

17 February 2020

Ms Rachel Morgan

Issued via email: rachelm@barker.co.nz

Dear Rachel,

RE: Clause 23 RMA Further Information – Patumahoe South Private Plan Change Request

Further to your private plan change request under Clause 21 to Schedule 1 of the Resource Management Act 1991 in relation to Drury South Industrial from Drury South Limited, Council has now completed an assessment of the information supplied.

Pursuant to Clause 23 of the Resource Management Act 1991 (please see Appendix 1), Council requires further information to continue processing the private plan change request.

The table in Appendix 2 attached to this letter sets out the nature of the further information required and reasons for its request. It also includes non-Clause 23 advisory notes as labelled.

Should you wish to discuss this matter or seek a meeting to clarify points in this letter please do not hesitate to contact me.

Kind regards,



Sanjay Bangs
Planner
Plans & Places Department
021 619 327

Appendix 1

Basis for the Information Sought

First Schedule to the Resource Management Act 1991

Clause 23 Further information may be required

(1) Where a local authority receives a request from any person under [clause 21](#), it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand—

- (a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of [Schedule 4](#); or
- (b) the ways in which any adverse effects may be mitigated; or
- (c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or
- (d) the nature of any consultation undertaken or required to be undertaken—

if such information is appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.

(2) A local authority, within 15 working days of receiving any information under this clause, may require additional information relating to the request.

(3) A local authority may, within 20 working days of receiving a request under [clause 21](#), or, if further or additional information is sought under subclause (1) or subclause (2), within 15 working days of receiving that information, commission a report in relation to the request and shall notify the person who made the request that such a report has been commissioned.

(4) A local authority must specify in writing its reasons for requiring further or additional information or for commissioning a report under this clause.

(5) The person who made the request—

- (a) may decline, in writing, to provide the further or additional information or to agree to the commissioning of a report; and
- (b) may require the local authority to proceed with considering the request.

(6) To avoid doubt, if the person who made the request declines under subclause (5) to provide the further or additional information, the local authority may at any time reject the request or decide not to approve the plan change requested, if it considers that it has insufficient information to enable it to consider or approve the request.

Appendix 2:

Further information requested under Clause 23 First Schedule of the Resource Management Act 1991

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Note: No further information has been requested by:

- Rob Pryor, LA4 Landscape Architects – Landscape and visual effects

#	Category of information	Specific Request	Reasons for request
Planning, statutory and general matters – Sanjay Bangs, Plans & Places			
P1	Shape files	Please provide shape files showing the proposed spatial amendments to the zoning and Drury South Industrial Precinct.	Shape files are required to show the extent of the Private Plan Change (PPC) request on the AUP(OP) GIS Viewer upon notification.

#	Category of information	Specific Request	Reasons for request
P2	Consultation	<p>Please explain why consultation with iwi groups has been limited to Ngāti Tamaoho and Ngāti Te Ata (Section 7.2.4 of Section 32 Assessment report), and revise the extent of consultation to include all relevant iwi groups.</p> <p>Please also explain the nature of consultation, including the key timeframes, scope of engagement, and documents provided to iwi groups.</p>	<p>Auckland Council's mana whenua contacts facilities identifies eight iwi groups with an interest in the PPC land (Ngāti Whanaunga, Te Ākitai Waiohū, Ngāti Tamaoho, Ngāi Tai ki Tāmaki, Te Ahiwaru - Waiohū, Ngāti Te Ata, Ngāti Maru, Waikato – Tainu). It is unclear why consultation has been confined to just two of the eight iwi groups.</p> <p>In addition, the nature of the consultation, in terms of timeframes, scope and documents supplied to mana whenua is not substantiated in the Section 32 Assessment report.</p>
P3	Consultation	Please comment on the extent and nature of consultation undertaken with the parties outlined in Section 7.2.4 of the Section 32 Assessment.	While the information provided on consultation is appreciated, it is unclear what the extent and nature of the consultation undertaken to date has been. Further information is required to understand this.
P4	Consultation	Please clarify whether Auckland Transport, the New Zealand Transport Agency and/or Supporting Growth have been consulted with in the preparation of the PPC.	Given the PPC has consequences for trips generated on the current and future local and strategic network, it would be helpful to understand the extent of consultation undertaken with these agencies.
P5	Section 32 (See also Item UD9)	Please explain whether a Business – Local Centre Zone, or other commercial zones has been considered as a reasonable alternative to the Business – Mixed Use	It is unclear what the basis is for preferring the Business – Mixed Use Zone over other commercial zones that could be applied to the land. The Business – Mixed Use Zone is typically applied to areas adjacent to centres, although there are some exceptions. It appears that the Business – Local Centre Zone might be more appropriate, given that a

