and hence there is no basis for the required transport upgrades to be different with or without Access A. The reference to Table IX.6.1.2 in Standard IX.6.2 (1) will also need to be deleted.</p>	<p>Amend Standards IX.6.1 (1) and (2) and delete Standard IX.6.1 (3) and the note as follows:</p> <p>IX.6.1 Staging of Development with Transport Upgrades</p> <p>(1) Development and subdivision within the area shown on IX.10.2 Waiheehoe: Precinct Plan 2 must not exceed the thresholds in Table IX.6.1.1 and Table IX.6.1.2 until such time that the identified infrastructure upgrades are constructed and are operational.</p> <p>(2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for those activities that have are subject to a valid land use and/or building consent or subdivision that is subject to a subdivision consent, that has a 224c certificate for vacant lots less than 1200m².</p> <p>(3) Table IX.6.1.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Waiheehoe: Precinct Plan 2. Table IX.6.1.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Waiheehoe: Precinct Plan 2. Note: Transport infrastructure projects for Drury</p>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought						
			<p>Auckland Transport also seeks to delete the note under Standard IX.6.1. This is a consequential amendment which relates to changes sought to Table IX.6.1.1 as outlined below.</p>	<p>included in the New Zealand Upgrade Programme – Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below</p>						
	Table IX.6.1.1	Oppose	<p>Amend Table IX.6.1.1 as follows, including to specify additional transport infrastructure upgrades and network improvements required to be completed (NB: the upgrades / network improvements specified below are those which Auckland Transport has identified to date as needing to be completed, as a minimum, noting also that triggers may change as a result of negotiations with developers and/or additional assessment):</p> <p>Table IX.6.1.1 Threshold for Development and Subdivision with Access A – as shown on IX.10.2 Waihoehoe Precinct Plan 2 not constructed</p> <table border="1" data-bbox="673 1438 1112 1480"> <thead> <tr> <th data-bbox="673 1333 787 1438">New/ Additional Dwelling Threshold</th> <th data-bbox="673 1144 787 1333">New/ Additional Retail GFA Threshold</th> <th data-bbox="673 913 787 1144">New/ Additional Commercial GFA Threshold</th> </tr> </thead> <tbody> <tr> <td data-bbox="787 1333 901 1438">Prior to any subdivision, new dwellings, retail or commercial development</td> <td data-bbox="787 1144 901 1333"></td> <td data-bbox="787 913 901 1144">Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds. <u>For the purpose of this Rule, transport upgrades are triggered if any one of these thresholds is not complied with.</u></td> </tr> </tbody> </table>	New/ Additional Dwelling Threshold	New/ Additional Retail GFA Threshold	New/ Additional Commercial GFA Threshold	Prior to any subdivision , new dwellings, retail or commercial development		Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds. <u>For the purpose of this Rule, transport upgrades are triggered if any one of these thresholds is not complied with.</u>	<p>Interim safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for pedestrians and cyclists on all approaches.</p> <ul style="list-style-type: none"> Interim road upgrade of Waihoehoe Road (Great South Road to Fitzgerald Road) meeting a two lane Arterial design standard in accordance with Auckland Transport's current design standards. Full road rehabilitation upgrade of Fitzgerald Road (Waihoehoe Road to Drury Hills Road intersection) meeting a two lane Mixed Collector design standard in accordance with Auckland Transport's current design standards. Interim road upgrade of Waihoehoe Road (Fitzgerald Road to Drury Hills Road intersection) meeting a two lane Arterial design standard in accordance with Auckland Transport's current design standards. Interim reconstruction of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South intersections to dual lane roundabout treatments. Construction of the northern end of Drury Boulevard as the primary multi-modal station access.
New/ Additional Dwelling Threshold	New/ Additional Retail GFA Threshold	New/ Additional Commercial GFA Threshold								
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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p><u>2,172</u></p> <p>39,830m²</p> <p>22,200m²</p>	<ul style="list-style-type: none"> • <u>Upgrade Waihoehoe Road from two lanes to four lane Arterial (Great South Road to Fitzgerald Road).</u> • <u>Closure of the northern end of Flanagan Road.</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> • <u>State Highway 1 three-laning to Drury.</u> • <u>State Highway 22 widening to Karaka.</u> • <u>Rail Electrification Papakura to Pukekohe.</u> • <u>New Drury Central and West Rail Stations.</u>
22.12			<p>3,406</p> <p>62,430m²</p> <p>34,800m²</p>	<ul style="list-style-type: none"> • <u>Upgrade of the Waihoehoe / Great South Road intersection to signals.</u> • <u>Upgrade Great South Road to four traffic lanes (Drury Interchange to at least 400m north of Great South Road / Waihoehoe Road intersection).</u> • <u>Upgrade of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / proposed Opāheke North-South intersections to signals with capacity (on all approaches).</u> • <u>Upgrade Waihoehoe Road from two lanes to four lane Arterial (Great South Road to Fitzgerald Road) in accordance with Auckland Transport's current design standards.</u> • <u>Upgrade State Highway 1 Drury Interchange to double north on-ramp and south bound off-ramps.</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> • <u>State Highway 1 Drury South Interchange.</u> • <u>Mill Road Upgrade (Drury South Interchange to Fitzgerald Road).</u>
			<p>4,640</p> <p>83,960m²</p> <p>46,800m²</p>	<ul style="list-style-type: none"> • <u>Capacity upgrade of the Waihoehoe / Great South Road intersection (western arm only).</u>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>6,428</p> <p>107,650m²</p> <p>60,000m²</p>	<ul style="list-style-type: none"> <u>Additional capacity upgrade of the Waihoehoe / Great South Road and Waihoehoe Road / Fitzgerald Road / proposed Opāheke North-South signalised interections (on all approaches).</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> <u>State Highway 1 three laning Drury to Bombay.</u> <u>Mill Road Full Route.</u> <u>Pukekohe Expressway Full Route.</u> <u>Proposed Opāheke North-South Road Full Route.</u> <u>Capacity upgrade of the Waihoehoe / Great South Road intersection (on all approaches).</u> <u>Additional capacity upgrade of the Waihoehoe / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South signalised interections (on all approaches).</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> <u>Provision for a third and fourth rail line.</u>

Table IX.6.1.1 set out the transport upgrades required to enable specified development thresholds to be exceeded (i.e. the number of dwellings and gross floor areas of retail and commercial development), each applying to successively higher development yields. It appears that Table IX.6.2.1 was formulated based on the applicant's modelling outcomes, and Table 9-2 of the applicant's Integrated Transport Assessment and Attachment 3 of the Request for Information Response: Transport. It is concluded in the applicant's Integrated Transport Assessment that the developments are unlikely to have a significant adverse effect on the traffic network, provided that the transport infrastructure required to support the developments is implemented.

However, Table IX.6.1.1 as currently drafted is of concern to Auckland Transport for the following reasons:

- It is unclear as to how the proposed development thresholds (by way of number of dwellings and gross floor areas) will be able to capture subdivision. As discussed above, it is Auckland Transport's view that all subdivision (including vacant lots) and any development of land which precedes a subdivision (e.g. earthworks) will generate construction

Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>traffic which can in turn affect both the network capacity and road conditions (e.g. provision of a safe pavement condition). Therefore, the transport upgrade requirements should apply to subdivision.</p> <ul style="list-style-type: none"> As proposed by the applicant under Table IX.6.1.1., no transport upgrade except for interim safety upgrades (i.e. safe crossing facilities for pedestrians and cyclists) to the Waihoehoe / Great South Road intersection is required until 3,406 dwellings, 62,430m² of retail GFA or 34,800m² of commercial GFA are developed. This is different to Table 8-2 of the applicant's Integrated Transport Assessment and Attachment 3 of the Request for Information Response: Transport which includes additional transport upgrade requirements at lower development threshold levels. There is lack of mitigation proposed to address construction traffic effects on both the capacity and condition of roads. The pavement condition of both Fitzgerald Road and Waihoehoe will require pavement rehabilitation upgrade from the outset in order to safely and effectively accommodate the increased construction related traffic from the development to be enabled through this plan change. Any pavement upgrade should take into account the future requirements of the road and other underground / above ground service renewals. The existing roundabouts at the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road intersections will also require upgrades to support increased traffic volumes and construction related movements. The requirements in relation to Drury Boulevard and closure of Flanagan Road are discussed in detail below. The wider network improvements required to enable each threshold level were not included in Table IX.6.1.1. While the funding and/or programme of a number of these wider works have already been planned, the plan change proposals including the Drury Centre, Drury East, Waihoehoe and Drury 2 Precincts are effectively bringing forward the need for such works. To give certainty as to when and what transport upgrades are required to mitigate the associated traffic effects, the NZUP projects and other wider network improvements should be included in Table IX.6.2.1. This aligns with Table 9-2 of the applicant's Integrated Transport Assessment. <p>Auckland Transport therefore considers that the proposal (i.e. the amended provisions and the resulting anticipated development enabled by these amendments) will have the potential to result in significant adverse effects on the local and wider transport network, unless the above issues are appropriately addressed.</p>	
22.13	Table IX.6.1.2	Oppose	Refer to discussion in relation to Access A below.	Delete Table IX.6.1.2.

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
	IX.6.2 Standard	Oppose	<p>The reasons for the amendment sought to Standard IX.6.2 (1) and the deletion of Standards IX.6.2 (2) and (3) and the note have been discussed above (refer to submission point in relation to Standard IX.6.1 above).</p> <p>Auckland Transport seeks to include a new clause to provide clear guidance on how compliance with the standard should be determined i.e. by a traffic assessment prepared by a suitably qualified expert.</p>	<p>Amend Standard IX.6.2 (1), delete Standards IX.6.2 (2) and (3) and the note, and add a new clause as follows:</p> <p>IX.6.2 Trip Generation Limit</p> <p>(1) Development and subdivision within the area shown on IX.10.2 Waihoehoe: Precinct Plan 2 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational.</p> <p>(2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for these activities that have a valid land use consent or a subdivision that has a 224c certificate for vacant lots less than 1200m².</p> <p>(3) Table IX.6.2.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Waihoehoe: Precinct Plan 2. Table IX.6.2.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Waihoehoe: Precinct Plan 2.</p> <p><i>Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020—Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below</i></p> <p>(x) A Transport Assessment corresponding to the scale and significance of the proposed activity prepared by a suitably qualified expert must be provided in order to confirm compliance with this standard.</p>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought				
	Table IX.6.2.1	Oppose	<p>Amend Table IX.6.2.1 as follows, including to specify additional transport infrastructure upgrades and network improvements required to be completed (NB: the upgrades / network improvements required for PPC 50 is a matter of ongoing discussion and review – the upgrades / network improvements specified below are those which Auckland Transport has identified to date as needing to be completed, as a minimum, noting also that triggers may change as a result of negotiations with developers and/or additional assessment):</p> <p>Table IX.6.2.1 <u>Trip Generation Limits Threshold for Development with 'Access A' as shown on IX.10.2 Waihoehoe Precinct Plan 2 not constructed</u></p> <table border="1" data-bbox="592 787 885 1144"> <thead> <tr> <th data-bbox="592 787 722 934">Inbound Trip Generation in vehicles per hour (vph)</th> <th data-bbox="592 934 722 1144">Outbound Trip Generation in vehicles per hour (vph)</th> </tr> </thead> <tbody> <tr> <td data-bbox="722 787 885 934">Prior to any subdivision, new dwellings, retail or commercial development</td> <td data-bbox="722 934 885 1144">Transport Upgrades Required to Exceed the Trip Generation Thresholds</td> </tr> </tbody> </table>	Inbound Trip Generation in vehicles per hour (vph)	Outbound Trip Generation in vehicles per hour (vph)	Prior to any subdivision , new dwellings, retail or commercial development	Transport Upgrades Required to Exceed the Trip Generation Thresholds	<p>Interim safety upgrade to the Waihoehoe / Great South Road intersection to provide safe crossing facilities for pedestrians and cyclists on all approaches.</p> <p><u>Interim road rehabilitation upgrade of Waihoehoe Road (Great South Road to Fitzgerald Road) meeting a two lane Arterial design standard in accordance with Auckland Transports Traffic Design Manual (TDM) or its subsequent replacement.</u></p> <p><u>Full road upgrade of Fitzgerald Road (Waihoehoe Road to Drury Hills Road intersection) meeting a two lane Mixed Collector design standard in accordance with Auckland Transports TDM or its subsequent replacement.</u></p> <p><u>Interim road rehabilitation upgrade of Waihoehoe Road (Fitzgerald Road to Drury Hills Road intersection) meeting a two lane Arterial design standard in accordance with Auckland Transports TDM or its subsequent replacement.</u></p> <p><u>Interim reconstruction of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / proposed Opāheke North-South intersections to dual lane roundabout treatments.</u></p> <p><u>Construction of the northern end of Drury Boulevard as the primary multi-modal station access.</u></p>
Inbound Trip Generation in vehicles per hour (vph)	Outbound Trip Generation in vehicles per hour (vph)							
Prior to any subdivision , new dwellings, retail or commercial development	Transport Upgrades Required to Exceed the Trip Generation Thresholds							



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
	<p><u>AM Peak: 1,550</u> <u>PM Peak: 2,390</u></p>		<p><u>AM Peak: 1,990</u> <u>PM Peak: 1,990</u></p>	<ul style="list-style-type: none"> <u>Upgrade Waihoehoe Road from two lanes to four lane Arterial (Great South Road to Fitzgerald Road).</u> <u>Closure of the northern end of Flanagan Road.</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> <u>State Highway 1 three-laning to Drury.</u> <u>State Highway 22 widening to Karaka.</u> <u>Rail Electrification Papakura to Pukekohe.</u> <u>New Drury East and West Rail Stations.</u>
22.15	<p>AM Peak: 1,890 PM Peak: 2,860</p>		<p>AM Peak: 2,340 PM Peak: 2,470</p>	<ul style="list-style-type: none"> <u>Upgrade of the Waihoehoe / Great South Road intersection to signals.</u> <u>Upgrade Great South Road to four traffic lanes (Drury Interchange to at least 400m north of Great South Road / Waihoehoe Road intersection).</u> <u>Upgrade of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South intersections to signals with capacity (on all approaches).</u> <u>Upgrade Waihoehoe Road from two lanes to four lane Arterial (Great South Road to Fitzgerald Road) in accordance with Auckland Transport's current design standards.</u> <u>Upgrade SH1 Drury Interchange to double north on-ramp and south bound off-ramps.</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> <u>State Highway 1 Drury South Interchange.</u> <u>Mill Road Upgrade (Drury South Interchange to Fitzgerald Road).</u>
529	<p>AM Peak: 2,620 PM Peak: 3,730</p>		<p>AM Peak: 3,220 PM Peak: 3,270</p>	<ul style="list-style-type: none"> <u>Capacity upgrade of the Waihoehoe / Great South Road intersection (western arm only).</u>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>AM Peak: 3,510 PM Peak: 4,910</p>	<ul style="list-style-type: none"> <u>Additional capacity upgrade of the Waihoehoe / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South signalised intersections (on all approaches).</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> <u>Stateway Highway 1 three laning Drury to Bombay.</u> <u>State Highway 1 Drury South Interchange.</u> <u>Mill Road Full Route.</u> <u>Pukekohe Expressway Full Route.</u> <u>Proposed North-South Opāheke Road.</u> <p>Capacity upgrade of the Waihoehoe / Great South Road intersection (on all approaches).</p> <ul style="list-style-type: none"> <u>Additional capacity upgrade of the Waihoehoe / Great South road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South signalised intersections (on all approaches).</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> <u>Third Main Rail Line (Pukekohe to Papakura).</u>

Table IX.6.2.1 set out the transport upgrades required once specified trip generation limits are met, each applying to successively higher limits. It appears that Table IX.6.2.1 was formulated based on the applicant's modelling outcomes, and Table 9-2 of the applicant's ITA and Attachment 3 of the RFI Response: Transport. It is concluded in the applicant's ITA that the developments are unlikely to have a significant adverse effect on the traffic network, provided that the transport infrastructure required to support the developments is implemented.

However, Table IX.6.2.1 as currently drafted is of concern to Auckland Transport for the following reasons:

- It is unclear as to how the proposed development thresholds (by way of number of dwellings and gross floor areas) will be able to capture subdivision. As discussed above, it is Auckland Transport's view that all subdivision (including vacant lots) and any development of land which precedes a subdivision (e.g. earthworks) will generate construction traffic which can in

Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>turn affect both the network capacity and road conditions (e.g. pavement condition). Therefore, the transport upgrade requirements should apply to subdivision.</p> <ul style="list-style-type: none"> The applicant has proposed in Table IX.6.2.1 that no transport upgrade except for interim safety upgrade (i.e. safe crossing facilities for pedestrians and cyclists) to the Waihoehoe / Great South Road intersection is required until the inbound trip of 1,890 vph during AM peak and 2,860 vph during PM peak or the outbound trip of 2,340 vph during AM peak and 2,470 vph during PM peak are reached. This is different to Table 9-2 of the applicant's ITA and Attachment 3 of the RFI Response: Transport which includes additional transport upgrade requirements at trip generation limits. There is lack of mitigation proposed to address construction traffic effects on both the capacity and condition of roads. The pavement condition of both Fitzgerald Road and Waihoehoe Road will therefore require pavement rehabilitation upgrade from the onset in order to safely and effectively accommodate the increased construction related traffic from the development to be enabled through this plan change. Any pavement upgrade should take into account the future requirements of the road and other underground / above ground service renewals. The existing roundabouts at the Waihoehoe Road / Great South Road and prioritised intersection at Waihoehoe Road / Fitzgerald Road will also require upgrades to support increased traffic volumes and construction related movements. The wider network improvements required to enable each threshold level were not included in Table IX.6.2.1. While the funding and/or programme of a number of these wider works have already been planned, the plan change proposals (including the Drury Centre, Drury East and Waihoehoe Precincts) are effectively bringing forward the need for a proportion of the proposed works. To give certainty as to when and what transport upgrades are required to mitigate the associated traffic effects, the NZUP projects and other wider network improvements should be included in Table IX.6.2.1. This aligns with Table 9-2 of the applicant's ITA. <p>Auckland Transport therefore considers that the proposal (i.e. the amended provisions and the resulting anticipated development enabled by these amendments) will have the potential to result in significant adverse effects on the local and wider transport network, unless the above issues are appropriately addressed.</p>	
22.15	Table IX.6.2.2	Oppose	Refer to discussion in relation to Access A above.	Delete Table IX.6.2.2.



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
	IX.8.1 (2) Matters of discretion	Support in principle	<p>Auckland Transport acknowledges that a number of transport upgrade requirements as stated in Tables IX.6.1.1 and IX.6.1.2 fall on third-party land outside the ownership of the applicant but is concerned that this fragmented land ownership will pose risks to the successful delivery of the necessary transport infrastructure to support the proposal. To address this, Auckland Transport seeks to add new matters of discretion and assessment criteria to require the preparation of a funding agreement.</p> <p>In addition, amendment is sought to ensure that both subdivision and development are covered by these provisions and that Drury East is clearly defined as the area shown on IX.10.2 Precinct Plan 2.</p>	<p>Amend IX.8.1 (2) as follows:</p> <p>(2) Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit:</p> <p>(a) Effects on the transport network consistent with the trips generated by development specified in Table IX.6.2.1 of Table IX.6.2.2;</p> <p>(b) The rate of public transport uptake and travel management measures; and</p> <p>(c) The rate of coordination of retail, commercial and residential development in <u>the wider Drury East area shown on Precinct Plan 2; and</u></p> <p><u>(x) The degree of certainty around the provision of required infrastructure upgrades including confirmation of infrastructure funding or other such measures agreed; and</u></p> <p><u>(x) Any mitigation measures or review conditions required to address the effects from development occurring ahead of the required infrastructure upgrades.</u></p>
22.18	IX.8.2 (2) Assessment criteria	Support in principle		<p>Amend IX.8.2 (2) as follows:</p> <p>(2) Development <u>and/or</u> subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit:</p> <p>(a) Whether the effects of the proposal on the transport network are consistent with the trips generated by development specified in Table IX.6.2.1 of Table IX.6.2.2;</p>

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
				<p>(b) <u>Whether increased use of public transport provides additional capacity within the local transport network included within the area shown on IX.10.2 Precinct Plan 2; including by implementing travel demand management measures.</u></p> <p>(c) <u>Whether residential development is coordinated with retail and commercial development within the area shown on IX.10.2 Precinct Plan 2 Drury East to minimise trips outside of the precinct providing additional capacity within the transport network;</u></p> <p>(d) <u>The effect of the timing and development of any transport upgrades;</u></p> <p>(x) <u>Where new, upgrades and/or extensions to transport infrastructure are required, whether infrastructure funding agreements or other agreements with service providers exist to ensure that the new, upgraded or extended infrastructure required to service the subdivision and/or development can be funded and delivered; and</u></p> <p>(x) <u>Whether the effects of development proceeding ahead of the required transport upgrades are mitigated by any conditions of consent including those relating to the scale, staging or operation of an activity, review conditions or interim network improvements proposed by the applicant.</u></p>
State Highway 1 Drury Interchange direct access ('Access A')	IX.6.1 and IX.6.2 Standard, Precinct Plan 2	Oppose in part	The proposed Standards IX.6.1 and IX.6.2 set out the transport upgrades required to exceed specified development and trip generation thresholds. The level at which the thresholds are set differs according to whether a direct access to the Drury Centre Precinct from the State Highway 1 Drury Interchange is assumed to be provided (referred to as 'Access A' in Precinct Plan 2).	Delete all reference to 'Access A' in Standards IX.6.1 and IX.6.2. Remove 'Access A' from Precinct Plan 2.



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>Based on the applicant's Integrated Transport Assessment, the primary transport advantage associated with the provision of Access A appears to be the deferral of the need to widen the southern and eastern approaches of the existing Waihoehoe / Great South / Norrie Road intersection from two lanes to four from 2033 to 2038.</p> <p>However, the Integrated Transport Assessment identifies that Access A does not negate the need for the Waihoehoe Road and Great South Road upgrades to enable the full development of the Drury Centre Precinct, Waihoehoe Precinct and Drury East Precinct. Nor is it associated with a significant increase in total development yield or transport network capacity. Moreover, the applicant's modelling has not demonstrated if any other connections on the network are over capacity as a result of excluding Access A.</p> <p>Accordingly, Auckland Transport does not consider that the need for Access A has been adequately justified.</p> <p>In addition, there are a number of factors which prove that the provision of Access A will be problematic:</p> <ul style="list-style-type: none"> • Most of the land required for transport upgrades falls on third party land outside the ownership of the applicant. It is not demonstrated by the applicant how this will be addressed and managed; and • It is subject to the approval of Auckland Transport, Waka Kotahi and KiwiRail (i.e. crossing bridge structure with sufficient vertical clearance over the rail corridor will be required). 	



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
Land Use Integration with Public Transport Networks	Entire Plan Change	Oppose	<p>Auckland Transport supports transit-oriented developments where these are appropriately located, well designed and multi-modal transport opportunities are enabled and encouraged. In particular, opportunities should be provided for people who live and work within an area so as to reduce the length and/or number of private vehicle trips through the availability of public transport and/or other active modes such as cycling and walking.</p> <p>Auckland Transport believes that transport-land use integration outcomes are a prerequisite to mitigate the effects of urban development. Spatial, physical and operational integration of the land use development (enabled by this plan change) with public transport networks and facilities is critical. The principles of a transit or transit-oriented development model should therefore underpin the spatial location of infrastructure, prioritisation of transport modes, patterns of land use development and associated development potential/intensity within the plan change.</p> <p>Transit-oriented development is a well understood concept that is characterised by compact developments with moderate to high densities, located within walking distance of a transit station or stop, generally with a mix of residential and non-residential opportunities, designed for pedestrians, that does not exclude vehicles.¹¹</p> <p>The main principles underpinning the transit-oriented development concept can be summarised in terms of the following:</p> <p><u>Urban Structure and Accessibility</u></p> <p>Development is anchored around a transit station or node that ideally provides opportunities for public transport uptake. The</p>	<p>The precinct provisions should be amended to better address the following related matters:</p> <ol style="list-style-type: none"> 1. Define the key transit-oriented development principles, characteristics and outcomes as they apply to the plan change area. 2. Ensure there is consistency through the suite of precinct provisions in regard to giving effect to the transit-oriented development related outcomes. 3. Applying appropriate mechanisms in the precinct provisions to support transit-oriented development related outcomes e.g. managing the provision of parking as part of the wider suite of travel demand management measures that are applied to transit-oriented development scenarios. <p>In addition:</p> <ul style="list-style-type: none"> • Provide further assessment of the impacts of the proposal on accessibility between the Waihoehoe Plan Change area and the Drury Central rail station for all modes including public transport and pedestrian access, focusing on safety, permeability and connectivity between the areas. • Include provisions in the plan change to ensure that funding for public transport services (i.e. bus services) is available to support and provide public transport connections between the developments and the Drury Central rail station upon its completion.

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>barriers to accessibility (e.g. busy roads, areas with safety risks) should be avoided or appropriately mitigated to maximise safety, permeability and connectivity.^[2]</p> <p><u>Density</u></p> <p>Modal shift to public transport is most likely to occur within the walkable catchment of a public transport station or stop and increased density of land use within this catchment supports increased public transport patronage.</p> <p><u>Diversity</u></p> <p>The diversity or range of land use activities located within a defined catchment has the potential to reduce travel distances and vehicle trips with origins/destinations (e.g. housing, offices and institutional activities) being in close proximity and providing opportunities for multi-purpose walking and/or public transport trips as an alternative to private vehicle trips.</p> <p><u>Design</u></p> <p>The functional and amenity-based design of the physical built-form elements within a transit-oriented development (e.g. streets, public transport facilities, buildings and public spaces) can influence and encourage the realisation of transit-oriented development benefits, such as increasing the levels of walking between local destinations and transit stations / stops.</p> <p><u>Parking</u></p> <p>Car parking is discouraged and provided in lower numbers compared to surrounding development (non-transit oriented developments).^[2]</p> <p>These transit-oriented development attributes are consistent with transport and land use outcomes sought by Auckland</p>	



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
Opāheke North-South Arterial	IX.10.1 Waihoehoe: Precinct Plan 1	Oppose	<p>Transport, when implemented in an integrated and appropriate manner in terms of optimising investment in public transport, providing for transport alternatives and managing network impacts and effects.</p> <p>Auckland Transport seeks a more directive approach on how the precinct as a whole will enable and encourage the realisation of a transit-oriented development. Amendments are sought to a number of precinct provisions to support this.</p> <p><u>1</u> Refer to GB Arrington, 2007. Transit Oriented Development: Understanding the Fundamentals of TOD</p> <p><u>2</u> Falconer, R and Richardson, E, Rethinking urban land use and transport planning – opportunities for transit-oriented development in Australian cities, Australian Planner, Vol 47, No 1, March 2010.</p>	<p>Amend IX.10.1 Waihoehoe: Precinct Plan 1 as follows:</p> <ul style="list-style-type: none"> Add to the legend and show the proposed Opāheke North-South arterial road as a future arterial road.
	IX.3 Policies	Oppose	<p>The proposed precinct provisions do not recognise the importance of the proposed Opāheke North-South arterial road which runs through the Waihoehoe Precinct, nor do the provisions provide for its form and function as a Frequent Transit Network (FTN) arterial road as envisaged by SG and Auckland Transport.</p> <p>Auckland Transport considers that maintaining an FTN arterial function on this route is critical in ensuring that the Opāheke-Drury area is served by frequent and reliable public transport. Amendments are sought to a number of precinct provisions to support this.</p> <p>The alignment for the proposed Opāheke North-South arterial road proposed by SG is different to the equivalent alignment in Precinct Plan 1 as proposed by the applicant. While both alignments start at the existing Waihoehoe / Fitzgerald Road intersection at the southern end, the alignment by the</p>	<p>Add two new policies as follows:</p> <p><u>(x) Recognise and protect the route for the proposed Opāheke North-South arterial road as a future Frequent Transit Network arterial route which provides for the north-south movements between Papakura and Waihoehoe Road; and</u></p> <p><u>(x) Ensure that subdivision and development in Waihoehoe Precinct does not preclude the construction and operation of proposed Opāheke North-South arterial, as defined by:</u></p> <ul style="list-style-type: none"> <u>The indicative Opāheke North-South arterial road alignment shown in IX.10.1 Waihoehoe: Precinct Plan 1; or</u>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought			
22.25			<p>applicant veers some 150m further to the east by the northern extent of the precinct. This has potentially significant implications to the alignment north of the Waihoehoe Precinct:</p> <ul style="list-style-type: none"> A more easterly alignment results in the road traversing an area where the Waihoehoe Stream splits into three tributaries. This may require stream realignment due to bridge spans and in turn resulting in greater environmental impacts; 	<ul style="list-style-type: none"> <u>Relevant designations and resource consents for the proposed Opāheke North-South arterial road.</u> 			
22.26	Table IX.4.1 Activity Table	Oppose	<p>Add a new rule as follows:</p> <table border="1" data-bbox="479 630 592 819"> <tr> <td data-bbox="479 630 527 819">(X)</td> <td data-bbox="527 630 852 819"><u>Subdivision and/or development of land including or adjacent to the proposed Opāheke North-South arterial road shown in IX.10.1 Waihoehoe: Precinct Plan 1</u></td> <td data-bbox="852 630 901 819">RD</td> </tr> </table>	(X)	<u>Subdivision and/or development of land including or adjacent to the proposed Opāheke North-South arterial road shown in IX.10.1 Waihoehoe: Precinct Plan 1</u>	RD	<p>Add a new matter of discretion as follows:</p> <p><u>(x) Subdivision and/or development of land including or adjacent to the proposed Opāheke North-South arterial road:</u></p> <p><u>(a) Effects on the proposed Opāheke North-South arterial road.</u></p>
(X)	<u>Subdivision and/or development of land including or adjacent to the proposed Opāheke North-South arterial road shown in IX.10.1 Waihoehoe: Precinct Plan 1</u>	RD					
22.27	IX.8.1 Matters of Discretion	Oppose	<ul style="list-style-type: none"> The above would also result in a longer and more expensive bridge structure; Additional cost associated with improving ground condition across existing low-lying areas; 	<p>Add new assessment criteria as follows:</p> <p><u>(x) Subdivision and/or development of land including or adjacent to the proposed Opāheke North-South arterial road:</u></p> <p><u>(a) Whether the subdivision and/or development preclude the construction and operation of the proposed Opāheke North-South arterial road; and</u></p> <p><u>(b) the extent to which the subdivision and/or development provide for the proposed Opāheke North-South arterial road to be developed in a cohesive manner.</u></p>			
22.28	IX.8.2 Assessment Criteria	Oppose	<ul style="list-style-type: none"> Flooding effects would also need to be investigated further, as a more easterly alignment would cross a wider area of floodplain which give rise to potential connection issues to adjacent land uses; and A more easterly alignment is also closer to existing dwellings. <p>While Auckland Transport acknowledges that only an indicative alignment is being proposed by the applicant, further engineering design is required by Auckland Transport in order to confirm an optimum solution based on the constraints as identified above.</p> <p>Furthermore, the precinct provisions as currently drafted present some ambiguity on how this road will integrate with its surrounding urban form. In particular, the precinct provisions do not specifically trigger the formation of the road,</p>				
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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
Waihoehoe Road route protection	IX.3 Policies	Oppose	<p>but rather assume it will be provided progressively at the time of subdivision or development. While the proposed Assessment Criterion IX.8.2 (1)(e) seeks connectivity with neighbouring sites by requiring new roads to be developed to the site boundaries, it does not fully remove the risk of the road being developed in an uncoordinated and piecemeal manner, which in turn will compromise its future functionality.</p> <p>Auckland Transport therefore seeks to include a new policy, a new rule and corresponding matter of discretion and assessment criteria to ensure that the proposed Opāheke North-South arterial road will be provided for and will not be precluded by subdivision and development within the Waihoehoe Precinct.</p>	
22.29			<p>The proposed policies do not recognise the importance of Waihoehoe Road as a future arterial road and its function as a multi-modal connection. Auckland Transport considers that two new policies are needed to:</p> <ul style="list-style-type: none"> Recognise and protect the route for Waihoehoe Road as a four-lane arterial road (between Great South Road and Fitzgerald Road) and two-lane arterial road (between Fitzgerald Road and Drury Hills Road intersection) in order to service growth in Drury; and Support the safe and efficient use of Waihoehoe Road for walking, cycling and public transport by restricting direct vehicle access from adjoining properties. 	<p>Add two new policies as follows:</p> <p><u>(x) Recognise and protect the route for Waihoehoe Road as a multi-modal arterial route which provides for the east-west movements between Great South Road and Drury Hills Road intersection.</u></p> <p><u>(x) Restrict direct vehicle access onto Waihoehoe Road to support the safe and efficient operation of the transport network for walking, cycling and public transport.</u></p>
22.30				



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
22.31	IX.6.4 Standard	Support in principle	<p>The proposed building setback standard IX.6.4 is to protect the future corridor for widening of Waihoehoe Road. However, the proposed rule would not be necessary after a notice of requirement has been lodged for the road upgrade.</p> <p>The proposed building setback standard IX.6.4 is to protect the future corridor for widening of Waihoehoe Road. However, the proposed rule would not be necessary after a notice of requirement has been lodged for the road upgrade.</p>	<p>Amend the building line restrictions to reflect the final alignment and width required and ensure any yard requirements that apply are considered in addition to the building setbacks. The need for IX.6.4 should be reviewed if a notice of requirement is lodged for the upgrade of Waihoehoe Road.</p>
22.32	IX.11 Appendix 1: Road Cross Section Details	Support in part	<p>Auckland Transport supports the vehicle access restriction proposed on Waihoehoe Road for the reasons as discussed above.</p> <p>Refer below for further discussion of IX.11 Appendix 1.</p>	<p>Retain the vehicle access restriction on Waihoehoe Road as per Rule E27.6.4.1 (3)(c) of the AUPOP.</p>
22.33	IX.2 Objective (1)	Support in principle	<p>Auckland Transport seeks amendments to the objective and policies proposed by the applicant to ensure that strong emphasis is directed on the need to provide for public transport and active modes such as walking and cycling. It is important to note that the applicant's Integrated Transport Assessment has relied upon a modal shift (at around 14%) when assessing the overall trip generation potential. If this is not achieved, then the impacts of the proposal (i.e. the plan change provisions and the resulting anticipated development enabled by these amendments) will be greater than assessed and the timing of the recommended development triggers as stated under Standards IX6.1 and IX.6.2 above would also be incorrect.</p>	<p>Amend Objective IX.2 (1) as follows:</p> <p>(1) <i>Waihoehoe Precinct is a comprehensively developed residential environment that integrates with the Drury Centre and the natural environment, supports public transport use, walking and cycling, and respects Mana Whenua values.</i></p>
22.34	IX.3 Policies (3) and (7)	Support in principle		<p>Amend Policies IX.3 (3) and (7) as follows:</p> <p>(3) <i>Require streets to be attractively designed and appropriately provide for all transport modes by:</i></p> <p>a) <u>providing a high standard of pedestrian amenity, safety and convenience; and</u></p> <p>b) <u>providing for safe separated access for cyclists on arterial and collector roads that link key destinations; and</u></p> <p>c) <u>providing a level of landscaping that is appropriate for the function of the street; and</u></p>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought			
22.34				<p>d) <u>providing for the safe and efficient movement of public transport and private vehicles.</u></p> <p>(7) <u>Provide for the staging of bus, pedestrian and cycling connections to the Drury Central train rail station upon its completion to encourage the immediate use of public and active modes of transport as soon as practically possible.</u></p>			
22.35				<p>Retain Policy IX.3 (1) (correcting the cross-reference to Precinct Plan 1) and amend Policy IX.3 (2) as follows:</p> <p>(1) <u>Require collector roads to be generally in the locations shown in IX.10.X1 Waihoehoe: Precinct Plan 1 while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network.</u></p> <p>(2) <u>Ensure that subdivision and development provides a local road network that achieves a highly connected street layout that integrates with the collector road network within the precinct and the surrounding transport network, and supports the safety and amenity of the open space and stream network.</u></p>			
22.36	IX.3 Policies (1) and (2)	Support in principle	Auckland Transport generally supports Policies IX.3 (1) and (2) but seeks amendments to Policy IX.3 (2) to ensure that subdivision is covered.				
22.37	IX.4.1 Activity table	Oppose in part	Rule IX.4.1 (A1) as proposed requires the development of public or private road as a restricted discretionary activity. The associated assessment criteria under IX.8.1 (1) relate to matters on how and where the roads should be developed. It appears that the intention of this rule is to capture the development of new roads only. To avoid confusion, Auckland Transport seeks to amend Rule IX.4.1 (A1) by adding the word 'new' before public or private road with a note which explicitly states that this rule does not apply to Auckland Transport. The requirements of activities within roads and unformed roads by Auckland Transport are covered under E26 the Infrastructure Chapter of the AUPOP.	<p>Amend Rule IX.4.1 (A1) as follows:</p> <table border="1" data-bbox="1079 63 1201 766"> <tr> <td data-bbox="1079 661 1201 766">(A1)</td> <td data-bbox="1079 178 1201 661">Development of <u>new</u> public or private road (this rule does not apply to Auckland Transport).</td> <td data-bbox="1079 63 1201 178">RD</td> </tr> </table> <p>As a consequential amendment, the same changes are sought to the heading of IX.8.1 (1) matters of discretion and IX.8.2 (1) assessment criteria.</p>	(A1)	Development of <u>new</u> public or private road (this rule does not apply to Auckland Transport).	RD
(A1)	Development of <u>new</u> public or private road (this rule does not apply to Auckland Transport).	RD					
22.38							



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought			
	IX.6 Standards and IX.4.1 Activity table	Oppose	The proposed rules and standards do not include any requirements in relation to road vesting. To provide clear direction, Auckland Transport seeks to include a new standard and rule about the requirement of road vesting.	<p>Add a new standard to require the vesting of proposed public roads as follows:</p> <p><u>IX.6.X Road Vesting</u></p> <p><u>Proposed public roads (including separated pedestrian and bicycle routes) must be constructed and vested in Council upon subdivision or development of the relevant area at no cost to the Council.</u></p> <p>As a consequential amendment, add a new rule as follows:</p> <table border="1" data-bbox="641 52 738 766"> <tr> <td data-bbox="641 661 657 766"><input checked="" type="checkbox"/></td> <td data-bbox="657 178 738 661">Development and/or subdivision that does not comply with IX.6.X Roading Vesting.</td> <td data-bbox="657 52 738 178"><input type="checkbox"/></td> </tr> </table>	<input checked="" type="checkbox"/>	Development and/or subdivision that does not comply with IX.6.X Roading Vesting.	<input type="checkbox"/>
<input checked="" type="checkbox"/>	Development and/or subdivision that does not comply with IX.6.X Roading Vesting.	<input type="checkbox"/>					
	IX.8.1 (1) Matters of discretion	Support in principle	The proposed matters of discretion do not address the matters of public transport and the location and design of intersection with existing roads. Auckland Transport therefore seeks amendments to IX.8.1 (1) and request a new clause to ensure that these matters are included.	<p>Amend IX.8.1 (1) as follows:</p> <p>(1) Development of <u>new public and private roads</u>:</p> <p>(a) <u>Location and design of the collector street road, local streets roads and connections with neighbouring sites to achieve an integrated street network;</u></p> <p>(b) <u>Provision of safe and efficient public transport, cycling and pedestrian networks;</u></p> <p>(c) <u>Location and design, and sequencing of connections to the Drury Central rail rail station; and</u></p> <p>(d) <u>Matters of discretion IX.8.1 (1)(a) – (b)(c) apply in addition to the matters of discretion in E38.12.1; and</u></p> <p><u>(x) Location and design of intersections with existing roads.</u></p>			



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
22.41	IX.8.2 (1) Assessment criteria	Support in principle	<p>The proposed assessment criteria do not include the matters of public transport and the location and design of intersection with existing roads. Auckland Transport therefore seeks to add three new assessment criteria under IX.8.2 (1) to ensure that these matters are included for assessing consent applications for the development of new roads.</p> <p>Auckland Transport seeks to delete Assessment Criterion IX.8.2 (1)(a)(iii) as proposed by the applicant. The constructability of any new roads is already covered by Auckland Transport's Transport Design Manual (TDM) and a requirement for new roads to be delivered by a single landowner is not warranted in terms of managing effects. Therefore, this assessment criterion is not considered necessary and should be deleted.</p> <p>Amendments are sought to Assessment Criteria IX.8.2 (1)(b) and (g) to ensure that the road network are accessible and also well connected.</p> <p>Auckland Transport generally supports Assessment Criteria IX.8.2 (1)(c), (d) and (h) which seek the provision of pedestrian and cycle connections. Auckland Transport therefore seeks the retention of these assessment criteria, with minor modifications proposed to (h).</p> <p>Auckland Transport also seeks amendments to Assessment Criterion IX.8.2 (1)(e) to ensure that arterial road is covered (also refer to submission points in relation to the proposed Opāheke North-South arterial road).</p> <p>Auckland Transport also considers it appropriate that when development is undertaken next to a rural road, the road should be upgraded by developments/applicants to the appropriate urban standard.</p>	<p>Amend IX.8.2 (1) as follows:</p> <p>(1) Development of new public and private roads:</p> <p>Location of roads</p> <p>(a) Whether the collector roads are provided generally in the locations shown on IX.10.1 Waihoehoe: Precinct Plan 1 to achieve a highly connected street layout that integrates with the surrounding transport network. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:</p> <p>(i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads;</p> <p>(ii) The need to achieve a permeable and efficient block structure and layout within the precinct suitable to the proposed activities;</p> <p>(iii) The constructability of roads and the ability for it to be delivered by a single landowner.</p> <p>(b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and connectivity, and supports public and active modes of transport a walkable street network;</p> <p>(c) Whether roads are aligned with the stream network, or whether pedestrian and/or cycle paths are provided along one or both sides of the stream network, where they would logically form part of an integrated open space network;</p>
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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
22.43				<p>(d) Where pedestrian and/or cycle paths are proposed within proposed open spaces, whether they are located adjacent to, and not within the 10m planted riparian area;</p>
22.44				<p>(e) Whether subdivision and development provide for <u>arterial</u>, collector roads and local roads to the site boundaries to coordinate with neighbouring sites and support the integrated completion of the network within the precinct over time;</p>
22.45				<p>Design of roads</p> <p>(g) Whether the design of collector and local roads are generally in accordance with the <u>minimum road reserve widths and key design elements</u> provided in IX.10.1 Waihoehoe: Appendix 1;</p>
22.46				<p>(h) Whether the layout of the street network provides a good degree of accessibility <u>and connectivity</u>, and supports <u>the development of Waihoehoe Precinct as a walkable centre and community street network</u>. As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 600m;</p>
22.47				<p>(i) Whether safe and legible pedestrian and cycle connections to the Drury Central train <u>rail</u> station are provided, via facilities on Waihoehoe Road and Henegon Road Drury Boulevard, from the Fitzgerald Rd extension to the Drury Rail Station. Or an alternative is provided that achieves an equal or better degree of connectivity. Where development precedes the upgrade of Waihoehoe Road and connecting roads, interim pedestrian and cycle facilities <u>should</u> may be provided.</p>
22.48				<p>(x) <u>Whether the layout of the street network supports the provision of a safe and efficient bus network;</u></p>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
22.48				<p><u>(x) Whether the design of collector and local roads include safe and efficient intersection treatments with existing roads; and</u></p> <p><u>(x) Where development is adjacent to a rural road, whether the road is to be upgraded to an urban standard.</u></p>
22.49	<p>IX.11 Appendix 1: Road Cross Section Details</p>	<p>Oppose in part</p>	<p>Auckland Transport seeks a consistency of approach across Private Plan Change precinct provisions in the use of cross sections which outline the standards to be applied to future road construction. This approach should balance the need for flexibility to respond to changing design standards over time and the need for certainty, particularly where roads have to be constructed over time by a number of developers.</p> <p>Auckland Transport seeks provisions within Precinct Plans which indicate appropriate overall minimum road reserve widths as well as the functional requirements and key design elements for street design. These should be supported by appropriate activity status, matters for discretion and assessment criteria to provide for instances where these provisions are not met.</p> <p>Auckland Transport seeks to replace the range proposed for the corridor and carriageway width with an appropriate minimum road corridor width requirement.</p> <p>The minimum road corridor width required to support the functional requirements and key design elements for each road or road typology should be defined. This width should be informed by the key design elements and functional requirements.</p> <p>Auckland Transport therefore seeks the deletion of the widths identified for carriageway, median, cycle path, street trees,</p>	<p>Delete IX.11 Appendix 1: Road Cross Section Details.</p> <p>Introduce provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and roads which need to be upgraded to urban standards including but not limited to:</p> <ul style="list-style-type: none"> • Carriageway • Footpaths • Cycleways • Public Transport • Ancillary Zone (parking, street trees etc.) • Berm • Frontage • Building Setback • Design Speed <p>As part of the new provisions, retain the vehicle access restriction provisions, as addressed above.</p>
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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>parking, and footpath. Auckland Transport acknowledges the benefits of using rain gardens as a stormwater detention/treatment device. However, the blanket rule of requiring the establishment of rain garden on all roads is not practical and may not necessarily achieve the best environmental outcomes. For example, rain gardens are not suitable for areas with steep slopes, the volume of stormwater detention and/or runoff reduction can also be limited depending on the size of the rain gardens, and they are known to be expensive to maintain and/or service and hence may not be the most cost-effective solution.</p> <p>Auckland Transport therefore seeks to delete the reference to rain gardens in IX.11 Appendix 1. The relevant stormwater management requirements are covered in E8 and E9 the Stormwater Discharge and Diversion and the Stormwater Quality Chapters of the AUPOP.</p>	
Arterial road control	Entire plan change	Oppose	<p>The AUPOP maps in its controls layer depicts arterial roads. At present, Great South Road and the state highways are the only ones that are annotated in the Drury area.</p> <p>Under Standard E27.6.4.1 of the AUPOP, any vehicle crossings onto arterial roads will require resource consent as restricted discretionary activities and with matters of consideration including effects on the transport network, building frontage, pedestrian priority, pedestrian safety, street and pedestrian amenity.</p> <p>Whilst the precinct plans do indicate future arterials and often have access provisions this does not in itself carry through to the AUPOP maps. Auckland Transport therefore requests that these be added to the AUPOP map layer.</p>	<p>Seek provisions to add layers to the AUPOP for:</p> <ul style="list-style-type: none"> • Arterial roads within the Precinct area, including Waihoehoe Road and proposed Opāheke North-South • The purpose of all roads to be shown on the precinct plans. As notified, some existing roads do not have their future role annotated. The AUPOP maps need to specify the future intended classification of these roads.

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought			
Consistency of approach and provisions across Drury Private Plan Changes			<p>There should also be a mechanism to apply them to future arterials as they are created.</p> <p>Auckland Transport seeks a consistency of approach and drafting across the policies and other provisions contained within the Drury private plan changes provided that this exercise does not adversely affect the outcomes it is seeking.</p>	<p>Make necessary amendments to PPC 50 as required to achieve a consistency in approach, including in relation to objectives, policies, rules, methods and maps, across the private plan changes within the Drury growth area.</p>			
Noise Mitigation	IX.3 Policies	Oppose in Part	<p>These additions seek to ensure that noise-sensitive activities in proximity to arterial roads are controlled to address potential health and reverse sensitivity effects.</p>	<p>Add a new policy as follows: <u>Avoid the establishment of activities sensitive to noise adjacent to arterial roads, unless it can be demonstrated that potential adverse effects from and on the corridor can be appropriately mitigated.</u></p>			
	IX.6 Standards and IX.4.1 Activity table	Oppose in Part		<p>Add a new standard to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level).</p> <p>As a consequential amendment, add a new rule as follows:</p> <table border="1" data-bbox="1079 126 1169 766"> <tr> <td data-bbox="1079 672 1169 766">(X)</td> <td data-bbox="1079 441 1169 672"><u>Development that does not comply with IX.6.X Noise Mitigation.</u></td> <td data-bbox="1079 126 1169 441">RD</td> </tr> </table>	(X)	<u>Development that does not comply with IX.6.X Noise Mitigation.</u>	RD
(X)	<u>Development that does not comply with IX.6.X Noise Mitigation.</u>	RD					
	IX.8.2 Assessment criteria	Oppose in Part		<p>Add a new assessment criterion as follows: <u>The extent to which noise sensitive activities in proximity to arterial roads are managed.</u></p>			

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Attachment 2

See attached Auckland Transport submissions on:

- Proposed Private Plan Change 48 (Drury Centre Precinct)
- Proposed Private Plan Change 49 (Drury East Precinct)
- Proposed Private Plan Change 51 (Drury 2 Precinct)

Contact details

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Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:
See attached submission

Property address:

Map or maps:

Other provisions:

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
See attached submission

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: See attached submission

Submission date: 22 October 2020

Supporting documents
Appendix 1 - CP line assets_20201022164823.195.pdf
201022_10_PPC50_Counties-Power-submisison.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

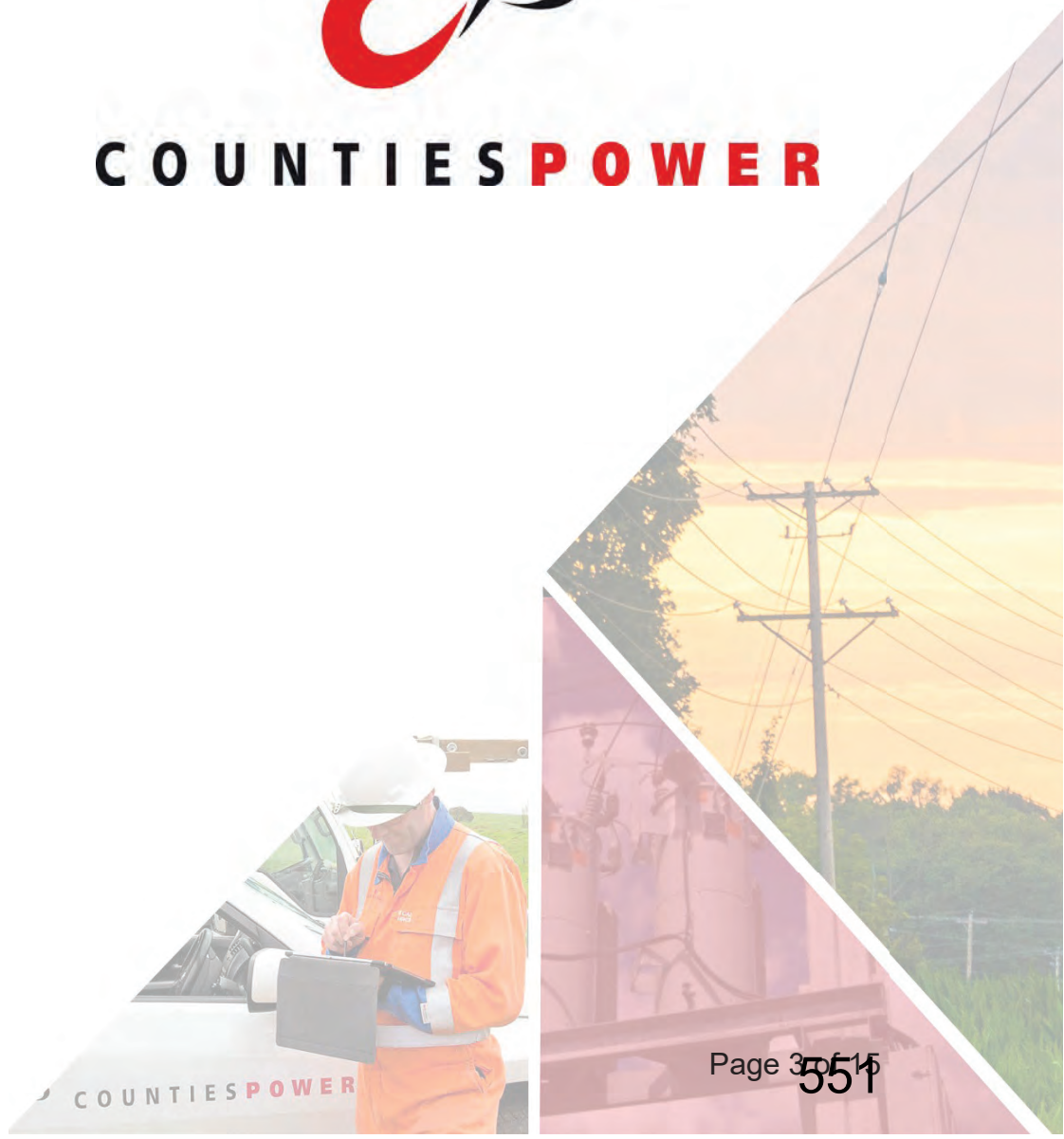
Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Auckland Unitary Plan PC 50 (Private): Waihoehoe Precinct submission



Quality Control Sheet

Submitter: Counties Power Limited

Asset: Counties Power Electricity Distribution Network

Plan: Auckland Unitary Plan - Proposed Plan Change 50 (Private) Waihoehoe Precinct

Document: Submission

Counties Power Contact: Rachel Bilbe, Land Access Coordinator

Consultant Contact: Jeremy Brydon, Planning Consultant, Align Limited

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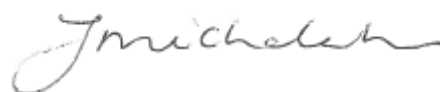
Issue 1.0	22 October 2020	For submission
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Distribution:

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AC Policy Team	Auckland Council	Online Submission



Produced by:
Jeremy Brydon



Review by:
Jo Michalakis

Align Limited

Date: 22 October 2020

Limitations:

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1. Introduction

This document provides a submission on Plan Change 50 (Private): Waihoehoe Precinct. The document contains a table with submission points both supporting and opposing policies, matters of discretion and assessment criteria to the following parts of the proposed plan change:

- Objective IX.2 (2);
- Policy IX.2 (3);
- Policy IX.3 (1);
- Policy IX.3 (3);
- Policy IX.3 (5);
- Policy IX.3 (6);
- Policy IX.3 (7);
- New Policy IX.3 (12);
- New Policy IX.3 (13);
- IX.8.1 Matters of discretion (1); and
- IX.8.2 Assessment criteria (1)
- IX.10 Appendices – Appendix 1

Overall, Counties Power are strong in their support of the developments and have the ability to supply power to enable this development. Counties Power are well positioned to support the developments from both a funding and forward planning perspective (i.e. have either purchased or identified land for future zone substations and a future option to create a new GXP at Transpower's Drury site in addition to the existing Transpower Bombay GXP). Counties Power is currently constructing a new zone substation at Bombay (at a lower voltage than the Bombay GXP), which combined with its existing Opaheke substation can provide capacity to the development. In addition, once construction of the Quarry Road substation, which is located in Drury, is completed over 2025 - 2030, Counties Power will have additional capacity to supply power any future demands within the area covered by Plan Change 50. Counties Power are also working with Kiwirail to build a 25kV line from Quarry Rd, Drury to Burt Rd to support the Papakura to Pukekohe rail electrification programme which will support the proposed Railway Station in this precinct.

Counties Power wishes to be heard in support of their submission.

If others make a similar submission, they will consider presenting a joint case with them at a hearing.

2. About Counties Power

Counties Power is an electricity operator under the Electricity Act, a network operator under the Telecommunications Act, and a network utility operator under the Resource Management Act (RMA). Counties Power is a requiring authority in respect of its electricity network (NZ Gazette 13 January 1994, p55).

Counties Power owns, manages, and operates an electricity distribution network in southern Auckland, Waikato, and Hauraki District areas with a system length of 3,200km covering an area of approximately 2,250km². The Auckland Council portion of their network covers 830km² and makes up 37% of the Counties Power network. In the Auckland Region, this includes urban centres such as Pukekohe, Waiuku and Southern Papakura; rural residential areas like Hunua; and rural areas with very low customer density. It also includes Drury, the area subject to proposed Plan Change 46. The company also provides telecommunications and smart metering services.

Counties Power is 100% consumer owned. All shares are held by the Trustees of the Counties Power Consumer Trust (Trust) on behalf of all local power consumers. The Trust has a total of five Trustees, of which two are required to be elected every two years. Counties Power is managed for the benefit of its consumers and their communities. The Trust oversees the performance of Counties Power through the appointment of a Board of Directors (Board). The Board and Management of Counties Power consult the Trust on the strategic direction, business plans, and asset management measures and targets. Information about the Trust can be obtained from www.countiespowertrust.co.nz.

By length, 72% of the Counties Power network is rural overhead, however the urban networks supplying Pukekohe, Waiuku, Tuakau, Pokeno, Drury and parts of Papakura comprise a split of overhead and underground assets. Generally, the eastern part of the network is newer, higher in network connection densities and subject to high levels of growth in the areas adjacent to motorway and state highway corridors. The western side of the network is older, more remote, lower density and subject to little growth. The Counties Power network is exposed to a range of environmental conditions, including weather – particularly the harsh coastal environment around the Awhitu peninsula, and vegetation – most notable in the areas around Hunua Ranges, but with effects across the entire network.

3. The Counties Electricity Network

Counties Power has two points of supply from Transpower's National Grid via GXP's at Glenbrook and Bombay. From there, power is distributed to consumers via eight zone substations and our extensive network of lines, cables, transformers, and other equipment. The Glenbrook GXP supplies the western substations at 33kV whilst Bombay GXP supplies the eastern 110kV and 33kV.

Counties Power's network is made up of both High Voltage (HV) and Low Voltage (LV) lines made up as follows:

HV network comprises:

- sub-transmission lines (33kV and 110kV) which carry electricity from the Grid Exit Point (GXP) to zone substations or between zone substations. Typically serving 500 to 12,000 customer connections.

- feeder lines (11kV and 22kV) which carry electricity from zone substations to transformers or in some cases direct to customers with a large demand (e.g. some industrial customers). These typically serve 80 to 2,500 customer connections.

LV Network (400V) comprises lines from transformers to individual connection points, typically serving 1 to 20 customer connections.

More than 20 years ago, Counties Power decided to provide for future growth by converting the backbone of its network from 33kV (for sub-transmission) and 11kV (for feeders) to 110kV and 22kV, respectively. These voltages carry significant loads with a reasonably unobtrusive overhead line network and have provided the consumer-shareholders of Counties Power with a network that is cost effective to construct, flexible and resilient.

Approximately 8,500 customers (or 20% of Counties Powers total network load) are in the Hingaia, Drury, Papakura and Hunua areas with this number expected to rise as part of the proposed plan changes currently in motion.

The customers in these areas rely on power from the Counties Power zone substation at Opaheke, which is supplied from the Transpower GXP at Bombay. Electricity is conveyed between these two points by means of two sub-transmission lines operating at 110kV, referred to as the Bombay-Opaheke (west) and Bombay-Opaheke (east) lines. The west line runs through the middle of the proposed Waihoehoe Precinct for approximately 750m.

There are three additional 22kV overhead lines within the precinct. These are shown in the attached Appendix 1.

4. Low carbon development

The Government is targeting 100% renewable electricity generation. Non-renewable alternatives, such as the reticulation of natural gas, unnecessarily increases carbon dioxide emissions when alternative electricity solutions already exist. These solutions are locked in for the economic life of the equipment (e.g. gas boilers, home gas heaters). With this in mind, Counties Power requests that Auckland Council uses this opportunity to implement policies that will enable low carbon energy options within the development precinct that will reduce future carbon emissions for the Auckland and be cost effective for households and businesses.

- Enabling security of electricity supply (targeted to be 100% renewable) to provide for end-use electricity consumption activities where cost-effective.
- Reducing transport carbon dioxide emissions through encouraging the electrification of transport infrastructure, including rail. The development should consider the need for provision of charging stations for an increasing electric vehicle fleet, with numerous OECD countries now looking to stop the sale of petrol and diesel vehicles around 2035.

IX Waihoehoe Precinct				
Objective/Policy	Provision	Position	Reason for position	Relief Sought
IX Waihoehoe Precinct				
Objective IX.2 (2)	Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network.	Support	Counties Power relies on the effectiveness and efficiency of the State Highway to ensure access for vehicles to carry out timely construction, maintenance, and repair to the network for the essential electricity service.	23.1 Include objective as proposed.
Objective IX.2 (3)	Development is supported by appropriate infrastructure.	Support	Counties Power provides electricity infrastructure to enable and support development. Once construction of the Quarry Road substation is complete in 2025, Counties Power will have the capacity to supply power to the area covered by Plan Change Area 50. Electrical infrastructure and reticulation can be made available subject to negotiation and satisfactory financial contribution from the developer and suitable space being made available in a timely manner. If there is a requirement to relocate or underground existing overhead infrastructure, the developer will also be required to make a contribution toward the cost. It is noted that there is a Counties Power 110kV sub transmission line which crosses the identified precinct area from south to north. This is a vital sub transmission line in terms of achieving and maintaining security of electricity supply to the Plan Change area and integration of the proposed line with future roading would be recommended.	23.2 Include objective as proposed.

<p>Policy IX.3 (1)</p>	<p>Require collector roads to be generally in the locations shown in IX.10.X Waihoehoe: Precinct Plan 1 while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network.</p>	<p>Support in part</p>	<p>Electrical infrastructure and reticulation can be made available subject to negotiation and satisfactory financial contribution from the developer and suitable space being made available in a timely manner. If there is a requirement to relocate or underground existing overhead infrastructure, the developer will also be required to make a contribution toward the cost.</p> <p>Currently the 110kV line crosses the precinct and does not align with any proposed road as part of the precinct then Counties Power will require suitable access to their line for maintenance purposes.</p>	<p>If the proposed collector road shown in the appendices does not change then Counties Power requests that, if the existing 110kV line remains in-situ, provision be made to maintain suitable vehicular access to the line for maintenance purposes.</p> <p>Further to this appropriate setback for new buildings should be maintained at all times in accordance New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003.</p>
<p>Policy IX.3 (3)</p>	<p>Require streets to be attractively designed and appropriately provide for all transport modes.</p>	<p>Support in part</p>	<p>Electrical infrastructure must be taken into consideration when planning landscaping and planting of street trees and should be carried out in consultation with Counties Power.</p> <p>This is of particular importance where existing overhead lines are to be retained. Trees, branches and windblown tree debris falling onto lines are a major cause of power outages in Auckland. The Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 require that trees must be kept clear of network power lines. The presence of trees can also impede access for maintenance purposes.</p> <p>When designing the layout of the Town road network, consideration should be given to the type and location of</p>	<p>Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted.</p> <p>Counties Power seek consultation regarding the species of trees/shrubs standard in the vicinity of overhead lines to ensure that due consideration is given to the height and spread of the tree and any potential hazards to the electricity network associated with the</p>

23.3

23.4

			<p>landscaping, street trees, street furniture and paving to ensure suitable access to electrical infrastructure for operation and maintenance purposes and minimise any negative effect on supply to the area.</p>	<p>location and the species of the tree.</p> <p>Counties Power seeks a typical road cross-section with minimum 800mm allowance for berms to ensure that there is acceptable width for installation of underground electrical reticulation.</p> <p>Counties Power seeks that the provisions are amended to consider these factors.</p>	<p>23.4</p>
<p>Policy IX.3 (5)</p>	<p>Ensure that the timing of development in Waihoehoe Precinct is coordinated with the transport infrastructure upgrades necessary to mitigate the adverse effects of development on the effectiveness and safety of the immediately surrounding transport network.</p>	<p>Support</p>	<p>The timing of development should be coordinated with all infrastructure providers in order to be able to provide the Waihoehoe Precinct with appropriate supporting infrastructure and avoid disruption caused by delayed installation of other (non-water) utilities.</p>	<p>Include policy as proposed.</p>	<p>23.5</p>
<p>Policy IX.3 (6)</p>	<p>Ensure that development in Drury East is coordinated with supporting stormwater, wastewater and water supply infrastructure.</p>	<p>Support in part</p>	<p>The timing of development should be coordinated with all infrastructure providers in order to be able to provide the Waihoehoe Precinct with appropriate supporting infrastructure and avoid disruption caused by delayed installation of other (non-water) utilities.</p>	<p>Amend the provision to include reference to electrical, telecommunications and other infrastructure.</p>	<p>23.6</p>
<p>Policy IX.3 (7)</p>	<p>Provide for the staging of pedestrian and cycling connections to the Drury Central train station to encourage the use of public and active modes of transport.</p>	<p>Support</p>	<p>Where access is required to existing, or new electrical infrastructure installed within the pedestrian or cycling routes, it is essential to maintain suitable vehicular access for electrical lines construction, upgrade or maintenance in these areas</p>	<p>Include policy as proposed.</p>	<p>23.7</p>

New Policy IX.3 (12)	Provide for the inclusion of vehicle recharging stations within parking areas and for the ability to upgrade additional spaces for increased demand when required.		during and after the construction of these connections to the train station.	Include new policy as proposed.	23.8
New Policy IX.3 (13)	Enable the reduction of CO ₂ emissions by promoting the use of renewable energy in new subdivisions and development.	Support	Central government has set greenhouse gas emissions reductions targets for 2030 and with any new development area comes the ability to promote more sustainable energy types than those currently in wide use.	Include policy as proposed	23.9
Rules/Standards	Provision	Position	Reason for position	Relief Sought	
IX.8.1 Matters of discretion	(1) Development of public and private roads; (a) Location and design of the collector streets, local streets and connections with neighbouring sites to achieve an integrated street network; (b) Provision of cycling and pedestrian networks; (c) Location and design of connections to the Drury Central train station; and (d) Matters of discretion IX8.1 (1)(a) - (c) apply in addition to the matters of discretion in E38.12.1.	Support in part	Each category of road (or service lane) must provide suitable space for installation of electrical infrastructure to meet the needs of the area or building, as well as adequate separation between the different utilities, landscaping and other road users. Where electrical infrastructure is required, vehicular access of a suitable construction standard must be provided to allow access for maintenance of electrical infrastructure. Note: the indicative road layouts are supported by Counties Power.	Counties Power seeks that the provisions are amended to consider these factors. Counties Power seeks a typical road cross-section for collector roads to ensure that the berm is an acceptable width for installation of underground electrical reticulation.	23.10
IX.8.2 Assessment criteria	(1) Development of public and private roads; Location of roads	Support in part	Counties Power support the road layout as indicated in IX.10.1 Waihoehoe Precinct Plan 1, or an alternative which provides similar connectivity for the	Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the	23.11

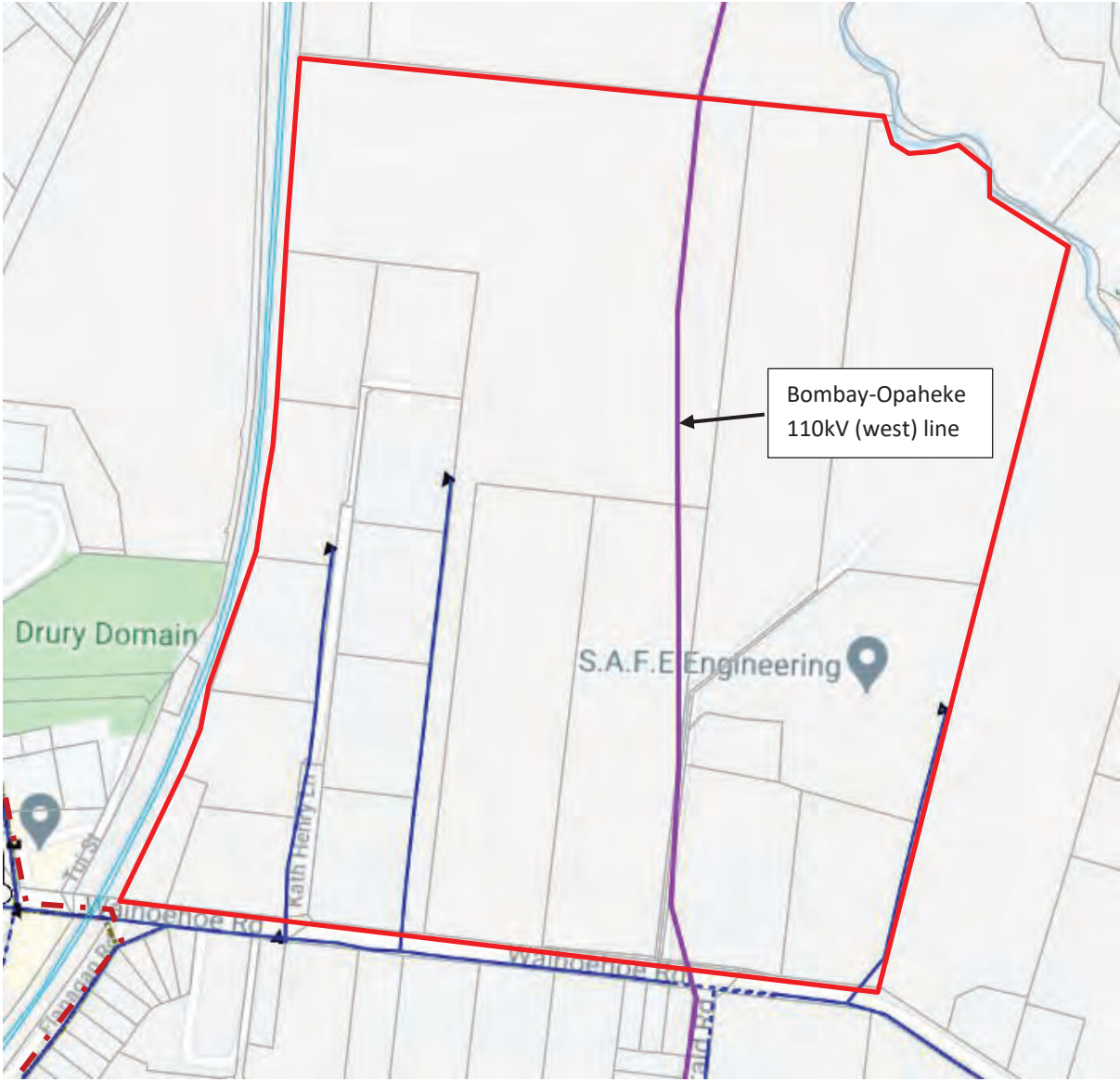
	<p>(a) The extent to which the collector road network and the Key Retail Street are provided generally in the locations shown on IX.10.1 Waihoehoe. Precinct Plan 1 to achieve a highly connected street layout that integrates with the surrounding transport network and responds to landform. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:</p> <p>(i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads;</p> <p>(ii) The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and</p> <p>(iii) The constructability of roads and the ability for it to be delivered by a single landowner.</p> <p>(b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network. Whether subdivision and</p>		<p>installation of the electrical distribution network.</p> <p>Counties Power support the functional matters (i) and (ii) in that these may also be matters which would otherwise impact on their ability to install and maintain the electrical infrastructure.</p> <p>Counties Power support functional matter (iii) as this will enable a coordinated and sequential approach to the supply and installation of new electrical reticulation. This is of particular importance where existing overhead infrastructure is to be replaced with underground cables and where connectivity needs to be maintained across distinct areas within a specific Plan Change area or between the different Plan Change Areas (48-51).</p> <p>Electrical infrastructure must be taken into consideration when planning landscaping and planting of street trees and should be carried out in consultation with Counties Power. This is of particular importance where existing overhead lines are to be retained but is also relevant in terms of access to, and the safe operation of existing and new underground cables.</p> <p>Each category of road must provide suitable space for installation of electrical infrastructure as well as a adequate separation between the different utilities, landscaping and other road users.</p>	<p>Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted.</p> <p>Counties Power seeks a typical road cross-section with minimum 800mm allowance for berms to ensure that there is acceptable width for installation of underground electrical reticulation.</p> <p>Counties Power seeks that the provisions are amended to consider these factors.</p>
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23.11






<p>561</p>	<p>development provides for collector roads and local roads to the site boundaries to coordinate with neighbouring sites and support the integrated completion of the network within the precinct over time;</p> <p>Design of roads</p> <p>(f) Whether the design of collector and local roads are generally in accordance with the road cross sections provided in IX.10.1 Waihoehoe: Appendix 1;</p> <p>...</p> <p>(h) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network. As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 600m;</p> <p>(i) Whether safe and legible pedestrian and cycle connections to the Drury Central train station are provided, via facilities on Waihoehoe Road and Flanagan Road/Drury Boulevard, from the Fitzgerald Rd extension to the Drury Rail Station. Or an alternative is provided that achieves an equal or</p>			
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IX.10 Appendices	<p>better degree of connectivity. Where development precedes the upgrade of Waihoehoe Road and connecting roads, interim pedestrian and cycle facilities may be provided.</p> <p>...</p>	Support in part	<p>Electrical infrastructure must be taken into consideration when planning landscaping and planting of street trees and should be carried out in consultation with Counties Power.</p> <p>This is of particular importance where existing overhead lines are to be retained – especially the 110kV sub-transmission line running through the precinct area. If required to be undergrounded in the road, a minimum 800mm berm width will need to be in place with the preference for wider to accommodate further growth.</p> <p>Each category of road must provide suitable space for installation and safe operation of electrical infrastructure. Roots from trees and other plants can cause problems where there are underground cables in terms of access for maintenance of the cables and faults.</p>	<p>Counties Power seeks that the provisions are amended to consider these factors.</p>
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23.12



Existing Counties Power Infrastructure

	110kV sub-transmission (overhead)		Plan area
	22kV distribution (overhead)		
	22kV distribution (underground)		
	Fibre – high criticality (overhead/underground)		



FORM 5

Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: C/- Beca Ltd
21 Pitt Street
Auckland 1010

Attention: Jess Rose

Phone: 09 308 4565

Email: jess.rose@beca.com

This is a submission on the Proposed Plan Change 50 to the Auckland Unitary Plan ('Plan Change 50').

Introduction

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, and ensuring that the educational needs of new communities are met through purchasing sites and constructing new schools to meet demand as it occurs. The Ministry has an interest in activities that may impact on educational facilities and assets in the Auckland region and on the timing and urban form of large scale that will generate demand for additional education facilities, including state schools, Māori medium and learning support requirements.

The Ministry could not gain an advantage in trade competition through this submission

The Ministry of Education's interest in the Drury Area

In 2019, the Ministry of Education developed the National Education Growth Plan 2030 (NEGP) which provides a co-ordinated approach for addressing school-aged population growth across New Zealand. The NEGP identifies a number of catchments across the country and considers the anticipated demand and growth patterns so that the Ministry can ensure the school network is delivered in the right place at the right time.

Plan Change 50 is one of five recently notified plan change in the Drury area. The NEGP categorises the Papakura-Rosehill-Drury area as 'Blueprint for Growth', being an area where: *"local government planning includes intensive housing development and expansion into outer urban areas in response to, or causing, a large influx of people to move into a particular area. These areas provide opportunities to master plan education infrastructure collaboratively across agencies to integrate into new communities"*.

NEGP anticipates that the school network in the Papakura-Rosehill-Drury catchment will need to support approximately 11,500 to 12,600 students. With the potential need for 4 – 6 new primary schools and at least one new state secondary school in this area by 2030.

Position on this plan change

Plan Change 50 is seeking to rezone approximately 49ha of Future Urban zoned land in Drury East to Terrace Housing and Apartment Building zone. Once the urban zonings are in place, the Drury East development (Plan Changes 48, 49, and 50) will enable approximately 7,000 new dwellings accommodating 19,000 new residents. The rezoning of the proposed area covered by Plan Change 50 will provide capacity for at least 1,133 dwellings.

The Ministry broadly supports the proposed plan changes in Drury in so far as they will provide a framework for the development of much needed housing for the wider Auckland Region. This will, however, require additional capacity in the local school network to cater for this growth as the area develops. The section 32 Report supporting the plan change records that: *“New schools will be required to service urban growth in Drury and the Ministry of Education is currently undertaking a needs assessment. The Ministry of Education will designate the land for future schools as required.”*

The Ministry agrees that new schools will be required to service the urban growth enabled through the proposed plan changes. The Ministry has had a number of high-level discussions with developers in East Drury; however, it has not commenced a site acquisition process. These plan changes, if approved, will influence the site selection process and determine what level and type of educational facilities are required. The Ministry will still need to go through a formal notice of requirement processes before any designation is included in the Unitary Plan. The underlying District Plan provisions will be considered as part of any future the designation processes within the Plan Change areas. Currently the proposed plan change provisions do not recognise or acknowledge the need for a future school site to be enabled to support the social and educational needs of the East Drury community.

The Section 32 report states that 485 Burt Road, in West Drury has been rezoned Special Purpose School zone and a Notice of Requirement is currently processing to designate 41 Burberry Road, West Drury for a Primary School and Early Childhood Education Centre. The Ministry would like to clarify that:

- The school at 485 Burt Road will be a State Integrated School and the Ministry will not determine the timing for this school.
- The site at 41 Burberry Road, Drury has now been designated for a Primary School.
- Land at 401 and 281 Jesmond Road, Drury has been purchased for the establishment of a Secondary School; however the notice of requirement process has not been lodged to date.

The Ministry provides and plans for schools in response to demand created by residential development or intensification. It is important to ensure that other key infrastructure such as roading, wastewater and utilities are addressed up front as part of the Plan Change process to ensure wider infrastructure provision is timed appropriately to avoid access or service issues for education facilities (for example needing to establish appropriate road infrastructure to access a new school site).

The Ministry therefore has an interest in:

- How development is planned and sequenced, particularly in terms of infrastructure provision such as roading as this will impact where and when schools can be established.
- Ensuring the Precinct provisions specifically acknowledge and provide for schools. This is critical given schools are a critical piece of social and community infrastructure. An absence of

supportive provisions can place obstacles in the way of establishment of education facilities in future years.

- The urban form and amenity provided through connectivity and usable areas of public open space.

We note that the plan change reports were drafted prior to the publication of the National Policy Statement on Urban Development 2020 (NPS-UD) but that the Section 32 Report does include an assessment of the Proposed National Policy Statement on Urban Development. Of particular importance to the Ministry is Policy 10 of the NPS-UD, which states that local authorities should engage with providers of development infrastructure and additional infrastructure (schools are considered additional infrastructure) to achieve integrated land use and infrastructure planning. In addition to this, subpart 3.5 of the NPS-UD states that local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available. We have requested amendments to the precinct provisions below, which reflect the importance of providing for additional infrastructure in areas of growth.

The Ministry broadly support provisions in the plan change that seek to put in place a framework that will deliver integrated communities with a street and block pattern that supports the concepts of liveable, walkable and connected neighbourhoods. This includes a transport network that is easy and safe to use for pedestrians and cyclists and is well connected to public transport, shops, schools, employment, open spaces and other amenities.

Decision sought

The Ministry requests the following decision:

- Amendments to the proposed IX. Waihoehoe Precinct Chapter (requested changes are underlined):
- Objective IX.2 (3) Development is supported by appropriate infrastructure (including education infrastructure). | 24.1
- Policy IX.3 (6) Ensure that development in Drury East is coordinated with supporting education infrastructure, stormwater, wastewater and water supply infrastructure. | 24.2
- *IX.8.1 Matters of discretion*

The Council will reserve its discretion to all of the following matters when assessing a restricted discretionary activity resource consent application, in addition to the matters specified for the relevant restricted discretionary activities in the overlays, Auckland-wide or zones provisions:

1) *Development of public and private roads:*

- (a) *Location and design of the collector streets, local streets and connections with neighbouring sites (including schools) to achieve an integrated street network;* | 24.3
 - (b) ...
 - (c) ...
 - (d) ...
- *IX.8.2 Assessment criteria*

1) *Development of public and private roads:**Location of roads*

(a) ...

i. ...

ii. *The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities (including provision of schools); and*

24.4

iii. ...

(b) ...

(c) ...

(d) *Whether subdivision and development provides for collector roads and local roads to the site boundaries to coordinate with neighbouring sites (including potential future school sites) and support the integrated completion of the network within the precinct over time;*

24.5

Design of Roads

(f) ...

(g) ...

(h) *Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network, including to existing schools or sites designated for this purpose. As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 600m;*

24.6

(i) ...

- Amendments to ensure there is provision of appropriate public open space to support the surrounding community.

24.7

- The retention of:

- Standard IX.6.1 Staging of Development with Transport Upgrades. These standards will help ensure appropriate transport infrastructure is provided prior to significant development occurring in the area. It will also enable greater ability to stage the provision of education facilities as development progresses.

24.8

- Objectives and policies relating to the provision of safe and legible walking and cycling connections through communities as this will decrease reliance on private motor vehicle for travel to and from school and have health and safety benefits for communities.

24.9

Given the level of increase in housing provision in Drury as a result of this private plan change and the other plan changes in Drury, the Ministry requests regular engagement with Auckland Council and Oyster Capital to keep up to date with the housing typologies being proposed, staging and timing of this development so that the potential impact of the plan changes on the school network can be planned for.

Any consequential amendments required to give effect to the matters set out in this submission.

The Ministry wishes to be heard in support of its submission.



Jess Rose
Planner – Beca Ltd

(Consultant to the Ministry of Education)

Date: 22 October 2020

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name) Leith McFadden

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

6 Sagra Way
Bombay 2675

Telephone: 021 752 987 Fax/Email: leith@playgrounds.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number PC 50

Plan Change/Variation Name Waihoehoe Precinct

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

The zoning and precinct provisions

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended Yes No

The reasons for my views are:

Support in part. The overall development of the area is supported to support Auckland's Growth.
Increased commitment, by the way of open space zoning, is requested to ensure a positive community outcome.
Concerns regarding negative traffic, transport and infrastructure effects.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

Accept the proposed plan change / variation with amendments as outlined below

Decline the proposed plan change / variation

If the proposed plan change / variation is not declined, then amend it as outlined below.

Zone areas for parks and public space.

25.1

Ensure infrastructure upgrades are tied to staging through precinct provisions.

25.2

I wish to be heard in support of my submission

I do not wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing

22 October 2020

Signature of Submitter
(or person authorised to sign on behalf of submitter)

Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could /could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

Contact details

Full name of submitter: Susan Andrews

Organisation name: Heritage New Zealand Pouhere Taonga

Agent's full name:

Email address: sandrews@heritage.org.nz

Contact phone number: 09 307 9920

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:

Please see attached submission.

Property address: Please see attached submission.

Map or maps: Please see attached submission.

Other provisions:

Please see attached submission.

Do you support or oppose the provisions you have specified? I or we support the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:

Please see attached submission.

I or we seek the following decision by council: Approve the plan change with the amendments I requested

Details of amendments: Please see attached submission.

Submission date: 22 October 2020

Supporting documents

HNZPT Submission PPC50 - Waihoehoe Precinct.pdf

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

No

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



22nd October 2020

Attention: Planning Technician
Auckland Council
Level 24
135 Albert Street
Private Bag 92300
Auckland 1143

Dear Sir or Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

PROPOSED PLAN CHANGE 50 (PRIVATE): WAIHOEHOE PRECINCT

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. This is a submission on the following proposed private change to the Auckland Unitary Plan (Operative in Part) (the proposal):

PC 50 (Private): To rezone 48.9 hectares of land located to the north of Waihoehoe Road and east of the North Island Main Trunk Railway, from Future Urban to Residential: Terrace Housing and Apartment Buildings zone.

2. Heritage New Zealand could not gain an advantage in trade competition through this submission.

- Heritage New Zealand is an autonomous Crown Entity with statutory responsibilities under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage.

3. The specific provisions of the proposal that Heritage New Zealand's submission relates to are:

- The plain change in its entirety.

4. Heritage New Zealand's submission is:

- Heritage New Zealand wishes to have the proposed plan change above amended.

5. The reasons for Heritage New Zealand's position are as follows:

5.1. The Drury area has a number of notable historical associations relating to Maori settlement and activity, early European settlement, the New Zealand Wars, development of transport and industry, and rural activities from the mid-19th to the mid-20th centuries.

5.2. The archaeological assessment accompanying the proposed plan change provides comprehensive background information, but only the eastern third of the plan change area has been subject to an archaeological field survey. Therefore, as both the Archaeological Assessment and Assessment of Effects acknowledge, there is the potential for unrecorded archaeological sites in the plan change area.