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		Zone, and update the Section 32 assessment to assess this option.	commercial zoning in this location would act as a convenience centre for the future residential catchment.
P6	Precinct provisions	<p>For activities proposed to be amended by the PPC, please provide a comparison between the operative provisions within Sub-precinct C (including both the Light Industry Zone and precinct provisions) and the proposed provisions (including both the Mixed Use Zone and amended precinct provisions).</p> <p>This would ideally be provided by expanding the table on pages 9-10 of the Section 32 Assessment.</p>	The PPC proposes various amendments to the status of activities within Sub-precinct C, in addition to the rezoning of land from Light Industry to Mixed Use. The Section 32 Assessment provides a comparison between the proposed underlying Mixed Use Zone provisions and the additional precinct (Sub-precinct C) controls proposed. However, it is difficult to understand how the operative activity statuses would be amended by the PPC. Further information is required to clarify the effects of the PPC.
P7	Trade suppliers	Please provide reasoning to justify the proposed permitted activity status for trade suppliers within Sub-precinct A.	<p>The operative Drury South Industrial Precinct applies a Prohibited activity status to retail of a gross floor area (GFA) greater than 450m². As expressed in the initial private plan change request to the legacy plans (PC12 to the Papakura District Plan etc.), this rule seeks to emphasise that the majority of the precinct is for industry and not retailing.</p> <p>In providing an exception to the GFA threshold for trade suppliers, the PPC request would enable a proliferation of trade suppliers to establish within Sub-precinct A at the expense of light industrial activities. This does not appear to be addressed by the Section 32 Assessment or the Economic Assessment. Further information is required to understand why a more enabling approach to trade suppliers is appropriate.</p>

#	Category of information	Specific Request	Reasons for request
P8	Activities in Sub-precinct A	Please clarify the removal of “activities that do not comply with the standards in I410.6.2” from Activity Tables I410.4.2 and I410.4.3.	The proposed removal of these rules from the activity tables means that activities infringing a standard listed in I410.6.2 would be considered as a restricted discretionary activity by way of Standard C1.9(2), rather than a discretionary activity. However, there are no assessment provisions within the precinct directly related to the matters addressed by these standards. Further explanation is required to understand the reasons for these amendments.
P9	Reverse sensitivity	Please explain the amendments to Objectives I410.2(8) and (9), and whether alternative language has been considered.	<p>These objectives relate to managing reverse sensitivity effects of development on the quarry and key infrastructure networks respectively. The operative wording seeks to avoid reverse sensitivity effects, whereas the PPC seeks to amend this to allow for mitigation of such adverse effects on the quarry (I410.2(8)), and minimising adverse effects on infrastructure networks (I410.2(9)).</p> <p>While it is understood that reverse sensitivity effects associated with sensitive residential activities cannot necessarily be avoided, there is no justification in the application for the wording chosen.</p>
P10	Employment generating activities	Please justify the proposed deletion of Policy I410.3(10) which seeks to locate higher employment generating activities in Sub-precinct C close to potential public transport route.	It is understood that the PPC would enable a broader range of activities in Sub-precinct C, rather than being confined to offices and convenience retail. However, it is unclear why this policy is proposed to be deleted, rather than broadened to include the additional retail and residential activities enabled in Sub-precinct C by this PPC.
P11	Retail and office activity	Please comment on why a restricted discretionary activity status has been proposed for office and retail activity in	It appears that a RDA status has been preferred as the effects of larger scale office and retail can be identified. However, comment is required to confirm this and provide further reasoning.

#	Category of information	Specific Request	Reasons for request
		Sub-precinct C compared to discretionary in the underlying Mixed Use Zone	
P12	Notification	Please justify the proposed amendments to Standard I410.5(1) precluding restricted discretionary activities from limited or public notification.	It is unclear from the Section 32 Assessment why the standard notification tests should not apply within this precinct. This is particularly relevant given the scale of supermarket, retail and office activity that could be sought as a restricted discretionary activity within the precinct.
P13	Internal roading network	Please expand on the reasons provided in Section 5.2.2 of the Transport Assessment Report (TAR) for amending standard I410.6.3, particularly in relation to where/on whom costs would fall.	It is understood from Section 5.2.2 of the TAR that greater flexibility is sought in terms of the alignment of roads internal to the PPC area. However, the application material does not explain the reasoning behind deleting the requirement to construct and vest proposed roads with Council, at no cost to the Council.
P14	Vesting of land in Sub-precinct D	Please explain the reasoning behind the proposed amendments to Standard I410.6.3(2) related to the vesting of land within Sub-precinct D.	Similarly, amendments are proposed to Standard I410.6.3(2) to remove the requirement to develop and vest reserves and stormwater management areas with at no cost to the council. Clarification is sought as to the reasoning/background behind these proposed amendments, and whether this has been discussed with Council's Parks Policy team.
P15	Mitigation of traffic noise	Please clarify whether Standard I430.6.4 (noise and ventilation) should be supported by provisions to assess infringements to these standards, such as those contained in Section E25.8 of the Auckland-wide noise and vibration provisions.	The PPC proposes standards that manage noise and ventilation (Standard I430.6.4). By way of Clause C1.9(2), any infringement to these standards would be assessed as a restricted discretionary activity. However, there are no supporting matters of discretion or assessment criteria to guide such an assessment. Comment is sought as to matters akin to those contained in Section E25.8 of the Auckland-wide noise and vibration provisions should be introduced (or cross-referenced) within the precinct.

#	Category of information	Specific Request	Reasons for request
P16	Precinct Plan	Please provide road names on proposed Precinct Plan 1, particularly Maketu Road.	The proposed amendments to the Drury South Industrial Precinct contain various references to Maketu Road (in place of the Spine Road as per the operative provisions). However, Maketu Road is not identified on the proposed Precinct Plan 1. Identifying this road on the precinct plan would be to make the application of precinct provisions clearer.
P17	Precinct Plan	Please explain the reduction of Sub-precinct D Open Space / Stormwater Management within proposed Precinct Plan 1. If it has resulted from the vesting of land with Auckland Council, please explain whether rezoning to an Open Space zone has been considered and discussed with Auckland Council's Parks and Recreation team.	The land identified as Sub-precinct D: Public Open Space/Stormwater Management within the operative Precinct Plan 1 appears to be have been reduced in the proposed Precinct Plan 1. Confirmation is sought as to whether this is because of inaccuracies in the operative precinct plan, vesting of land with Council as recreation/reserve or if there are other reasons.
P18	Open Space Connections	Please explain whether the urban design elements shown in p.20 of the Urban Design Report (Appendix 6b) have been considered as precinct provisions.	Page 20 of the Urban Design Report (Appendix 6b) identified opportunities for pedestrian and cycling circulation, recreational circulation, potential connections between Sub-precinct C and the recreation reserve and a potential neighbourhood centre. Precinct Plans are referenced as a mechanism to implement these elements, but they are not reflected in the proposed precinct plans, not discussed in the Section 32 Assessment. Comment is sought as to how these elements will be delivered, and whether additional precinct provisions (within the Precinct Plans or the assessment provisions) are appropriate to provide a greater certainty of outcome.