- 5.3. Ideally, Heritage New Zealand would seek that additional archaeological field survey and assessment should be completed for the balance of the plan change area not yet surveyed prior to the Plan Change being granted.
- 5.4. While a requirement that an authority be applied for would be ultra vires, the requirement that an archaeological assessment be undertaken during the subdivision stages of proposed development will allow the presence of potential archaeological sites to inform the development including green space locations, building platform locations and road layout. Any features discovered through this process could also be used to inform interpretation in the area.
- 5.5. Reliance on the Accidental Discovery Protocol provisions of the Auckland Unitary Plan is only appropriate in the instance where it has been established by a professional archaeologist that the potential for archaeological remains is low. Without an archaeological assessment, in an area acknowledged as having the potential for unrecorded archaeological sites, reliance on the Accidental Discovery Rule would be inappropriate.
- 5.6. Riparian margins often contain archaeology. Particularly in relation to the Waihoihoi Stream, Heritage New Zealand supports the proposed 20 metre riparian setback for buildings. In order to avoid damage to archaeological sites from plant and tree roots, Heritage New Zealand requests that the planting proposed in the precinct provisions within the riparian margins of the watercourses be subject to an archaeological assessment so that the planting can avoid archaeological sites. 26.1
- 5.7. While potentially outside of the scope of this process, Heritage New Zealand also believes that Auckland Council and the applicants should explore the potential of commissioning a heritage interpretation plan for the wider Drury area subject to the four separate plan changes, including ideas for place-shaping, place-naming, colour schemes, design references, public artworks and other heritage interpretation. With the proposed esplanade reserves, riparian setbacks, and new road layouts it may be possible to develop a heritage trail to support local identity and enhance public understanding of historic heritage places through improved public access, continuous esplanade reserves, presentation, interpretation and maintenance of significant historic heritage as suggested in the Structure Plan for the area. 26.4
- 5.8. Heritage New Zealand supports mana whenua in the exercising of kaitiakitanga and would ask that appropriate provisions are incorporated in the precinct plan to address any Māori cultural heritage values that may have been identified. 26.3
- 6. Heritage New Zealand seeks the following decision from the local authority:**
- Accept the proposed plan change with amendments as outlined below:
 - Include provisions within the precinct plan to require archaeological assessment of the area are undertaken by a suitably qualified professional through the subdivision process. 26.1
 - Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to exclude archaeological site extents as assessed by a professionally qualified archaeologist and require the preparation of an archaeological assessment by a suitably qualified person to inform the planting plan. 26.2

- Include appropriate provisions within the precinct plan to address any Māori cultural heritage values identified.

26.3

7. Heritage New Zealand does wish to be heard in support of our submission.

Yours sincerely



Sherry Reynolds
Director Northern Region

Address for Service:

Susan Andrews

PO Box 105 291, Auckland

09 307 9920

sandrews@heritage.org.nz

Contact details

Full name of submitter: Matthew Royston Kerr

Organisation name:

Agent's full name:

Email address: Royston.Kerr@Hirepool.co.nz

Contact phone number: 092947636

Postal address:
34 Appleby Road
Drury
Auckland 2577

Submission details

This is a submission to:

Plan change number: Plan Change 50 (Private)

Plan change name: PC 50 (Private): Waihoehoe Precinct

My submission relates to

Rule or rules:
Rezoning of Future Urban Zone land.

Property address:

Map or maps:

Other provisions:
Reverse sensitivity effects of the proposed Terrace Housing and Apartment Building zone on adjacent Future Urban Zoned land.
Increased traffic effects along Waihoehoe Road with insufficient provisions for the upgrade of the corridor.
Inefficiency and uncertainty with regard to the rezoning and urban development of the remaining Future Urban Zoned land in the Opaheke Drury area.

Do you support or oppose the provisions you have specified? I or we oppose the specific provisions identified

Do you wish to have the provisions you have identified above amended? Yes

The reason for my or our views are:
Reverse sensitivity effects of the proposed Terrace Housing and Apartment Building zone on adjacent Future Urban Zoned land.
Increased traffic effects along Waihoehoe Road with insufficient provisions for the upgrade of the corridor.
Inefficiency and uncertainty with regard to the rezoning and urban development of the remaining Future Urban Zoned land in the Opaheke Drury area.

I or we seek the following decision by council: Decline the plan change

Submission date: 22 October 2020

Attend a hearing

Do you wish to be heard in support of your submission? Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

Declaration

Could you gain an advantage in trade competition through this submission? No

Are you directly affected by an effect of the subject matter of this submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

Yes

I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PRIVATE PLAN
CHANGE UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE
MANAGEMENT ACT 1991**

TO: Auckland Council

SUBMITTER: Drury South Limited

SUBMISSION ON: Proposed Plan Change 50 (Private): Waihoehoe Precinct to the Auckland Unitary Plan ("**PC50**").

Introduction

1. Drury South Limited ("**DSL**") owns approximately 257ha of land within the Drury South Industrial Precinct, located to the south of the PC50 land. DSL is in the process of developing its land for largely industrial purposes.
2. DSL could not gain an advantage in trade competition through this submission.
3. DSL is directly affected by effects of PC50 that:
 - (a) adversely affect the environment; and
 - (b) do not relate to trade competition or the effects of trade competition.

Scope of submission

4. The submission relates to PC50 in its entirety, but is particularly focused on specific provisions of PC50 as set out in **Schedule 1**.

Nature of submission

5. DSL supports further urban development in the Drury area and is supportive of PC50, subject to appropriate provisions being included within PC50 to ensure that PC50 does not adversely affect others in the area.

Reasons for submission

6. PC50, if amended to address the issues DSL has identified:
 - (a) will promote sustainable management of resources, and therefore will achieve the purpose and principles of the Resource Management Act 1991 ("**RMA**");
 - (b) will meet the reasonably foreseeable needs of future generations;
 - (c) will enable social, economic and cultural wellbeing;
 - (d) will avoid, remedy or mitigate adverse effects on the environment; and

- (e) represents the most appropriate way to achieve the objectives of the Auckland Unitary Plan, in terms of section 32 of the RMA.

Specific reasons for submission

7. Without limiting the generality of paragraph 6 above, DSL is particularly concerned to ensure that the transport effects of PC50 are appropriately managed.
8. Transport was a key consideration through the development of the Drury South Industrial Precinct provisions that has detailed transport provisions including various transport upgrades external to the Precinct to ensure that transport effects are appropriately managed. DSL seeks to ensure that a framework is established under PC50 that similarly and appropriately manages transport effects.

Decision sought

9. The following decision is sought from the local authority:
- (a) confirmation of PC50 subject to the inclusion of appropriate provisions to address the issues discussed above and identified in **Schedule 1**; and
- (b) such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.
10. DSL wishes to be heard in support of this submission.
11. If others make a similar submission consideration would be given to presenting a joint case with them at any hearing.

DRURY SOUTH LIMITED by its solicitors and authorised agents Russell McVeagh:



Signature:

Daniel Minhinnick

Date:

22 October 2020

Address for Service:

C/- Lauren Eaton
Russell McVeagh
Barristers and Solicitors
Level 30
Vero Centre
48 Shortland Street
PO Box 8/DX CX10085
AUCKLAND 1140

Telephone:

+64 9 367 8000

Email:

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SCHEDULE 1

Issue Provision	Reasons for submission	Decision / relief sought
IX.4.1(A2), (A3), (A5) and (A6) IX.6.2	<p>Activity Table IX.4.1 (A2), (A3), (A5) and (A6) together with Standard IX.6.2 provides an alternative mechanism (via trip generation thresholds) to meeting the GFA thresholds in Standard IX.6.1 that trigger transport upgrades.</p> <p>It is not clear how the trip generation thresholds and GFA mechanisms will be implemented given that there will be challenges that arise with monitoring trip generation levels across a complex arrangement of multiple development sites across an area site with multiple access points.</p>	<p>Consideration should be given to whether a simplified approach using GFA triggers alone is a more effective approach, given the potential challenges in monitoring trip generation levels for a development of this scale.</p>
IX.4.1	<p>Activity Table IX.4.1 also does not address the issue of non-compliance with Standard IX.6.5 (Stormwater Quality and Flooding).</p>	<p>Amend Table IX.4.1 by introducing two new discretionary activities: (a). <i>Development that does not comply with Standard IX6.1 (Staging of Development with Transport Upgrades)</i>; and (b). <i>Subdivision that does not comply with Standard IX6.1 (Staging of Development with Transport Upgrades)</i>.</p>
IX.6(2)	<p>IX.6(2) exempts activities within the PC50 area from complying with Trip Generation Rule E27.6.1. This might be acceptable if adequate provision was made for transportation infrastructure within the other PC50 rules, but it is not, as set out below.</p>	<p>Amend so that any exemption is clear as to the activities that it applies to, and that the effects of those activities have been assessed through an ITA.</p>
IX.6.1	<p>Tables IX.6.1.1 and IX.6.1.2 set out the development GFA thresholds and upgrades to the Waihoehoe Road / Great South Road intersection both with and without direct access being provided to the Drury Centre from State Highway 1, as shown on IX.10.2 Waihoehoe: Precinct Plan 2. The transportation upgrades proposed in both Tables IX.6.1.1 and IX.6.1.2 are inadequate in scope and nature to ensure that there are not adverse effects on the Drury South Industrial Precinct and the surrounding transport network. The transport assessment which supports PC50 places undue reliance on currently unfunded transportation upgrades being provided by other parties or through as yet unspecified developer funding agreements.</p>	<p>Amend PC50 to ensure that: (a). adequate upgrading of the surrounding road network (for example Waihoehoe Road shown on Precinct Plan 1) is undertaken; and (b). any non-compliance with this standard is a discretionary activity.</p>

28.1

28.2

28.3

28.4



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 Customs Street West
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 Auckland 1143
 New Zealand
 T 64 9 969 9800
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FORM 5

Submission on a notified proposal for Private Plan Change 50 – Drury Centre under Clause 6 of Schedule 1 Resource Management Act 1991

22 October 2020

Auckland Council
 Plans and Places
 Private Bag 92300
 Auckland 1142
 Attn: John Duguid

Email: unitaryplan@aucklandcouncil.govt.nz

CC: rebeccas@barker.co.nz

Name of submitter: The New Zealand Transport Agency

This is a submission on Private Plan Change 50 Waihoehoe Precinct (**Plan Change**) to the Auckland Unitary Plan (Operative in Part).

The New Zealand Transport Agency (**Waka Kotahi**) could not gain an advantage in trade competition through this submission.

Waka Kotahi role and responsibilities

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (**LTMA**). Waka Kotahi's objective is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Waka Kotahi's roles and responsibilities include:

- Managing the State Highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

The Plan Change relates to areas that are close to and potentially affect State Highway 1 and the future Mill Road corridor (proposed state highway). Waka Kotahi's interest in this proposed Plan Change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.

- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.
- The manager of the State Highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.

Government Policy Statement on Land Transport.

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (GPS). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. Likewise, changes in transport can affect land use.

Waka Kotahi gives effect to the GPS through a number of strategic plans including:

- Arataki - our ten-year view of the step changes and actions needed to deliver on the government's current priorities and long-term outcomes for the land transport system;
- Toitu Te Taiao - Our sustainability action plan. This notes two big challenges around reducing greenhouse gases and improving public health;
- Keeping Cities Moving - our national mode shift plan based around shaping urban form, making shared and active modes more attractive and influencing travel demand and transport choices.

Wider Context

In making this submission, Waka Kotahi is cognisant of the context of the Plan Change and ongoing planning processes and projects. These include:

- The recent funding of the Mill Road corridor which is planned to traverse the southern Drury area and the Papakura to Drury South project as part of the New Zealand Upgrade Programme;
- Te Tupu Ngātahi's planning work on the Drury transport network which includes a number of new and upgraded arterial roads in the wider Drury area;
- Other private development proposals in the area including other plan changes;
- The National Policy Statement on Urban Development;
- The Council adopted Drury-Opaheke Structure Plan.

A high level of care is required to ensure integration between the projects in the area and the planning outcomes being sought, all of which have differing timeframes.

Decision sought

Waka Kotahi supports the plan change but seeks amendments and / or further information to provide greater certainty around the provision and funding of transport infrastructure and to ensure the outcomes in the plan change are achieved.

Decisions that Waka Kotahi seeks on the Plan Change are set out in its submissions contained in **Table 1**. Waka Kotahi also seeks any consequential changes to the Plan Change required to give effect to the relief described in **Table 1**.

Hearings

Waka Kotahi wishes to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Submitter:



Kim Harris-Cottle

Team Lead, Consents and Approvals Waka Kotahi

Address for Service of person making submission:

NZ Transport Agency

Contact Person: Evan Keating

Email: Evan.Keating@nzta.govt.nz

Table 1: NZ Transport Agency Submission on Auckland Unitary Plan (OIP) Plan Change 50 (Private) Waihoehoe Precinct

Sub #	Provision Number	Reason for Submission	Relief Sought
1	Whole of plan change	Waka Kotahi seeks to ensure that transport effects across the land transport system are appropriately managed and that sufficient infrastructure is provided to service the proposed development. At present, future local level transport networks (i.e. those provided and/or operated by Auckland Transport) for the Drury area are not identified in the Regional Land Transport Plan. The delivery of such infrastructure needs to be aligned with the release of land for development in order to manage adverse effects on the transport network.	<p>Base text is PC50 as notified</p> <p>New text <u>underline</u></p> <p>Deleted text strrikethrough</p> <p>Provide information and suitable provisions to resolve the transport infrastructure issue.</p>
2	Whole Plan Change (including Precinct Plans)	The terms <i>active transport</i> and <i>public transport</i> are utilised within the National Policy Statement Urban Development 2020 (NPSUD). It is requested that references referring to <i>pedestrians and cyclists</i> is replaced with <i>active transport</i> . For clarity, where the individual term pedestrian or cyclist is used, these should remain.	<p>Support with amendment. Relief sought:</p> <p>Replace references to <i>pedestrians and cyclists</i> is with <i>active transport</i> (as defined within the National Policy Statement on Urban Development 2020).</p>
3	Whole of plan change	The proposed zoning pattern is generally supported and is consistent with the Drury-Opaheke Structure Plan. However, since that time, the NPSUD has come into effect and prescribes a zoning and density response to Metropolitan Centre zones and rapid transit stops. For example, IX.6(3) proposes to apply Mixed Housing Urban standard to Terrace House and Apartment Building Zone. This may need revising to ensure it is not contrary to the NPSUD.	<p>Review the proposed zoning and associated provisions in light of the NPSUD requirements.</p>

4	Precinct Plan 2	Modifications to remove references to Access A are requested consequential to other parts of the submission.	Delete 'Access A' from Precinct Plan 2.	29.4
5	Whole of Plan Change	Waka Kotahi has noticed what appears to be an oversight. The provisions refer to sub-precincts A and B in relation to the management of stormwater. A plan showing the extent of these sub-precincts appears to be omitted.	Consider whether <i>Figure A22 - Stormwater Management Plan for 116 Waihoehoe Road and surrounds</i> , from Appendix A, Tonkin and Taylor report <i>Proposed Stormwater Management Areas Drury East - Waihoehoe Precinct Plan Change Area</i> , needs to be included to indicate the location of stormwater management sub-precincts A and B.	29.5
6	IX Precinct description	Subject to other submission points, the Precinct Description is generally supported as it proposes a transport network which is progressively upgraded over time to support development in the wider area.	Retain as notified.	29.6
7	IX.2 Objective 1, 2 and 3	With a minor modification, the objectives are generally supported as they provide for public transport, appropriate infrastructure and the safe and efficient operation of the transport network. However, they should be expanded to include recognition of active (as well as public) transport.	Retain with amendment.	29.7
8	IX.3 Policies 1, 2, 3, 5 and 7.	The policies are supported as they enable a safe and connected transport network which accommodates all modes and its provision is timed to reflect development demand. Policy 7 needs to be amended to broaden the active transport to linkages to Drury Centre.	(1) Waihoehoe Precinct is a comprehensively developed residential environment that integrates with the Drury Centre and the natural environment, supports <u>active and public</u> transport use, and respects Mana Whenua values. Retain with amendment. (7) Provide for the staging of pedestrian and cycling connections to the Drury Central train station and <u>Drury Centre</u> to encourage the use of public and active modes of transport.	29.8 29.9 29.10 29.11 29.12 29.13 29.14
9	IX.4.1 (A1)	Support requirement for resource consent for new public and private roads as this will enable a suitable assessment to be made.	Retain as notified.	29.15
10	IX.4.1 (A2), (A3), (A5) and (A6)	The provisions are opposed for the following reasons. a. Monitoring the thresholds would be extremely difficult and it would be onerous to keep up to date and convey when and what threshold had been reached.	Consequential amendments and deletions which respond to Waka Kotahi's submission in its entirety.	29.16

		<p>b. The thresholds are standard across PC 48, 49 and 50, which adds further confusion determining when these thresholds are reached (or close to being reached).</p> <p>c. The thresholds centre on general vehicle performance, and deficient of public transport or active mode performance criteria. Alternative mode uptake is considered necessary to achieve the overarching trip generation as identified in the ITA</p> <p>d. The threshold criteria assume, the safety upgrades to be undertaken before any new dwellings, retail or commercial development, at the Waihoehoe/ Great South Road intersection, will be adequate until to cater for significant development (for example, 62,430m2 of retail GFA).</p>	
11	IX.5(2), (3) and (4) Notification	<p>The provision is opposed as it precludes notification / affected persons approvals for activities within Table E11.4.1. Table E11.4.1 includes public and private roads (A1) and non-compliance with standards IX6.2 and 6.3 (transport upgrades and trip generation limits). Waka Kotahi opposes this provision as it would preclude its consideration as an affected party for activities which may affect the provision or operation of transport infrastructure.</p>	<p>Opposed notified provision; relief sought: Either: Delete IX.5(3); or Modify IX.5(3) to ensure that Activity E11.4.1(A1) (new public or private roads) and infringements to standards IX6.2 and 6.3 (transport upgrades and trip generation limits) are subject to normal notification tests.</p>
12	IX.6(3)	<p>The proposal to apply the Mixed Housing Urban standard to Terrace House and Apartment Building Zone is not supported as it would potentially hinder the provision of high density development in proximity to a rapid transit station and a metropolitan centre zone, contrary to the NPSUD.</p>	<p>Delete provision.</p>
13	IX.6(2) Standards	<p>The provision recognises E27.6.1(2)(d) which provides an 'exemption' from further assessment where there are requirements to consider transport, traffic or trip-generation effects within zone or precinct rules. The provision is supported on basis that transport, traffic or trip-</p>	<p>Retain as notified on basis that transport, traffic or trip-generation provisions are retained in the precinct and that no permitted activities are enabled.</p>

29.17

29.18

29.19

14	IX.6.1 (3) Staging of Development with Transport Upgrades	generation provisions are retained in the precinct and that no permitted activities are enabled. Waka Kotahi seeks deletion of Access A from Precinct Plan 2 and all consequential amendments. IX.6.1 (3) needs to be deleted to reflect this.	Delete provision.	29.20
15	IX.6.1(4) Note	The purpose of the italicised Note is uncertain.	Delete provision.	29.21
16	Table IX.6.1.1 Threshold for Development	The provision is supported as it assists in managing effects on the transport network. Amend title to reflect deletion of Access A.	Retain with amendment.	29.22
17	Table IX.6.1.1 Threshold for Development	The transport upgrades described in the right hand column (Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds) of the Table require more specificity to ensure that the proposed outcomes are clear for future plan uses and able to be delivered.	Table IX.6.1.1 Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 not constructed. Retain with amendment: Provide more specificity as to the details of works required by including upgrade details listed in Table 8.1 ¹ , column headed <i>Revised (2020) Modelling – Infrastructure Upgrades Required</i> .	29.23
18	Table IX.6.1.2	Waka Kotahi seeks deletion of Access A from Precinct Plan 2 and all consequential amendments. Table IX.6.1.2 needs to be deleted to reflect this.	Delete Table IX.6.1.2 Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 constructed	29.24
19	IX.6.2 Trip Generation Limit Including Table IX.6.2.1 and Table IX.6.2.2	The provisions intention is supported, however the ability to implement these (particularly calculating trip generation thresholds) across multiple landowners, development stages and three plan changes (PC48, 49, 50) is highly uncertain and would result in significant and ongoing compliance requirements. An alternative approach is proposed to ensure the operation of the transport network and timely provision of transport infrastructure relative to subdivision and development. However, these methods are not the only potential solutions to this issue and Waka Kotahi will work with all parties to agree the most appropriate method. Amendments are sought which include:	Delete IX.6.2 Trip Generation Limit including Tables IX.6.2.1 and IX.6.2.2. Replace with provisions which provide for operational requirements and more specific transport network responses. Potential wording could include a new permitted activity standard with non-compliance being a restricted discretionary activity (consequential changes to Activity Table IX.4 would be required). Restricted discretionary activity assessment criteria/matters of discretion could include transport network improvements.	29.25

¹ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

	<p>(a) a provision which ensures a Level of Service of no less than LOS E at the Great South Road/ Waihoehoe Road Intersection; and</p> <p>(b) provides a range of improvements which may be required to ensure LOS E.</p> <p>The proposed range of transport network improvements would reflect those from Table 8.1.²</p>	<p>An alternative compliance pathway would be for an applicant to propose and undertake transport network improvements to maintain LOS E i.e. comply (noting that all development requires consent so compliance could be considered as part of this process).</p> <p><u>IX.6.2 Transport Infrastructure Development and subdivision to comply with the following:</u></p> <p>(a) <u>Great South Road/ Waihoehoe Road Intersection Operation:</u></p> <p>(i) <u>Where the baseline intersection operation is at Level of Service E (LOS E) or better at the time of application, no subdivision or development shall generate traffic movements which result in:</u></p> <ol style="list-style-type: none"> 1) <u>a Level of Service of less than LOS E; or</u> 2) <u>have a degree of saturation higher than 95%.</u> <p>(ii) <u>Where the baseline intersection operation is at Level of Service F (LOS F) at the time of application, no subdivision or development shall generate traffic movements which results in:</u></p> <ol style="list-style-type: none"> 1) <u>degrees of saturation of more than the base line scenario, or</u> 2) <u>delays of more than 10% greater than the baseline scenario.</u> <p>Other relief would include additional provisions which outline transport upgrades to be considered (as listed in Table 8.1³). Waka Kotahi would like to work with the applicant on this proposal.</p>
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² Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec
³ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

	IX.6.2.1 Table for Development with 'Access A' not constructed and IX.6.2.2 Table for Development with 'Access A' is constructed	If the relief in point 19 is not accepted; for both Tables, the transport upgrades described in the right-hand column (<i>Transport Upgrades Required to Exceed the Trip Generation Thresholds</i>) require more specificity to ensure that the proposed outcomes are clear for future plan uses and able to be delivered.	Retain with amendment if submission point 19 not accepted: Provide more specificity as to the details of works required in the right hand columns of both Tables by including upgrade details listed in Table 8.1 ⁴ , column headed <i>Revised (2020) Modelling – Infrastructure Upgrades Required</i> .	29.26
20	IX.6.2(4) Note	The purpose of the italicised <i>Note IX.6.2(4)</i> is uncertain.	Delete provision.	29.27
21	IX.8.1 Matters of discretion (1)	The matters of discretion are supported and one further additional matters proposed to ensure that the relevant road controlling authority outcomes are considered.	Support with amendment. (1) <i>Development of public and private roads:</i> (a) ... (d) ... (e) <u>the outcome of engagement with the relevant road controlling authority.</u>	29.28
22	IX.8.1 Matters of discretion (2)	The matters of discretion are supported and one further additional matters proposed to ensure that the relevant road controlling authority outcomes are considered.	Support with amendment. (2) <i>Development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit:</i> (a) ... (b) ... (c) ... (d) <u>the outcome of engagement with the relevant road controlling authority.</u>	29.29
23	IX.8.2(1) Assessment criteria	The assessment criteria are supported with additional matters proposed to ensure that the relevant road controlling authority outcomes are considered and to strengthen active transport provision (including to the Town Centre).	Support with amendment. (1) Development of public and private roads: Location of roads (a) ... (b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good	29.30

⁴ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

<p>degree of accessibility and supports an <u>integrated active transport walkable-street</u> network. [...]</p> <p>(c) ... (d) ... Design of roads (f) ... (g) ... (h) Whether the layout of the street network provides a good degree of accessibility and supports an <u>integrated active transport walkable-street</u> network. [...]</p> <p>(i) Whether safe and legible <u>active transport pedestrian and-eye</u> connections to the Drury Central train station and <u>Drury Centre</u> are provided, via facilities on Waihoehoe Road and Flanagan Road/Drury Boulevard, from the Fitzgerald Rd extension to the Drury Rail Station. Or an alternative is provided that achieves an equal or better degree of connectivity. Where development precedes the upgrade of Waihoehoe Road and connecting roads, interim pedestrian and cycle facilities <u>should</u> may be provided. <u>Road Controlling Authority</u></p> <p>(j) <u>how the outcome of engagement with the relevant road controlling authority has been responded to.</u></p>			
<p>Support with amendment:</p> <p>(2) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit:</p> <p>(a)... (b) Whether increased use of public <u>and active</u> transport provides additional capacity within the transport network including by implementing travel demand management measures. (d)... (e) <u>how the outcome of engagement with the relevant road controlling authority has been responded to.</u></p>	<p>The assessment criteria are supported with additional matters proposed to ensure that the relevant road controlling authority outcomes are considered and to strengthen active transport provision.</p>	<p>IX.8.2(2) Assessment criteria</p>	<p>24</p>

29.30

29.31

22 October 2020

Auckland Council
Plans and Places
Private Bag 92300
Auckland 1142
Attn: John Duguid

By email to: unitaryplan@aucklandcouncil.govt.nz

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PLAN, CHANGE OR VARIATION (FORM 5)
Plan Changes 48 and 50

NAME OF SUBMITTER:
KiwiRail Holdings Limited (KiwiRail)

ADDRESS FOR SERVICE:
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Bunny Street
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KiwiRail Submission on Auckland Unitary Plan Operative in Part Plan Changes 48 and 50

KiwiRail is the State-Owned Enterprise responsible for the management and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services within New Zealand. KiwiRail is also the requiring authority for land designated "Railway Purposes" (or similar) in district plans throughout New Zealand.

KiwiRail is interested in Plan Changes 48 and 50 (Plan Changes) for several reasons;

1. Both Plan Change areas lie adjacent to the one of New Zealand's key main railway lines, the North Island Main Trunk line (**NIMT**), which carries both rail freight traffic and Metro passenger services and which forms part of the golden triangle network for rail freight between Auckland, Tauranga and Hamilton. KiwiRail seeks to protect the railway corridor to enable its ongoing use for operational purposes.
2. KiwiRail has commenced planning and design work for the Papakura to Pukekohe electrification (P2P) project as well as the platforms, signals and electric structures for three new Drury stations. The investment will extend the electrified rail network from Papakura to Pukekohe, and include a range of supporting network upgrades:
 - Electrification of 19km of track, including installation of overhead equipment (OLE), new traction power feed and signalling upgrades.
 - Potential lowering of tracks at a number of road overbridges (including SH1 Drury Interchange) to provide sufficient clearance for the OLE.



- Provision of two additional platform faces and stabling for twelve 3-car Electric Multiple Units at Pukekohe.
 - Passive provision for future construction of three new Drury stations and additional tracks.
 - Safety enhancements at level crossings.
3. The NZUP programme allocated \$247m to KiwiRail to build new Drury stations including station structures, access and parking, by 2024. KiwiRail is working closely with the Te Tupu Ngatahi Supporting Growth Programme in planning designations to enable the transport system to be protected and delivered over both the short and longer term. In particular, the Drury Central railway station is included in the New Zealand Upgrade Programme (NZUP), with work expected to start in 2023.
4. The scope of KiwiRail's submissions relate to the protection of the NIMT and efficiency of the railway works and stations to operate. KiwiRail shares the objectives of ensuring that the railway corridor and station facilities are fully integrated into both the urban landscape and local road, public transport, walking and cycling networks, and that appropriately located, well designed and multi-mode transport opportunities are enabled and encouraged.

KiwiRail's specific submissions on the Plan Changes are covered in the following submission sheets:

- Plan Change 48 (Private) Drury Centre Precinct: Applicant Kiwi Property
- Plan Change 50 (Private) Waihoehoe Precinct: Applicant: Oyster Capital

KiwiRail supports the Plan Changes, subject to the matters raised in this submission being appropriately addressed to ensure that any adverse effects of the proposal on the transport network can be adequately avoided or mitigated.

KiwiRail has coordinated its submissions with those of other local and government agencies.

KiwiRail could not gain an advantage in trade competition through this submission.

KiwiRail wishes to speak to our submission and will consider presenting a joint case at the hearing with other parties who have a similar submission.

If you have any queries, please don't hesitate to contact me.

Yours faithfully,



Pam Butler
Senior RMA Advisor
KiwiRail

22 October 2020





Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 48 Drury	Relief Sought (as stated or similar to achieve the requested relief)
Plan Change 48 (Private) Drury Centre Precinct			
IX.1 Project description	Seek amendment	Does not allow for appropriate precinct specific controls to address adverse effects on the North Island Main Trunk railway line (NIMT)	Amend IX.1 Precinct Description to add: <u>The North Island Main Trunk railway line is protected from reverse sensitivity effects by ensuring that new buildings and activities will be designed and located to manage any adverse effects</u>
IX.2 Objectives		The Plan Change seeks to bring forward both a metropolitan centre zone, business mixed use and open space zones. The use of precincts in the AUP OP is to "enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling". This has not been achieved.	Add new Objective IX.2
IX.3 Policies		While all the relevant overlay, Auckland-wide and zone policies apply to the precinct the lack of any specific controls are an inadequate response to the intrinsic qualities and physical characteristics of the site and area, including the location of the existing NIMT, which runs through the north western portion of the Plan Change area The NIMT is one of New Zealand's key railway lines. This line is operated and maintained 24/7. There are no provisions, including objectives, seeking to ensure that development within the precinct addresses the operational effects of the adjacent railway corridor on receivers or reverse sensitivity effects on the NIMT. The railway can generate noise effects above what might be usually anticipated by residential receivers. It is noted that the Drury South Industrial and Mixed Use Precinct in Plan Change 46 included measures to manage the effects of quarrying activities on the precincts more sensitive receivers with policies and standards (I410.6.4 Sub-Precinct C (Noise and Ventilation) which sought to protect activities sensitive to noise from unreasonable levels of land transport noise. This provides an example of precinct controls that provide provisions to address constraints for new development within their boundaries. It is not unreasonable that provisions be made to address potential adverse effects experienced in neighbouring land uses. Kiwirail has had recent success seeing a developer add similar controls with a development for residential activities in Te Kauwhata.	<u>(8) The NIMT is protected from adverse effects, including reverse sensitivity effects, of subdivision, use and development by:</u> <u>1. setbacks within which incompatible activities will be managed;</u> <u>2. standards designed to protect noise sensitive receiver's health and amenity.</u> Add new policy IX.3 <u>(XX) Adverse effects on the operation of the regionally significant NIMT and on the health and safety of adjacent development and noise sensitive receivers are managed through setbacks and performance standards.</u>
IX.1 Precinct Description	Seek amendment	Inconsistent with other objectives and policies of the AUP OP The Plan Change does not address the Plan Change area's development with reference to its effects on the NIMT. Accordingly, it is inconsistent with the direction of Plan Policy B2.3.2 of the AUP OP which seeks to: "(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following." It is also inconsistent with the objective B2.4 Residential Growth B2.4.1. Objectives of the AUP OP: "(2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area" And B3.3 Transport B3.3.2 of the AUP OP which provides: "5 (f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure, and (6) Require activities sensitive to adverse effects from the operation of transport infrastructure to be located or designed to avoid, remedy or mitigate those potential adverse effects." Inconsistent with other provisions of the Plan Change Objective IX.2 of the Plan Change requires "Access to the precinct occurs in an effective, efficient, and safe manner and manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network." This objective accordingly recognises the effects on the state highway network but there is no corresponding objective to recognise, and protect, the NIMT from adverse effects. The statement in the first paragraph that the "precinct also provides for the highest employment generating activities and retail and residential densities around the future Drury Central train station" does not recognise that the preferred location of the station is planned to be further to the north than that shown on Precinct Plan 2. The	Delete "around" and replace with "in the vicinity of".



Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons	Relief Sought (as stated or similar to achieve the requested relief)											
Table IX.4.1 Activity	Seek amendment	<p>retail and residential development may not necessarily be "around" the future Drury Central train station but will be in its vicinity.</p> <p>Sub- Precinct D bullet point refers to the Sub-Precinct that "provides for the establishment of the Drury Central Train Station and associated Park-and-Ride and transport interchange. A public plaza is provided for that will integrate the train station with the centre and will provide a high quality pedestrian experience." As above, the train station is likely to be in a location further north. In addition, the land proposed by the applicant to be included within Sub-Precinct D is third-party land outside the ownership of the applicants. Accordingly, it is not certain what could be developed within this area and it may be that this land does not form part of the Plan Change area.</p> <p>The reasons for setbacks and noise and vibration criteria are set out below. Activities that do not meet those standards should be classified as restricted discretionary activities to allow the effects of such non-compliances to be assessed on an application by application basis.</p>	<p>Delete the bullet point relating to Sub-Precinct D.</p> <p>Insert new activity (A8) as set out below and renumber existing (A8) to (A20) accordingly</p> <p>New activity (A8):</p> <p><u>(A8) Development that does not comply with IX.6.9 Setback from NIMT and IX.6.10 Noise Sensitive Activities within 100m of a Rail Network Boundary RD</u></p>											
IX.6	Seek amendment	<p>A key concern for KiwiRail is to ensure the safe and efficient operation of the rail network, in particular where neighbouring activities may come into conflict with adjacent land uses. Providing a physical setback for buildings adjoining the railway corridor boundary is a safety control which manages the interface between operations within the railway corridor and activities near the railway corridor i.e. it ensures that site occupants are able to carry out normal residential or business activities, including building maintenance with a reduced risk of coming into contact with the operational railway. A building setback is appropriate to reduce the potential conflict between the safe enjoyment and maintenance of buildings on adjacent properties and activities within the operational rail corridor.</p>	<p>Add to IX.6 Standards a new standard IX.6.9:</p> <p><u>IX.6.9 Setback from NIMT</u></p> <p><u>Buildings must be setback at least 5 metres from any boundary which adjoins the NIMT railway line.</u></p>											
IX.6	Seek amendment	<p>The Plan Change does not adequately address noise and vibration effects from the railway corridor. KiwiRail acknowledges that developing and intensifying land near transport corridors is good planning practice. Initiatives to create sustainable and liveable urban development in accordance with national policy documents are fully supported. However, this can bring new occupants close to existing noise and vibration effects areas.</p> <p>A key part of ensuring the safe and efficient operation of the Auckland railway network is ensuring that reverse sensitivity effects on the railway corridor are appropriately mitigated. These effects can arise from the impact of noise and vibration arising from railway operations on nearby residents. It is also widely accepted nationally and internationally that sound and vibration from road and rail networks has the potential to cause adverse health and amenity effects on people living nearby. Railways are generally an accepted part of the urban environment, but many do not appreciate the actual effects of living with rail sound and vibration when they choose to live near existing railway designations. Railway operations occur 24/7 and include maintenance activities.</p> <p>For new buildings being constructed near the railway it is relatively straight-forward to control internal sound and vibration through the building location, design and provision of adequate ventilation systems. Likewise, acoustic screening can be used to achieve reasonable external sound levels. With careful design, future occupants can be protected from the most significant adverse effects associated with railway noise. It is not possible nor appropriate to expect that the railway corridor can mitigate new development, especially at height.</p> <p>Rail noise effects will extend approximately 100m from the railway designation. The plan change process permits a full assessment of noise and vibration effects and given the future potential for rail within the region, it is reasonable that effects on this critical transport infrastructure are addressed under the plan change process in terms of effects on adjacent sites. The noise rules applying within the zone do not take into account railway noise specifically, rather the control is designed to address the noise from activities within the zone which tend to have different characteristics.</p> <p>Regional Policy Statement (RPS) objectives and policies seek to protect infrastructure by setting out issues of regional significance which include urban growth and form and infrastructure, transport and energy. For example, RPS objectives in B2.3.1 relating to 'quality-built environment' and 'infrastructure' and policies in B3.2.2 are relevant to any plan change.</p> <p>The Infrastructure and Noise chapters in the AUP OP build on the RPS with additional objectives:</p>	<p>Add to IX.6 Standards a new standard IX.6.10 to manage potential human health effects from rail noise and vibration where buildings containing noise sensitive activities are located adjacent to the railway corridor as follows:</p> <p><u>IX.6.10 Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p><u>Indoor railway noise</u></p> <p>1. <u>Any new building or alteration to an existing building that contains an activity sensitive to noise where the building or alteration:</u></p> <p>(a) <u>Shall be designed, constructed and maintained to achieve indoor design noise levels resulting from the railway not exceeding the maximum values in the following table; or</u></p> <table border="1" data-bbox="1141 228 1396 685"> <thead> <tr> <th>Building type</th> <th>Occupancy/activity</th> <th>Maximum railway noise level LAeq(1h)</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Residential</td> <td>Sleeping spaces</td> <td>35 dB</td> </tr> <tr> <td>All other habitable rooms</td> <td>40 dB</td> </tr> <tr> <td>Education</td> <td>Lecture rooms/theatres, music studios, assembly halls</td> <td>35 dB</td> </tr> </tbody> </table>	Building type	Occupancy/activity	Maximum railway noise level LAeq(1h)	Residential	Sleeping spaces	35 dB	All other habitable rooms	40 dB	Education	Lecture rooms/theatres, music studios, assembly halls	35 dB
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Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 48 Drury	Relief Sought (as stated or similar to achieve the requested relief)															
		<p>"E26.2.1. Objectives</p> <p>(6) Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.</p> <p>E26.2.2. Policies</p> <p>(2) Avoid where practicable, or otherwise remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.</p> <p>E26.3 Noise policies</p> <p>(7) Require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse sensitivity effects on;existing or authorised infrastructure."</p> <p>The inadequate assessment of onsite amenity (health and therefore of the well-being of people and communities) and reverse sensitivity effects is inconsistent with these objectives and policies. This issue is created by the proposed zone change in close proximity to the operational railway corridor.</p>	<table border="1" data-bbox="188 230 520 685"> <tr> <td data-bbox="188 573 316 685"></td> <td data-bbox="188 383 316 573">Teaching areas, conference rooms, drama studios, sleeping areas</td> <td data-bbox="188 230 316 383">40 dB</td> </tr> <tr> <td data-bbox="316 573 443 685">Health</td> <td data-bbox="316 383 443 573">Libraries</td> <td data-bbox="316 230 443 383">45 dB</td> </tr> <tr> <td data-bbox="443 573 520 685"></td> <td data-bbox="443 383 520 573">Overnight medical care, wards</td> <td data-bbox="443 230 520 383">40 dB</td> </tr> <tr> <td data-bbox="520 573 596 685"></td> <td data-bbox="520 383 596 573">Clinics, consulting rooms, theatres, nurses' stations</td> <td data-bbox="520 230 596 383">45 dB</td> </tr> <tr> <td data-bbox="596 573 673 685">Cultural</td> <td data-bbox="596 383 673 573">Places of worship, marae</td> <td data-bbox="596 230 673 383">35 dB</td> </tr> </table> <p>(b) is at least 50 metres from any railway network, and is designed so that a noise barrier completely blocks line-of-sight from all parts of roofs and windows, to all points 3.8 metres above railway tracks</p> <p><u>Mechanical ventilation</u></p> <p>2. if windows must be closed to achieve the design noise levels in clause 1(a), the building is designed, constructed and maintained with a mechanical ventilation system that</p> <p>(a) For habitable rooms for a residential activity, achieves the following requirements:</p> <p>i. provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and</p> <p>ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</p> <p>iii. provides relief for equivalent volumes of spill air;</p> <p>iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18 °C and 25 °C; and</p> <p>v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.</p> <p>(b) For other spaces, is as determined by a suitably qualified and experienced person.</p> <p><u>Indoor railway vibration</u></p> <p>3. Any new buildings or alterations to existing buildings containing an activity sensitive to noise, closer than 60 metres from the boundary of a railway network:</p> <p>(a) is designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s vv 95 or</p> <p>(b) is a single-storey framed residential building with:</p> <p>i. a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and</p> <p>ii. vibration isolation separating the sides of the floor slab from the ground; and</p> <p>iii. no rigid connections between the building and the ground.</p>		Teaching areas, conference rooms, drama studios, sleeping areas	40 dB	Health	Libraries	45 dB		Overnight medical care, wards	40 dB		Clinics, consulting rooms, theatres, nurses' stations	45 dB	Cultural	Places of worship, marae	35 dB
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Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 48 Drury	Relief Sought (as stated or similar to achieve the requested relief)
IX.8.1	Seek amendment	Consequential change to accommodate restricted discretionary status if the development does not meet IX6.9 Setback from NIMT and IX6.10 Noise Sensitive Activities within 100m of a Rail Network Boundary	<p>4. <u>A report is submitted to the council demonstrating compliance with clauses (1) to (3) above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise. In the design:</u></p> <p>(a) <u>railway noise is assumed to be 70 LAeq(1h) at a distance of 12 metres from the track, and must be deemed to reduce at a rate of 3 dB per doubling of distance up to 40 metres and 6 dB per doubling of distance beyond 40 metres.</u></p> <p>Insert new matters of discretion in IX.8.1 as follows:</p> <p><u>(12) Setback from NIMT and Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p><u>Effects from non-compliance with Standards IX.6.9 and IX.6.10</u></p>
IX.8.2	Seek amendment	Consequential change to accommodate restricted discretionary status if the development does not meet IX6.9 Setback from NIMT and IX6.10 Noise Sensitive Activities within 100m of a Rail Network Boundary. There are no specific assessment criteria included relating to the railway corridor. The assessment criteria proposed by KiwiRail reflects criteria developed by a Network Utilities industry working group. These include considerations for required mitigation based on how far removed from the rail corridor a building is. The ability to consider applications and the effects arising from reduced mitigation, along with the ability to require written approval from KiwiRail will enable specific circumstances to be taken into account as necessary for each application.	<p>Insert new assessment criteria in IX.8.2 as follows:</p> <p><u>(11) Setback from NIMT</u></p> <p>(a) <u>The size, nature and location of the buildings on the site.</u></p> <p>(b) <u>The extent to which the safety and efficiency of railway operations will be adversely affected.</u></p> <p>(c) <u>The outcome of any consultation with KiwiRail.</u></p> <p>(d) <u>Any characteristics of the proposed use that will make compliance unnecessary.</u></p> <p><u>(12) Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p>(a) <u>Whether the activity sensitive to noise could be located further from the railway corridor.</u></p> <p>(b) <u>The extent to which the noise and vibration criteria are achieved and the effects of any non-compliance</u></p> <p>(c) <u>The character of and degree of amenity provided by the existing environment and proposed activity.</u></p> <p>(d) <u>The reverse sensitivity effects on the railway corridor and the extent to which mitigation measures can enable their ongoing operation, maintenance and upgrade.</u></p> <p>(e) <u>Special topographical, building features or ground conditions which will mitigate vibration impacts.</u></p> <p>(f) <u>The outcome of any consultation with KiwiRail.</u></p>
Drury Centre Zoning Plan Drury Centre Precinct Plan Drury Centre Precinct Plan 1 - Building Height Drury Centre Precinct Plan 3 - Transport	Seek amendment	The land proposed by the applicant to be included within Sub-precinct D is third-party land outside the ownership of the applicants. Accordingly, it is not certain what could be developed within this area and it may be that this land does not form part of the Plan Change area. In that case the listed maps would need to be amended to remove this land from the Plan Change area.	<p>Remove the land within Sub-precinct D from the listed plans.</p> <p>In addition, remove the reference to Sub-precinct D from the legend in Precinct Plan 1.</p>



Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 48 Drury	Relief Sought (as stated or similar to achieve the requested relief)
Staging Boundary			
Precinct Plan 2 - Spatial features	Seek amendment	<p>The location and/or design of the train station should be determined by the designation process to be undertaken by KiwiRail. The 'train station' and 'Station Plaza' locations do not recognise that the preferred location of the station is further to the north.</p> <p>In addition, the land proposed by the applicant to be included within Sub-Precinct D is third-party land (outside the ownership of the applicants). Accordingly, it is not certain what could be developed within this area and it may be that this land does not form part of the Plan Change area.</p>	<p>Move the 'future train station' and 'Station Plaza' symbols to the preferred location further north.</p> <p>In addition, annotate Precinct Plan 2 to make it clear that the 'future train station' and 'Station Plaza' are shown as indicative only. For ease of readership it would be preferable to have two legends, one for indicative features and one for confirmed features on Precinct Plan 2.</p> <p>Remove the land within Sub-Precinct D from the Plan Change area.</p>
Plan Change provisions	Seek amendment	<p>The land proposed by the applicant to be included within Sub-precinct D is third-party land outside the ownership of the applicants. Accordingly, it is not certain what could be developed within this area and it may be that this land does not form part of the Plan Change area.</p>	<p>Any consequential changes to the Plan Change provisions to give effect to the relief sought above.</p>





Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 50 (Private) Waihoehoe	Relief Sought (as stated or similar to achieve the requested relief)
Plan Change 50 (Private) Waihoehoe Precinct			
IX.1 Precinct description	Seek amendment	Does not allow for appropriate precinct specific controls to address adverse effects on the North Island Main Trunk railway line (NIMT)	Amend IX.1 Precinct Description to add: <i>The North Island Main Trunk railway line, which runs the entire length of the Precinct's western boundary is protected from reverse sensitivity effects by ensuring new buildings and activities will be designed and located to manage any adverse effects</i>
IX.2 Objectives		The Plan Change seeks to add a new Waihoehoe Precinct, with two sub precincts A and B within it to be zoned THAB. The use of precincts in the AUP OP is to "enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling". This has not been achieved.	Add new Objective IX.2 <i>(5) The NIMT is protected from adverse effects, including reverse sensitivity effects, of subdivision, use and development by:</i> <i>1. setbacks within which incompatible activities will be managed;</i> <i>2. standards designed to protect noise sensitive receiver's health and amenity.</i>
IX.3 Policies		While all the relevant overlay, Auckland-wide and zone policies apply to the precinct the lack of any specific controls are an inadequate response to the intrinsic qualities and physical characteristics of the site and area, including the location of the existing NIMT, which runs the entire length of the Precinct's western boundary. The NIMT is one of New Zealand's key railway lines. This line is used 24/7. There are no provisions, including objectives, seeking to ensure that development within the Precinct addresses the operational effects of the adjacent railway corridor on receivers or reverse sensitivity effects on the NIMT. The railway can generate noise effects above what might be usually anticipated by residential receivers. It is noted that the Drury South Industrial and Mixed Use Precinct in Plan Change 46 ¹ included measures to manage the effects of quarrying activities on the precinct's more sensitive receivers through policies and standards (H10.6.4 Sub-Precinct C (Noise and Ventilation)) which sought to protect activities sensitive to noise from unreasonable levels of land transport noise. This provides an example of precinct controls that provide bespoke provisions to address constraints and adverse effects for new development within their boundaries. Kiwirail has had recent success seeing a developer add similar controls with a development for residential activities in Te Kauwhata (Waikato District).	Add new Policy IX.3 <i>(12) Adverse effects on the operation of the regionally significant NIMT and on the health and safety of adjacent development and noise sensitive receivers are managed through setbacks and performance standards.</i>
		Inconsistent with other objectives and policies of the AUP OP The Plan Change does not address the Plan Change area's development with reference to its effects on the NIMT. Accordingly, it is inconsistent with the direction of Plan Policy B2.3.2 of the AUP OP which seeks to: <i>"(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following: ..."</i> It is also inconsistent with the objective B2.4 Residential Growth B2.4.1. Objectives of the AUP OP: <i>"(2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area"</i> And B3.3 Transport B3.3.2 of the AUP OP which provides: <i>"5 (f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure, and</i> <i>(6) Require activities sensitive to adverse effects from the operation of transport infrastructure to be located or designed to avoid, remedy or mitigate those potential adverse effects."</i> Inconsistent with other provisions of the Plan Change Objective IX.2 of the Plan Change requires "Access to the precinct occurs in an effective, efficient, and safe manner and manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network." This objective accordingly recognises the effects on the state highway network but there is no corresponding objective to recognise, and protect, the NIMT from adverse effects.	
Table IX.4.1 Activity	Seek amendment	The reasons for setbacks and noise and vibration criteria are set out below. Activities that do not meet those standards should be classified as restricted discretionary activities to allow the effects of such non-compliances to be assessed on an application by application basis.	Insert new activity (A5) as set out below and renumber current (A5) and (A6) to (A6) and (A7). New activity (A5):



Relief Sought (as stated or similar to achieve the requested relief)
 (45) Development that does not comply with IX.6.7 Setback from NIMT and IX.6.8 Noise Sensitive Activities within 100m of a Rail Network Boundary RD

Add to IX.6 Standards a new standard IX.6.7:

IX.6.7 Setback from NIMT

Buildings must be setback at least 5 metres from any boundary which adjoins the NIMT railway line.

Add to I.X.6 Standards a new standard IX.6.8 to manage potential human health effects from rail noise and vibration where buildings containing noise sensitive activities are located adjacent to the railway corridor, as follows:

IX.6.8 Noise Sensitive Activities within 100m of a Rail Network Boundary

Indoor railway noise

1. Any new building or alteration to an existing building that contains an activity sensitive to noise where the building or alteration.
- (a) Shall be designed, constructed and maintained to achieve indoor design noise levels resulting from the railway not exceeding the maximum values in the following table or:

<u>Building type</u>	<u>Occupancy/activity</u>	<u>Maximum railway noise level (Aeq,1h)</u>
<u>Residential</u>	<u>Sleeping spaces</u>	<u>35 dB</u>
	<u>All other habitable rooms</u>	<u>40 dB</u>
<u>Education</u>	<u>Lecture rooms/theatres, music studios, assembly halls</u>	<u>35 dB</u>
	<u>Teaching areas, conference rooms, drama studios, sleeping areas</u>	<u>40 dB</u>
	<u>Libraries</u>	<u>45 dB</u>
<u>Health</u>	<u>Overnight medical care, wards</u>	<u>40 dB</u>
	<u>Clinics, consulting rooms, theatres, nurses' stations</u>	<u>45 dB</u>
<u>Cultural</u>	<u>Places of worship, marae</u>	<u>35 dB</u>

A key concern for KiwiRail is to ensure the safe and efficient operation of the rail network, in particular where neighbouring activities may come into conflict with adjacent land uses. Providing a physical setback for buildings adjoining the railway corridor boundary is a safety control which manages the interface between operations within the railway corridor and activities near the railway corridor i.e. it ensures that site occupants are able to carry out normal residential or business activities, including building maintenance with a reduced risk of coming into contact with the operational railway. A building setback is appropriate to reduce the potential conflict between the safe enjoyment and maintenance of buildings on adjacent properties and activities within the operational rail corridor.

The Plan Change does not adequately address noise and vibration effects from the railway corridor. KiwiRail acknowledges that developing and intensifying land near transport corridors is good planning practice. Initiatives to create sustainable and liveable urban development in accordance with national policy documents are fully supported. However, this can bring new occupants close to existing noise and vibration effects areas.

A key part of ensuring the safe and efficient operation of the Auckland railway network is ensuring that reverse sensitivity effects on the railway corridor are appropriately mitigated. These effects can arise from the impact of noise and vibration arising from railway operations on nearby residents. It is also widely accepted nationally and internationally that sound and vibration from road and rail networks has the potential to cause adverse health and amenity effects on people living nearby. Railways are generally an accepted part of the urban environment, but many do not appreciate the actual effects of living with rail sound and vibration when they choose to live near existing railway designations. Railway operations occur 24/7 and include maintenance activities.

For new buildings being constructed near the railway it is relatively straight-forward to control internal sound and vibration through the building location, design and provision of adequate ventilation systems. Likewise, acoustic screening can be used to achieve reasonable external sound levels. With careful design, future occupants can be protected from the most significant adverse effects associated with railway noise. It is not possible nor appropriate to expect that the railway corridor can mitigate new development, especially at height.

Rail noise effects will extend approximately 100m from the railway designation. The plan change process permits a full assessment of noise and vibration effects and given the future potential for rail within the region, it is reasonable that effects on this critical transport infrastructure are addressed under the plan change process in terms of effects on adjacent sites. The noise rules applying within the zone do not take into account railway noise specifically, rather the control is designed to address the noise from activities within the zone which tend to have different characteristics.

Regional Policy Statement (RPS) objectives and policies seek to protect infrastructure by setting out issues of regional significance which include urban growth and form and infrastructure, transport and energy. For example, RPS objectives in B2.3.1 relating to 'quality-built environment' and 'infrastructure' and policies in B3.2.2 are relevant to any plan change.

The Infrastructure and Noise chapters in the AUP OP build on the RPS with additional objectives:

"E26.2.1. Objectives

- (6) *Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.*

E26.2.2. Policies

- (2) *Avoid where practicable, or otherwise remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.*

E25.3 Noise policies

- (7) *Require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse sensitivity effects on:existing or authorised infrastructure....."*

IX.6

Seek amendment

IX.6

Seek amendment

Proposed Amendment

Support/Oppose/ Seek Amendment

Relief Sought (as stated or similar to achieve the requested relief)



Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 50 (Private) Waihoehoe	Relief Sought (as stated or similar to achieve the requested relief)
		<p>The inadequate assessment of onsite amenity (health and therefore of the well-being of people and communities) and reverse sensitivity effects is inconsistent with these objectives and policies. This issue is created by the proposed zone change in close proximity to the operational railway corridor.</p>	<p>(b) <u>is at least 50 metres from any railway network, and is designed so that a noise barrier completely blocks line-of-sight from all parts of doors and windows, to all points 3.8 metres above railway tracks</u></p> <p><u>Mechanical ventilation</u></p> <p>2. <u>If windows must be closed to achieve the design noise levels in clause 1(a), the building is designed, constructed and maintained with a mechanical ventilation system that</u></p> <p>(a) <u>For habitable rooms for a residential activity, achieves the following requirements:</u></p> <p>i. <u>provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and</u></p> <p>ii. <u>is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</u></p> <p>iii. <u>provides relief for equivalent volumes of spill air;</u></p> <p>iv. <u>provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and</u></p> <p>v. <u>does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.</u></p> <p>(b) <u>For other spaces, is as determined by a suitably qualified and experienced person.</u></p> <p><u>Indoor railway vibration</u></p> <p>3. <u>Any new buildings or alterations to existing buildings containing an activity sensitive to noise, closer than 60 metres from the boundary of a railway network:</u></p> <p>(a) <u>is designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s v_r 95; or</u></p> <p>(b) <u>is a single-storey framed residential building with:</u></p> <p>i. <u>a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz installed in accordance with the supplier's instructions and recommendations; and</u></p> <p>ii. <u>vibration isolation separating the sides of the floor slab from the ground; and</u></p> <p>iii. <u>no rigid connections between the building and the ground.</u></p> <p>4. <u>A report is submitted to the council demonstrating compliance with clauses (1) to (3) above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise in the design.</u></p> <p>(a) <u>railway noise is assumed to be 70 LAeq(1h) at a distance of 12 metres from the track, and must be deemed to reduce at a rate of 3 dB per doubling of distance up to 40 metres and 6 dB per doubling of distance beyond 40 metres.</u></p>
IX.8.1	Seek amendment	Consequential change to accommodate restricted discretionary status if the development does not meet IX.6.7 Setback from NIMT and IX.6.8 Noise Sensitive Activities within 100m of a Rail Network Boundary	<p>Insert new matters of discretion in IX.8.1 as follows:</p> <p>(4) <u>Setback from NIMT and Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p><u>Effects from non-compliance with Standards IX.6.7 and IX.6.8</u></p>
IX.8.2	Seek amendment	Consequential change to accommodate restricted discretionary status if the development does not meet IX.6.7 Setback from NIMT and IX.6.8 Noise Sensitive Activities within 100m of a Rail Network Boundary. There are no specific assessment criteria included relating to the railway corridor. The assessment criteria proposed in the	<p>Insert new assessment criteria in IX.8.2 as follows:</p>

Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 50 (Private) Waihoehoe	Relief Sought (as stated or similar to achieve the requested relief)
		<p>relief sought reflect criteria developed by a Network Utilities industry working group. These include considerations for required mitigation based on how far removed from the rail corridor a building is. The ability to consider applications and the effects arising as a result of an application providing reduced mitigation, along with the ability to require written approval from KiwiRail will enable specific circumstances to be taken into account as necessary for each application.</p>	<p>(4) <u>Setback from NIMT</u> (a) <u>The size, nature and location of the buildings on the site.</u> (b) <u>The extent to which the safety and efficiency of railway operations will be adversely affected.</u> (c) <u>The outcome of any consultation with KiwiRail.</u> (d) <u>Any characteristics of the proposed use that will make compliance unnecessary.</u> (5) <u>Noise Sensitive Activities within 100m of a Rail Network Boundary</u> (a) <u>Whether the activity sensitive to noise could be located further from the railway corridor</u> (b) <u>The extent to which the noise and vibration criteria are achieved and the effects of any non-compliance</u> (c) <u>The character of and degree of amenity provided by the existing environment and proposed activity.</u> (d) <u>The reverse sensitivity effects on the railway corridor and the extent to which mitigation measures can enable their ongoing operation, maintenance and upgrade.</u> (e) <u>Special topographical, building features or ground conditions which will mitigate vibration impacts.</u> (f) <u>The outcome of any consultation with KiwiRail.</u></p>



IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of an submission to the
AUCKLAND COUNCIL by
KARAKA AND DRURY LIMITED
in respect of **PRIVATE PLAN**
CHANGE 50 (Waihoehoe
Precinct), to the Auckland Unitary
Plan

**SUBMISSION OF KARAKA AND DRURY LIMITED ON
PRIVATE PLAN CHANGE 50 (WAIHOEHOE PRECINCT)**

TO: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
Unitaryplan@auckland.govt.nz

Introduction

1. This submission is made by Karaka and Drury Limited ("KDL" or "the Submitter") on Private Plan Change 50 Waihoehoe Precinct ("PPC 50") to the partly operative Auckland Unitary Plan ("AUP").
2. Identical submissions have been lodged by KDL in respect of
 - (a) Private Plan Change 48 Drury Centre Precinct; and
 - (b) Private Plan Change 49 Drury East Precinct.
3. KDL's position in relation to all three plan changes are the same to the extent that:
 - (a) KDL is neutral, i.e., neither supports nor opposes PPCs 48, 49 and 50; and
 - (b) KDL requests that all plan changes be approved as notified.
4. KDL's only concern in relation to PPC 50 is to ensure that the PPC does not in any way impact on, impede or preclude:
 - (a) The quality of planning outcomes that KDL seeks to achieve for Drury West; or
 - (b) The timing in which those outcomes are delivered.
5. KDL is not a trade competitor for the purposes of PPC 50 and could not gain an advantage in trade competition through this submission.

Context - KDL and MADE - the Auranga development in Drury West

6. KDL is a subsidiary of MADE Group Limited ("MADE") that has put in place the policy and planning framework that has (and will) enable the staged development of a

significant urban community, Auranga, in Drury West. The first two stages of the Auranga development have been authorised as follows:

- (a) Drury Precinct 1 (Auranga A) via PAUP Plan Variation 15 ("PV15"), which rezoned an area of approximately 84.6ha in Bremner Road, Drury, from Future Urban to a mix of Mixed Housing Suburban, Mixed Housing Urban, Terraced Housing and Apartment Building and Local Centre zones to facilitate residential development.
 - (b) Drury Precinct Expansion (Auranga B1) via AUP Plan Change 6 ("PC6"), which re-zoned approximately 83ha of land in Drury West to the immediate west of "Auranga A", known as Auranga B1, from Future Urban to a mix of Mixed Housing Suburban and Mixed Housing Urban to facilitate and support residential development on that land, including providing a precinct plan for the PC6 land within the Drury 1 Precinct.
7. Significant progress has already been made on the first two stages of the Auranga development. The roads have been formed, all other infrastructure is in place, houses have been built and people are living there.

Planning for Drury

8. Over the last five years, significant structure planning and master planning of the Drury West area has been undertaken to ensure that a vibrant, cohesive and compact urban outcome can be achieved for that area. As a result and in accordance with PV15 and PC6, the planning and development of Drury West has largely been completed and is actively underway.
9. Further, KDL has:
- (a) Participated extensively in the development of the Council's adopted Drury Opaheke Structure Plan ("DOSP"); and
 - (b) Worked with the PPC 48, 49 and 50 applicants as part of the Drury Developers Group to test and agree a shared masterplan for the wider Drury-Opaheke area (for both Drury East and Drury West).

Reasons for KDL submission

10. KDL seeks that PPC 50 is approved as notified. That is on the basis that as currently drafted, PPC 50:
- (a) Appropriately gives effect to or has regard to all applicable higher order planning instruments, including the Regional Policy Statement provisions of the AUP.
 - (b) Promotes the sustainable management of natural and physical resources and is not contrary to Part 2 of the Resource Management Act 1991 ("RMA"), to the extent that it would:
 - (i) Ensure that any potential adverse effects are appropriately addressed;
 - (ii) Enable the social, economic and cultural well-being of the community in the Auckland region; and
 - (iii) Meet the reasonably foreseeable needs of future generations.
 - (c) Accords with and would assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 50 provisions relative to other means.

- (d) Would enable quality planning outcomes to be achieved for Drury-Opaheke and Drury West in particular, which are consistent with the DOSP and can be delivered in a timely manner.

Relief sought

11. For the foregoing reasons, KDL seeks the following outcome in relation to PPC 50:

- (a) That PPC 50 be approved as notified. 31.1
- (b) In particular, that no amendments be made to PPC 50 that would in any way impact on, impede or preclude:
 - (i) The quality of planning outcomes that KDL seeks to achieve for Drury West; or 31.2
 - (ii) The timing in which those outcomes are delivered.

12. KDL wishes to be heard in support of its submission.

13. If others make a similar submission, KDL will consider presenting a joint case with them at any hearing.

KARAKA AND DRURY LIMITED by its solicitors
and duly authorised agents, Berry Simons



S J Berry

Date: 22 October 2020

Address for service:

Karaka and Drury Limited's address for service in respect of this submission is as follows:

Karaka and Drury Limited
C/- Berry Simons
PO Box 3144
Auckland 1140

T: (09) 909 7316
E: helen@berrysimons.co.nz

SUBMISSION ON PLAN CHANGE 50 – WAIHOEHOE PRECINCT, DRURY – AUCKLAND UNITARY PLAN BY KĀINGA ORA HOMES AND COMMUNITIES

TO: Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1010

Submission via email: unitaryplan@aucklandcouncil.govt.nz

KĀINGA ORA HOMES AND COMMUNITIES (“**Kāinga Ora**”) at the address for service set out below makes the following submission on Plan Change 50 – Waihoehoe Precinct, Drury (“**PC50**”) to the Auckland Unitary Plan Operative in Part (“**AUP:OP**”).

Background

1. Kāinga Ora was established in 2019 as a statutory entity established under the Kāinga Ora-Homes and Communities Act 2019. Kāinga Ora consolidates Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown entity and is required to give effect to Government policies.
2. Kāinga Ora is now the Government’s delivery entity for housing and urban development. Kāinga Ora will therefore work across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:
 - (a) being a world class public housing landlord; and
 - (b) leading and co-ordinating urban development projects.
3. Kāinga Ora’s statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
 - (a) provide people with good quality, affordable housing choices that meet diverse needs; and

- (b) support good access to jobs, amenities and services; and
 - (c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
4. Kāinga Ora is focused on delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures.
 5. The public housing portfolio managed by Kāinga Ora in Auckland comprises approximately 30,100 dwellings¹. Auckland is a priority to reconfigure and grow Kāinga Ora's housing stock to provide efficient and effective public and affordable housing that is aligned with current and future residential demand in the area, and the country as a whole.
 6. Kāinga Ora has a shared interest in the community as a key stakeholder, alongside local authorities. Kāinga Ora's interests lie in the provision of public housing to persons who are unable to be sustainably housed in private sector accommodation, and in leading and co-ordinating residential and urban development projects. Kāinga Ora works with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.
 7. In addition to its role as a public housing provider, Kāinga Ora also has a significant role as a landowner, landlord, rate payer and developer of residential housing. Strong relationships between local authorities and central government are key to delivering government's priorities on increasing housing supply.
 8. Policy decisions made at both central and local government level have impacts on housing affordability. The challenge of providing affordable housing will require close collaboration between central and local government to address planning and governance issues to reduce the cost of construction, land supply constraints, infrastructure provisions and capacity as well as an improved urban environment.
 9. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing. These include the provision of services and infrastructure and how this may

¹ As of 30 September 2020

impact on Kāinga Ora existing and planned housing, community development and Community Group Housing (“**CGH**”) suppliers.

10. In addition to the above, Kāinga Ora will play a greater role in urban development in New Zealand. The legislative functions of Kāinga Ora, as outlined in the Kāinga Ora Act, illustrate this broad mandate and outline two key roles of Kāinga Ora in that regard:
 - a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
 - b) providing a leadership or coordination role more generally.
11. Notably, Kāinga Ora’s statutory functions in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first time buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.

Scope of Submission

12. The submission relates to PC50 in its entirety.

The Submission is:

13. Kāinga Ora **supports** the plan change **in part**, which seeks to rezone land within the spatial extent of the Proposed Waihoehoe Precinct (“**the Proposed Precinct**” or “**Precinct**”) from Future Urban Zone (“**FUZ**”) to Residential - Terrace Housing and Apartment Buildings Zone (“**THAB**”). This is subject to Kāinga Ora’s relief being granted and matters raised in its submission being addressed.
14. Kāinga Ora seeks a number of amendments to PC50 which are set out in further detail in this submission below and set out in:
 - (a) **Attachment 1** – Table 1: Identifies the specific provisions of PC50 which Kāinga Ora either supports, seeks amendment to, or opposes; and
 - (b) **Attachment 2** – Proposed re-zoning to be included in the plan change.
 - (c) **Attachment 3** – Proposed Height Variation Control
15. In particular, but without limiting the generality of the above:

16. Kāinga Ora supports in part the proposed THAB zoning of land within the PC50 spatial extent, being generally-aligned with the identified zoning within the Drury-Opāheke Structure Plan 2019. The proposed zoning and corresponding proposed Precinct Provisions will promote and enable a compact urban form that is supported by the Precinct’s transportation connectivity in the form of proximity to State Highway One, the planned and funded Drury East Rail Station and integration with identified roading connections to the proposed PC48 and PC49 precincts to the South – consistent with Chapter B2 of the Regional Policy Statement (“**RPS**”) in the AUP:OP.
17. Kāinga Ora acknowledges that the rezoning of land may not be sequenced with the ‘Future Urban Land Supply Strategy 2017 (“**FULSS**”) which is cross-referenced within the Drury-Opāheke Structure Plan 2019 to be rezoned during ‘2028 – 2032’. Kāinga Ora generally supports the planning assessment undertaken in support of the Plan Change because:
- (a) The proposed rezoning under PC50 has taken place following the Drury-Opāheke Structure Plan 2019, and is therefore aligned with the sequence for urban land rezoning outlined within the RPS (as-assessed within the section 32 evaluation of the Resource Management Act 1991 (“**the Act**” or “**RMA**”) report supporting PC50);
 - (b) The Proposed Precinct’s location, intensity and timing is consistent with the relevant objectives and policies of the National Policy Statement on Urban Development 2020 (“**NPS:UD**”) because in particular:
 - (i) Urbanisation of land at this time is responsive to the need to ensure sufficient development capacity for the wider Auckland Region and to deliver housing supply (Objective 1, 6 and Policy 8);
 - (ii) The Proposed Precinct enables buildings heights and intensity surrounding the proposed Business – Metropolitan Centre Zone within the PC48 spatial extent, which is consistent with Policy 3 and would otherwise be strengthened through Kāinga Ora’s submission to include a 19.5m Height Variation Control; and
 - (iii) Provides for a range of land uses and housing types across the PC48, 49 and 50 spatial extents that that will be integrated through comprehensive land use planning and specific transportation-

connectivity provisions that promote well-functioning environments that support a range of transportation choices (Policy 1).

- (c) The timing and funding for key infrastructure upgrades are confirmed by Waka Kotahi – New Zealand Transport Agency (“**NZTA**”);
 - (d) The Proposed Precinct provisions would ensure that the sequencing of development within the Precinct is undertaken in a manner that mitigates actual and potential effects on the wider transportation network, and takes place in a staged manner to remain ‘in step’ with key public infrastructure delivery necessary to support the precinct;
 - (e) There is a clear demand for developable land within the Auckland Region to facilitate an increase in housing supply;
 - (f) The timing for completion of the statutory process to deliver live urban zoning, along with the planning, consenting and eventual delivery of development would put the actual infrastructure *demand* from enabled development within the Proposed Precinct close to the 2028 timeframe otherwise envisaged by the FULSS.
18. Notwithstanding the general support of PC50, Kāinga Ora opposes in part the proposed spatial extent of rezoned land under PC50, which compromises the opportunity for coordinated urbanisation and development on FUZ land within and adjacent to the Proposed Precinct. In particular, the proposed zoning of the Precinct does not align with planned zoning identified in the Drury-Opāheke Structure Plan 2019, as it is not contiguous with existing urbanised land to the west within Drury Township. As such, PC50 isolates existing land at 1 and 1A East Street to the immediately to the west of the Precinct spatial extent and introduces fragmentation into the pattern and grain of urban zoning and future land development. Retaining 1 and 1A East Street as FUZ also disincentivises the exploration of potential road and/or pedestrian connections between the Proposed Precinct and 1 – 1A East Street (across the North Island Rail Line), which may occur as result from urban re-zoning of these two land areas (PC50 and 1 – 1A East Street) being out of sequence with each other (i.e. there would be little incentive to establish any connection between the two areas if urban development is precluded at 1 and 1A East Street as a result of FUZ zoning).

19. Kāinga Ora therefore considers it appropriate to include the following land within the spatial extent of land sought to be rezoned under PC50 (refer **Attachment One** for proposed zoning) and seeks:
- (a) The inclusion of 1 and 1A East Street, Drury within the spatial extent of land sought to be rezoned under PC50;
 - (b) The zoning of 1 East Street, Drury (owned by Kāinga Ora – Homes and Communities) to THAB; and
 - (c) The zoning of 1A East Street, Drury (under private ownership) as Business – Local Centre Zone (“**LCZ**”). This is intended to enable the integrated development of the existing Centre and lawfully-established operation of the ‘Murphys Law Irish Bar’ (Tavern) at 200-212 Great South Road, under the same ownership. This is an extension of the existing LCZ land at and as-such is considered to be an appropriate zoning which reflects both the existing zoning pattern and that identified within the Drury-Opāheke Structure Plan 2019.
20. Kāinga Ora considers Policy 3(c) of the NPS:UD to be of relevance to the intensity of land use proposed within PC50. This policy encourages building heights of at least six storeys within a walkable catchment to existing and planned rapid transit stops. In relation to the planned establishment of the Drury East Rail Station to the south and the proposed rezoning sought within its submission:
- (a) Kāinga Ora request a 22.5m Height Variation Control over the extent of the proposed THAB zone (including 1 East Street, Drury), to better-provide for design flexibility in achieving seven storey residential development in proximity to centres (where a minimum of six storeys is encouraged by the NPS:UD); and
 - (b) Kāinga Ora request a 27m Height Variation Control over the extent of the LCZ proposed (including 1A East Street, Drury and at 200-212 Great South Road), to better-provide for design flexibility in achieving a minimum of six storey development in proximity to centres as-encouraged by the NPS:UD.

32.1

32.2

The extent of the proposed application of the Height Variation Control and corresponding heights, are identified in **Attachment Three**.

21. Kāinga Ora supports the spatial extent of Proposed Precinct Plan 2 – Transport Staging Boundary. The land at 1 and 1A East Street to the west of the North Island Rail Line are isolated from the bulk of the PC50 land area and are within a separate catchment. Kāinga Ora therefore seek that the spatial extent of the application of proposed Standards IX.6.1 and IX.6.2 remains as-notified. 32.10
32.11
22. Kāinga Ora has identified that the Proposed Precinct provisions contain a number of inconsistencies. These are identified within **Attachment Two** to this submission and in particular:
- (a) The Precinct provisions contain references to Sub-Precincts A and B which are not identified on the precinct plans;
 - (b) The Precinct provisions contain references to Residential – Mixed Housing Urban zoned land which is not identified on the precinct plans; and
 - (c) Standard IX.6.5 applies different impervious area limitations based on Sub-Precincts A and B which are not identified;

Relief Sought

23. Kāinga Ora seeks the following decision from Auckland Council on PC50:
- (a) The land at 1 and 1A East Street Drury be rezoned as part of the PC50 process. 32.1
 - (b) The provisions of the Proposed Precinct be deleted or amended, to address the matters raised in this submission and its attachments so as to provide for the sustainable management of the Region's natural and physical resources and thereby achieve the purpose of the Act.
 - (c) Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.
 - (d) Any other alternative or consequential relief to give effect to this submission.
24. In the absence of the relief sought, PC50:
- (a) is contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;

- (b) will compromise an integrated release of urbanised land and create a large-scale 'spot zone' of high-density land that is not contiguous with existing urbanised land to the west;
 - (c) will in those circumstances impact significantly and adversely on the ability of people and communities to provide for their social, economic and cultural wellbeing.
25. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.
26. Kāinga Ora wishes to be heard in support of this submission.
27. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at hearing.

Dated this 22 day of October 2020



Brendon Liggett
Manager – Development Planning
Kāinga Ora Homes and Communities

ADDRESSES FOR SERVICE:

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Attachment 1

Table 1: Identifies the specific provisions of PC50 which Kāinga Ora either supports, seeks amendment to, or opposes.

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:
	<p><i>Note: Kāinga Ora's submission relates to PC 50 in its entirety. Where provisions within the proposed Waihoehoe Precinct are not included in this submission table, those provisions are supported in part, subject to the relief sought by Kāinga Ora.</i></p>			
1	Spatial application of Zoning within the Drury Centre Precinct	Support in part	<p>Kāinga Ora generally supports the proposed THAB zoning within the Waihoehoe Precinct, which is aligned with the zoning indicated on the Drury-Opāheke Structure Plan 2019, and will promote and enable a compact urban form with an efficiency of land use and residential development in proximity to the proposed metropolitan centre under PC48 to the south.</p> <p>Kāinga Ora considers the proposed spatial extent of rezoned land under PC50 will compromise the opportunity for coordinated urbanisation and development on FUZ land within and adjacent to the proposed Waihoehoe Precinct. In particular, the proposed zoning of the proposed Waihoehoe Precinct does not align with planned zoning identified in the Drury-Opāheke Structure Plan 2019 as it is not contiguous with existing urbanised land to the west within Drury Township. As a result, PC50 isolates existing land at 1 and 1A East Street which introduces fragmentation into the pattern and grain of urban land development. Retaining this land as FUZ also disincentivises the exploration of potential road and/or pedestrian connections between the proposed precinct and 1 – 1A East Street (across the North Island Rail Line), which may occur as result from urban re-zoning of these two land areas (PC50 and 1 – 1A East Street) being out of sequence with each other (i.e. there would be little incentive to establish any connection between the two areas if urban development is precluded at 1 and 1A East Street as a result of FUZ zoning).</p>	<p>Approve the plan change subject to inclusion of sites at 1 and 1A East Street for rezoning (refer Attachment Two).</p>

32.1

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:
	Waihoehoe Precinct Plans	Support in part	<p>Kāinga Ora generally supports the Drury Centre Precinct Plans.</p> <p>Kāinga Ora considers Policy 3(c) of the NPS:UD to be of relevance to the intensity of land use proposed within PC50. This policy encourages building heights of at least six storeys within a walkable catchment to existing and planned rapid transit stops. In relation to the planned establishment of the Drury East Rail Station to the south and the proposed rezoning sought within its submission:</p> <p>a. Kāinga Ora request a 22.5m Height Variation Control over the extent of the proposed THAB zone (including 1 East Street, Drury), to better provide for design flexibility in achieving seven storey residential development in proximity to centres (where a minimum of six storeys is encouraged by the NPS:UD); and</p> <p>b. (b) Kāinga Ora request a 27m Height Variation Control over the extent of the LCZ proposed (including 1A East Street, Drury and at 200-212 Great South Road), to better provide for design flexibility in achieving a minimum of six storey development in proximity to centres as encouraged by the NPS:UD.</p> <p>Refer Attachment Three.</p>	<p>Approve the plan change subject to the application of the 22.5m and 27m height variation controls.</p>
2	IX.1 Waihoehoe Precinct Description	Support in part	<p>Kāinga Ora generally supports the purpose of the precinct and the description. However, it is noted that the description contains reference to Sub-Precincts A and B which are not identified on the precinct plans.</p>	<p>Retain the Waihoehoe Precinct description subject to:</p> <ul style="list-style-type: none"> • clarification of the identified inconsistencies between the precinct plans and provisions; • any consequential changes resulting for Kāinga Ora's submission.
3	IX.2 Objectives (1)	Support in part	<p>It is unclear what the phrase '...respects <i>Mana Whenua values</i>' means within the context of future assessment as part of</p>	<p>Retain Objective (1) subject to clarification and amendment sought.</p>

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:
			<p>resource consent application, and how this would be applied in any future assessment under Section 104 (1)(b) of the Resource Management Act 1991.</p> <p>It is also unclear whether, by implication, a Cultural Values Assessment ('CVA') would be required for all resource consent applications within the precinct to understand what those particular values are within the context of a development or the wider precinct.</p> <p>Kāinga Ora suggest that those values may be better-incorporated into the precinct provisions themselves to avoid administrative ambiguity. If this has been undertaken through the setting of reduced impervious coverage standards (IX.6.5) and stormwater quality requirements (IX.6.6) then policies should be included to specifically reflect these as giving effect to Objectives IX.2 (1).</p>	
4	IX.2 Objective (4)	Support	Kāinga Ora supports the proposed objective which is aligned with the National Policy Statement on Fresh Water Management.	Retain Objective (4) as notified. 32.5
5	IX.3 Policy (9)	Oppose in part	The policy contains reference to Sub-Precinct B which is not identified on the precinct plans. The policy should be clarified to reflect what is proposed within the precinct.	Retain Policy (9) with amendment or deletion sought. 32.6
6	11.1. (1) Notification	Support in part	There is a spelling error in the provision which should read “...development of the indicative collective collector road...”	Retain Standard 11.1 (1) with proposed amendment. 32.7
7	IX.6 (3) Standards	Support in part	The provision makes reference to the Mixed Housing Urban Zone which is not identified within the precinct plans. This reference should either be deleted, or the proposed zonings amended to reflect.	Retain Standard IX.6 (3) with proposed amendment. 32.8

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:
8	IX.6 (4) Standards	Support in part	The standard makes reference to Sub-Precinct B which is not identified on the precinct plans. This reference should either be deleted, or the proposed zonings amended to reflect.	Retain Standard IX.6 (4) with proposed amendment.
9	IX.6.1 Staging of Development with Transport Upgrades	Support in part	<p>Kāinga Ora supports in part the need to manage the actual and potential effects that residential development may generate on the transportation network, where necessary upgrades to support such development may not have occurred.</p> <p>However, Kāinga Ora question the extent to which the various publicly-funded infrastructure works (noted under IX.6.1 (4) and IX.6.2 (4) as “...not included in the development thresholds...” have influenced the setting of the development thresholds proposed, and whether the thresholds have assumed those upgrades have taken place. If those public works not taking place have a material influence on the threshold proposed, Kāinga Ora submit they should be <i>included</i> in the precinct.</p>	Retain Standard IX.6.1 subject to clarify and / or amending provisions and thresholds to account for public infrastructure upgrades.
10	IX.6.2 Trip Generation Limit	Support in part	<p>Kāinga Ora supports in part the need to manage the actual and potential effects that residential development may generate on the transportation network, where necessary upgrades to support such development may not have occurred.</p> <p>However, Kāinga Ora question the extent to which the various publicly-funded infrastructure works (noted under IX.6.1 (4) and IX.6.2 (4) as “...not included in the development thresholds...” have influenced the setting of the development thresholds proposed, and whether the thresholds have assumed those upgrades have taken place. If those public works not taking place have a material influence on the threshold proposed, Kāinga Ora submit they should be <i>included</i> in the precinct.</p>	Retain Standard IX.6.2 subject to clarifying and / or amending provisions and thresholds to account for public infrastructure upgrades.

32.9

32.10

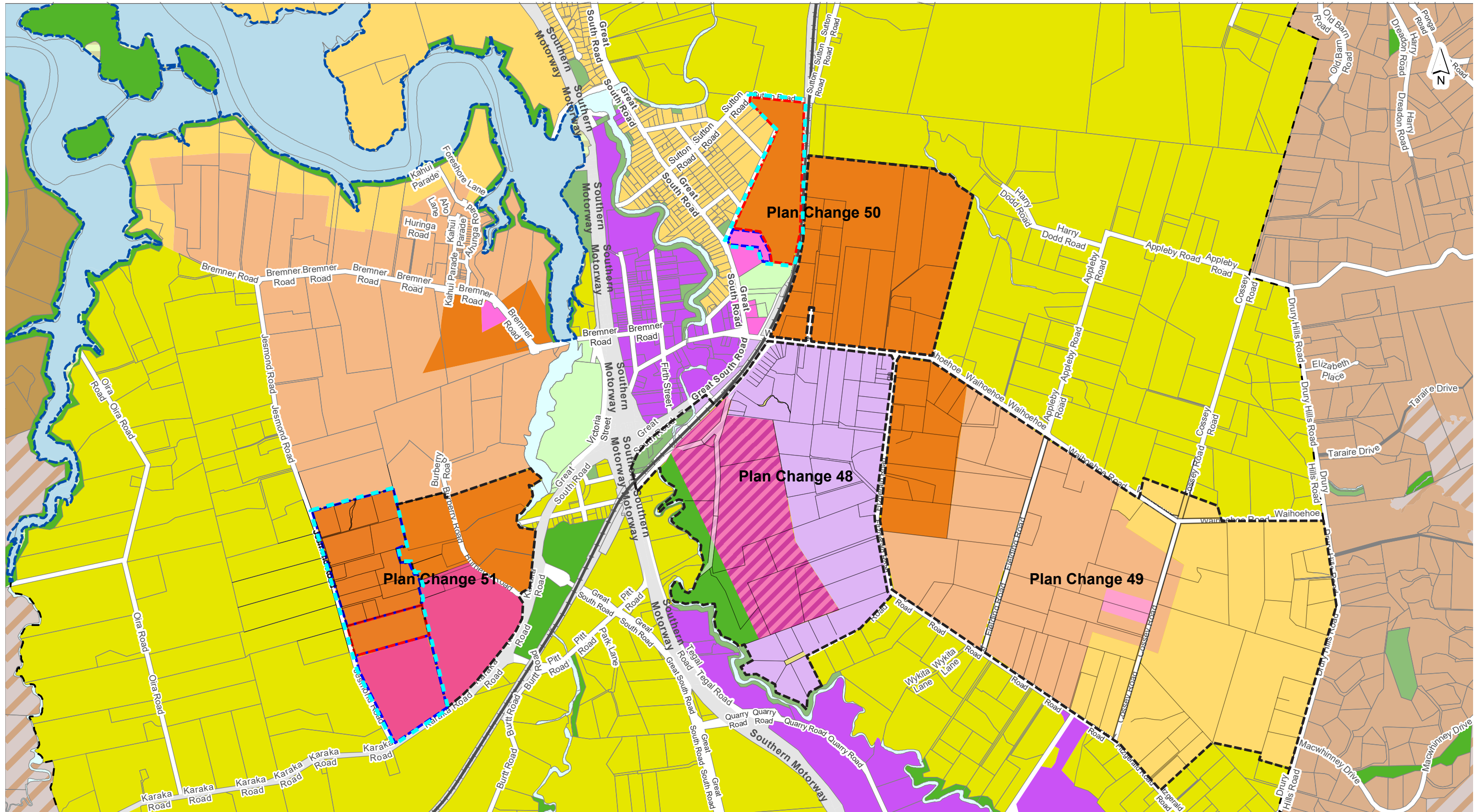
32.11

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:
11	IX.6.5 Maximum Impervious Area within Sub-Precinct B	Support in part	<p>Kāinga Ora supports the intention to manage impervious runoff, should this be specifically required from an infrastructure capacity perspective and to give effect to objectives and policies regarding Mana Whenua values, to the extent the standard is consistent with its submission on proposed Objective IX.2 (1).</p> <p>Notwithstanding, the standard applies to Sub-Precinct B which is not identified on the precinct plans. The standard should be amended to reflect what is proposed within the precinct.</p>	Retain Standard IX.6.5 subject to proposed amendments.
12	IX.8.2(1) (f) and (g) Assessment criteria	Support in part	Criteria (f) and (g) are duplicated.	Delete duplicated criteria IX.8.2 (1)(f).
13	IX.8.2 (3) Assessment criteria		The criterion applies to Sub-Precinct B which is not identified on the precinct plans. The criterion should be amended to reflect what is proposed within the precinct.	Retain IX.8.2 (3) subject to proposed amendments.