Traffic matters – Terry Church and Mat Collins, Flow Transport Specialists Ltd

T1	Assessment of transport effects in sub-precinct C	Please explain whether a restricted discretionary activity status triggered when trade retail exceeds 5,500m ² GFA across sub-precincts C and A has been considered to enable an assessment of effects on the safe and efficient operation of the transport network.	<p>Section 8.3.2: Traffic Effects of the Section 32 Assessment Report states that</p> <p><i>“The form and design of [transport] upgrades will be considered as part of future subdivision consents, as development is progressed in the precinct as required by rule I410.4.1(A1). This will appropriately address any change in the balance of inbound and outbound traffic flows”</i></p> <p>Rule I410.4.1(A1) is reproduced below</p> <p><i>(A1) Subdivision or any development of land which precedes a subdivision being undertaken which complies with Standard I410.6.3 below. Restricted Discretionary.</i></p> <p>Standard I410.6.3(1) states that all roads identified on Precinct Plan 1 and Precinct Plan 2 must be constructed and vested to Council upon subdivision and development of the relevant area. Matters of discretion I410.8.1(1)(f) and Assessment criteria I410.8.2(1)(f) identify the transport network requirements (TNDR) that are required to support subdivision and development.</p> <p>However, should subdivision consent be sought for land within sub-precinct C without an accompanying land-use consent, there would be a risk to Council that the potential future transport effects would not be mitigated unless a “worst case” scenario in terms of vehicle trip generation was assessed. The key issue is that the underlying Business - Mixed Use Zone (MUZ) enables a wide variety of potential land-uses, some of which are Permitted activities in both the MUZ and the proposed Precinct Plan. Further, the PPC proposes that Trade Retail is a permitted activity within sub-precinct A, whereas currently any retail over 450 m² is prohibited.</p> <p>We have reviewed the activities that are Permitted within sub-precinct C and consider that Trade Retail should be capped in the same way that the proposed Precinct caps Retail and Office Gross Floor Area (GFA) for the sub-precinct. The Traffic Assessment Report (TAR) has assessed a total of 5,500 m² GFA of Trade Retail and as a result, the</p>
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			<p>traffic effects of trade retail exceeding 5,500m² GFA are not understood. Therefore, it appears to be more appropriate to have provision(s) within the precinct enabling AC to assess traffic effects associated with trade retail exceeding 5,500m² total across sub-precincts A and C through a resource consent process. .</p> <p>Advisory Note (Non-Clause 23): <i>We recommend that Trade Retail exceeding 5,500m² GFA in total across sub-precinct A and C is considered as a restricted discretionary activity, with assessment criteria related to effects on the transport network.</i></p>
T2	Assessment of transport effects in sub-precinct C	Please explain and justify the proposed exemption from Standard E27.6.1 Trip Generation from I410.6 Standards. Please confirm how potential transport effects from land-use activities in sub-precinct C would be mitigated in the instance that subdivision consent applications are not accompanied with a land-use consent, or where the transport effects fall outside of the scope of I410.8.2(1)(f).	<p>We are concerned that the proposed Precinct Plan includes an exemption from Standard E27.6.1 Trip Generation. As discussed above in relation to Item T1, future transport effects may not be adequately mitigated through subdivision consent assessments. Further, we consider that the TNR (contained in I410.8.2(1)(f)) may not provide sufficient scope to address potential transport effects as the anticipated land-uses surrounding the Precinct have evolved. At the time of the original Plan Change, the future land-uses and transport infrastructure were likely quite different from those now proposed in Council's Structure Plan for Drury and being considered by the Supporting Growth Alliance.</p> <p>Without Standard E27.6.1 there would be no ability for Council to require the mitigation of transport effects if future land-use consents resulted in greater impacts than was anticipated as part of the subdivision consent, or effects on parts of the transport network that are not included in I410.8.2(1)(f).</p> <p>Advisory Note (Non-Clause 23): <i>We recommend that the proposed exemption from Standard E27.6.1 Trip Generation is deleted from the PPC.</i></p>
T3	Sub-precinct C	Please consider whether the Retail and Office GFA caps for sub-precinct C would be more clearly identified if located in	<p>We consider that the Retail and Office GFA caps for sub-precinct C would be more clearly identified if located in Table I410.4.4 rather than in Standard I410.6.1 as currently proposed. This would provide greater clarity and ease of use for those reading and interpreting the precinct in the future.</p>

		Table I410.4.4 rather than in Standard I410.6.1.	
T4	Walking and cycling connections	Please explain whether a walking and cycling link between sub-precinct C and the Drury South Residential Precinct on I140.10.2 Drury South Industrial and Mixed Use: Precinct Plan 1 and Precinct Plan 2 has been considered.	<p>Proposed Policies I410.3.(25) and (27) encourage the integration of land-use activities within sub-precinct C with the Drury South Residential precinct, including focussing convenience activities in the southern part of the sub-precinct.</p> <p>I451.9.2 Drury South Residential – Precinct Plan 2 includes a “Potential Connection” between the Drury South Residential and the Drury South Industrial precincts, as shown in Figure 3. This connection connects to the southern portion of sub-precinct C. However, this connection is not included in the proposed I410.10.2 Drury Southern Industrial and Mixed Use: Precinct Plan 1. Without this connection, the southern part of sub-precinct C is approximately 1.4 km from the highest residential density of Drury South Residential, as shown in Figure 4.</p> <p>Although the TAR does not comment on the expected walking and cycling mode share for activities in sub-precinct C, the vehicle trip generation rates used by Beca inherently assume a portion of trips will be undertaken by non-car based modes.</p> <p>Advisory Note (Non-Clause 23): To support Policies I410.3.(25) and (27) and to manage potential effects on the road network, we recommend that a walking and cycling link is shown on I140.10.2 Drury South Industrial an Mixed Use: Precinct Plan 1 and Precinct Plan 2, in the location shown in Figure 3.</p>
T5	Traffic distribution	Please confirm the expected change in estimated number of jobs that will result within Drury South from the PPC.	<p>Section 3.2 and 4.2 of the TAR note that there may be some change in traffic distribution as a result of the PPC, however, Beca consider that this will likely be balanced by a greater range and number of employment options will be in the Drury East area, as proposed in Council’s Structure Plan. We agree with Beca’s conclusion, and for comparison have included the expected employment numbers for Drury South and Drury East for the Scenario I11.4 land use (used for recent traffic modelling for Drury South) and the current Scenario I11.5 land use scenario, as shown in Table 2. This shows approximately 1,800 additional jobs as a result of Council’s Structure Plan.</p>