32.12

32.13

32.14



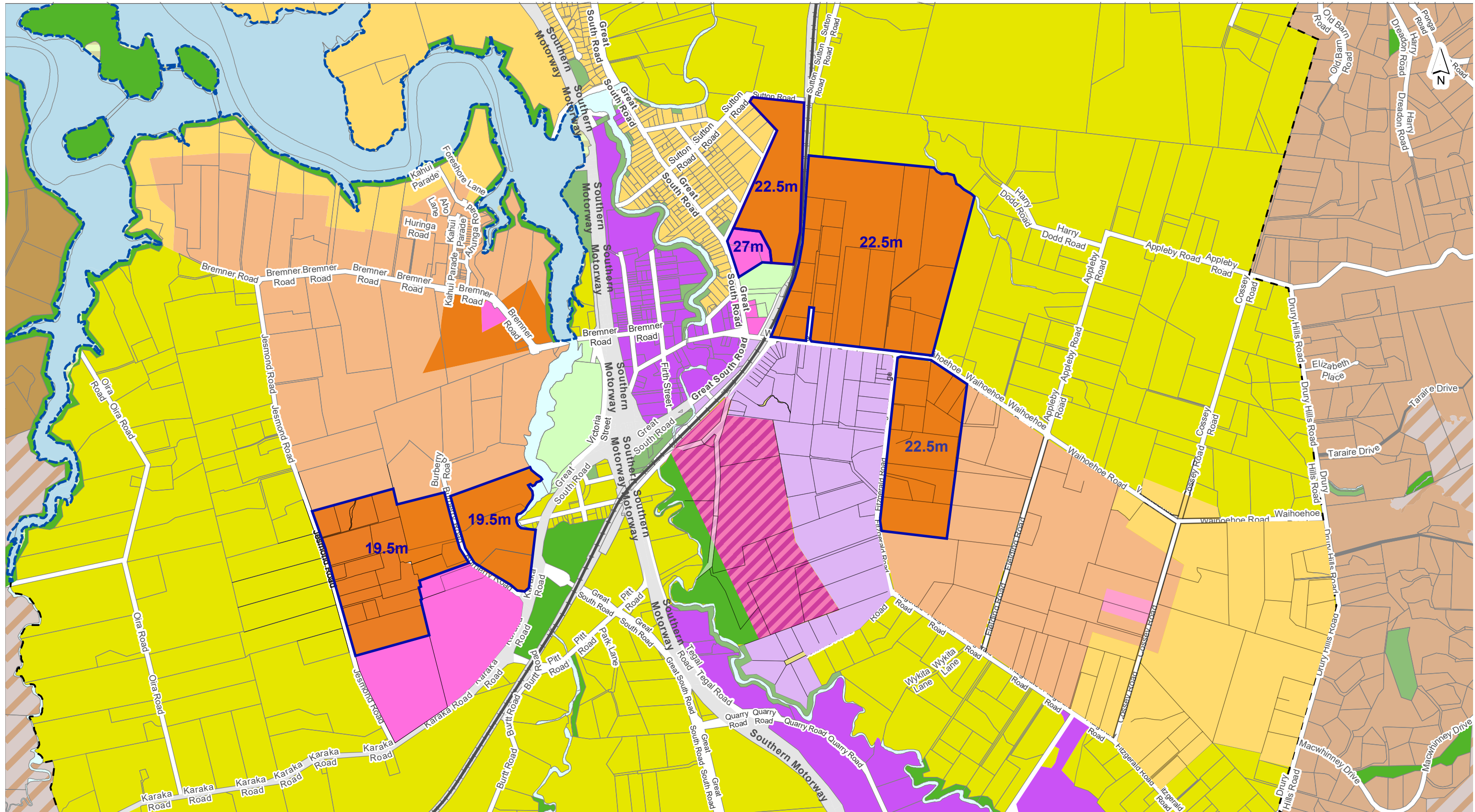
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Proposed Rezoning Map Plan Change 50 and 51

0 150 300 450
 Meters
Scale @ A3
 = 1:15,000
Date Printed:
 29/09/2020

Legend

- Metropolitan Centre Zone
- Town Centre Zone
- Mixed Use Zone
- Terraced Housing and Apartment Building Zone
- Mixed Housing Urban Zone
- Mixed Housing Suburban Zone
- Local Centre Zone
- Neighbourhood Centre Zone
- Open Space Zone
- Notified Plan Change areas
- Proposed Zoning inclusion
- Kāinga Ora sites
- Adjacent sites



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Proposed Rezoning Map Height Variation Control



Scale @ A3
 = 1:15,000

Date Printed:
 29/09/2020

Legend

- Metropolitan Centre Zone
- Mixed Use Zone
- Terraced Housing and Apartment Building Zone
- Mixed Housing Urban Zone
- Mixed Housing Suburban Zone
- Local Centre Zone
- Neighbourhood Centre Zone
- Open Space Zone
- Height Variation Control

Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council
SUBMISSION ON: Plan Change 50 (Private): Waihoehoe Precinct
FROM: Watercare Services Limited
ADDRESS FOR SERVICE: ilze.gotelli@water.co.nz
DATE: 22 October 2020

Watercare could not gain an advantage in trade competition through this submission.

1. INTRODUCTION

1.1. Watercare's purpose and mission

Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council ("**Council**").

Watercare provides integrated water and wastewater services to approximately 1.4 million people in Auckland. Watercare collects, treats and distributes drinking water from 11 dams, 26 bores and springs, and four river sources. A total of 330 million litres of water is treated each day at 15 water treatment plants and distributed via 89 reservoirs and 90 pump stations to 450,000 households, hospitals, schools, commercial and industrial properties.

Watercare's water distribution network includes more than 9,000 km of pipes. The wastewater network collects, treats and disposes of wastewater at 18 treatment plants and includes 7,900 km of sewers.

Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of the assets. Watercare must also give effect to relevant aspects of the Council's Long Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Urban Land Supply Strategy.¹

2. SUBMISSION

2.1. General

This is a submission on a change proposed by Oyster Capital Limited to the Auckland Unitary Plan (Operative in Part) that was publicly notified on 27 August 2020 ("**Plan Change**").

The applicant proposes to rezone 48.9 hectares of Future Urban zoned land located to the north of Waihoehoe Road and east of the North Island Main Trunk Railway to a Residential: Terrace Housing and Apartment Buildings zone ("**Plan Change Area**"). The Plan Change also introduces the Waihoehoe Precinct to the Auckland Unitary Plan (Operative in Part).

Watercare neither supports nor opposes the Plan Change.

The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing arrangement to ensure that the effects on Watercare's existing and planned water and wastewater network are appropriately considered and managed in accordance with the Resource Management Act 1991.

2.2. Specific parts of the Plan Change

The specific parts of the Plan Change that this submission relates to are:

- (a) the proposed water and wastewater servicing arrangement; and
- (b) the effects of the Plan Change on Watercare's existing and planned water and wastewater network.

Watercare has reviewed the Plan Change and considers that:

- (a) the proposed water and wastewater capacity and servicing requirements have been adequately assessed as part of the Plan Change;
- (b) subject to development occurring in accordance with the proposed staging and infrastructure upgrades described further below:
 - (i) the proposed servicing arrangement is technically feasible; and

¹ Local Government (Auckland Council) Act 2009, s58.

- (ii) any adverse effects of the Plan Change on Watercare's existing and planned water and wastewater infrastructure network will be appropriately managed.

The Plan Change area falls within the area serviced by Veolia Water under a Franchise Agreement with Watercare. Watercare is responsible for constructing, operating, and maintaining bulk water and wastewater infrastructure to service the Veolia Service Area. Under the Franchise Agreement, Watercare owns the local water and wastewater network but Veolia is responsible for operating and maintaining the local network.

2.2.1. Water supply servicing for the Plan Change Area

Currently the Plan Change Area is not serviced by Watercare's water network.

The proposed servicing arrangement involves the installation of a new watermain between Flanagan Road and Waihoehoe Road. Watercare supports this arrangement in principle, however the specific capacity and alignment have not yet been confirmed and will require further assessment to ensure sufficient supply is provided for the Plan Change Area and future development areas.

The costs of any necessary public water supply infrastructure required to service the Plan Change Area, once agreed, will be distributed between Watercare and contributing developers.

All internal local reticulation will be required to be provided at developer cost. As the Plan Change Area falls within the area serviced by Veolia, the local network configuration will need to be agreed with Veolia.

Design of all water supply infrastructure, including sizing for future reticulation, will be required to comply with Watercare's Code of Practice for Land Development and Subdivision.

Design and testing for firefighting pressure and provision for fire hydrants within the road reserve will be required to be addressed at resource consent stage.

2.2.2. Wastewater servicing for the Plan Change Area

Currently the Plan Change Area is not serviced by Watercare's wastewater network.

The Plan Change Area falls within the Opaheke North catchment. Under Watercare's wider Drury Servicing Strategy, the Opaheke North catchment will be serviced by a new transmission wastewater pump station in the vicinity of Miro Road and Sutton Road that will pump to the existing Hingaia Pump Station. Flows to this pump station will be collected via a new gravity transmission pipe that extends across the rail line at Sutton Road and a network of local wastewater gravity lines see Figure 1 attached as **Appendix A.**) As the Opaheke North catchment is still in the Future Urban zone area, Watercare does not have a timeline for the development of the infrastructure required to service the Opaheke North catchment as this will be driven by the Auckland Council land release strategy.

In order to facilitate earlier development of the Plan Change Area, Watercare has supported in principle an interim wastewater solution that enables the Area to discharge into the wastewater network that is being constructed to service the Opaheke South catchment. The proposed solution includes the construction of a temporary pump station on the northern

perimeter of the Plan Change Area to pump gravity flows via a rising main to connect to a new gravity sewer at Waihoehoe Road. The gravity sewer will convey flows to the new Drury South pump station that Watercare is currently constructing. The interim solution provides servicing for up to 350 Dwelling Unit Equivalents (DUEs).

The cost of the interim solution is to be met by the developer in accordance with existing Infrastructure Funding Agreements as is the connection to the permanent solution once that is in place.

All internal local reticulation to connect to either the temporary pump stations (in the interim case) or the permanent gravity sewers (in the ultimate case) is to be provided at developer cost. As the Plan Change Area falls within the area serviced by Veolia, the local network configuration will need to be agreed with Veolia.

All wastewater infrastructure, including local reticulation and temporary pump station design, will be required to comply with Watercare's Code of Practice for Land Development and Subdivision.

3. DECISION SOUGHT

Watercare seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Plan Change will be adequately met, such that the water and wastewater related effects are appropriately managed.

To enable that decision to be made, Watercare requests the following amendments to the proposed Waihoehoe Precinct provisions:

(a) Amend Policy 6 as follows:

(6) Ensure that subdivision and development in Drury East is coordinated with (and does not precede) supporting stormwater, wastewater and water supply infrastructure and manages adverse effects, including reverse sensitivity effects, which may compromise the operation or capacity of that infrastructure.

33.1

(b) Such other alternative or consequential relief as required to give effect to the matters raised in this submission.

4. HEARING

Watercare wishes to be heard in support of its submission.

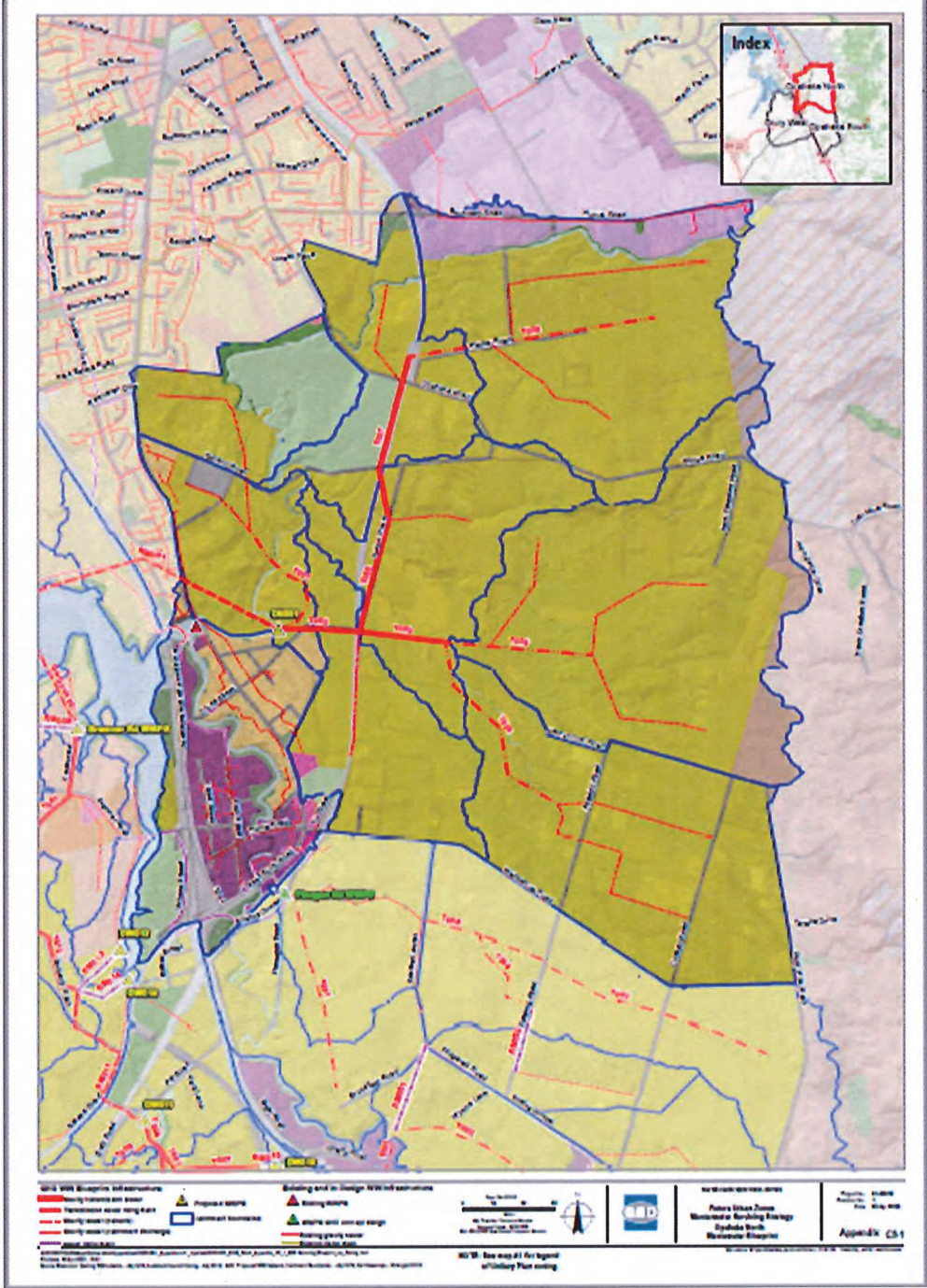
22 October 2020


Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Address for Service:
Ilze Gotelli
Head of Major Developments
Watercare Services Limited
Private Bag 92 521
Wellesley Street
Auckland 1141
Phone: 021 831 470
Email: ilze.gotelli@water.co.nz

Appendix A

Figure 1: Wastewater Service Strategy for Opaheke North.





SUBMISSION ON PLAN CHANGE 50 (PRIVATE): WAIHOEHOE PRECINCT

To: Auckland Council

Name of Submitter: Ngāti Tamaoho (the **Submitter**)

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 50: Waihoehoe Precinct (**PPC50**) by Oyster Capital (**applicant**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. PPC50 seeks to rezone 48.9 hectares of land in Drury East from Future Urban to Terrace Housing and Apartment Building zone. PPC50 provides capacity for at least 1,133 dwellings.
3. PPC50 is one of three private plan change requests that have been prepared and lodged by three separate developers, but which are interrelated. The net result of the three plan change requests is a proposed large development constituting approximately 7,000 new dwellings, 19,000 new residents and 58,000m² GFA of new office space, among other outcomes. The Submitter has lodged separate submissions of each of the three plan change requests.
4. The Submitter could not gain an advantage in trade competition through this submission.
5. This submission relates to the entire PPC50.
6. The Submitter's key interests are to ensure the protection, preservation and appropriate management of natural and cultural resources in a manner that recognises and provides for Mana Whenua interests and values and enables positive environmental, social and economic outcomes.
7. As the proposal currently stands, the Submitter **opposes** in part PPC50 on the basis that:
 - (a) Mana Whenua have not had the opportunity to provide input into the design and detail of the proposal to ensure that their values are reflected in PPC50, and that adverse environmental, social and cultural effects are avoided, remedied or mitigated.

8. Ngāti Tamaoho prepared a Cultural Values Assessments for the applicant which set out in detail the cultural connections Ngāti Tamaoho has with the PPC48 land and the surrounding Drury-Opaheke area. We do not repeat this detail provided in this CVA.

SUBMISSION

9. The Submitter considers that PPC51 is inconsistent with Part 2 of the RMA, including:
- (a) The purpose of the RMA to promote the sustainable management of natural and physical resources, including by safeguarding the life-supporting capacity of air, water, soil and ecosystems;
 - (b) Section 6(a) the preservation of the natural character of the coastal environment, wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development;
 - (c) Section 6(e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other Taonga;
 - (d) Section 6(f) the protection of historic heritage from inappropriate subdivision, use and development;
 - (e) Section 6(g) the protection of protected customary rights;
 - (f) Section 7(a) which requires all persons exercising functions and powers under the RMA to have particular regard to kaitiakitanga; and
 - (g) Section 8 which requires all persons exercising functions and powers under the RMA to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
10. It is vital for the people of Ngāti Tamaoho that the mana of the land subject to PPC50 is upheld, acknowledged and respected and that their people have rangatiratanga (opportunity to participate and be involved in decision making) over their ancestral land and Taonga. In addition, the people of Ngāti Tamaoho (alongside other iwi holding Mana Whenua) have responsibility as kaitiaki to fulfil their obligation and responsibilities to the environment in accordance with customs passed down, and to be accountable to the people (current and future generations) in these roles as custodians.
11. The Submitter is concerned that PPC50 will result in adverse environmental and cultural effects, as it is currently proposed by the applicant. Specifically:
- (a) Wai (Water): PPC50 does not give effect to Te Mana o te Wai and risks damaging the mauri of wai within the project area. This includes through PPC48's proposed treatment of waterways and its proposed stormwater and wastewater solutions. 34.6
34.7
34.8
34.9
 - (b) Sustainable Management: The Submitter considers that PPC50 should in some, if not most ways, be self-reliant and self-sustainable. Sustainable management has not been adequately given effect to in PPC50. 34.11
 - (c) Native Trees and Plants: The Submitter supports whakapapa sourced trees and plants within the PPC50 site. 34.10
 - (d) Te Aranga Design Principles: These principles have been developed by Auckland Council and Tamaki Makaurau iwi over a number of projects. The principles include mana (treaty based relationships), whakapapa (naming), tohu 34.3

(acknowledgement of wider cultural landscape), taiao (bringing natural landscape elements into urban environments), mauri tu (environmental health of the site including wai and whenua), mahi toi (inscribing Maori narratives into architecture and design), and ahi ka (living presences for iwi and hapu to undertake their kaitiaki roles). Te Aranga Design Principles have not been incorporated into PPC50.

- (e) Landscapes: The Submitter seeks that PPC50 identifies and preserves landscapes, including view shafts, hilltops, tuff rings and ridge lines. | 34.5

RELIEF

12. The Submitter requests a decision on PPC50 that confirms, at a minimum, the following:
- (a) Ongoing participation, consultation and engagement in the project; | 34.1
 - (b) Acknowledgement within the project design of the history of Mana Whenua in the PPC50 area; | 34.2
 - (c) Te Aranga Principles incorporated in design concepts; | 34.3
 - (d) Iwi monitoring; | 34.4
 - (e) Natural and cultural landscaping accounted for in the project design; | 34.5
 - (f) A minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways; | 34.6
 - (g) A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway; | 34.7
 - (h) Roof capture for reuse and groundwater recharge; | 34.8
 - (i) Park edge design adjacent to all waterways; | 34.9
 - (j) Native trees and plants only within the precinct; | 34.10
 - (k) Sustainable development reflected in the design and outcomes | 34.11
13. The Submitter seeks the following decision from Auckland Council:
- (a) **Reject** PPC50 unless the issues addressed in this submission can be adequately addressed
14. The Submitter wishes to be heard in support of its submission.
15. The Submitter would consider presenting a joint case if others make similar submissions.

22 October 2020

Lucie Rutherford

R.M.A. Officer

Ngati Tamaoho

rmaofficer@tamaoho.maori.nz

A handwritten signature in black ink, appearing to read 'L. Rutherford', written in a cursive style.

Submission on a notified proposal for policy statement or plan change or variation

Clause 6 of Schedule 1, Resource Management Act 1991
FORM 5



Send your submission to unitaryplan@aucklandcouncil.govt.nz or post to :

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

For office use only
Submission No:
Receipt Date: 22 OCT 2020

Received at Epsom library
22/10 at 3.30pm

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Tim JOHN MAC WHINNEY

Organisation Name (if submission is made on behalf of Organisation)

Address for service of Submitter

13 A WAPITI AVE, EPSOM, AUCKLAND

Telephone:

0275225116

Fax/Email:

a.t.macwhinney@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

This is a submission on the following proposed plan change / variation to an existing plan:

Plan Change/Variation Number

PC ~~54~~ (Private) 50

Plan Change/Variation Name

Drury 2 Precinct Waihochoe Rd

The specific provisions that my submission relates to are:

(Please identify the specific parts of the proposed plan change / variation)

Plan provision(s)

PLAN CHANGE 50

Or

Property Address

28 WAIHOCHOE RD

Or

Map

PHOTO INCLUDED

Or

Other (specify)

Submission

My submission is: (Please indicate whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)

I support the specific provisions identified above

I oppose the specific provisions identified above

I wish to have the provisions identified above amended

Yes

No

AT 28 WAITOEHUO RD DUNN.

The reasons for my views are: 1) SIGNIFICANT LANDSCAPE FEATURES

WITH 130 YEAR OLD OAKS & PHOENIX PALMS NEED PROTECTED FROM WAITOEHUO RD WIDENING.

35.1

2) NEED TO HAVE FINAITY TO BOUNDARIES OF PROPERTY FOR WIDENING WAITOEHUO RD.

35.2

(continue on a separate sheet if necessary)

I seek the following decision by Council:

- Accept the proposed plan change / variation
- Accept the proposed plan change / variation with amendments as outlined below
- Decline the proposed plan change / variation
- If the proposed plan change / variation is not declined, then amend it as outlined below.

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

Signature of Submitter
(or person authorised to sign on behalf of submitter)

20/10/20
Date

Notes to person making submission:

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

Please note that your address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as the Council.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could / could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission please complete the following:

I am / am not directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

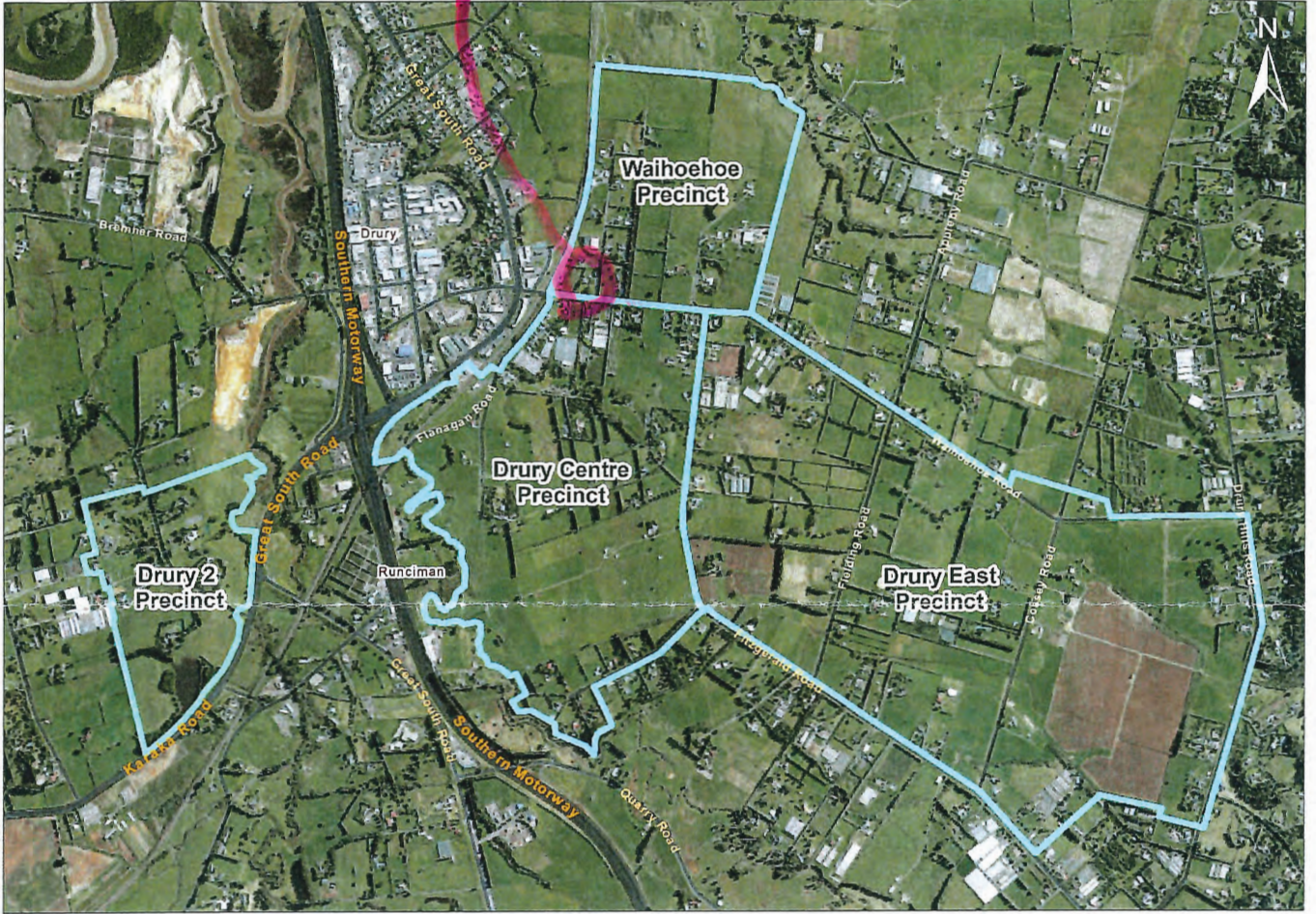
Before you fill out the attached submission form, you should know:

You need to include your full name, an email address, or an alternative postal address for your submission to be valid. Also provide a contact phone number so we can contact you for hearing schedules (where requested).

By taking part in this public submission process your submission (including personal details, names and addresses) will be made public.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious.
- It discloses no reasonable or relevant case.
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
- It contains offensive language.
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



Submission Process: 15545 WITH WIDENING WAIHOEHOE RD

The four private plan change requests are to be publicly notified for submissions.

While three of the private plan change requests are contiguous, they have all been lodged as four separate private plan change requests. Therefore, if you wish to submit on one or more of the requests you **must lodge separate submissions for each private plan change request or on any part of the request that you wish to comment on.**

Clearly identify the private plan change request and any parts you are submitting on by reference to the private plan change number and its precinct name.

Submissions close on 22 October 2020, being 40 working days following notification. This is double the normal submission period in recognition of the large amount of information that has been provided by the requestors. The four private plan change requests will be notified at the same time as one other private plan change request for the Drury area. The other private plan change request is:

Plan Change (Private) 52: 520 Great South Road Limited

Further details on how to make a submission are set out in the attached copy of the public notice; a summarised version of this public notice for each private plan change request will appear in the New Zealand Herald and Franklin County News on **27 August 2020** and in the Papakura Courier on **26 August 2020**.

Find out more about these Private Plan Change requests:

The Resource Management Act provides the opportunity for private plan change requests to be made to the Council to amend the Auckland Unitary Plan (Operative in Part). The private plan change requests seek to set in place a framework of zoning, standards and assessment criteria that will enable development of the land within the subject areas, while managing adverse effects on the environment. If approved, subdivision and development can proceed in context of the framework and may involve subsequent resource consent applications.



From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan further submission - Plan Change 50 - Phillip Hogan
Date: Monday, 25 January 2021 10:45:56 AM

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Phillip Hogan

Organisation name: Britt matt Holdings Ltd

Full name of your agent: Paul Sousa

Email address: paulsousa@xtra.co.nz

Contact phone number: 0272595070

Postal address:
12A Mace Terrace,
Oakura
New Plymouth 4314

Submission details

This is a further submission to:

Plan change number: Plan Change 50

Plan change name: PC 50 (Private): Waihoehoe Precinct

Original submission details

Original submitters name and address:
Kaianga Ora

In respect of 1 East Street, Drury

Submission number: Submission Number 32.

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number Support Submission in general in particular 32.1

The reasons for my or our support or opposition are:

We are the owners of land identified in the Submission, namely 1A East Street, Drury and support the inclusion of the land at 1 and 1A East Street in Plan Change 50 as well as the Terraced Housing and Apartments Zoning and Local Centre Zoning sought by the submitter for the subject. The reasons for supporting the submission is that we agree with the reasons set out in the submission as well as those stated in our own submission, being submission number 16.

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 25 January 2021

Attend a hearing

I or we wish to be heard in support of this submission: Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?

Yes

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:
I am the owner of land identified in Submission 32.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

FORM 6

**Further submission in support of, or in opposition to, submission on a notified proposal for
Private Plan Change 50 Waihoehoe under
Resource Management Act 1991**

28 January 2021

Auckland Council
Plans and Places
Private Bag 92300
Auckland 1142
Attn: John Duguid

Email: unitaryplan@aucklandcouncil.govt.nz

Name of further submitter: The New Zealand Transport Agency (Waka Kotahi)

This is a further submission on submissions on Private Plan Change 50 Waihoehoe (**Plan Change**) to the Auckland Unitary Plan (operative in Part).

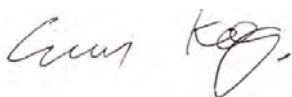
The Transport Agency is a person who has an interest in the proposal that is greater than the interest of the general public. Waka Kotahi made a submission on the Plan Change dated 22 October 2020.

The specific parts of the submissions supported or opposed and the reasons for that support or opposition are set out in attachment 1. The decisions which Waka Kotahi seeks from the Council in terms of allowing or disallowing submissions are also set out in attachment 1.

Hearings

The Transport Agency wishes to be heard in support of its further submission. If others make a similar submission, the Transport Agency will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of further submitter:



Evan Keating
Principal Planner
NZ Transport Agency

Address for Service of person making submission:
NZ Transport Agency
Contact Person: Evan Keating
Email: Evan.Keating@nzta.govt.nz

Table 1: NZ Transport Agency Further Submission Auckland Unitary Plan – Private Plan Change 50 – Waihoehoe Precinct

Submitter #	Name	Email or Post Address	Submission point	Position	Reasons	Relief sought
16.1	Phil Hogan	paulsousa@xtra.co.nz	Include the property at 1A East Street Drury, currently zoned Future Urban Zone, in the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.	Oppose	No assessment of potential effects on the transport system has been provided.	Reject submission point
20.25	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Add a policy and standards to provide for increased density near RTN stations including: a. A policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u> [...]	Support	This will allow increased development intensity close to the proposed metropolitan centre zone and rail station.	Accept submission point
22.7	Auckland Transport	Josephine.Tam@at.govt.nz	Add new Infrastructure and Staging policy as follows: (x) Avoid any subdivision and development in the wider Drury area as defined on Precinct Plan 2 until the required transport infrastructure is in place.	Support	The relief sought will support the integration of land use development and infrastructure provision.	Accept submission point
22.8	Auckland Transport	Josephine.Tam@at.govt.nz	Amend Rules IX.4.1 (A2), (A3), (A5) and (A6) to introduce more onerous activity status for any development and/or subdivision not complying with Standards IX.6.1 Staging of Development and IX.6.2 Trip Generation Limit (such as non-complying activity status). In the alternative, amend Rules IX.4.1 (A2) and (A3) as follows: [...]	Support	The relief sought will support the integration of land use development and infrastructure provision.	Accept submission point
22.14	Auckland Transport	Josephine.Tam@at.govt.nz	Amend Standards IX.6.2 (1), delete Standard IX.6.2 (2) and (3), and add a new clause as follows: IX.6.2 Trip Generation Limit [...]	Support	The relief sought will support the integration of land	Accept submission point

22.15	Auckland Transport	Josephine.Tam@at.govt.nz	<p><u>(x) A Transport Assessment corresponding to the scale and significance of the proposed activity prepared by a suitably qualified expert must be provided in order to confirm compliance with this standard.</u></p> <p>Amend IX.8.2 (2) as follows: [...]</p> <p><u>(x) Where new, upgrades and/or extensions to transport infrastructure are required, whether infrastructure funding agreements or other agreements exist to ensure that the new, upgraded or extended infrastructure required to service the subdivision and/or development can be funded and delivered; and</u></p> <p><u>(x) Whether the effects of development proceeding ahead of the required transport upgrades are mitigated by any conditions of consent including those relating to the scale, staging or operation of an activity, review conditions or interim network improvements proposed by the applicant</u></p>	Support	The relief sought will support the integration of land use development and infrastructure provision.	Accept submission point
32.1	Kāinga Ora	michael@campbellbrown.co.nz	<p>Approve the plan change, subject to inclusion of sites at 1 and 1A East Street for rezoning (see Attachment Two to the submission). Zone 1 East Street as THAB and 1A East Street as LCZ.</p>	Oppose	No assessment of potential effects on the transport system has been provided.	Reject submission point
32.2	Kāinga Ora	michael@campbellbrown.co.nz	<p>Approve the plan change, subject to:</p> <ul style="list-style-type: none"> • application of a 22.5m Height Variation Control across the proposed THAB zone (including 1 East St, Drury) (see Attachment Three to submission); • application of a 27m Height Variation Control over the extent of the proposed LCZ (including 1A East St, Drury and 200-212 Great South Rd) (see Attachment Three to submission). 	Support in part	This will allow increased development intensity close to the proposed metropolitan centre zone and rail station but will need to be considered in line with the	Accept submission point subject to the requirements of the NPS-UD

									requirements of the NPS-UD	
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29 January 2021

Plans and Places
Auckland Council
Private Bag 92300
Auckland 1142
Attn: Planning Technician

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Further submission by Auckland Council on Proposed Private Plan Change 50 – Waihoehoe Precinct

Please find attached Auckland Council's further submission to the submissions lodged on Proposed Private Plan Change 50 from Oyster Capital Ltd.

If you have any queries in relation to this further submission, please contact Christopher Turbott on 0212403727 or email christopher.turbott@aucklandcouncil.govt.nz

Yours sincerely

Christopher Turbott
Senior Planner

cc:

Barker and Associates Ltd
PO Box 1986
Shortland Street
Auckland 1140
Attention: Rachel Morgan
Via email: RachelM@barker.co.nz

Encl: Auckland Council's Further Submission on Proposed Private Plan Change 50 – Waihoehoe Precinct

Form 6: Further Submission by Auckland Council on Proposed Private Plan Change 50 –
Waihoehoe Precinct

To: Auckland Council
Private Bag 92300
Auckland 1142

Further submission on: Submissions to Proposed Private Plan Change 50 – Waihoehoe
Precinct.

From: Auckland Council
Private Bag 92300
Auckland 1142

1. Introduction

1.1 Auckland Council represents a relevant aspect of the public interest and is the local authority responsible for the Auckland Unitary Plan – Operative in Part. It is also a primary funder of infrastructure in Auckland along with other agencies.

2. Scope of further submission

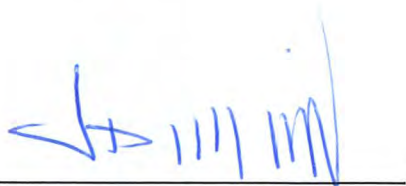
2.1 The specific parts of the submissions opposed are addressed, and the reasons for Auckland Council's position, are set out in **Attachment 1**.

2.2 The decisions which the council seeks in terms of allowing or disallowing submissions are also set out in **Attachment 1**.

3. Appearance at the hearing

3.1 Auckland Council wishes to be heard in support of this further submission.

3.2 If others make a similar further submission, Auckland Council will consider presenting a joint case with them at the hearing.



Signed for and on behalf of Auckland Council

John Duguid

General Manager: Plans and Places

Chief Planning Office

29 January 2021

Address for service of further submitter:

Christopher Turbott

Plans and Places

Auckland Council

Private Bag 92300

Auckland 1142

Email: christopher.turbott@aucklandcouncil.govt.nz

Attachment 1

Submitter	Submission point	Summary of submission	Support or oppose	Reason for AC further submission	Decision sought
7. Oyster Capital Ltd	7.1	Add new Policy 12 as follows: <u>Policy IX.3(12):</u> <u>Require subdivision and development to be consistent with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.</u>	Support in part	This is supported in principle. However, the council requests amendments to clarify that the supporting stormwater management plan is the version to be approved by the network utility operator.	Accept subject to amendments to clarify that the supporting stormwater management plan is the version to be approved by the network utility operator.
	N/A (uncoded)	Additional transport modelling information provided	Oppose in part	This aspect of the submission appears to represent the provision of further information/evidence from the	No relief sought by submitter, however on a precautionary basis the Council

				<p>applicant, rather than a submission point seeking relief and requiring a response. For the avoidance of doubt, however, the Council restates the concerns set out in its primary submission and reserves the right to respond to the new information in legal submissions and evidence at hearing.</p>	<p>seeks a decision declining this aspect of the submission.</p>
<p>16. Britmat Holdings Ltd</p>	<p>16.1</p>	<p>Include the property at 1A East Street Drury (currently zoned Future Urban Zone) within the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.</p>	<p>Oppose</p>	<p>Additional areas of urban zoned land cannot be supported by necessary infrastructure for the reasons set out in Auckland Council's primary submission.</p>	<p>Decline the submission.</p>
<p>32. Kāinga Ora</p>	<p>32.1</p>	<p>Approve the plan change, subject to inclusion of sites at 1 and 1A East Street for rezoning (see Attachment Two to the submission). Zone 1 East Street as</p>	<p>Oppose</p>	<p>Additional areas of urban zoned land cannot be supported by necessary infrastructure for the reasons set out in Auckland Council's primary submission.</p>	<p>Decline the submission.</p>

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THAB and 1A East
Street as LCZ.

**FURTHER SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PRIVATE
PLAN CHANGE UNDER CLAUSE 8 OF THE FIRST SCHEDULE OF THE
RESOURCE MANAGEMENT ACT 1991**

TO: Auckland Council

SUBMITTER: Drury South Limited

SUBMISSION ON: Proposed Plan Change 50 (Private): Waihoehoe Precinct to the Auckland Unitary Plan ("**PC50**").

Introduction

1. Drury South Limited ("**DSL**") made a submission on PC50, listed as Submission 28.
2. DSL has an interest in the proposal that is greater than the interest that the general public has given that it owns approximately 257 ha of land within the Drury South Industrial Precinct, located to the south of the PC50 land.
3. This is a further submission on the submissions on PC50 as set out in the **attached** schedule.
4. For those submissions that DSL supports, DSL supports the relief sought because it:
 - (a) will promote sustainable management of resources, and therefore will achieve the purpose and principles of the Resource Management Act 1991 ("**RMA**");
 - (b) will meet the reasonably foreseeable needs of future generations;
 - (c) will enable social, economic and cultural wellbeing;
 - (d) will avoid, remedy or mitigate adverse effects on the environment; and
 - (e) represents the most appropriate way to achieve the objectives of the Auckland Unitary Plan, in terms of section 32 of the RMA.
5. For those submissions that DSL takes a neutral position, DSL is interested in the subject matter of the submission but does not, or cannot at this stage based on the information before it, support or oppose the particular relief.
6. DSL wishes to speak to its further submission.
7. DSL could not gain an advantage in trade competition through this further submission.