			<p>Table 2: Employment assumptions for Drury South and Drury East</p> <table><tr><th rowspan="2">Zone</th><th colspan="2">Assumed employment numbers</th></tr><tr><th>I11.4</th><th>I11.5</th></tr><tr><td>Drury East</td><td>362 (Zone 522)</td><td>1585 (Zone 554) 545 (Zone 555)</td></tr><tr><td>Drury South</td><td>5,553 (Zone 523)</td><td>5,580 (Zone 555)</td></tr><tr><td>Total employment</td><td>5,915</td><td>7,710</td></tr></table> <p>Provided our request that the proposed exemption from Standard E27.6.1 is removed and a cap is placed on Trade Retail, as discussed in Section 4.1 of this report, we are comfortable that no further assessment of vehicle trip distribution is needed at this stage. However for completeness, and to respond to NZTA concerns, please confirm the change in the estimated number of jobs within Drury South that will result from the PPC.</p>	Zone	Assumed employment numbers		I11.4	I11.5	Drury East	362 (Zone 522)	1585 (Zone 554) 545 (Zone 555)	Drury South	5,553 (Zone 523)	5,580 (Zone 555)	Total employment	5,915	7,710
Zone	Assumed employment numbers																
	I11.4	I11.5															
Drury East	362 (Zone 522)	1585 (Zone 554) 545 (Zone 555)															
Drury South	5,553 (Zone 523)	5,580 (Zone 555)															
Total employment	5,915	7,710															
T6	Road 3 design and Plan Change Design Guidelines	Please provide assessment of the benefits and disbenefits of the proposed intersection between Link Road, Spine Road, and Avenue Road. This should include a discussion about safety and efficiency of operation.	<p>Section 2.1 of the TAR discusses how the intersection of Avenue Road (Road 3) with Link Road may be affected by the Mill Road corridor, which is currently under investigation by the Supporting Growth Alliance. Beca suggests that the northern intersection of Avenue Road may need to be moved south to connect with the east-west road (Road 5). We support this conclusion and associated changes to Standard I410.6.3.(1).</p> <p>Section 3.3 of the TAR discusses how the alignment of the northern Avenue Road has been amended to align with the developable area. We note that this has resulted in a less than desirable intersection arrangement between Spine Road, Link Road, and Avenue Road, as shown in Figure 5. We consider that the alignment shown in Precinct Plan 1 and Precinct Plan 2 may create safety and operational issues for this intersection.</p>														

T7	Road 3 design and Plan Change Design Guidelines	Please explain why the road element dimensions included in Plan Change Design Guidelines: Design Element 3 – Roads and accessways are not consistent with Auckland Transport design standards, and comment on whether this may be problematic for consenting.	Plan Change Design Guidelines: Design Element 3 – Roads and Accessways provides minimum dimensions for common elements of road cross sections. We recommend that these dimensions are removed as some no longer meet minimum the specifications contained in Auckland Transport standards and guidance documents. Instead, we recommend that the directs the reader to Auckland Transport's Roads and Streets Framework, Code of Practice, and other relevant design guidance.
T8	Road 3 design and Plan Change Design Guidelines	Please explain why the Typical Road Cross Sections included in Plan Change Design Guidelines: Attachment 1 are not consistent with Auckland Transport design standards and do not reflect the proposed land use zoning for sub-precinct C. Please comment on whether this may be problematic for future consenting.	<p>The typical cross sections included in Plan Change Design Guidelines: Attachment 1 – Typical Road Cross Sections should be updated so they are consistent with Auckland Transport minimum design specifications, or otherwise be removed from the document.</p> <p>Further to the above, the "Indicative Road Cross Section", which would apply to Avenue Road, is not suitable for Mixed Use Zone land-use activities. For example, wider footpaths are required, space for loading zones and a greater amount of on-street parking may be desirable, etc.</p> <p>We recommend that minimum corridor widths are specified, and street elements are listed (for example two lane carriageway, on-street parking, cycleway, etc), but that the detailed arrangement is confirmed as part of future resource consents and engineering plan approvals.</p>
T9	Minor edits and additions	Please add a "Base case" column to Table 4-1 and 4-2 of the TAR so PPC volumes can be compared with potential volumes from the existing precinct, as assessed in the Housing Infrastructure business case assessment.	We request that a "Base case" column is added to Table 4-1 and 4-2 of the TAR so PPC volumes can be compared with potential volumes from the existing precinct, as assessed in the Housing Infrastructure business case assessment.

T10	Minor edits and additions	TAR Table 4-5 does not show any difference in performance between the PM peak scenarios. Please check whether the “with” and “without” pedestrian phase scenario results are correct.	TAR Table 4-5 does not show any difference in performance between the PM peak scenarios. Please check whether the “with” and “without” pedestrian phase scenario results are correct.
Economic matters – Tim Heath, Property Economics			
E1	Timing / development of catchment	Please clarify whether the Drury South Residential Precinct south of sub-precinct C (including the SHA) provide for any retail or commercial activity? If so, please assess the effects this would have on the conclusions of the Economic Assessment.	Any retail provision enabled within sub-precinct C would form part of the existing environment and lower the retail demand identified for the subject site.
E2	Timing / development of catchment	Please explain the anticipated timings around the development of land within the Drury South Residential Precinct and the Drury South Industrial Precinct.	The assumptions around the timing and rate of growth in the zoned provisions within the identified precincts will affect the level of retail demand generated at the more localised context.
E3	Retail demand	Please explain what the retail / supermarket demand generated from a more localised Drury South catchment (residential and employment areas), and how this would change the timing of sustainable demand.	The catchment is very extensive for a convenience centre with convenience retail and commercial services proposed, and includes areas that also have convenience centres planned. This is important to better understand the sustainable demand / supply dynamics at a more localised level.
E4	Infra timing	Please explain the timing of Mill Road being developed, and whether this	The timing of the Mill Road expansion is important to the timing, rate and scale of retail and commercial office demand generated from residential, commercial, industrial and retail development in Drury South. Better understanding the timing of this road’s

		changes the timings of demand for retail or office activities	development in the modelling will assist in better understanding the link between Mill Road and retail and office demand.
E5	Infra timing	Please clarify the timings for the expressway on the west of SH1 between SH1 and Pukekohe (the extension of the Mill Road link on the eastern side of SH1). I thought they were mutually exclusive projects with quite different timeframes.	Once again, the timing of the SH1 – Pukekohe expressway link west of SH1 in the model would appear an important component of retail and commercial office demand in Drury South. Clarity around the timing of the road and growth in the model for this area would be beneficial.
E6	Retail spend	Please clarify the basis for the Drury South Industrial Precinct retail assumptions in relation to spend captured locally.	The percentage assumptions for the amount of retail spend captured locally within the precinct appear to be high. It would be helpful to have a greater understanding of the basis for those assumptions.
E7	Large format retail	Please outline the economic basis for enabling large format retail within the Business – Mixed Use Zone within Sub-precinct C in this location.	This is in context to the same retail format being proposed within the Drury Town Centre just north of Drury South and is relying on the same market demand. Are there different brands / store types anticipated in Drury TC relative to Drury South, and more information around the likely timing of LFR demand in Drury South from a more localised catchment perspective.
E8	Offices	Please assess the economic impacts of enabling 15,000m ² of office space within Sub-precinct C, particularly the effects on areas where offices are enabled or encouraged in Council's Drury-Opaheke Structure Plan.	There seems a focus on potential effects of office on the Drury Town Centre, however the Drury Structure Plan anticipates office development in a range of areas, so consideration of the effects on other business areas would be helpful as well.