DRURY SOUTH LIMITED by its solicitors and authorised agents Russell McVeagh:



Signature:

Daniel Minhinnick

Date:

29 January 2021

Address for Service:

C/- Lauren Eaton
Russell McVeagh
Barristers and Solicitors
Level 30
Vero Centre
48 Shortland Street
PO Box 8/DX CX10085
AUCKLAND 1140

Telephone:

+64 9 367 8000

Email:

lauren.eaton@russellmcveagh.com

Submission No	Submitter	Address	Decision sought by submitter	Support /oppose	Reasons for support or opposition
7.7; and 7.8	Oyster Capital	jeremy@brabant.co.nz	<p>Amend Standard IX.6.2 Trip Generation Limit as follows:</p> <p>(1) Development within the area shown on IX.10.2 Waihoehoe: Precinct Plan 2 must not exceed the thresholds in Table IX.6.2.1 and Table IX6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational.</p> <p>(2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for these activities that have a valid land use consent or a subdivision that has a 224c certificate for vacant lots less than 1200m².</p> <p>(32) Table IX.6.2.1 sets.... Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020 Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below</p> <p>Update Table IX6.2.2 to clarify the provisions by adding "<u>Prior to any new dwellings, retail or commercial development</u>".</p>	Neutral	DSL seeks to ensure that a framework is established under PC50 that appropriately manages transport effects, including on the surrounding transport network. DSL is interested in this submission to the extent that it would provide greater clarification on the traffic effects of PC50.
18	Lomai Properties	bill.loutit@simpsongrimson.com	<p>Decline PC50 unless the matter relating to alternative staging of development, provisions of all required infrastructure and traffic are adequately resolved.</p>	Neutral	DSL seeks to ensure that a framework is established under PC50 that appropriately manages transport effects, including on the surrounding transport network. DSL is interested in this submission to the extent that it would provide greater clarification on the traffic effects of PC50.

Submission No	Submitter	Address	Decision sought by submitter	Support /oppose	Reasons for support or opposition
21.1	Auckland Council	christopher.turbott@aucklandcouncil.govt.nz	Provide additional evidence and provisions to demonstrate how infrastructure will be provided and funded to support PC50.	Neutral	DSL is concerned to ensure that there is appropriate infrastructure in place to manage the impacts of PC50 in a way that does not adversely affect the wider transport network and developments in the area, such as DSL's development.
22	Auckland Transport	josephine.tam@at.govt.nz	Auckland Transport has made a comprehensive submission seeking amendments to the provisions to ensure that the effects of PC50 on the transport network are appropriately managed.	Neutral	DSL is interested to the extent that the relief sought by Auckland Transport seeks to ensure that transport effects are appropriately managed and do not adversely affect DSL's development.
29	Waka Kotahi	evan.keating@nzta.govt.nz	Waka Kotahi has made a comprehensive submission on a range of matters in relation to transport effects.	Neutral	DSL is interested to the extent that the relief sought by Waka Kotahi seeks to ensure that transport effects are appropriately managed and do not adversely affect DSL's development.
32.10; 32.11	Kāinga Ora		Kāinga Ora seeks to clarify and / or amend policies and associated provisions to account for public infrastructure upgrades. This relates to the extent to which the various publicly-funded infrastructure works (noted under IX.6.1 (4) and IX.6.2(3) as "...not included in the development thresholds...") have influenced the setting of the development thresholds proposed, and whether the thresholds have assumed those upgrades have taken place.	Neutral	DSL is interested to the extent that the relief sought by Kāinga Ora impacts on DSL's development and seeks to ensure that transport effects are appropriately managed and do not adversely affect DSL's development.

29 January 2021

Plans and Places

Auckland Council

Private Bag 92300

Auckland 1142

Attn: Planning Technician

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Further submission by Auckland Transport on Proposed Private Plan Change 50 – Waihoehoe Precinct

Please find attached Auckland Transport's further submission to the submissions lodged on Proposed Private Plan Change 50 from Oyster Capital.

If you have any queries in relation to this further submission, please contact Josephine Tam on 09 448 7271 or email Josephine.Tam@at.govt.nz.

Yours Sincerely

Josephine Tam
Principal Planner, Strategic Land Use and Spatial Management

cc:

Barker and Associates Ltd

PO Box 1986

Shortland Street

Auckland 1140

Attention: Rachel Morgan

Via email: RachelM@barker.co.nz

Encl: Auckland Transport's Further Submission on Proposed Private Plan Change 50 – Waihoehoe Precinct

Form 6: Further Submission by Auckland Transport on Proposed Private Plan Change 50 – Waihoehoe Precinct

To: Auckland Council
Private Bag 92300
Auckland 1142

Further submission on: Submissions to Proposed Private Plan Change 50 – Waihoehoe Precinct. This Plan Change is to rezone approximately 49 hectares of land in Drury from Future Urban zone to Residential - Terrace Housing and Apartment Buildings zone. PPC 50 also seeks to introduce a new Waihoehoe Precinct.

From: Auckland Transport
Private Bag 92250
Auckland 1142

1. Introduction

- 1.1 Auckland Transport represents a relevant aspect of the public interest and also has an interest in the proposal that is greater than the interest that the general public has. Auckland Transport's grounds for specifying this are that it is a Council-Controlled Organisation of Auckland Council ('the Council') and Road Controlling Authority for the Auckland region.
- 1.2 Auckland Transport's legislated purpose is "to contribute to an effective, efficient and safe Auckland land transport system in the public interest."

2. Scope of further submission

- 2.1 The specific parts of the submissions supported, opposed or where Auckland Transport has a neutral position providing any transport implications arising from accepting a submission are addressed, and the reasons for Auckland Transport's position, are set out in **Attachment 1**.
- 2.2 The decisions which Auckland Transport seeks from the Council in terms of allowing or disallowing submissions are also set out in **Attachment 1**.

3. Appearance at the hearing

- 3.1 Auckland Transport wishes to be heard in support of this further submission.
- 3.2 If others make a similar further submission, Auckland Transport will consider presenting a joint case with them at the hearing.



Signed for and on behalf of Auckland Transport

Christina Robertson
Group Manager: Strategic Land Use and Spatial Management

29 January 2021

Address for service of further submitter:

Josephine Tam, Principal Planner
Strategic Land Use and Spatial Management
Auckland Transport
20 Viaduct Harbour Avenue
Auckland Central
Auckland 1010

Email: Josephine.Tam@at.govt.nz

Attachment 1

Submitter	Submission point	Summary of submission	Support or oppose	Reason for AT further submission	Decision sought
7. Oyster Capital	Additional traffic modelling information provided	N/A (uncoded)	Oppose	<p>It is noted that the modelling/funding matters addressed by the applicant's submission are not coded submission points in the Summary of Decisions Requested. Auckland Transport wishes to make a submission in respect of these matters.</p> <p>Auckland Transport opposes the supplementary findings supplied by Oyster Capital relating to their additional modelling analysis on the following basis:</p>	<ol style="list-style-type: none"> 1. The Private Plan Change's ITA and the applicant's supplementary modelling analysis do not include any consideration of the likely construction related effects of the Private Plan Change subdivision/development works relative to the operational performance of the local road network and suitability of the existing intersection controls and pavement. 2. The modelling analysis has relied on a large proportion of modal shift occurring. However, the levels that the applicant has adopted will not be realised without first constructing the required infrastructure to support active and public transport from the onset of all development. 3. The modelling analysis also relies solely on the implementation of New Zealand Upgrade Programme projects that are planned to be built in the wider Drury area. There has been no sensitivity analysis confirming how the network would operate without their implementation relative to the Private Plan Change

				<p>proposal. There is also no guarantee that the projects will be constructed at the time planned nor designed to the level/scale intended.</p> <p>Auckland Transport therefore requests the implementation of the identified improvement works as detailed in Auckland Transport's original submission to mitigate the effects of this Private Plan Change.</p>
<p>16. Britmat Holdings Ltd</p>	<p>16.1</p>	<p>Include the property at 1A East Street, Drury (currently zoned Future Urban Zone) within the plan change with a zoning of Business – Local Centre Zone to match that of the land adjoining at 200-212 Great South Road.</p>	<p>Oppose</p>	<p>The submitter's site is located well outside the boundary of the plan change and seeks to apply an urban zone to one property without consideration of the transport effects or immediate network requirements.</p> <p>Decline the submission.</p>
<p>17. Josephine Kleinsman</p>	<p>17.4</p>	<p>Reclassify Fitzgerald Road extension as an Arterial.</p>	<p>Support</p>	<p>Auckland Transport understands that "Fitzgerald Road extension" refers to the proposed Opāheke North-South arterial road which runs through the Waihoehoe Precinct. As stated in Auckland Transport's original submission, this road should be recognised and provided for as a Frequent</p> <p>Auckland Transport supports the relief sought by the submitter to reclassify Fitzgerald Road extension as an arterial road and seeks that this relief be granted.</p>

				Transit Network (FTN) arterial road.	
17.10	Amend plan change policies to ensure appropriate funding arrangements are in place for development.	Support	Addressing the effects arising from development occurring ahead of the provision of the required transport network improvements and services is dependent on funding/financing to support the planning, design, consenting, and construction, and operation of the transport infrastructure, services and improvements.	Auckland Transport supports the relief sought on issues/agreements and seeks that it be accepted.	
19.1	Revise the plan change to be consistent with the requirements of the NPS-UD including the intensification policies and removal of minimum car parking rates, and the investigation of a six-storey height in the THAB zone within the walkable catchment of Drury East rail station.	Support in part	The submitter's relief sought has not been included and considered in the applicant's Integrated Transport Assessment. Any associated transport effects should be appropriately assessed and mitigated.	Auckland Transport in general supports the submission that the proposed zoning and associated provisions be consistent with the NPS-UD requirements, however, this requires consideration on whether this could be more appropriately undertaken as part of the Council's NPS-UD work programme rather than in isolation. Auckland Transport requests that any	
19. Ministry of Housing and Urban Development, Te Puni Kōkiri and the Department of Corrections					

20. Ngāti Te Ata Waiohau	20.6	Apply a minimum of 20 metre riparian margin for all waterways, especially those to contain walkways / cycleways.	Support in part	The submitter's relief sought is supported by Auckland Transport provided that the associated provisions do not impede the formation of the transport network, including the walking and cycling linkages.	amendments to the proposed zoning and/or development yield should be assessed and addressed as part of an appropriately scaled transport assessment prior to any provision for such being made in the plan change. Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.
<p>Auckland Transport requests that any potential impact on the proposed transport network (including the walking and cycling linkages) of incorporating riparian margins into the precinct plans be appropriately assessed as part of the plan change process.</p> <p>Any proposed rules and/or associated provisions are to include appropriate provisions for proposed</p>					

21. Auckland Council	21.1	<p>Ensure that the council's concerns about infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <p>a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded.</p> <p>b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects.</p> <p>c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include:</p>	Support	<p>Submitter's relief sought is consistent with relief sought in Auckland Transport's original submission to PPC50.</p>	<p>crossings, roads or other transport infrastructure and any consequential changes to the proposed networks depicted within the precinct plan.</p> <p>Accept the submitter's relief.</p>
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			<ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. • Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). • Threshold rules are not used in circumstances where the extent and location of works have not been determined yet. • Use of prohibited activity status for infringement could be 	
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		<p>considered.</p> <p>d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.</p>			
	<p>21.8</p>	<p>Retain and amend standard IX6.6 (1) Stormwater Quality but amend it to read as follows (including a correction to the precinct reference):</p> <p>The activity rules and standards in E9 apply to development in the Drury Centre Waihoehoe precinct as if the reference to 'high use roads', was <u>were</u> a reference to 'all <u>existing, new, upgraded or</u> <u>redeveloped roads, accessways and carparks', or other amendments that would achieve the same environmental outcome.</u></p> <p>Insert new matters of control and discretion, in addition to those in E9, to the effect of:</p> <ul style="list-style-type: none"> • <u>How the location and design of stormwater treatment assets reduces their operating costs.</u> • <u>The consolidation and community scale of stormwater treatment assets.</u> • <u>The location of stormwater treatment assets where they will</u> 	<p>Support</p>	<p>Auckland Transport supports the proposed additional matters of control or discretion in relation to the location and design of stormwater treatment assets, particularly those within the road environment. It is important to ensure that stormwater treatment assets are only provided where necessary and in a cost-effective manner. The provision and consolidation of community scale stormwater treatment assets are also supported.</p>	<p>Auckland Transport in general supports the principles of effective stormwater treatment assets design and location. Auckland Transport requests the matters of control and discretion sought by the submitter be accepted and included in the precinct plan.</p>

		<p><u>be most effective in reducing contaminants.</u></p>	<p>Support in part</p>	<p>The submitter's relief sought is supported by Auckland Transport provided that the associated provisions do not impede the formation of the transport network, including the walking and cycling linkages.</p>	<p>Auckland Transport requests that any potential impact on the proposed transport network (including the walking and cycling linkages) of incorporating riparian margins into the precinct plans be appropriately assessed as part of the plan change process. Any proposed rules and/or associated provisions are to include appropriate provisions for proposed crossings, roads or other transport infrastructure and any consequential changes to the proposed networks depicted within the precinct plan.</p>
<p>21.10</p>	<p>Replace standard IX.6.3(2) with a new standard and consequential amendments to effect that the riparian yards set for buildings in table H9.6.6.1 Yards read as follows: "Riparian - 40<u>20</u>m from the edge of all permanent streams and 10m from the edge of all intermittent streams" Other yards in these tables are not amended.</p>	<p>Add the following matters of discretion to IX.8.1: (a) Effects on water quality and stream habitat. (b) <u>Effects on floodplain management taking into account maximum probable development, climate change and the roughness coefficient</u></p>	<p>Support in part</p>	<p>The submitter's relief sought is supported by Auckland Transport provided that any proposed additions would not impede the formation of any necessary infrastructures that may be required within the riparian yards.</p>	<p>Auckland Transport requests that the proposed addition (d) to matters of discretion should be amended to also cover any infrastructure that needs to cross streams within the riparian yards.</p>
<p>21.11</p>		<p>Add the following matters of discretion to IX.8.1: (a) Effects on water quality and stream habitat. (b) <u>Effects on floodplain management taking into account maximum probable development, climate change and the roughness coefficient</u></p>	<p>Support in part</p>	<p>The submitter's relief sought is supported by Auckland Transport provided that any proposed additions would not impede the formation of any necessary infrastructures that may be required within the riparian yards.</p>	<p>Auckland Transport requests that the proposed addition (d) to matters of discretion should be amended to also cover any infrastructure that needs to cross streams within the riparian yards.</p>

		<p><u>of existing and planned planting.</u></p> <p>(c) <u>Effects on stream bank stability taking into account the cohesiveness of the soil and steepness of the bank angle.</u></p> <p>(d) <u>Effects on the ability to provide for any proposed paths, cycleways, infrastructure and facilities outside the 10m wide strip of riparian planting.</u></p> <p>Add related assessment criteria at IX8.2.</p>	Support in part	The submitter's relief sought has not been included and considered in the applicant's Integrated Transport Assessment. Any associated transport effects should be appropriately assessed and mitigated.	Auckland Transport in general supports the principles of transit-oriented developments (i.e. allowing higher density near RTN stations), however, requests that any amendments to the proposed zoning and/or development yield should be assessed and addressed as part of an appropriately scaled transport assessment prior to any provision for such being made in the plan change.
	21.25	<p>Add a policy and standards to provide for increased density near RTN stations including:</p> <p>a. <u>A policy to the effect of: Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u></p> <p>b. <u>Building height standards enabling at least the Metropolitan Centre equivalent 22-23 storey building height in all zones within a short walkable radius of the RTN train station, and 7-8 storey building height within an extended walkable radius of the proposed RTN station;</u></p>			

		<p>c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone;</p> <p>d. Any alterations to other building standards to respond to increased building height;</p> <p>e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.</p>			<p>Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.</p>
	21.28	<p>Review the need for IX.6.4 if a notice of requirement has been lodged for the upgrade of Waihoehoe Road.</p>	Support	The submitter's relief is appropriate.	Auckland Transport supports the relief sought by the submitter.
23. Counties Power Limited	23.8	<p>Add new policy IX.3(12) as follows:</p> <p><u>Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.</u></p>	Support in part	Auckland Transport is in general supportive of measures that will increase the uptake and use of electric vehicles. However, it is concerned that the relief sought extends to the mandatory provision of charging areas within public roads without	<p>Auckland Transport supports this proposed plan provision to the extent that it applies to private sites.</p> <p>Auckland Transport requests that the proposed policy sought by the submitter does not apply to public roads.</p>

				<p>any appropriate standards/guidelines around their design, operation and location.</p>	<p>In the event that the submitter's relief is granted without this clarification/exclusion, then this must be subject to appropriate standards/guidelines, that are to be developed with or by Auckland Transport, around the design, operation, and location of any electric vehicle charging points located within roads.</p>
<p>23.12</p>		<p>Amend IX.10 Appendix 1 Road Cross Section Details to provide a minimum 800mm berm width if overhead lines are required to be undergrounded in the road.</p>	<p>Oppose</p>	<p>As stated in Auckland Transport's original submission, Auckland Transport seeks a consistency of approach across private plan change precinct provisions in the use of cross sections which outline the standards to be applied to future road construction. Such an approach should balance the need for flexibility to respond to changing design standards over time and the need for certainty, particularly where roads have to be</p>	<p>Auckland Transport requests that this submitter's request be declined and that IX.11 Appendix 1: Road Cross Section Details be deleted and replaced with provisions relating to the minimum road reserve widths, with key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards.</p>

29. Waka Kotahi (The New Zealand Transport Agency)	29.2	Amend the whole Plan Change to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).	Support in part	Auckland Transport in general supports the intent of this submission point. However, Auckland Transport considers that such changes may be better addressed in a considered manner rather than wholesale change in order to ensure such new terms are used appropriately and do not result in any consequential issues.	Auckland Transport supports the concept of the plan change being amended as appropriate to address new policy directives, however, requests that any such amendments, if undertaken as part of this plan change process rather than through Council's separate NPS-UD work programme, are through a considered approach to ensure there are no consequential issues created, such as misalignment with terminology definition/understanding used in design standards or codes of practice, or inconsistencies with the rest of the Auckland Unitary Plan.
	29.3	Review the proposed zoning and associated provisions in light of the NPS-UD requirements.	Support in part	The submitter's relief sought has not been included and considered in the applicant's Integrated Transport Assessment.	Auckland Transport in general supports that the proposed zoning and associated provisions be consistent with the NPS-UD requirements, however,

				<p>Any associated transport effects should be appropriately assessed and mitigated.</p>	<p>considers that this could be more appropriately undertaken as part of the Council's NPS-UD work programme rather than in isolation.</p> <p>Auckland Transport requests that any amendments to the proposed zoning and/or development yield should be assessed and addressed as part of an appropriately scaled transport assessment prior to any provision for such being made in the plan change.</p> <p>Impacts on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.</p> <p>Auckland Transport seeks that the submitter's relief be accepted. Auckland Transport is a road controlling authority and</p>
29.28		<p>Amend IX.8.1 Matters of discretion (1) as follows: (1) Development of public and private roads: (a).... (d)...</p>	Support	<p>Auckland Transport agrees that it is appropriate for the developers to engage with the relevant road controlling authority in</p>	<p>Auckland Transport seeks that the submitter's relief be accepted. Auckland Transport is a road controlling authority and</p>

		<u>(e) the outcome of engagement with the relevant road controlling authority.</u>			developing public and private roads.	supports the new provision proposed by the submitter which provides for the roading development while ensuring that the road controlling authority is engaged during the process.
29.29	Amend IX.8.1 Matters of discretion (2) as follows: (2) Development or subdivision that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX6.2 Trip Generation Limit: (a)... (b)... (c)... <u>(d) the outcome of engagement with the relevant road controlling authority.</u>		Support		Auckland Transport agrees that it is appropriate for the developers to engage with the relevant road controlling authority in developing public and private roads.	Auckland Transport is a road controlling authority and supports the new provision proposed by the submitter which provides for the roading development while ensuring that the road controlling authority is engaged during the process.
29.30	Amend IX.8.2(1) Assessment criteria as follows: 1) Development of public and private roads: Location of roads (a) ... (d) ... Design of roads (f)...		Support		Auckland Transport agrees that it is appropriate for the developers to engage with the relevant road controlling authority in developing public and private roads.	Auckland Transport is a road controlling authority and supports the new provision proposed by the submitter which provides for the roading development while ensuring that the road controlling authority is engaged during the process.

						engaged during the process.	
				<p>(g)... (h)... (i)...</p> <p><u>Road Controlling Authority</u> (l) <u>how the outcome of engagement with the relevant road controlling authority has been responded to.</u></p>	Support		<p>Auckland Transport is a road controlling authority and supports the new provision proposed by the submitter which provides for the roading development while ensuring that the road controlling authority is engaged during the process.</p>
	29.31		<p>Amend assessment criteria IX.8.2(2) as follows: (2) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit: (a)... (d)... (e) <u>how the outcome of engagement with the relevant road controlling authority has been responded to.</u></p>			<p>Auckland Transport agrees that it is appropriate for the developers to engage with the relevant road controlling authority for any development and/or subdivision that do not comply with the transport upgrades requirements.</p>	
32. Kainga Ora – Homes and Communities	32.1		<p>Approve the plan change, subject to inclusion of sites at 1 and 1A East Street for rezoning (see Attachment Two to the submission). Zone 1 East Street as THAB and 1A East Street as LCZ.</p>	Oppose		<p>Decline the submitter's relief to approve the plan change, unless Auckland Transport's submission points are appropriately addressed. Decline the submitter's relief to include the sites at 1 and 1A East Street for rezoning.</p>	

	32.2	<p>Approve the plan change, subject to:</p> <ul style="list-style-type: none"> • application of a 22.5m Height Variation Control across the proposed THAB zone (including 1 East St, Drury) (see Attachment Three to submission); • application of a 27m Height Variation Control over the extent of the proposed LCZ (including 1A East St, Drury and 200-212 Great South Rd) (see Attachment Three to submission). 	Oppose in part	<p>change and seeks to apply an urban zone to one property without consideration of the transport effects or immediate network requirements.</p> <p>Auckland Transport made a submission on this plan change requesting it to be declined unless a number of matters could be addressed, including infrastructure provision and funding.</p> <p>The submitter's relief sought to amend the height variation controls (and include such variation on additional sites they are seeking to have included for which Auckland Transport has opposed such relief) has not been included and considered in the applicant's Integrated Transport Assessment. Any associated transport effects should be appropriately assessed and mitigated.</p>	<p>Decline the submitter's relief to approve the plan change, unless Auckland Transport's submission points are appropriately addressed.</p> <p>If additional height as requested enables development capacity to that considered in the plan change ITA, then Auckland Transport requests that any amendments to the proposed zoning and/or development yield beyond that provided for in the Plan Change should be assessed and addressed as part of an appropriately scaled transport assessment prior to any such provision being made in the plan change. Impacts</p>
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34. Ngāti Tamaoho	34.6	Apply a minimum of 20 metre riparian margin for all waterways, especially those to contain walkways / cycleways.	Support in part	The submitter's relief sought is supported by Auckland Transport provided that the associated provisions do not impede the formation of the transport network, including the walking and cycling linkages.	on the transport network and demand for transport services must be addressed and mitigated through plan provisions and/or other appropriate means.
<p>Auckland Transport requests that any potential impact on the proposed transport network (including the walking and cycling linkages) of incorporating riparian margins into the precinct plans be appropriately assessed as part of the plan change process.</p> <p>Any proposed rules and/or associated provisions are to include appropriate provisions for proposed crossings, roads or other transport infrastructure and any consequential changes to the proposed networks depicted within the precinct plan.</p>					

Further Submission on Plan Change 50 - Waihoehoe Precinct, Drury South – Auckland Unitary Plan by Kāinga Ora – Homes and Communities

Clause 8 of Schedule 1 to the Resource Management Act 1991

TO: Planning Technician

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Further submission sent via email: unitaryplan@aucklandcouncil.govt.nz

1. **Kāinga Ora – Homes and Communities (“Kāinga Ora”)** makes this further submission on Plan Change 50 – Waihoehoe Precinct, Drury (“PC50”) in support of/in opposition to original submissions to PC50.
2. Kāinga Ora makes this further submission in respect of submissions by third parties to the Proposed Plan Change provisions to the extent that they directly affect the relief sought in its own submission, which seeks specific amendments to PC50 to, amongst a number of matters stated in its original submission, enable Kāinga Ora to provide for high quality cost effective, state housing to the people in the greatest need for the duration of their need.
3. Kāinga Ora submits the following in reference to the Summary of Decisions Requested (“SDR”) by Auckland Council:
 - (a) The reasons set out in Kāinga Ora 's original submission on PC50.
 - (b) In the case of the Original Submissions that are opposed:
 - (i) The Original Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with

the purpose and principles of the Resource Management Act 1991 (“**RMA**”);

- (ii) The relief sought in the Original Submissions is not the most appropriate in terms of section 32 of the RMA;
 - (iii) Rejecting the relief sought in the Original Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
 - (iv) The Original Submissions are inconsistent with the policy intent of Kāinga Ora’s submission.
- (c) In the case of Original Submissions that are supported:
- (i) The Original Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
 - (ii) The reasons set out in the Original Submissions to the extent that they are consistent with Kāinga Ora’s submission; and
 - (iii) Allowing the relief sought in the Original Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
- (d) Such additional reasons (if any) in respect of each of the Original Submissions supported or opposed as are set out in the **attached** Schedule.
4. The specific relief in respect of each Original Submission that is supported or opposed is set out in the **attached** Schedule derived from Auckland Council’s ‘Summary of Decisions Requested’. Of particular relevance to Kāinga Ora’s further submission:
- (a) Kāinga Ora opposes the inclusion of objectives, policies and specific controls in relation to noise-sensitive activities being required to fully manage reverse sensitivity effects on themselves, within close proximity to State Highways, Rail Network, Arterial Roads and other high-noise generating infrastructure. Kāinga Ora considers that the requested changes result in an unnecessary and overly restrictive burden for landowners, without a corresponding burden on infrastructure providers to manage effects to adjacent land uses generated by the operation of infrastructure. There are more balanced and less onerous

ways in which potential interface issues can be managed, notwithstanding there are noise and vibration standards already present within the Unitary Plan.

- (b) Kāinga Ora supports enabling objectives and policies that seek to enable stream works where necessary and the best practicable option (“BPO”) to deliver on the outcomes sought to be enabled by the precinct, to the extent those provisions may be consistent with the national direction provided under the National Policy Statement for Freshwater Management 2020 (“NPS: FM”).
- (c) Kāinga Ora supports the identification of ‘indicative’ streams, green corridors and other key outcomes and features sought to be enabled by the precinct and included by other submitters. However, in Kāinga Ora’s experience these features are often administered in a fashion where any deviation from the precinct plan (regardless of a feature being indicative) either triggers a resource consent requirement and/or the location of any feature it ‘locked in’. Sufficient clarity of wording should be incorporated into any amended precinct provisions to ensure such situations do not arise in future resource consent processes, should the relief sought by such submissions be granted.

- 5. Kāinga Ora wishes to be heard in support of its further submission.
- 6. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

DATED 29 January 2021

Kāinga Ora – Homes and Communities



Brendon Liggett

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Ponsonby, Auckland 1144

Attention: Michael Campbell

Email: Michael@campbellbrown.co.nz

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
3	3.1	Peter David Dodd	pdodd@doddcivil.co.nz	Support the plan change with the amendments	Provide further flooding information for the wider Slippery Creek Catchment, and include provisions for flooding and future land use for the flood prone area north of Waihoehoe Road - suggests large lots with elevated building platforms and onsite compensation for flooding.	Oppose in part	Kāinga Ora opposes the submission to the extent it introduces standards and assessment that are already contained within Chapter E36 - Natural Hazards of the AUP(OP). However Kāinga Ora supportive of further flood modelling that clarifies the effects (if any) of flood plain modifications on the land at and surrounding 1 - 1A East Street, Drury.
7	7.1	Oyster Capital	jeremy@brabant.co.nz	Support the plan change with the amendments	Add new Policy 12 as follows: <u>Policy IX.3(12): Require subdivision and development to be consistent with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.</u>	Oppose in part	Kāinga Ora opposes the submission as compliance with an NDC is already required and administered by existing AUP(OP) provisions (Chapter E8).
7	7.2	Oyster Capital	jeremy@brabant.co.nz	Support the plan change with the amendments	Amend Standard IX.6.6 Stormwater Quality as follows: (1) The activity rules and standards in E9 apply to development in the Drury Centre precinct as if the reference to 'high use roads', was a reference to 'all roads'. (2) <u>For all other impervious surfaces inert building materials should be used.</u>	Oppose	Kāinga Ora opposes the submission as restricting the use of certain building materials is already managed by the AUP(OP) in respect of water quality to sensitive environments (i.e. discharges to aquifers, from High Contaminant Generating activities etc). If there is a specific requirement this should be administered through an NDC / SMP. In addition, the inclusion of 'should' is a passive term not appropriate for a standard. The proposed addition may also lead to unforeseen complications with the consent process by requiring product specifications for all 'impervious surfaces' to confirm compliance.
7	7.5	Oyster Capital	jeremy@brabant.co.nz	Support the plan change with the amendments	Insert a precinct plan that shows the boundaries of Sub-Precinct A and Sub-Precinct B. Sub-Precinct B applies to the northern portion of the precinct and applies a lower impervious area to manage the volume of stormwater runoff.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with the outcomes sought in its original submission.
7	7.6	Oyster Capital	jeremy@brabant.co.nz	Support the plan change with the amendments	Delete Policy IX.3(11).	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original and the national direction under the NPS:FM.
7	7.7	Oyster Capital	jeremy@brabant.co.nz	Support the plan change with the amendments	Amend Standard IX.6.2 Trip Generation Limit as follows: (1) Development within the area shown on IX.10.2 Waihoehoe: Precinct Plan 2 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational. (2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for those activities that have a valid land use consent or a subdivision that has a 224c certificate for vacant lots less than 1200m². (3) Table IX.6.2.1 sets.... Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020. Transport prepared by the New Zealand Transport Agency are not included in the development	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submissions.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
7	7.8	Oyster Capital	jeremy@brabant.co.nz	Support the plan change with the amendments	Amend Table IX.6.2.2 to add in " <u>Prior to any new dwellings, retail or commercial development</u> " as shown in Appendix 1 to the submission.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submissions.
7	7.11	Oyster Capital	jeremy@brabant.co.nz	Support the plan change with the amendments	Amend Standard IX.6.4 Building Setback along Waihoehoe Road as follows: Purpose: To enable the future required widening of Waihoehoe Road. (1) A building or parts of a building must be set back from the 2020 Waihoehoe Road boundary by a minimum depth of 7.5m <u>when measured from the legal road boundary that existed as at the year 2020.</u>	Support in part	Kāinga Ora supports the submission to the extent it clarifies the intent of the standard.
7	7.12	Oyster Capital	jeremy@brabant.co.nz	Support the plan change with the amendments	Add a purpose statement for Standard IX.6.5 Maximum Impervious Area within Sub-Precinct B as follows: Purpose: To appropriately manage stormwater effects generated within Sub-Precinct B.	Support in part	Kāinga Ora supports the submission to the extent it clarifies the intent of the standard.
8	8.2	Dong Leng	kgiffney@doddcivil.co.nz	Support the plan change with the amendments	Explain why the Stream Enhancement Map does not indicate the Waihoehoe Stream abutting the north eastern corner of the PPC50 site as an enhancement opportunity.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission, and clarifies the effects (if any) of flood plain modifications on the land at and surrounding 1 - 1A East Street, Drury.
8	8.3	Dong Leng	kgiffney@doddcivil.co.nz	Support the plan change with the amendments	Provide further analysis of the effects of minor filling within the floodplains where there could be opportunities to create more usable land without affecting flood levels.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission, and clarifies the effects (if any) of flood plain modifications on the land at and surrounding 1 - 1A East Street, Drury.
8	8.4	Dong Leng	kgiffney@doddcivil.co.nz	Support the plan change with the amendments	Assess if a drainage reserve will be required over the overland flow path running immediately adjacent to the eastern boundary of the PPC50 site and if the reserve would need to extend across the boundary into the PPC50 site.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission, and clarifies the effects (if any) of flood plain modifications on the land at and surrounding 1 - 1A East Street, Drury.
8	8.6	Dong Leng	kgiffney@doddcivil.co.nz	Support the plan change with the amendments	Amend the locations of the proposed collector roads to be in accordance with the draft Drury-Opaheke Structure Plan and so as to properly service the land beyond, without conflicting with the streams to the north and east.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submissions.
8	8.7	Dong Leng	kgiffney@doddcivil.co.nz	Support the plan change with the amendments	Amend the stormwater management approach to manage the whole catchment as "passing flows forward"; retain the SMAF 1 retention and detention proposal although preferably implement this via common, publicly owned, attenuation basins; and remove the implementation of water quality treatment for "all roads".	Oppose in part	Kāinga Ora opposes the whole of catchment management approach aspect of this submission as the matters are better-addressed through future resource consenting processes and/or by way of an NDC.
9	9.1	Kenneth Giffney	kandcgiffney@xtra.co.nz	Support the plan change with the amendments	Provide further analysis of the effects of minor filling within the floodplains where there could be opportunities to create more usable land without affecting flood levels.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission, and clarifies the effects (if any) of flood plain modifications within the precinct, on the land at and surrounding 1 - 1A East Street, Drury.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
9	9.2	Kenneth Giffney	kandcgiffney@xtra.co.nz	Support the plan change with the amendments	Amend the locations of the proposed collector roads to be in accordance with the draft Drury-Opaheke Structure Plan and so as to properly service the land beyond, without conflicting with the streams to the north and east.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submissions.
9	9.3	Kenneth Giffney	kandcgiffney@xtra.co.nz	Support the plan change with the amendments	Amend the stormwater management approach to manage the whole catchment as "passing flows forward"; retain the SMAF 1 retention and detention proposal although preferably implement this via common, publicly owned, attenuation basins; and remove the implementation of water quality treatment for "all roads".	Oppose	Kāinga Ora opposes the submission as the matters are better-addressed through future resource consenting processes and/or by way of an NDC.
12	12.1	Kiwi Property Holdings No.2 Limited	dallan@ellisgould.co.nz	Support the Plan Change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
13	13.1	Fulton Hogan Land Development Ltd	Sue@berrysimons.co.nz	Support the Plan Change	Approve the plan change.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
14	14.1	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with the amendments	Consult Spark and the other telecommunication network providers throughout the plan change process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
14	14.2	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with the amendments	Consult Spark and the other telecommunication network providers to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development proposed.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
14	14.3	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with the amendments	Consult Spark and the other telecommunication network providers to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
14	14.4	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with the amendments	Consult with Spark and the other telecommunication network providers to ensure funding is available through the infrastructure funding agreements.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
14	14.5	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with the amendments	Include telecommunications infrastructure within the triggers for the staged release of development.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. Telecommunications infrastructure is not typically controlled through triggers within precinct provisions, and is one of the considerations for infrastructure servicing generally as part of any proposed subdivision.
15	15.1	Fletcher Residential Limited	mtweddie@frl.co.nz	Support the Plan Change	Approve the plan change.	Support in part	Kāinga Ora supports the submission, to the extent it is consistent with its original submission.
16	16.1	Britmat Holdings Ltd	paulsousa@xtra.co.nz	Support the plan change with the amendments	Include the property at 1A East Street Drury (currently zoned Future Urban Zone) within the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.	Support	Kāinga Ora supports the submission for the reasons outlined in its original submission.
17	17.1	Josephine Kleinsman	nigel@hosken.co.nz	Decline the plan change, but if approved make amendments	Decline the plan change on the basis of a number of issues set out in full in the submission, including Oyster not owning large percentage of plan change site, inability to deliver the plan change outcomes, insufficient infrastructure upgrades, unsecured funding.	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its original submission.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
17	17.8	Josephine Kleinsman	nigel@hosken.co.nz	Decline the plan change, but if approved make amendments	Amend the road cross sections to include the proposed locations of the underground services.	Oppose	Kāinga Ora opposes the submission as this is overly-prescriptive and too much detail on road cross sections may become confusing and restrictive.
17	17.9	Josephine Kleinsman	nigel@hosken.co.nz	Decline the plan change, but if approved make amendments	Reconsider interim wastewater solution as a single pump station with storage that could be upsized as demand increases with a single riser main following the NIMT Railway alignment.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
17	17.10	Josephine Kleinsman	nigel@hosken.co.nz	Decline the plan change, but if approved make amendments	Amend plan change policies to ensure appropriate funding arrangements are in place for development.	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its original submission, and questions whether it is appropriate to reflect funding arrangements within Policies.
18	18.1	Lomai Properties Limited	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Decline PPC50, unless the matters relating to alternative staging of development, provision of all required infrastructure and traffic are adequately resolved.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
19	19.1	The Ministry of Housing and Urban Development (HUD), Te Puni Kōkiri and the Department of Corrections	Ernst.Zollner@hud.govt.nz	Support the plan change with the amendments	Revise the plan change to be consistent with the requirements of the NPS-UD including the intensification policies and removal of minimum car parking rates, and the investigation of a six storey height in the THAB zone within the walkable catchment of Drury East rail station.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
19	19.2	The Ministry of Housing and Urban Development (HUD), Te Puni Kōkiri and the Department of Corrections	Ernst.Zollner@hud.govt.nz	Support the plan change with the amendments	Enable further open space through zoning (primarily refers to the PC49 area).	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
20	20.1	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Confirm ongoing iwi participation, consultation and engagement in the project.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
20	20.2	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Acknowledge within the project design the history of Mana Whenua in the PPC50 area.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
20	20.3	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Incorporate Te Aranga Principles in design concepts.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
20	20.5	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Account for natural and cultural landscaping in the project design, identify and preserve landscapes including view shafts, hilltops, tuff rings and ridge lines.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
20	20.6	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Apply a minimum of 20 metre riparian margin for all waterways, especially those to contain walkways / cycleways.	Oppose	Kāinga Ora opposes the submission. The Unitary Plan generally sets a consistent 10m riparian yard requirement for all streams. Increasing this to 20m may have implications on development potential and would therefore need to be justified through a thorough s32 analysis.
20	20.7	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.	Oppose	Kāinga Ora opposes the submission as such matters would be addressed through an NDC and the existing management framework within the AUP(OP).
20	20.8	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Require roof capture for reuse and groundwater recharge.	Oppose	Kāinga Ora opposes the submission as such matters would be addressed through an NDC and the existing management framework within the AUP(OP).
20	20.9	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Confirm park edge design adjacent to all waterways.	Oppose in part	Kāinga Ora opposes the submission to the extent that such an approach is overly restrictive, requiring park edge approach to <i>all</i> waterways, and should be considered at future resource consent stage.
20	20.10	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Use native trees and plants only within the precinct.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
20	20.11	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Protect ridgelines, hilltops and wetlands.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
20	20.12	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Reflect sustainable development in the design and outcomes.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
21	21.1	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Ensure that the council's concerns about infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <p>a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded.</p> <p>b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects.</p> <p>c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include:</p> <ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. • Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). • Threshold rules are not used in circumstances where the extent and location of works have not been determined yet. • Use of prohibited activity status for infringement could be considered. <p>d. <u>Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.</u></p>	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
21	21.3	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Amend precinct to include additional policies and rules to manage the effects of stormwater as described in the SMP.</p> <p>This includes:</p> <p>a. New policy: <u>Require subdivision and development to be assessed for consistency with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.</u></p> <p>b. Additional matters of discretion/assessment criteria that would apply to any restricted discretionary activity in the area of the precinct to ensure that new development and subdivision can be assessed for consistency with the NDC and SMP.</p> <p>Any other rules necessary to give specific effect to the SMP during development.</p>	Oppose	Kāinga Ora opposes the submission as compliance with an NDC is already required and administered by existing AUP(OP) provisions (Chapter E8).
21	21.6	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Add a new policy to the following effect: <u>Provide sufficient floodplain storage within the Waihoehoe precinct to avoid increasing flood risk upstream and downstream, and manage increased flood risk within the precinct unless downstream infrastructure capacity means this is not required. This is subject to the upgrade of the downstream culvert upgrade.</u></p> <p>Insert rules to give effect to this.</p>	Oppose	Kāinga Ora opposes the submission. The management of flooding and overland flow paths is already applicable through Chapter E36 - Natural Hazards and Flooding, and would also form part of any wider NDC and Stormwater Management Plan approved to support development.
21	21.7	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Add a new policy to the following effect: <u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u></p>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with the national direction within the NPS:FM.
21	21.8	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Amend standard IX6.6 (1) Stormwater Quality as follows (including a correction to the precinct reference): "The activity rules and standards in E9 apply to development in the Drury Centre <u>Waihoehoe</u> precinct as if the reference to 'high use roads', was <u>were</u> a reference to 'all existing, new, upgraded or redeveloped roads, accessways and carparks'", or other amendments that would achieve the same environmental outcome.</p> <p>Insert new matters of control and discretion, in addition to those in E9, to the effect of:</p> <ul style="list-style-type: none"> • <u>How the location and design of stormwater treatment assets reduces their operating costs.</u> • <u>The consolidation and community scale of stormwater treatment assets.</u> 	Oppose	Kāinga Ora opposes the submission as the proposed amendments generally relate to considerations for the vesting of assets. These are better managed through those processes.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
21	21.9	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include a new standard to the effect that: <u>Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.</u>	Oppose in part	Kāinga Ora opposes the submission as restricting the use of certain building materials is already managed by the AUP(OP) in respect of water quality to sensitive environments (i.e. discharges to aquifers, from High Contaminant Generating activities etc). If there is a specific requirement this should be administered through an NDC / SMP.
21	21.10	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Replace standard IX.6.3(2) with a new standard and consequential amendments to effect that the riparian yards set for buildings in table H9.6.6.1 Yards read as follows: "Riparian - <u>4020m</u> from the edge of all permanent streams and <u>10m from the edge of all</u> intermittent streams" Other yards in these tables are not amended	Oppose	Kāinga Ora opposes the submission. The Unitary Plan generally sets a consistent 10m riparian yard requirement for all streams. Increasing this to 20m will have implications on development potential and would therefore need to be justified through a thorough s32 analysis.
21	21.11	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Add the following matters of discretion to IX.8.1: (a) Effects on water quality and stream habitat. (b) <u>Effects on floodplain management taking into account maximum probable development, climate change and the roughness coefficient of existing and planned planting.</u> (c) <u>Effects on stream bank stability taking into account the cohesiveness of the soil and steepness of the bank angle.</u> (d) <u>Effects on the ability to provide for any proposed paths, cycleways, infrastructure and facilities outside the 10m wide strip of riparian planting.</u> Add related assessment criteria at IX.8.2.	Oppose in part	Kāinga Ora opposes the submission to the extent that assessment of stream bank stability and floodplain management are assessed through existing AUP(OP) provisions relating to Natural Hazards and Integrated Catchment Management.
21	21.12	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include indicative permanent and intermittent streams and wetlands on the precinct plan.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is a risk that despite the streams being 'indicative' they will 'lock in' a particular stream classification or wetland location.
21	21.14	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend policy IX.3(8) as follows: Support <u>Ensure</u> improvements to water quality, and habitat and biodiversity, including by providing planting on the riparian margins of permanent and intermittent streams. And add a new policy as follows: <u>Enable a network of open space, riparian corridors and park edge roads that provides for:</u> • <u>potential ecological corridors along streams between Te-Manukanuka-O-Hoturoa (Manukau Harbour) and the Hunua;</u> • <u>improvement of freshwater and coastal water systems; and</u> • <u>a safe and attractive walking and cycling network.</u>	Support in part	Kāinga Ora support the submission, to the extent it is consistent with the outcomes sought within its original submission.
21	21.15	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Retain policy IX.3(9) and consider whether additional rules are necessary to give effect to this.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
21	21.17	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Delete policy IX.3(11).	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submissions, and the national direction under the NPS:FM.