Urban design effects – Tracy Ogden-Cork, Motu Design Ltd			
UD1	Maketu Road slip lane	Please provide urban design comment on the potential slip lane running alongside Maketu Road as illustrated in the Design Strategy	This is to help better understand the likely development scenarios under the mixed use zone, and the site related constraints and opportunities, including how active frontages, servicing and pedestrian amenity can managed, and the pros/cons of slip lane.
UD2	Scale drawing	Please provide a scale drawing of the precinct and the indicative layout illustrated in the Design Strategy, and/or alternative development scenarios.	This is to help better understand the likely development scenarios under the mixed use zone, and the site related constraints and opportunities.
UD3	Car parking	Please explain how car parking is anticipated to be managed within the precinct – as illustrated in Page 21 of the Design Strategy	This is to help better understand the likely development scenarios under the mixed use zone, and the site related constraints and opportunities.
UD4	Reserve	Please provide cross sections through the precinct from the reserve to Maketu Road to illustrate any changes in levels and the likely relationship between the park and future streets and built elements.	This is to help better understand the likely development scenarios under the mixed use zone, and the site related constraints and opportunities, as well as the scale/height of development relative to adjoining streets and the reserve areas.
UD5	Pedestrian and cycle network	Please provide more information on the location and quality of the pedestrian/cycle connections to the residential precinct across the reserve	This is to better understand the planned connectivity between precincts and the options for walking and cycling, including likely amenity and ease of access between key destinations and routes.

UD6	Spine Road	Please provide an explanation on the planned location of the 'Spine Road' shown in I410.10.2 and how this relates to Spine Road as shown in I451.9.2 Drury South Residential – Precinct Plan 2 . This shows a different alignment.	This is to better understand the planned connectivity between precincts and the route residents are likely to take to access the services in the mixed use zone.
UD7	Maketu Road	Please provide information on intended design of Maketu Road. (as consented or planned) to better understand the likely pedestrian environment along the frontage	It is noted that road cross-sections are included in detailed appendices to the Drury South Industrial precinct, but if road design has been consented it would be helpful to know the design to better understand the likely pedestrian environment along the frontage; and to assist with understanding the commercial activities that may locate along it.
UD8	1.410.11 Appendices	Please highlight any proposed conflicts between the proposed new provisions and the design guidance provided in the Appendices to the precinct, and explain the statutory weighting given to them.	I understand that the detailed appendices to the Drury South Industrial precinct are not affected by the plan change. However, it is important to clearly understand their suitability for application to a mixed use zone.
UD9	Local Centre vs Mixed Use Zoning	Comment on whether or not a local centre zone was considered for part or all Sub-Precinct C and what the costs and benefits would be.	The mixed-use zone has the potential to function as a local centre by default due to the mix of activities, its location separate from (not adjoining) an existing centre, and the need to provide a focal point for residents and workers needs similar to what a local centre would typically do.

UD10	Access to schools	Please provide comment on the location of nearest schools (existing or planned) and the expected travel routes.	The introduction of mixed use provides the potential for an increase in residential population in addition to the Drury South Residential Precinct, and to service their needs may require additional social infrastructure such as schools.
Acoustic effects – Jon Styles, Styles Group Ltd			
A1	Activities sensitive to noise in Sub-precinct C.	Please explain whether provisions to make plan users aware of the requirement to apply E25.6.10 in addition to proposed Standard I410.6.4 have been considered, to ensure an adequate level of acoustic insulation/ mechanical ventilation is provided across Sub-Precinct C.	<p>Chapter E25 of the AUP provides a comprehensive noise management framework to manage effects within and between sites in mixed use environments, including the BMUZ. Through the underlying BMUZ zoning, the following Chapter E25 controls would apply to noise sensitive activities within Sub-Precinct C:</p> <ul style="list-style-type: none"> • E25.6.9 Noise levels between units. This rule prescribes internal-tenancy noise levels between units¹ in the BMUZ, including noise levels for bedrooms and sleeping areas within units containing activities sensitive to noise. The noise levels ensure a sufficient level of amenity is provided and sleep disturbance effects are avoided where noise sensitive activities establish within the same buildings as other noise generating activities, (such as where commercial activities are located on the ground floor with apartments above); • E25.6.10 Noise levels for noise sensitive spaces. This rule requires any noise sensitive activities within the BMUZ to be designed and insulated to achieve the internal noise levels specified in Table E25.6.10.1. Achieving the internal noise levels will ensure that bedrooms, sleeping areas and other noise sensitive spaces are adequately protected from the maximum level of noise exposure permitted to be generated by activities on other sites in the zone or precinct (or the adjacent zone or precinct) ². This ensures that an appropriate level of amenity/ internal noise level is achieved, and sleep disturbance is avoided. • E25.6.10(3) requires that mechanical ventilation/ cooling is provided to any noise sensitive space within the BMUZ. This means that windows and doors