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Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
21	21.19	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend policy IX.3(4) to read as follows: (4) In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contributes to a sense of place for Drury East, by incorporating any distinctive site features and integrating with the stream network. <u>Also, if Auckland Council ownership is proposed, the open spaces must be consistent with the council's open space and parks acquisition and provision policies.</u>	Oppose in part	Kāinga Ora opposes the submission to the extent that acquisition policy sits outside of the Unitary Plan and is implied through existing vesting processes.
21	21.20	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include indicative open spaces in the precinct plan as shown in Attachment 1 to the submission.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
21	21.23	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend the precinct plan to include the sub-precincts referred to in the text of the precinct. This includes any additional changes necessary to respond to the council's other submission points.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
21	21.24	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend the legend of the zoning plan to delete the reference to MHU zone.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
21	21.25	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Add a policy and standards to provide for increased density near RTN stations including: a. A policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u> b. Building height standards enabling at least the Metropolitan Centre equivalent 22-23 storey building height in all zones within a short walkable radius of the RTN train station, and 7-8 storey building height within an extended walkable radius of the proposed RTN station; c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone; d. Any alterations to other building standards to respond to increased building height; e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
21	21.26	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Delete standard IX.6(3) in its entirety.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission.
21	21.27	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Delete the last sentence of policy IX.3(9) as follows: Limit the maximum impervious area within Sub-precinct B to manage the stormwater runoff generated by a development to ensure that adverse flooding effects are avoided or mitigated. Provide opportunities to deliver a range of site sizes and densities in the Terrace Housing and Apartment Buildings zone.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
21	21.28	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Review the need for IX.6.4 if a notice of requirement has been lodged for the upgrade of Waihoehoe Road.	Support in part	Kāinga Ora supports the submission to the extent that a front yard building setback still applies from the front boundary as-defined in the AUP(OP), to ensure underlying zone consistency and urban design outcomes.
21	21.29	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development taking into account the recommendations in the cultural values assessments. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
21	21.30	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Enable and provide for accessible and affordable social housing for Māori.	Oppose	Kāinga Ora opposes the submission as it is unclear as to what relief is sought and questions why it is proposed as a policy without any corresponding rules or activities in the precinct provisions. Kāinga Ora also questions why it is worded and limited only to Maori and specific housing types.
22	22.4	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Objective IX.2(2) as follows: (2) Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network. A transport network that facilitates the safe and efficient movement of people, goods and services and manages effects on the safe and efficient operation of the surrounding and wider transport network.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.5	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Objective IX.2(3) as follows: (3) Development is supported by appropriate infrastructure. Subdivision and development are supported by the timely and coordinated provision of robust and sustainable transport, stormwater, water, wastewater, energy and communications infrastructure networks.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.6	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3 (5) as follows: (5) Ensure that the timing of subdivision and development in the wider Drury area Waihoehoe Precinct is coordinated with the funding and delivery of transport infrastructure upgrades necessary to avoid, remedy and mitigate the adverse effects of urbanisation development on the safe and efficient operation effectiveness and safety of the immediately surrounding and wider transport network.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.7	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new Infrastructure and Staging policy as follows: (x) Avoid any subdivision and development in the wider Drury area as defined on Precinct Plan 2 until the required transport infrastructure is in place.	Oppose	Kāinga Ora opposes the submission as the use of 'avoid' may be overly restrictive, particularly where a component of subdivision and/or development works may be required to provide said transport infrastructure.
22	22.8	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Rules IX.4.1 (A2), (A3), (A5) and (A6) to introduce more onerous activity status for any development and/or subdivision not complying with Standards IX6.1 Staging of Development and IX6.2 Trip Generation Limit (such as non-complying activity status). In the alternative, amend Rules IX.4.1 (A2) and (A3) as follows: (A2) Development <u>and/or subdivision</u> that does not comply with Standard IX6.1 Staging of Development with Transport Upgrades but complies with Standard IX6.2 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent - RD</u> (A3) Development <u>and/or subdivision</u> that does not comply with Standard IX6.1 Staging of Development with Transport Upgrades <u>and</u> or Standard IX6.2 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent - NC-D</u> As a consequential amendment, delete Rules IX.4.1 (A5) and (A6).	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submissions.
22	22.10	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Standard IX.6 (2) as follows: (2) The following zone standards do not apply to activities listed in Activity Table IX.4.1 above: ▲ E27.6.1 Trip generation	Support in part	Kāinga Ora supports the submission for the reasons outlined in its original submission.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
22	22.11	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Standards IX.6.1 (1) and (2) and delete Standard IX.6.1 (3) and the note as follows: IX.6.1 Staging of Development with Transport Upgrades (1) Development <u>and subdivision</u> within the area shown on IX.10.3 Precinct Plan 3 must not exceed the thresholds in Table IX.6.1.1 and Table IX.6.1.2 until such time that the identified infrastructure upgrades are constructed and are operational. (2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for those activities that have <u>are subject to</u> a valid land use <u>and/or building</u> consent or subdivision that is <u>subject to a subdivision consent</u> that has a 224c certificate for vacant lots less than 1200m ² . (3) Table IX.6.1.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Waihoehoe: Precinct Plan 2. Table IX.6.1.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Waihoehoe: Precinct Plan 2. Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme — Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below	Oppose in part	Kainga Ora opposes the submission to the extent it is inconsistent with its original submissions.
22	22.12	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Table IX.6.1.1 as set out in full in the submission, including to specify additional transport infrastructure upgrades and network improvements required to be completed	Oppose in part	Kainga Ora opposes the submission to the extent it is inconsistent with its original submissions.
22	22.13	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Table IX.6.1.2.	Oppose in part	Kainga Ora opposes the submission to the extent it is inconsistent with its original submissions.
22	22.14	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Standards IX.6.2 (1), delete Standard IX.6.2 (2) and (3), and add a new clause as follows: IX.6.2 Trip Generation Limit (1) Development <u>and subdivision</u> within the Drury area shown on IX.10.2 Waihoehoe: Precinct Plan 2 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational. (2) Table IX.6.2.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Waihoehoe: Precinct Plan 2. Table IX.6.2.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Waihoehoe: Precinct Plan 2. (3) Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020— Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below <u>(x) A Transport Assessment corresponding to the scale and significance of the proposed activity prepared by a suitably qualified expert must be provided in order to confirm compliance with this standard.</u>	Oppose in part	Kainga Ora opposes the submission to the extent it is inconsistent with its original submissions.
22	22.15	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Table IX.6.2.1 as set out in full in the submission, including to specify additional transport infrastructure upgrades and network improvements required to be completed.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.16	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Table IX.6.2.2.	Oppose in part	Kainga Ora opposes the submission to the extent it is inconsistent with its original submissions.
22	22.17	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend IX.8.1 (2) as follows: (2) Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit: (a) Effects on the transport network consistent with the trips generated by development specified in Table IX.6.2.1 or Table IX.6.2.2 ; (b) The rate of public transport uptake and travel management measures; and (c) The rate of coordination of retail, commercial and residential development in the wider Drury East area shown on Precinct Plan 2; and <u>(x) The degree of certainty around the provision of required infrastructure upgrades including confirmation of infrastructure funding or other such measures agreed; and</u> <u>(x) Any mitigation measures or review conditions required to address the effects from development occurring ahead of the required infrastructure upgrades.</u>	Oppose in part	Kainga Ora opposes the submission to the extent it is inconsistent with its original submissions.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
22	22.18	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend IX.8.2 (2) as follows: (2) Development <u>and/or</u> subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit: (a) Whether the effects of the proposal on the transport network are consistent with the trips generated by development specified in Table IX.6.23.1 or Table IX.6.3.2 ; (b) Whether increased use of public transport provides additional capacity within the <u>local</u> transport network <u>included within the area shown on IX.10.2 Precinct Plan 2</u> ; <u>including by implementing travel-demand management measures</u> . (c) Whether residential development is coordinated with retail and commercial development within <u>the area shown on IX.10.2 Precinct Plan 2 Drury East</u> to minimise trips outside of the precinct providing additional capacity within the transport network; (d) The effect of the timing and development of any transport upgrades; (x) <u>Where new, upgrades and/or extensions to transport infrastructure are required, whether infrastructure funding agreements or other agreements exist to ensure that the new, upgraded or extended infrastructure required to service the subdivision and/or development can be funded and delivered; and</u> (x) <u>Whether the effects of development proceeding ahead of the required transport upgrades are mitigated by any conditions of consent including those relating to the scale, staging or operation of an activity, review conditions or interim network improvements proposed by the applicant.</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.20	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend the precinct provisions to better address the following related matters: • Define the key transit-oriented development principles, characteristics and outcomes as they apply to the plan change area. • Ensure there is consistency through the suite of precinct provisions in regard to giving effect to the transit- oriented development related outcomes. • Applying appropriate mechanisms in the precinct provisions to support transit-oriented development related outcomes e.g. managing the provision of parking as part of the wider suite of travel demand management measures that are applied to transit- oriented development scenarios.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.21	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Provide further assessment of the impacts of the proposal on accessibility between the Waihoehoe Plan Change area and the Drury Central rail station for all modes including public transport and pedestrian access, focusing on safety, permeability and connectivity between the areas.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.22	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Include provisions in the plan change to ensure that funding for public transport services (i.e. bus services) is available to support and provide public transport connections between the developments and the Drury Central rail station upon its completion.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submissions. Active transport modes should be equally-encouraged as per the precinct description.
22	22.23	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend IX.10.1 Waihoehoe: Precinct Plan 1 as follows: • Add to the legend and show the proposed Opāheke North-South arterial road as a future arterial road.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.24	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new policy as follows: (x) <u>Recognise and protect the route for the proposed Opāheke North-South arterial road as a future Frequent Transit Network arterial route which provides for the north-south movements between Papakura and Waihoehoe Road; and</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.25	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new policy as follows: (x) <u>Ensure that subdivision and development in Waihoehoe Precinct does not preclude the construction and operation of proposed Opāheke North-South arterial, as defined by:</u> • The indicative Opāheke North-South arterial road alignment shown in IX.10.1 Waihoehoe: Precinct Plan 1; <u>or</u> • <u>Relevant designations and resource consents for the proposed Opāheke North-South arterial road.</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.26	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new rule to Table IX.4.1 Activity table as follows: <u>Subdivision and/or development of land including or adjacent to the proposed Opāheke North-South arterial road shown in IX.10.1 Waihoehoe: Precinct Plan 1 - RD.</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
22	22.27	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new matter of discretion to IX.8.1 as follows: <u>(x) Subdivision and/or development of land including or adjacent to the proposed Opāheke North-South arterial road:</u> <u>(a) Effects on the proposed Opāheke North-South arterial road.</u>	Oppose in part	Kāinga Ora opposes the submission to the extent that the matter of discretion relating to 'effects on the proposed Opāheke North-South arterial road' is too broad. Further matters of discretion are required to elucidate what specific effects are to be assessed.
22	22.28	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new assessment criteria to IX.8.2 as follows: <u>(x) Subdivision and/or development of land including or adjacent to the proposed Opāheke North-South arterial road:</u> <u>(a) Whether the subdivision and/or development preclude the construction and operation of the proposed Opāheke North-South arterial road; and</u> <u>(b) the extent to which the subdivision and/or development provide for the proposed Opāheke North-South arterial road to be developed in a cohesive manner.</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.29	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new policy as follows: <u>(x) Recognise and protect the route for Waihoehoe Road as a multi-modal arterial which provides for the east-west movements between Great South Road and Drury Hills Road intersection.</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.30	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new policy as follows: <u>(x) Restrict direct vehicle access onto Waihoehoe Road to support the safe and efficient operation of the transport network for walking, cycling and public transport.</u>	Oppose	Kāinga Ora opposes the submission. Chapter E27 - Transport provides sufficient assessment for vehicle access to arterial roads (E27.6.4.1.3(c))
22	22.31	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend the building line restrictions in Standard IX.6.4 to reflect the final alignment and width required and ensure any yard requirements that apply are considered in addition to the building setbacks. The need for IX.6.4 should be reviewed if a notice of requirement is lodged for the upgrade of Waihoehoe Road.	Support in part	Kāinga Ora supports the submission to the extent that a front yard building setback still applies from the front boundary as-defined in the AUP(OP), to ensure underlying zone consistency and urban design outcomes.
22	22.32	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Retain the vehicle access restriction on Waihoehoe Road as per Rule E27.6.4.1 (3)(c) of the AUPOP.	Support	Kāinga Ora supports the submissions for the reasons outlined in its submission on point 22.30.
22	22.33	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Objective IX.2 (1) as follows: (1) Waihoehoe Precinct is a comprehensively developed residential environment that integrates with the Drury Centre and the natural environment, supports public transport use, <u>walking and cycling</u> , and respects Mana Whenua values.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.34	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3 (3) as follows: (3) Require streets to be attractively designed and appropriately provide for all transport modes <u>by:</u> <u>a) providing a high standard of pedestrian amenity, safety and convenience; and</u> <u>b) providing for safe separated access for cyclists on arterial and collector roads that link key destinations; and</u> <u>c) providing a level of landscaping that is appropriate for the function of the street; and</u> <u>d) providing for the safe and efficient movement of public transport and private vehicles.</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
22	22.35	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3(7) as follows: (7) Provide for the <u>staging of bus</u> , pedestrian and cycling connections to the Drury Central train rail station <u>upon its completion</u> to encourage the <u>immediate</u> use of public and active modes of transport <u>as soon as practically possible.</u>	Oppose	Kāinga Ora opposes the submission as the suggested amendments make the policy overly-prescriptive and applies a timing (i.e. upon train station completion) which may not be achievable.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
22	22.38	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Rule IX.4.1 (A1) as follows: "Development of <u>new</u> public or private road (<u>this rule does not apply to Auckland Transport</u>)" As a consequential amendment, the same changes are sought to the heading of IX.8.1 (1) matters of discretion and IX.8.2 (1) assessment criteria.	Oppose	Kāinga Ora opposes the submission as development of new roads by Auckland Transport would be covered by Chapter E26 - Infrastructure of the AUP(OP).
22	22.39	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new standard to require the vesting of proposed public roads in all sub-precincts as follows: <u>IX.6.X Road Vesting</u> <u>Proposed public roads (including separated pedestrian and bicycle routes) must be constructed and vested in Council upon subdivision or development of the relevant area at no cost to the Council.</u> As a consequential amendment, add a new rule as follows: <u>Development and/or subdivision that does not comply with IX.6.X Road Vesting - NC</u>	Oppose	Kāinga Ora opposes the submission. Vesting and acquisition are administered through separate established processes. The proposed standard/s are contrary to the approach otherwise established within the Auckland Unitary Plan - Operative in Part.
22	22.45	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Assessment criteria IX.8.2 (1)(g) for design of roads as follows: (g) Whether the design of collector and local roads are generally in accordance with the <u>minimum road reserve widths and key design elements</u> road cross sections provided in IX.10.1 Waihoehoe: Appendix 1;	Oppose in part	Kāinga Ora opposes the submission. Overly-prescriptive road cross sections may conflict with Auckland Transport Code of Practice requirements should they change. This may result in resource consents being required to comply with differing requirements.
22	22.48	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new assessment criteria to IX.8.2(1) as follows: <u>(x) Whether the layout of the street network supports the provision of a safe and efficient bus network;</u> <u>(x) Whether the design of collector and local roads include safe and efficient intersection treatments with existing roads; and</u> <u>(x) Where development is adjacent to a rural road, whether the road is to be upgraded to an urban standard.</u>	Oppose in part	Kāinga Ora opposes the submission to the extent that it is inconsistent with its original submissions. In addition, the proposed amendment may introduce an expectation that rural roads are upgraded.
22	22.49	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete IX.11 Appendix 1: Road Cross Section Details. Introduce provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and roads which need to be upgraded to urban standards including but not limited to: • Carriageway • Footpaths • Cycleways • Public Transport • Ancillary Zone (parking, street trees etc.) • Berm • Frontage • Building Setback • Design Speed As part of new provisions, retain vehicle access restriction provisions, as addressed above.	Oppose	Kāinga Ora opposes the submission. Setting minimum legal road widths may be appropriate to ensure necessary 'space' to provide for planned use of particular transport environments. However, the detailed design or streets should not be prescribed through standards as the submission seeks - rather, a matter for assessment through the resource consent process. Such an approach (as submitted) is likely to conflict with an frustrate the consent process should 'road controlling authority' requirements change (i.e. Auckland Transport Code of Practice).
22	22.50	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add layers to the AUPOP maps for Arterial roads within the Precinct area, including Waihoehoe Road and proposed Opāheke North-South.	Oppose	Kāinga Ora oppose the submission. This should only take place when the new roads are physically constructed and vested.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
22	22.51	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Show the purpose (role) of all roads on the precinct plans.	Oppose in part	Kāinga Ora opposes the submission. This should only take place when the new roads are physically constructed and vested. At such a time it would then be appropriate to demonstrate their purpose on the Unitary Plan maps and/or
22	22.53	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new policy as follows: <u>Avoid the establishment of activities sensitive to noise adjacent to arterial roads, unless it can be demonstrated that potential adverse effects from and on the corridor can be appropriately mitigated.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its further submission.
22	22.54	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new standard to IX.6 to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level). As a consequential amendment, add a new rule to Activity table IX4.1 as follows: <u>(X) Development that does not comply with IX.6.X Noise Mitigation - PD</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its further submission.
22	22.55	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new assessment criterion to IX.8.2 as follows: <u>The extent to which noise sensitive activities in proximity to arterial roads are managed.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its further submission.
23	23.3	Counties Power Limited	jbrydon@align.net.nz	Support the plan change with the amendments	If the proposed collector road shown in the appendices does not change, and if the existing 110kV line remains in-situ, amend plan provisions (including Policy IX.3(1)) to maintain suitable vehicular access to the line for maintenance purposes. Further, maintain appropriate setback for new buildings at all times in accordance with New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003.	Oppose	Kāinga Ora opposes the submission. The effect of development and works in proximity to electrical infrastructure are managed through separate legislation.
23	23.4	Counties Power Limited	jbrydon@align.net.nz	Support the plan change with the amendments	Amend IX3 Policy 3 so that electrical infrastructure is taken into consideration when planning landscaping and planting of street trees; require consultation with Counties Power regarding species in the vicinity of overhead lines; and apply a typical road cross section for arterial roads to ensure that the berm is an acceptable width for the installation of underground electrical reticulation.	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its further submission on point 22.49. in addition, the effect of development and works in proximity to electrical infrastructure are managed through separate legislation.
23	23.8	Counties Power Limited	jbrydon@align.net.nz	Support the plan change with the amendments	Add new policy IX.3(12) as follows: <u>Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with the NPS: UD. This may include removal of the reference to parking areas which are otherwise discouraged by the NPS:UD.
23	23.9	Counties Power Limited	jbrydon@align.net.nz	Support the plan change with the amendments	Add new policy IX.3.(13) as follows: <u>Enable the reduction of CO2 emissions by promoting the use of renewable energy in new subdivisions and development.</u>	Support in part	Kāinga Ora supports the submission to the extent it is consistent with the NPS: UD.
23	23.10	Counties Power Limited	jbrydon@align.net.nz	Support the plan change with the amendments	Amend matters of discretion in IX.8.1(1) to consider provision of suitable space for installation of electrical infrastructure to meet the needs of the area or building, as well as adequate separation between the different utilities, landscaping and other road users. Where electrical infrastructure is required, vehicular access of a suitable construction standard must be provided to allow access for maintenance of electrical infrastructure.	Oppose	Kāinga Ora opposes the submission. The effect of development and works in proximity to electrical infrastructure are managed through separate legislation.
23	23.11	Counties Power Limited	jbrydon@align.net.nz	Support the plan change with the amendments	Amend IX.8.2(1) assessment criteria to recognise the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/ trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted; and provide a typical road cross-section with minimum 800mm allowance for berms to ensure that there is acceptable width for installation of underground electrical reticulation.	Oppose	Kāinga Ora opposes the submission. The effect of development and works in proximity to electrical infrastructure are managed through separate legislation.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
23	23.12	Counties Power Limited	jbrydon@align.net.nz	Support the plan change with the amendments	Amend IX.10 Appendix 1 Road Cross Section Details to provide a minimum 800mm berm width if overhead lines are required to be undergrounded in the road.	Oppose	Kāinga Ora opposes the submission. The effect of development and works in proximity to electrical infrastructure are managed through separate legislation.
24	24.1	Ministry of Education	jess.rose@beca.com	Support the plan change with the amendments	Amend Objective IX.2 (3) as follows: Development is supported by appropriate infrastructure (including education infrastructure).	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
24	24.2	Ministry of Education	jess.rose@beca.com	Support the plan change with the amendments	Amend Policy IX.3 (6) as follows: Ensure that development in Drury East Precinct is coordinated with supporting <u>education infrastructure</u> , stormwater, wastewater and water supply infrastructure, having particular regard to the capacity of the Fitzgerald culvert and culverts under Great South Road.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
24	24.3	Ministry of Education	jess.rose@beca.com	Support the plan change with the amendments	Amend IX.8.1 Matter of discretion 1)(a) Development of public and private roads as follows: (a) Location and design of the collector streets, local streets and connections with neighbouring sites (including schools) to achieve an integrated street network.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
24	24.4	Ministry of Education	jess.rose@beca.com	Support the plan change with the amendments	Amend IX.8.2 Assessment criteria 1)(a)(ii) for Location of roads as follows: ii. The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities (including provision of schools); and	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
24	24.5	Ministry of Education	jess.rose@beca.com	Support the plan change with the amendments	Amend IX.8.2 Assessment criteria 1)(d) for Location of roads as follows: d) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network. Whether subdivision and development provides for collector roads and local roads to the site boundaries to coordinate with neighbouring sites (including potential future school sites) and support the integrated completion of the	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
24	24.6	Ministry of Education	jess.rose@beca.com	Support the plan change with the amendments	Amend IX.8.2 Assessment criteria 1)(h) for Design of Roads as follows: (h) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network, including to existing schools or sites designated for this purpose. As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 600m.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
24	24.7	Ministry of Education	jess.rose@beca.com	Support the plan change with the amendments	Amend plan change to ensure there is provision of appropriate public open space to support the surrounding community.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
24	24.8	Ministry of Education	jess.rose@beca.com	Support the plan change with the amendments	Retain Standard IX.6.1 Staging of Development with Transport Upgrades.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
24	24.9	Ministry of Education	jess.rose@beca.com	Support the plan change with the amendments	Retain objectives and policies relating to the provision of safe and legible walking and cycling connections through communities.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
25	25.1	Leith McFadden	leith@playgrounds.co.nz	Support the plan change with the amendments	Zone areas for parks and public space.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
25	25.2	Leith McFadden	leith@playgrounds.co.nz	Support the plan change with the amendments	Ensure infrastructure upgrades are tied to staging through precinct provisions.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
26	26.1	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the plan change with the amendments	Include provisions within the precinct plan to require that archaeological assessments of the area are undertaken by a suitable qualified professional during the subdivision process.	Oppose in part	Kāinga Ora opposes the submission. If specific archaeological sites are relevant then these should be identified upfront. Blanket archaeological investigations should not be a requirement for all development within the precinct.
26	26.2	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the plan change with the amendments	Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to exclude archaeological site extents as assessed by a professionally qualified archaeologist and require the preparation of an archaeological assessment by a suitably qualified person to inform the planting plan.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original and further submissions, and the national direction under the NPS:FM.
26	26.3	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the plan change with the amendments	Include appropriate provisions within the precinct plan to address any Māori cultural values identified.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
28	28.1	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with the amendments	Consider amending trip generation rule framework (Activity table IX.4.1(A2), (A3), (A5) and (A6) and standard IX.6.2) to replace with a simplified approach using GFA triggers alone, given the potential challenges in monitoring trip generation levels for a development of this scale.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. Utilising GFA alone is unlikely to provide a true representation of transportation - related effects, particularly where thresholds are tied to critical transport infrastructure upgrades.
28	28.2	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with the amendments	Amend Table IX.4.1 by introducing two new discretionary activities: <u>(a) Development that does not comply with Standard IX.6.5 (Stormwater Quality and Flooding); and</u> <u>(b) Subdivision that does not comply with Standard IX.6.5 (Stormwater Quality and Flooding).</u>	Oppose in part	Kāinga Ora opposes the submission as flooding issues are administered through the Natural Hazards chapter of the AUP(OP).
28	28.3	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with the amendments	Amend IX.6(2) so that any exemption is clear as to the activities that it applies to, and that the effects of those activities have been assessed through an ITA.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
28	28.4	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with the amendments	Amend Standard IX.6.1 / PC50 to ensure that: (a) adequate upgrading of the surrounding road network (for example Waihoehoe Road shown on Precinct Plan 1) is undertaken; and (b) any non-compliance with this standard is a discretionary activity.	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.1	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Provide information and suitable provisions through out the whole of the plan change to resolve the transport infrastructure issue.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.2	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend the whole Plan Change to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.3	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Review the proposed zoning and associated provisions in light of the NPSUD requirements.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.6	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Retain IX Precinct description	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
29	29.7	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend Objective 1 as follows: (1) Waihoehoe Precinct is a comprehensively developed residential environment that integrates with the Drury Centre and the natural environment, supports <u>active and</u> public transport use, and respects Mana Whenua values.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.16	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend and/or delete Activities IX.4.1 (A2), (A3), (A5) and (A6) in a manner which responds to Waka Kotahi's submission in its entirety.	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.17	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Either delete notification provision IX.5(3); or amend IX.5(3) to ensure that Activity E11.4.1(A1) (new public or private roads) and infringements to standards IX6.2 and 6.3 (transport upgrades and trip generation limits) are subject to normal notification tests.	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.18	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Delete Standard IX.6(3)	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.19	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Retain IX.6 Standard (2) as notified on the basis that transport, traffic or trip-generation provisions are retained in the precinct and that no permitted activities are enabled.	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.20	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Delete Standard IX.6.1(3) Staging of Development with Transport Upgrades.	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.21	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Delete italicised Note IX.6.1 (4).	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.22	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend title of Table IX.6.1.1 as follows: Table IX.6.1.1 Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 not constructed .		Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.23	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend Table IX.6.1.1 Threshold for Development to provide more specificity as to the details of works required in the right hand column by including upgrade details listed in Table 8.1 of the Integrated Transport Assessment supporting the proposal, column headed "Revised (2020) Modelling – Infrastructure Upgrades Required".	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.24	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Delete Table IX.6.1.2 Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 constructed	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
29	29.25	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	<p>Delete IX.6.2 Trip Generation Limit including Tables IX.6.2.1 and IX.6.2.2, and replace with provisions which provide for operational requirements and more specific transport network responses. Potential wording is set out below, and could include a new permitted activity standard with non-compliance being a restricted discretionary activity (consequential changes to Activity Table IX.4 would be required). Restricted discretionary activity assessment criteria/matters of discretion could include transport network improvements.</p> <p>An alternative compliance pathway would be for an applicant to propose and undertake transport network improvements to maintain LOS E i.e. comply (noting that all development requires consent so compliance could be considered as part of this process).</p> <p><u>IX.6.2 Transport Infrastructure</u> <u>Development and subdivision to comply with the following:</u> <u>(a) Great South Road/ Waihoehoe Road Intersection Operation:</u> <u>(i) Where the baseline intersection operation is at Level of Service E (LOS E) or better at the time of application, no subdivision or development shall generate traffic movements which result in:</u> <u>1) a Level of Service of less than LOS E; or</u> <u>2) have a degree of saturation higher than 95%.</u> <u>(ii) Where the baseline intersection operation is at Level of Service F (LOS F) at the time of application, no subdivision or development shall generate traffic movements which results in:</u> <u>1) degrees of saturation of more than the base line scenario, or</u> <u>2) delays of more than 10% greater than the baseline scenario.</u> Other relief would include additional provisions which outline transport upgrades to be considered (as listed in Table 8.1 of the Integrated Transport Assessment supporting the proposal)</p>	Oppose in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.26	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend Tables IX.6.2.1 and IX.6.2.2, if submission point 29.25 is not accepted, to provide more specificity as to the details of works required in the right hand columns of both Tables by including upgrade details listed in Table 8.1 of the Integrated Transport Assessment supporting the proposal, column headed Revised (2020) Modelling – Infrastructure Upgrades Required.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.27	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Delete italicised Note IX.6.2 (4).	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
29	29.28	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend IX.8.1 Matters of discretion (1) as follows: (1) Development of public and private roads: (a).... (d).. (e) <u>the outcome of engagement with the relevant road controlling authority.</u>	Oppose	Kāinga Ora opposes the submission, as the proposed inclusions may be requiring a form of third party approval through future resource consent processes.
29	29.29	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend IX.8.1 Matters of discretion (2) as follows: (2) Development or subdivision that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit: (a).. (b).. (c).. (d) <u>the outcome of engagement with the relevant road controlling authority.</u>	Oppose	Kāinga Ora opposes the submission, as the proposed inclusions may be requiring a form of third party approval through future resource consent processes.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
29	29.30	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend IX.8.2(1) Assessment criteria as follows: 1) Development of public and private roads: Location of roads (a) ... (b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports an integrated <u>active transport walkable street network</u> . [...] (c) ... (d) ... Design of roads (f) ... (g) ... (h) Whether the layout of the street network provides a good degree of accessibility and supports an <u>integrated active transport walkable street network</u> . [...] (i) Whether safe and legible <u>active transport pedestrian and cycle connections</u> to the Drury Central train station and <u>Drury Centre</u> are provided, via facilities on Waihoehoe Road and Flanagan Road/Drury Boulevard, from the Fitzgerald Rd extension to the Drury Rail Station. Or an alternative is provided that achieves an equal or better degree of connectivity. Where development precedes the upgrade of Waihoehoe Road and connecting roads, interim pedestrian and cycle facilities <u>should</u> may be provided. <u>Road Controlling Authority</u> (i) <u>how the outcome of engagement with the relevant road controlling authority has been responded to.</u>	Oppose	Kāinga Ora opposes the submission, as the proposed inclusions may be requiring a form of third party approval through future resource consent processes.
29	29.31	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with the amendments	Amend assessment criteria IX.8.2(2) as follows: (2) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit: (a)... (b) Whether increased use of public <u>and active transport</u> provides additional capacity within the transport network including by implementing travel demand management measures. (d)... (e) <u>how the outcome of engagement with the relevant road controlling authority has been responded to.</u>	Oppose	Kāinga Ora opposes the submission, as the proposed inclusions may be requiring a form of third party approval through future resource consent processes.
30	30.1	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the plan change with the amendments	Amend IX.1 Precinct Description to add: <u>The North Island Main Trunk railway line, which runs the entire length of the Precinct's western boundary is protected from reverse sensitivity effects by ensuring that new buildings and activities will be designed and located to manage any adverse effects</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
30	30.2	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the plan change with the amendments	Add new Objective IX.2(5) as follows: <u>(5) The NIMT is protected from adverse effects, including reverse sensitivity effects, of subdivision, use and development by:</u> <u>1. setbacks within which incompatible activities will be managed;</u> <u>2. standards designed to protect noise sensitive receiver's health and amenity.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
30	30.3	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the plan change with the amendments	Add new policy IX.3(12) as follows: <u>(12) Adverse effects on the operation of the regionally significant NIMT and on the health and safety of adjacent development and noise sensitive receivers are managed through setbacks and performance standards.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
30	30.4	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the plan change with the amendments	Insert new activity (A5) to Activity table IX.4.1 as set out below and renumber existing (A5) and (A6) to (A6) and (A7). <u>(A5) Development that does not comply with IX.6.7 Setback from NIMT and IX.6.8 Noise Sensitive Activities within 100m of a Rail Network Boundary - RD</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
30	30.5	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the plan change with the amendments	Add to IX.6 Standards a new standard IX.6.7 as follows: <u>IX.6.7 Setback from NIMT</u> <u>Buildings must be setback at least 5 metres from any boundary which adjoins the NIMT railway line.</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
30	30.6	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the plan change with the amendments	Add to IX.6 Standards a new standard IX.6.8 to manage potential human health effects from rail noise and vibration where buildings containing noise sensitive activities are located adjacent to (within 100m of) the railway corridor. See submission for full proposed wording.	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
30	30.7	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the plan change with the amendments	Insert new matters of discretion in IX.8.1 as follows: <u>(4) Setback from NIMT and Noise Sensitive Activities within 100m of a Rail Network Boundary</u> <u>Effects from non-compliance with Standards IX.6.7 and IX.6.8</u>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
30	30.8	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the plan change with the amendments	<p>Insert new assessment criteria in IX.8.2 as follows:</p> <p><u>(4) Setback from NIMT</u> <u>(a) The size, nature and location of the buildings on the site.</u> <u>(b) The extent to which the safety and efficiency of railway operations will be adversely affected.</u> <u>(c) The outcome of any consultation with KiwiRail.</u> <u>(d) Any characteristics of the proposed use that will make compliance unnecessary.</u></p> <p><u>(5) Noise Sensitive Activities within 100m of a Rail Network Boundary</u> <u>(a) Whether the activity sensitive to noise could be located further from the railway corridor</u> <u>(b) The extent to which the noise and vibration criteria are achieved and the effects of any non-compliance</u> <u>(c) The character of and degree of amenity provided by the existing environment and proposed activity.</u> <u>(d) The reverse sensitivity effects on the railway corridor and the extent to which mitigation measures can enable their ongoing operation, maintenance and upgrade.</u> <u>(e) Special topographical, building features or ground conditions which will mitigate vibration impacts;</u></p>	Oppose	Kāinga Ora opposes the submission for the reasons outlined in its primary submission.
31	31.1	Karaka and Drury Limited	helen@berrysimons.co.nz	Neither supports nor opposes the Plan Change	Approve plan change	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submissions.
31	31.2	Karaka and Drury Limited	helen@berrysimons.co.nz	Neither supports nor opposes the Plan Change	Do not amend PPC 50 in any way that would impact on, impede or preclude: (i) The quality of planning outcomes that the submitter seeks to achieve for Drury West; or (ii) The timing in which those outcomes are delivered.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submissions.
33	33.1	Watercare	ilze.gotelli@water.co.nz	Support the plan change with the amendments	Amend Policy 6 as follows: (6) Ensure that <u>subdivision and</u> development in Drury East Precinct is coordinated with <u>(and does not precede)</u> supporting stormwater, wastewater and water supply infrastructure <u>and manages adverse effects, including reverse sensitivity effects, which may compromise the operation or capacity of that infrastructure.</u>	Oppose	Kāinga Ora opposes the submission to the extent it is inconsistent with its primary submission.
34	34.1	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Confirm ongoing iwi participation, consultation and engagement in the project.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
34	34.2	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Acknowledge within the project design the history of Mana Whenua in the PPC50 area.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
34	34.3	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Incorporate Te Aranga Principles in design concepts.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.
34	34.5	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Account for natural and cultural landscaping in the project design, identify and preserve landscapes including view shafts, hilltops, tuff rings and ridge lines.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.

**Plan Change 50 - Waihoehoe Precinct
Summary of Decisions Requested**

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary	Kāinga Ora position	Kāinga Ora Reasons - Support / Oppose
34	34.6	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Apply a minimum of 20 metre riparian margin for all waterways especially those to contain walkways / cycleways.	Oppose in part	Kāinga Ora opposes the submission. The Unitary Plan generally sets a consistent 10m riparian yard requirement for all streams. Increasing this to 20m may have implications on development potential and would therefore need to be justified through a thorough s32 analysis.
34	34.7	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.	Oppose in part	Kāinga Ora opposes the submission. The approach to stormwater management would be assessed through the NDC and SMP process.
34	34.8	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Require roof capture for reuse and groundwater recharge.	Oppose in part	Kāinga Ora opposes the submission. The approach to stormwater management would be assessed through the NDC and SMP process.
34	34.9	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Confirm park edge design adjacent to all waterways.	Oppose in part	Kāinga Ora opposes the submission to the extent that such an approach is overly restrictive, requiring park edge approach to <i>all</i> waterways, and should be considered at future resource consent stage.
34	34.10	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Use native trees and plants only within the precinct.	Support in part	Kāinga Ora supports the submission to the extent it is consistent with its original submission.
34	34.11	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Reflect sustainable development in the design and outcomes.	Oppose in part	Kāinga Ora opposes the submission to the extent it is inconsistent with its original submission. There is insufficient information and analysis to understand the scope and assessment required as part of future resource consent applications as a result of the relief sought.

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

FURTHER SUBMISSION ON: Plan Change 50 (Private): Waihoehoe Precinct

FROM: Watercare Services Limited

ADDRESS FOR SERVICE: ilze.gotelli@water.co.nz

DATE: 29 January 2021

Watercare could not gain an advantage in trade competition through this further submission.

1. INTRODUCTION

1.1 Watercare's purpose and mission

Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 ("**CCO**") and is wholly owned by the Auckland Council ("**Council**").

Watercare made an original submission on Proposed Plan Change 50: Waihoehoe Precinct, submission no 33. Defined terms in Watercare's original submission have been used in this further submission.

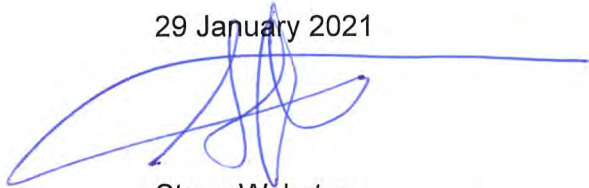
2. FURTHER SUBMISSION

Watercare wishes to make a further submission on the Plan Change. These further submissions are included in the attached table.

3. HEARING

Watercare wishes to be heard in support of its submission.

29 January 2021



Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Address for Service:
Ilze Gotelli
Head of Major Developments
Watercare Services Limited
Private Bag 92 521
Wellesley Street
Auckland 1141
Phone: 021 831 470
Email: ilze.gotelli@water.co.nz

Submitter ID	Submission point #	Submitter name	Submission point	Support/oppose	Watercare further submission commentary/relief sought
5	5.1	Wendy Hannah	Approve the plan condition on existing access rights to 228 Flanagan Road being maintained and access being provided to services and utilities to develop the property in future (note: property is outside PC50 area).	Oppose	No assessment on capacity and servicing requirements has been carried out for land outside of the Plan Change Area. Watercare is opposed to any extension of the Plan Change Area that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure network.
8	8.8	Dong Leng	Confirm that the water supply network will be extended up to the Waihoehoe Road frontage of 160 Waihoehoe Road and that the wastewater network will also be extended to service this site.	Oppose	No assessment on capacity and servicing requirements has been carried out for land outside of the Plan Change Area. Watercare is opposed to any extension of the Plan Change Area that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure network.
16	16.1	Britmat Holdings Ltd	Include the property at 1A East Street Drury (currently zoned Future Urban Zone) within the plan change with a zoning of Business – Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.	Oppose	No assessment on capacity and servicing requirements has been carried out for land outside of the Plan Change Area. Watercare is opposed to any extension of the Plan Change Area that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure network.
17	17.9	Josephine Kleinsman	Reconsider interim wastewater solution as a single pump station with storage that could be upsized as demand increases with a single riser main following the NIMT Railway alignment.	Oppose	The Opaheke North catchment is located in the Future Urban Zone area. In order to facilitate earlier development of the Plan Change Area, Watercare has supported in principle an interim wastewater solution, the full cost of which is to be met by the developer. The design of the pump station will be considered as part of the resource consent process.
21	21.1(c)	Auckland Council	The Council is concerned to ensure that infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions.	Support	Watercare supports this submission point as it aligns with the amendments to Policy 6 sought in Watercare's original submission.
22	22.5	Auckland Transport	Amend Objective IX.2(6)/(3) as follows: (6) Development is support by appropriate infrastructure. Subdivision and development are supported by the timely and coordinated provision of robust and sustainable transport, stormwater, water, wastewater, energy and communications infrastructure networks.	Support	Watercare supports this submission point as it aligns with the amendments to Policy 6 sought in Watercare's original submission.
32	32.1	Kāinga Ora	Approve the plan change, subject to inclusion of sites at 1 and 1A East Street for rezoning (see Attachment Two to the submission). Zone 1 East Street as THAB and 1A East Street as LCZ.	Oppose	No assessment on capacity and servicing requirements has been carried out for land outside of the Plan Change Area. Watercare is opposed to any extension of the Plan Change Area that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure network.
32	32.2	Kāinga Ora	Approve the plan change, subject to: <ul style="list-style-type: none"> application of a 22.5m Height Variation Control across 	Oppose	Watercare is opposed to any increase in the development yield from that set out in the Plan Change application that will have adverse effects on Watercare's existing and planned water and wastewater infrastructure

Submitter ID	Submission point #	Submitter name	Submission point	Support/oppose	Watercare further submission commentary/relief sought
			the proposed THAB zone (including 1 East St, Drury); <ul style="list-style-type: none">• application of a 27m Height Variation Control over the extent of the proposed LCZ (including 1A East St, Drury and 200-212 Great South Road).		network.

From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan further submission - Plan Change 50 - Counties Power Limited
Date: Friday, 29 January 2021 2:47:36 PM
Attachments: [210129_PPC50_Counties-Power-further-submisison.pdf](#)

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Counties Power Limited

Organisation name: Counties Power Limited

Full name of your agent: Jeremy Brydon

Email address: jbrydon@align.net.nz

Contact phone number: 092824768

Postal address:
PO Box 147105
Ponsonby
Auckland 1021

Submission details

This is a further submission to:

Plan change number: Plan Change 50

Plan change name: PC 50 (Private): Waihoehoe Precinct

Original submission details

Original submitters name and address:
See attached

Submission number: See attached

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number See attached

The reasons for my or our support or opposition are:
See attached

I or we want Auckland council to make a decision to: Allow part of original submission

Specify the parts of the original submission you want to allow or disallow:
See attached

Submission date: 29 January 2021

Supporting documents
[210129_PPC50_Counties-Power-further-submisison.pdf](#)

Attend a hearing

I or we wish to be heard in support of this submission: Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Counties Power is a network utility operator that will be required to service the proposed plan change area

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.

Auckland Unitary Plan
PC 50 (Private): Waihoehoe Precinct
Further Submission



C O U N T I E S P O W E R

Quality Control Sheet

Submitter: Counties Power Limited
Asset: Counties Power Electricity Distribution Network
Plan: Auckland Unitary Plan - Proposed Plan Change 50 (Private) Waihoehoe Precinct
Document: Further Submission
Counties Power Contact: Rachel Bilbe, Land Access Coordinator
Consultant Contact: Jeremy Brydon, Planning Consultant, Align Limited
File Reference: COUNT038

Version:

Issue 2.0	29 January 2021	For issue
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Distribution:

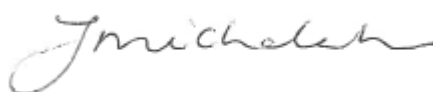
Rachel Bilbe	Counties Power	Email
AC Policy Team	Auckland Council	Online Submission
Submitters listed on p3	Various	Email

Produced by:



Jeremy Brydon

Review by:



Jo Michalakis

Align Limited

Date: 29 January 2021

Limitations:

This report has been prepared for the client according to their instructions. The information in this report should not be used by anyone else, or for any other purpose. Some of the information presented in this report is based on information supplied by the client. Align Limited does not guarantee the accuracy of any such information. Any advice contained in this report is subject to this limitation.

1. Introduction

This document provides a further submission on Plan Change 50 (Private): Waihoehoe Precinct. The document contains a spreadsheet with submission points in relation to the following submitters:

- Fire and Emergency New Zealand
- Spark New Zealand Trading Limited
- Josephine Kleinsman
- Lomai Properties Limited
- The Ministry of Housing and Urban Development (HUD), Te Puni Kokiri and the Department of Corrections
- Ngati Te Ata Waiohua
- Auckland Transport
- The New Zealand Transport Agency
- Watercare

Counties Power (CP) has an interest in the proposed plan that is greater than the interest the general public has because they own significant electricity infrastructure within the area that is subject to the plan change. Counties Power is therefore able to make a further submission on Plan Change 50. Information about the operation of the Counties Power network is contained in the original submission.

Counties Power wishes to be heard in support of their submission.

If others make a similar submission, they will consider presenting a joint case with them at a hearing.

2. Further submission points

Plan Change 50						
Relevant Provision	Submitter (Submission No.)	Submission Point	Submission "summary"	Support/Oppose	Reason	
IX.3 Policy (6)	Fire and Emergency New Zealand - 5	4.1	Approve the plan change, in particular proposed Policy 6 as currently worded	Support with amendments	Counties Power supports the intent of Policy (6) with amendments to also include for the provision of electrical, telecommunication and other infrastructure within the policy.	
General	Spark New Zealand Trading Limited – 14	14.1	Consult Spark and the other telecommunication network providers throughout the plan change process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD	Support with amendments	Consultation should be carried out with all essential network utility operators to enable efficient development of the proposed precinct.	

General	Spark New Zealand Trading Limited – 14	14.2	Consult Spark and the other telecommunication network providers to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development proposed	Support with amendments	<p>Consultation should be carried out with all essential network utility operators to enable appropriate infrastructure to support expected demand.</p> <p>In addition to this, existing infrastructure should not be adversely affected by reverse sensitivity or through planting/works near existing lines.</p>
General	Spark New Zealand Trading Limited – 14	14.3	Consult Spark and the other telecommunication network providers to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development	Support with amendments	<p>Consultation should be carried out with all essential network utility operators utilising underground ducting within the proposed development area.</p>
General	Spark New Zealand Trading Limited – 14	14.4	Consult with Spark and the other telecommunication network providers to ensure funding is available through	Support with amendments	<p>Consultation should be carried out with all essential network utility operators for discussions on funding agreements.</p>

			the infrastructure funding agreements			
Road cross sections	Josephine Kleinsman - 17	17.8	Amend the road cross sections to include the proposed locations of the underground services	Support	Underground services should be shown within the proposed cross sections to ensure that adequate space is provided within the berm for all network utility providers.	
General	Lomai Properties Limited - 18	18.1	Decline PPC50, unless the matters relating to alternative staging of development, provision of all required infrastructure and traffic are adequately resolved.	Oppose	Counties Power supports the plan change in general and can supply power to the development and subdivision. CP believes that it should be approved subject to relief sought.	
General	The Ministry of Housing and Urban Development (HUD), Te Puni Kokiri and the Department of Corrections – 19	19.2	Enable further open space through zoning (primarily refers to the PC 49 area)	Neutral	The location of any increased open space zoning; and the category of open space zoning (e.g. recreation, conservation, etc) should be informed by the location of existing and proposed Counties Power assets.	

				<p>This is primarily due to the interaction planted areas may have with Counties Power assets.</p> <p>Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted.</p> <p>Consideration should also be given to the nature of the reserve land (e.g. Open Space – Recreation,</p>
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						Conservation, etc) so that adequate provision is made for accessing Counties Power assets on reserve land; or are accessed via reserve land.
General	Ngati Te Ata Waiohua – 20	20.9	Confirm park edge design adjacent to all waterways.	Support		The confirmation of park edge design adjacent to waterways would enable Counties Power to have a better understanding of potential adverse effects on any existing and proposed electrical infrastructure.
General	Ngati Te Ata Waiohua – 20	20.10	Use only native trees and plants within the precinct	Support		Counties Power supports the use of native plants. However, consultation should be carried out with Counties Power when planting in the vicinity of electrical infrastructure to ensure compliance with the Electricity (Hazards from Trees) Regulations 2003 and ensure access and minimise detrimental impact on any underground assets.

General	Auckland Council - 21	21.1	Ensure that the council's concerns about infrastructure: funding deficit, timing and location uncertainty are resolved.	Neutral	Whilst Counties Power as an infrastructure provider, can supply electricity in conjunction with the developer and does not rely on funding from the Council, Council Controlled Organisations or through ratepayer sources, we do understand the benefits of a coordinated and integrated approach to land use and infrastructure development.
IX.6.3(2)	Auckland Council - 21	21.10	<p>Replace standard IX.6.3(2) with a new standard and consequential amendments to effect that the riparian yards set for buildings in tables and H9.6.6.1 Yards read as follows:</p> <p>"Riparian - 40<u>20</u>m from the edge of all permanent streams and <u>10m from the edge</u> of all intermittent streams"</p>	Support with amendments	Counties Powers supports the increase of riparian yards, acknowledging that the purpose of riparian yard is to ensure buildings are adequately set back from streams; to maintain water quality; and to provide protection from natural hazards. However, if riparian yards are increased, this may result in increased landscaping. Attention should be given to electrical infrastructure when planning

General	Auckland Council - 21	21.33	Provide a notable tree assessment and schedule and notable trees identified in that assessment.	Support with amendments	<p>landscaping within the riparian yard. This is of particular importance where existing overhead lines are to be retained but is also relevant in terms of access to, and the safe operation of existing and new underground cables.</p> <p>Ensure that the criteria for scheduling notable trees takes into account the proximity of these trees to critical electricity infrastructure.</p> <p>This is primarily due to the interaction planted areas may have with Counties Power assets.</p> <p>Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003</p>
			Other yards in these tables are not amended.		

IX.2(2)	Auckland Transport – 22	22.4	Amend Objective IX.2(2) as follows: (5) Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network. A <u>transport network that facilitates the safe and efficient movement of people.</u>	Support	<p>offer in order to protect the lines from encroachment from vegetation/trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted.</p> <p>Requirements for pruning/removal under this Act may conflict with resource consent requirements/assessment criteria for notable trees.</p>
					<p>Counties Power is reliant on the transport network to access the electricity network to carry out maintenance and repair of electricity infrastructure in a timely manner.</p>

IX.2(3)	Auckland Transport - 22	22.5	<u>goods and services and manages effects on the safe and efficient operation of the surrounding and wider transport network.</u>	Support	<p>Counties Power supports the proposed wording change as it specifically identifies all critical infrastructure required for the proposed development.</p>
General	Auckland Transport - 27	27.40	<p>Amend Objective IX.2(3) as follows: (6) <u>Development is supported by appropriate infrastructure. Subdivision and development are supported by the timely and coordinated provision of robust and sustainable transport, stormwater, water, wastewater, energy and communications infrastructure networks.</u></p> <p>Add new policy as follows:</p> <p>(x) Restrict direct vehicle access onto Waihoehoe Road to support the safe and efficient operation of the transport network for walking, cycling and public transport.</p>	Oppose	<p>Counties Power has existing infrastructure in Waihoehoe Road and needs to maintain suitable vehicular access for servicing and operation (as would other utility providers).</p>

IX.3 (7)	Auckland Transport - 23	22.34	<p>Retain Policy IX.3 (7):</p> <p>Require streets to be attractively designed to appropriately provide for all modes of transport by:</p> <p>(a) <u>providing a high standard of amenity for pedestrians in areas where high volumes of pedestrians are expected; and</u></p> <p>(b) <u>providing for safe separated access for cyclists on arterial and collector roads that link key destinations; and</u></p> <p>(c) <u>providing a level of landscaping that is appropriate for the function of the street:</u></p> <p><u>providing for the safe and efficient movement of vehicles.</u></p>	Support with amendments	<p>Counties Power support the proposed amendments to the policy provided the following amendment to c) is made:</p> <p>c) <u>providing a level of landscaping that is appropriate for the function of the street, taking into account the presence of utilities in the road reserve and a need to access these for maintenance purposes.</u></p>
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IX.3 (1)	The New Zealand Transport Agency - 29	29.10	Retain Policy 1	Support with amendments	<p>Access to the existing Counties Power 110kV line should be guaranteed if it is to remain in-situ and appropriate building setback should be provided, in addition to appropriate planting of trees in accordance with the Electricity (Hazards from Trees) Regulations 2003.</p>
IX.3 (3)	The New Zealand Transport Agency - 29	29.12	Retain Policy 3	Support with amendments	<p>Counties Power supports the retention of the policy provided that the design of the proposed roading network would not interfere with existing or proposed Counties Power assets.</p> <p>In particular the provision of planting where underground lines are located.</p>

IX.3 (5)	The New Zealand Transport Agency - 29	29.13	Retain Policy 5	Support with amendments	Include policy as proposed for the reasons outlined in our original submission.
IX.3 (5)	The New Zealand Transport Agency - 29	29.13	Retain Policy 5	Support with amendments	<p>Include policy as proposed for the reasons outlined in our original submission:</p> <p>The timing of development should be coordinated with all infrastructure providers in order to be able to provide the Drury Centre Precinct with appropriate supporting infrastructure and avoid disruption caused by delayed installation of other (non-water) utilities.</p>

IX.3 (6)	Watercare -33	33.1	<p>Amend Policy 6 as follows:</p> <p>(6) Ensure that <u>subdivision and development in Drury East Precinct is coordinated with (and does not precede) supporting stormwater, wastewater and water supply infrastructure and manages adverse effects, including reverse sensitivity effects, which may compromise the operation or capacity of that infrastructure.</u></p>	Support with amendments	<p>Subdivision and development should not precede the installation of all supporting infrastructure, including but not limited to electricity and telecommunication to avoid inadequate servicing or supply and avoid reverse sensitivity effects of infrastructure being installed after development.</p> <p>Coordination with the developer and Counties Power is required for efficient relocation of existing infrastructure as required.</p>
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From: UnitaryPlanFurtherSubmissionForm@donotreply.aucklandcouncil.govt.nz
To: [Unitary Plan](#)
Subject: Unitary Plan further submission - Plan Change 50 - Susan Andrews
Date: Friday, 29 January 2021 4:46:20 PM
Attachments: [HNZPT Further Submission PPC50 - Waihoehoe Precinct FINAL 28 01 21.pdf](#)
[HNZPT Further Submission PPC50 - Appendix A FINAL 28 01 21.pdf](#)

The following customer has submitted a Unitary Plan online further submission.

Contact details

Full name of person making a further submission: Susan Andrews

Organisation name: Heritage New Zealand Pouhere Taonga

Full name of your agent:

Email address: sandrews@heritage.org.nz

Contact phone number: 09 307 9920

Postal address:

Submission details

This is a further submission to:

Plan change number: Plan Change 50

Plan change name: PC 50 (Private): Waihoehoe Precinct

Original submission details

Original submitters name and address:
Please see attached further submission.

Submission number: Please see attached further submission.

Do you support or oppose the original submission? I or we support the submission

Specific parts of the original submission that your submission relates to:
Point number Please see attached further submission.

The reasons for my or our support or opposition are:
Please see attached further submission.

I or we want Auckland council to make a decision to: Allow the whole original submission

Submission date: 29 January 2021

Supporting documents

HNZPT Further Submission PPC50 - Waihoehoe Precinct FINAL 28 01 21.pdf

HNZPT Further Submission PPC50 - Appendix A FINAL 28 01 21.pdf

Attend a hearing

I or we wish to be heard in support of this submission: Yes

Would you consider presenting a joint case at a hearing if others have made a similar submission?
Yes

Declaration

What is your interest in the proposal? I am a person who has an interest in the proposal that is greater than the interest that the general public has

Specify upon which grounds you come within this category:

Heritage New Zealand Pouhere Taonga (formerly New Zealand Historic Places Trust) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.

I declare that:

- I understand that I must serve a copy of my or our further submission on the original submitter within five working days after it is served on the local authority
- I accept by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public.



HERITAGE NEW ZEALAND
POUHERE TAONGA

28th January 2021

Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1143

Dear Sir or Madam

FURTHER SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA – PROPOSED PRIVATE PLAN CHANGE 50: WAIHOEHOE PRECINCT

To: Auckland Council

Name of Submitter: Heritage New Zealand Pouhere Taonga

1. This is a further submission in support of submissions on the following proposed change to the Auckland Unitary Plan (Operative in Part) (the proposal):

Proposed Private Plan Change 50: Waihoehoe Precinct
2. Heritage New Zealand is a person who has an interest in the proposal that is greater than the interest the general public has:

Heritage New Zealand Pouhere Taonga (formerly New Zealand Historic Places Trust) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.
3. Heritage New Zealand supports the submission of:
 - Refer to Appendix A for a list of those submissions which Heritage New Zealand supports.
4. The particular parts of the submission Heritage New Zealand supports are:
 - Refer to Appendix A.
5. The reasons for Heritage New Zealand's support are listed in the table attached as Appendix A.
6. Heritage New Zealand seeks that the whole/part of the submission be allowed as listed in the table in Appendix A.
7. Heritage New Zealand wishes to be heard in support of our further submission.

Yours sincerely



Sherry Reynolds
Director Northern Region

Address for Service:
Heritage New Zealand Northern Regional Office
PO Box 105 291, Auckland
Telephone: 09 307 9920
Email: PlannerMN@heritage.org.nz
sandrews@heritage.org.nz

Appendix A: Heritage New Zealand Pouhere Taonga Further Submission on Private Plan Change 50 – Waihoehoe Precinct

No.	Submitter Details	Support or Oppose	Parts Supported/Opposed	Reasons for Submission	Decision Sought
19.2	<p>The Ministry of Housing and Urban Development (HUD), Te Puni Kōkiri and the Department of Corrections Ernst.Zollner@hud.govt.nz</p>	Support	Enable further open space through zoning.	Heritage NZ supports the submission in that the provision of open space should be appropriate to the scale and nature of the proposal. The provision of sufficient open space is further supported to enable the achievement of multiple objectives within these spaces including their potential alignment with the extents of historic and cultural heritage features located within the development area allowing for their identification, retention and/or interpretation and contribution to a sense of place and local identity.	Allow Submission
20.2	<p>Ngāti Te Ata Waiohua bill.loutit@simpsongrierson.com</p>	Support	Acknowledge within the project design the history of Mana Whenua in the area.	Heritage NZ supports Mana Whenua in the exercising of kaitiakitanga and the submission which seeks amendments to PPC50 in response to matters raised in the CVA completed for the	Allow Submission

20.3	<p>Ngāti Te Ata Waiohua bill.loutit@simpsongrierson.com</p>	Support	<p>Incorporate Te Aranga Principles in design concepts.</p>	<p>Heritage NZ supports Mana Whenua in the exercising of kaitiakitanga and the submission which seeks amendments to PPC50 in response to matters raised in the CVA completed for the area, including that their cultural heritage is reflected in the future development.</p>	Allow Submission
20.6	<p>Ngāti Te Ata Waiohua bill.loutit@simpsongrierson.com</p>	Support	<p>Apply a minimum of 20 metre riparian margin for all waterways, especially those to contain walkways / cycleways.</p>	<p>Heritage NZ supports the submission for the reason that riparian margins often contain archaeological sites relating to past Maori activity. The provision of a wider minimum riparian setback particularly where walking and cycling infrastructure are planned to occur, therefore better provides for the avoidance and retention of such sites. However as per Heritage New Zealand's original submission the extent of setback (and planting) should be informed by further archaeological assessment to</p>	Allow Submission

21.10	Auckland Council Christopher.Turbott@auckland		Support	<p>Replace standard IX.6.4(2) with a new standard and consequential amendments to effect that the riparian yards set for buildings in tables H13.6.5.1 Yards and H9.6.6.1 Yards read as follows:</p> <p>"Riparian - 1020m from the edge of all permanent streams and <u>10m from the edge of all intermittent streams</u>".</p> <p>Other yards in these tables are not amended.</p>	<p>ensure sites yet to be identified are avoided.</p> <p>Heritage NZ supports the submission seeking increased riparian setbacks for the reason that riparian margins often contain archaeological sites. As per Heritage New Zealand's original submission, we consider further archaeological assessment is required to inform riparian extents (and planting) to ensure sites yet to be identified are avoided.</p>	Allow Submission
21.20	Auckland Council christopher.turbott@aucklandcouncil.govt.nz	Support	<p>Include indicative open spaces in the precinct plan as shown in Attachment 1 to the submission.</p>	<p>Heritage NZ supports the submission that this will provide for a transparent starting point for discussion, including in relation to the potential for open spaces to encompass historic heritage features located within the area enabling their retention, interpretation and contribution to a sense of place.</p>	Allow Submission	

21.29	Auckland Council christopher.turbott@aucklandcouncil.govt.nz	Support	Inclusion of provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development as per recommendations in the CVAs. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.	Heritage New Zealand supports the submission in seeking that mana whenua values and traditions should be reflected in the new development with their participation.	Allow Submission
21.31	Auckland Council christopher.turbott@aucklandcouncil.govt.nz	Support	The provision of a notable tree assessment and scheduling of any notable trees identified in the assessment.	Heritage New Zealand supports the submission in so far as any trees are identified as notable in terms of their historic heritage associations, such as in relation to areas of known historic settlement.	Allow Submission
32.4	Kāinga Ora michael@campbellbrown.co.nz	Support	Retain Objective (3) subject to clarification and amendment around the phrase '...respects <i>Mana Whenua values</i> ', and whether a Cultural Values Assessment would be required for all applications within the precinct.	Heritage New Zealand supports the submission in seeking: <ul style="list-style-type: none"> - clarification as to what '<i>respects Mana Whenua values</i>' means within the context of assessing future resource consent applications and whether this would imply a CVA 	Allow Submission

					<p>would be required so that those particular values can be understood within the context of a development or the wider precinct, and</p> <p>- that those values may be better incorporated into the precinct provisions themselves.</p>	
34.2	Ngāti Tamaoho rmaofficer@tamaoho.maori.nz	Support	Acknowledge within the project design the history of Mana Whenua in the area.	Heritage NZ supports mana whenua in the exercising of kaitiakitanga, and the submission in seeking amendment to the precinct provisions to better reflect cultural heritage values.	Allow Submission	
34.3	Ngāti Tamaoho rmaofficer@tamaoho.maori.nz	Support	Incorporate Te Aranga Principles in design concepts.	Heritage NZ supports mana whenua in the exercising of kaitiakitanga, and the submission in seeking amendment to the precinct provisions to better reflect cultural heritage values.	Allow Submission	
34.6	Ngāti Tamaoho rmaofficer@tamaoho.maori.nz	Support	Apply a minimum of 20 meter riparian margin for all waterways especially those to	Heritage NZ supports the submission for the reason that riparian margins often contain archaeological sites	Allow Submission	

			<p>contain walkways / cycleways.</p>	<p>relating to past Maori activity. The provision of a wider minimum riparian setback particularly where walking and cycling infrastructure are planned to occur, therefore better provides for the avoidance and retention of such sites. However as per Heritage New Zealand's original submission the extent of setback (and planting) should be informed by further archaeological assessment to ensure sites yet to be identified are avoided.</p>	
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**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION ON
PROPOSED PLAN CHANGE NO 51: WAIHOEHOE PRECINCT, AUCKLAND UNITARY PLAN**

UNDER CLAUSES 7 AND 8 OF SCHEDULE 1 TO THE RESOURCE
MANAGEMENT ACT 1991

To Auckland Council

Name of person making
Further submission: Mrs Josephine Kleinsman ("KLEINSMAN"),

This is a further submission in support of, and in opposition to, submissions on the following proposed plan change: Proposed Private Plan Change No 50: Waihoehoe Precinct, Auckland Unitary Plan.

The further submissions are contained on the attached sheet.

KLEINSMAN wishes to be heard in support of its further submission.

If others make a similar submission KLEINSMAN will consider presenting a joint case with them at a hearing.



Signature:

(Signature of person making further submission or person authorised to sign on behalf of person making further submission)

29 January 2021

Date:

Address for Service of Person making further submission:

Hosken & Associates Limited
99 Gloria Avenue
Te Atatu Peninsula
AUCKLAND 0610

Tele: (09) 834 2571
Mob: 0274 770 773
E-mail: nigel@hosken.co.nz
Contact Person: Nigel Hosken, Registered Architect

Note to person making further submission:

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority

Table 1: Further Submissions – Proposed Plan Change No 50: Waitohoe Precinct - KLEINSMAN				
Council Submission Number	Submitter	Submission	KLEINSMAN Submission (Support/Oppose)	Reason for Further Submission
2	D Signal	Decline Plan Change	Support	Requires road upgrade in place before zoning
3	P Dodd	Seeks Amendments	Support	Information and resolution to flooding and consideration for land use in flood prone areas
5	W Hannah	Infrastructure Provision	Support/Oppose	Oppose to the extent that this submissions is requesting additional productive land is taken unnecessarily.
7	Oyster	All	Oppose	With the plan requiring amendment by the applicant to this extent clearly does not meet the RMA S32 Test
8	D Leng	All	Support	Seeks Clarification and Management of Effects
9	K Giffney	All	Support	Seeks Clarification and Management of Effects
10	Wang & Liu	All	Support/Oppose	To the extent that developers should contain their effects within their own land
14	Spark	Infrastructure Provision All	Support/Oppose	These matters should be resolved prior to plan notification
19	MHUD	All	Oppose	These matters should be resolved prior to plan notification
20	Ngati Te Ata Waiohua	All	Support/Oppose	Support the intention of protecting and enhancing the environment. Oppose the inclusion of rules requiring Iwi involvement in all parts of project given that the majority of landowners within plan change never consulted
21	Auckland Council	All	Support/Oppose	With the plan requiring amendment by the Council to this extent clearly does not meet the RMA S32 Test. Plan Change should have been resolved to a higher level by Council on behalf of its community prior to notification and landowners not put to the cost of protecting their interests
22	Auckland Transport	All	Support/Oppose	Support AT to the extent that roading upgrades are funded and in place prior to development. Oppose to the extent this plan change should have been resolved prior to notification.
23	Counties Power	Infrastructure Provision	Oppose in Part	Counties Power has other means to ensure the particular requirements of its infrastructure. There is no reason to clutter plan changes with duplication of policies and rules
24	Ministry of Education	Infrastructure Provision	Oppose	MoE has other mechanisms to provide for schools and do not need to have additional rules inserted into planning documents
25	L McFadden	Parks	Support/Oppose	Already Required and an unnecessary level of detail in planning document
26	Heritage NZ	Heritage	Support/Oppose	Supports to the extent that heritage is protected. Indicates Plan poorly prepared. The precinct should have been assessed and sites of interest and further investigation identified on the planning documents.
27	M Kim	Infrastructure	Support	Provide for infrastructure upgrades prior to development
28	Drury South	Infrastructure	Support/Oppose	Support to extent is attempting to provide for infrastructure upgrades. Oppose as upgrades should be in place prior to development
29	NZTA	Infrastructure, All	Support/Oppose	These matters should have been resolved prior to Plan Change notification
30	Kiwitahi Holdings	Infrastructure	Support/Oppose	These matters should have been resolved prior to Plan Change notification
32	Kainga Ora	All	Support/Oppose	These matters should have been resolved prior to Plan Change notification
33	Watercare	All	Support/Oppose	Support to the extent that infrastructure provision is confirmed. Oppose the interim solutions.
34	Ngati Tamiaoho	All	Support/Oppose	Support the intention of protecting and enhancing the environment. Oppose the inclusion of rules requiring Iwi involvement in all parts of project given that the majority of landowners within plan change never consulted
35	T Macwhinney	Infrastructure	Support/Oppose	Support to the extent that significant landscape features be protected and clarity for infrastructure provision.

APPENDIX 8

TABLE OF RECOMMENDATIONS ON SUBMISSIONS

Appendix 8 Summary of recommendations on submissions

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
1.1	Danielle Haerewa		Accept in part
2.1	Douglas Signal	FS10 - Josephine Kleinsman (Support)	Reject
3.1	Peter David Dodd	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part)	Reject
4.1	Fire and Emergency New Zealand	FS08 - Counties Power Ltd (Support)	Accept in part
5.1	Wendy Hannah	FS07 - Watercare (Oppose) FS10 - Josephine Kleinsman (Oppose)	Reject
6.1	Brookfield Road Limited		Accept in part
7.1	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS03 - Auckland Council (Support in part) FS05 - Auckland Transport (Oppose)	Accept in part
7.2	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Oppose)	Accept in part
7.3	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS05 - Auckland Transport (Oppose)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
7.4	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS05 - Auckland Transport (Oppose)	Accept in part
7.5	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Oppose)	Accept
7.6	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Oppose)	Accept
7.7	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS05 - Auckland Transport (Oppose)	Accept in part
7.8	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Oppose)	Accept in part
7.9	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS05 - Auckland Transport (Oppose)	Accept in part
7.10	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS05 - Auckland Transport (Oppose)	Accept in part
7.11	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Oppose)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
7.12	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support In part) FS05 - Auckland Transport (Oppose)	Accept
7.13	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS05 - Auckland Transport (Oppose)	Accept
7.14	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS05 - Auckland Transport (Oppose)	Accept
7.15	Oyster Capital	FS10 - Josephine Kleinsman (Oppose) FS05 - Auckland Transport (Oppose)	Accept
8.1	Dong Leng	FS10 - Josephine Kleinsman (Support)	Reject
8.2	Dong Leng	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part)	Reject
8.3	Dong Leng	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part)	Reject
8.4	Dong Leng	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part)	Reject
8.5	Dong Leng	FS10 - Josephine Kleinsman (Support)	Reject
8.6	Dong Leng	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part)	Reject
8.7	Dong Leng	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part)	Reject

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
8.8	Dong Leng	FS10 - Josephine Kleinsman (Support) FS07 - Watercare (Oppose)	Reject
9.1	Kenneth Giffney	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part)	Reject
9.2	Kenneth Giffney	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part)	Reject
9.3	Kenneth Giffney	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose)	Reject
10.1	Chunfeng Wang and Xiaoling Liu	FS10 - Josephine Kleinsman (Oppose)	Reject
11.1	Tony Chien		Accept in part
12.1	Kiwi Property Holdings	FS06 - Kāinga Ora (Support in part)	Accept in part
13.1	Fulton Hogan Land Development Ltd	FS06 - Kāinga Ora (Support in part)	Accept in part
14.1	Spark New Zealand Trading Limited	FS10 - Josephine Kleinsman (Oppose) FS08 - Counties Power Ltd (Support) FS06 - Kāinga Ora (Support in part)	Accept in part
14.2	Spark New Zealand Trading Limited	FS10 - Josephine Kleinsman (Support) FS08 - Counties Power Ltd (Support) FS06 - Kāinga Ora (Support in part)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
14.3	Spark New Zealand Trading Limited	FS10 - Josephine Kleinsman (Support) FS08 - Counties Power Ltd (Support) FS06 - Kāinga Ora (Support in part)	Accept in part
14.4	Spark New Zealand Trading Limited	FS10 - Josephine Kleinsman (Support) FS08 - Counties Power Ltd (Support) FS06 - Kāinga Ora (Support in part)	Accept in part
14.5	Spark New Zealand Trading Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part)	Accept in part
15.1	Fletcher Residential Limited	FS06 - Kāinga Ora (Support in part)	Accept in part
16.1	Britmat Holdings Ltd	FS07 - Watercare (Oppose) FS06 - Kāinga Ora (Support) FS05 - Auckland Transport (Oppose) FS03 - Auckland Council (Oppose) FS02 - NZTA (Oppose)	Reject
17.1	Josephine Kleinsman	FS06 - Kāinga Ora (Oppose)	Accept in part
17.2	Josephine Kleinsman		Rejected
17.3	Josephine Kleinsman		Rejected
17.4	Josephine Kleinsman	FS05 - Auckland Transport (Support)	Accept
17.5	Josephine Kleinsman		Accept
17.6	Josephine Kleinsman		Accept
17.7	Josephine Kleinsman		Accept

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
17.8	Josephine Kleinsman	FS08 - Counties Power ltd (Support) FS06 - Kāinga Ora (Oppose)	Accept in part
17.9	Josephine Kleinsman	FS07 - Watercare (Oppose) FS06 - Kāinga Ora (Oppose in part)	Reject
17.10	Josephine Kleinsman	FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Support)	Accept in part
18.1	Lomai Properties Limited	FS08 - Counties Power ltd (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
19.1	The Ministry of Housing and Urban Development (HUD), Te Puni Kōkiri and the Department of Corrections	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Support in part)	Accept in part
19.2	The Ministry of Housing and Urban Development (HUD), Te Puni Kōkiri and the Department of Corrections	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS06 - Kāinga Ora (Support in part) FS08 - Counties Power ltd (Neutral)	Reject
20.1	Ngāti Te Ata Waiohua	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
20.2	Ngāti Te Ata Waiohua	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS06 - Kāinga Ora (Oppose in part)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
20.3	Ngāti Te Ata Waiohū	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS06 - Kāinga Ora (Oppose in part)	Accept in part
20.4	Ngāti Te Ata Waiohū	FS10 - Josephine Kleinsman (Oppose)	Accept in part
20.5	Ngāti Te Ata Waiohū	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Accept in part
20.6	Ngāti Te Ata Waiohū	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Support in part)	Accept in part
20.7	Ngāti Te Ata Waiohū	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose)	Accept in part
20.8	Ngāti Te Ata Waiohū	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose)	Accept in part
20.9	Ngāti Te Ata Waiohū	FS10 - Josephine Kleinsman (Oppose) FS08 - Counties Power Ltd (Support) FS06 - Kāinga Ora (Oppose in part)	Reject
20.10	Ngāti Te Ata Waiohū	FS10 - Josephine Kleinsman (Oppose) FS08 - Counties Power Ltd (Support) FS06 - Kāinga Ora (Support in part)	Reject

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
20.11	Ngāti Te Ata Waiohua	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Reject
20.12	Ngāti Te Ata Waiohua	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Accept in part
21.1	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS07 - Watercare (Support) FS06 - Kāinga Ora (Oppose in part) FS05 - Auckland Transport (Support) FS04 - Drury South Limited (Neutral) FS08 - Counties Power Ltd (Neutral)	Accept in part
21.2	Auckland Council	FS10 - Josephine Kleinsman (Oppose)	Accept in part
21.3	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose)	Accept in part
21.4	Auckland Council	FS10 - Josephine Kleinsman (Oppose)	Accept in part
21.5	Auckland Council	FS10 - Josephine Kleinsman (Oppose)	Accept in part
21.6	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose)	Accept in part
21.7	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
21.8	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Support)	Accept in part
21.9	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Accept in part
21.10	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS08 - Counties Power Ltd (Support) FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Support in part)	Accept in part
21.11	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS05 - Auckland Transport (Support in part)	Accept in part
21.12	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Accept in part
21.13	Auckland Council	FS10 - Josephine Kleinsman (Oppose)	Accept in part
21.14	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
21.15	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
21.16	Auckland Council	FS10 - Josephine Kleinsman (Oppose)	Accept

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
21.17	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept
21.18	Auckland Council	FS10 - Josephine Kleinsman (Oppose)	Accept in part
21.19	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Reject
21.20	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS06 - Kāinga Ora (Support in part)	Accept
21.21	Auckland Council	FS10 - Josephine Kleinsman (Oppose)	Accept
21.22	Auckland Council	FS10 - Josephine Kleinsman (Oppose)	Accept in part
21.23	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept
21.24	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept
21.25	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Support in part) FS02 – NZTA (Support)	Accept in part
21.26	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Reject

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
21.27	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Reject
21.28	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Support)	Accept in part
21.29	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS06 - Kāinga Ora (Support in part)	Accept in part
21.30	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose)	Accept in part
21.31	Auckland Council	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS08 - Counties Power Ltd (Support)	Accept in part
21.32	Auckland Council	FS10 - Josephine Kleinsman (Oppose)	Accept in part
22.1	Auckland Transport	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Accept in part
22.2	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.3	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
22.4	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS08 - Counties Power ltd (Support) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.5	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS08 - Counties Power ltd (Support) FS07 - Watercare (Support) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.6	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.7	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS02 - NZTA (Support) FS04 - Drury South Limited (Neutral)	Accept in part
22.8	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS02 - NZTA (Support) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
22.9	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept
22.10	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.11	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.12	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.13	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.14	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS02 - NZTA (Support) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
22.15	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS02 - NZTA (Support) FS04 - Drury South Limited (Neutral)	Accept in part
22.16	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.17	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.18	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.19	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept
22.20	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.21	Auckland Transport	FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
22.22	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Reject
22.23	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.24	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Reject
22.25	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Reject
22.26	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Reject
22.27	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Reject
22.28	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Reject

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
22.29	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Reject
22.30	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS04 - Drury South Limited (Neutral)	Reject
22.31	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept
22.32	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support) FS04 - Drury South Limited (Neutral)	Accept
22.33	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.34	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS08 - Counties Power Ltd (Oppose) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
22.35	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.36	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.37	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.38	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.39	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS04 - Drury South Limited (Neutral)	Reject
22.40	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS08 - Counties Power ltd (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.41	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.42	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
22.43	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.44	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.45	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Reject
22.46	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.47	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.48	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.49	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.50	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
22.51	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
22.52	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.53	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.54	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
22.55	Auckland Transport	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose) FS04 - Drury South Limited (Neutral)	Accept in part
23.1	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part)	Accept in part
23.2	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part)	Accept in part
23.3	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part) FS06 - Kāinga Ora (Oppose)	Accept in part
23.4	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part) FS06 - Kāinga Ora (Oppose)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
23.5	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part)	Accept in part
23.6	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part)	Accept in part
23.7	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part)	Accept in part
23.8	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Support in part)	Accept in part
23.9	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part) FS06 - Kāinga Ora (Support in part)	Accept in part
23.10	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part) FS06 - Kāinga Ora (Oppose)	Accept in part
23.11	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part) FS06 - Kāinga Ora (Oppose)	Accept in part
23.12	Counties Power Limited	FS10 - Josephine Kleinsman (Oppose in part) FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Oppose)	Accept in part
24.1	Ministry of Education	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
24.2	Ministry of Education	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
24.3	Ministry of Education	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
24.4	Ministry of Education	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
24.5	Ministry of Education	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
24.6	Ministry of Education	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
24.7	Ministry of Education	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept
24.8	Ministry of Education	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Reject
24.9	Ministry of Education	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
25.1	Leith McFadden	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Reject
25.2	Leith McFadden	FS06 - Kāinga Ora (Support in part)	Accept in part
26.1	Heritage New Zealand Pouhere Taonga	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part)	Reject
26.2	Heritage New Zealand Pouhere Taonga	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part)	Accept
26.3	Heritage New Zealand Pouhere Taonga	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
26.4	Heritage New Zealand Pouhere Taonga	FS10 - Josephine Kleinsman (Support)	Reject
27.1	Matthew Royston Kerr	FS10 - Josephine Kleinsman (Support)	Reject
28.1	Drury South Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part)	Accept in part
28.2	Drury South Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part)	Accept in part
28.3	Drury South Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part)	Accept in part
28.4	Drury South Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part)	Accept in part
29.1	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.2	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
29.3	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part) FS05 - Auckland Transport (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.4	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Accept
29.5	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Accept
29.6	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.7	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.8	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Accept in part
29.9	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Accept in part
29.10	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS08 - Counties Power ltd (Support) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
29.11	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Accept in part
29.12	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS08 - Counties Power Ltd (Support) FS04 - Drury South Limited (Neutral)	Accept in part
29.13	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS08 - Counties Power Ltd (Support) FS04 - Drury South Limited (Neutral)	Accept in part
29.14	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Accept in part
29.15	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Accept in part
29.16	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.17	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support in part) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept
29.18	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Reject

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
29.19	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Reject
29.20	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.21	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.22	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.23	The New Zealand Transport Agency		Accept in part
29.24	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.25	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose in part) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
29.26	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.27	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Support in part) FS04 - Drury South Limited (Neutral)	Accept in part
29.28	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Support) FS04 - Drury South Limited (Neutral)	Accept in part
29.29	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Support) FS04 - Drury South Limited (Neutral)	Accept in part
29.30	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Support) FS04 - Drury South Limited (Neutral)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
29.31	The New Zealand Transport Agency	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose) FS05 - Auckland Transport (Support) FS04 - Drury South Limited (Neutral)	Accept in part
30.1	KiwiRail Holdings Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose)	Accept in part
30.2	KiwiRail Holdings Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose)	Accept in part
30.3	KiwiRail Holdings Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose)	Accept in part
30.4	KiwiRail Holdings Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose)	Accept in part
30.5	KiwiRail Holdings Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose)	Accept in part
30.6	KiwiRail Holdings Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose)	Accept in part
30.7	KiwiRail Holdings Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose)	Accept in part
30.8	KiwiRail Holdings Limited	FS10 - Josephine Kleinsman (Support) FS06 - Kāinga Ora (Oppose)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
31.1	Karaka and Drury Limited	FS06 - Kāinga Ora (Support in part)	Accept in part
31.2	Karaka and Drury Limited	FS06 - Kāinga Ora (Support in part)	Accept in part
32.1	Kāinga Ora	FS10 - Josephine Kleinsman (Support) FS07 - Watercare (Oppose) FS05 - Auckland Transport (Oppose) FS02 - NZTA (Oppose) FS03 - Auckland Council (Oppose) FS01 - Britmat Holdings Ltd (Support)	Reject
32.2	Kāinga Ora	FS10 - Josephine Kleinsman (Support) FS07 - Watercare (Oppose) FS05 - Auckland Transport (Oppose in part) FS02 - NZTA (Support in part)	Accept in part
32.3	Kāinga Ora	FS10 - Josephine Kleinsman (Support)	Accept in part
32.4	Kāinga Ora	FS10 - Josephine Kleinsman (Support) FS09 - Heritage New Zealand (Support)	Accept in part
32.5	Kāinga Ora	FS10 - Josephine Kleinsman (Support)	Accept in part
32.6	Kāinga Ora	FS10 - Josephine Kleinsman (Support)	Accept in part
32.7	Kāinga Ora	FS10 - Josephine Kleinsman (Support)	Accept in part
32.8	Kāinga Ora	FS10 - Josephine Kleinsman (Support)	Reject
32.9	Kāinga Ora	FS10 - Josephine Kleinsman (Support)	Accept

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
32.10	Kāinga Ora	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Reject
32.11	Kāinga Ora	FS10 - Josephine Kleinsman (Support) FS04 - Drury South Limited (Neutral)	Reject
32.12	Kāinga Ora	FS10 - Josephine Kleinsman (Support)	Accept
32.13	Kāinga Ora	FS10 - Josephine Kleinsman (Support)	Accept
32.14	Kāinga Ora	FS10 - Josephine Kleinsman (Support)	Accept
33.1	Watercare	FS10 - Josephine Kleinsman (Support) FS08 - Counties Power Ltd (Support) FS06 - Kāinga Ora (Oppose)	Accept in part
34.1	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
34.2	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS10 - Josephine Kleinsman (Oppose in part)	Accept in part
34.3	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS06 - Kāinga Ora (Oppose in part)	Accept in part
34.4	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose)	Accept in part
34.5	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Accept in part

Sub. No.	Name of Submitter	Further Submissions	Planners Recommendation Accept / Reject
34.6	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS09 - Heritage New Zealand (Support) FS06 - Kāinga Ora (Oppose in part) FS05 - Auckland Transport (Support in part)	Accept in part
34.7	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Accept in part
34.8	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Accept in part
34.9	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Accept in part
34.10	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Support in part)	Accept in part
34.11	Ngāti Tamaoho	FS10 - Josephine Kleinsman (Oppose) FS06 - Kāinga Ora (Oppose in part)	Accept in part
35.1	Tim John Macwhinney	FS10 - Josephine Kleinsman (Support)	Reject
35.2	Tim John Macwhinney	FS10 - Josephine Kleinsman (Support)	Reject