			<p>can be kept closed to enable compliance with the internal noise levels, whilst a reasonable internal temperature and fresh air supply is maintained.</p> <p>I have reviewed the PPC to confirm whether the above E25 standards will apply to noise sensitive activities within Sub-Precinct C. Achieving compliance with these standards will be important to avoid potential incompatibility between land use activities (within the BMUZ and from the adjacent Industrial Zones) and to ensure the noise sensitive activities are not exposed to unreasonable noise levels that could give rise to potential health and amenity effects on the future occupants.</p> <p>The wording below Standard I410.4 <i>Activity Table</i> confirms that “<i>the provisions in any relevant overlays, zone and the Auckland-wide³ (sic) apply in this precinct unless otherwise specified below</i>” which suggests that the Chapter E25 standards will apply to the precinct. However, the note also confirms “<i>in the event of a conflict between the zone or Auckland- wide rules and the precinct rules, the precinct rules prevail</i>”. As the PPC includes Standard I410.6.4 <i>Sub-Precinct C (Noise and Ventilation)</i> which applies insulation and ventilation controls, I consider it entirely possible that plan users may interpret compliance with Standard I410.6.as being required in lieu of, rather than in addition to, the E25 standards listed above.</p>
A2	Traffic noise exposure	<p>Please confirm whether or not an acoustic buffer zone is intended or required over Sub-Precinct C.</p> <ul style="list-style-type: none"> • If a buffer is proposed or required, please provide the location and dimensions of the buffer; or • If a buffer is not proposed or required, can MDA provide a revised indication of facade constructions (similar to that provided on page 3 of the MDA 	<p>The PPC contains objectives, policies and a rule to protect activities sensitive to noise in Sub- Precinct C from “unreasonable levels of land transport noise” from the strategic freight network serving the Drury Quarry- Maketu Road and New Quarry Access Road. Sub-Precinct C abuts Maketu Road only.</p> <p>The MDA Memo refers to the PPC’s “noise condition” (which I understand to be Standard I410.6.4 Sub-Precinct C (Noise and Ventilation)) and the AUP’s noise performance standards for habitable rooms (which I assume refers to E25.6.10). The MDA assessment concludes “the two rules would provide an equivalent result at approximately 50m from the curb of the Spine Road”.</p> <p>The MDA Assessment (and figure shown above) refers to an “indicative buffer zone” and “additional acoustic buffer zone” that would appear to require noise sensitive</p>

		<p>memo) that specifies suitable constructions that will achieve the internal noise level of 40dB LAeq(24hr) based on the smallest separation distance between the road and building that the proposed precinct provisions will permit.</p>	<p>activities to be set back a minimum of 17m and 34-50m from the road corridor respectively.</p> <p>I have reviewed the PPC documentation to find reference to a “buffer zone”, but I cannot locate a plan which identifies any acoustic buffer zone over Sub-Precinct C. The only reference to a setback in the PPC Chapter is contained in I410.8.2(3)(a)(iii) Assessment Criteria:</p> <p><i>“Where buildings are required to be setback from Maketu Road for acoustic amenity reasons, a safe and attractive edge to Maketu Road should be provided. Methods to achieve this include providing landscaping at the street edge and providing a good degree of glazing on the building facade overlooking Maketu Road”.</i></p> <p>From my review of the PPC documentation, I have not identified a formal requirement for an acoustic setback under the PPC, and an acoustic buffer zone does not appear formally on a Precinct Plan. Given Sub-Precinct C occupies a relatively narrow wedge of land, a buffer zone may not be practicable in any event. As such, I understand the acoustic insulation controls of Standard I410.6.4 Sub-Precinct C (Noise and Ventilation) are the primary method of mitigating traffic noise exposure to noise sensitive activities, and setbacks are voluntary.</p> <p>If there is no requirement for an acoustic buffer zone to setback noise sensitive activities from Maketu Road, the level of acoustic insulation required to insulate activities directly adjacent to the road corridor could be considerably greater (and potentially impracticable).</p> <p>For example, the proposed controls require the design of the building envelopes to be based on a traffic noise level of 75dB LAeq(24hr) at 10 from the nearest traffic lane. If there is no buffer zone, it might be possible to locate the facade of a residential unit perhaps only 5m from the edge of the nearest traffic lane. This would result in an external noise level of 78dB LAeq(24hr). In order to achieve the internal design criteria of 40dB LAeq(24hr), a noise level reduction (from outside to inside) of 38dB is required. When heavy traffic is the source of noise (with a high level of low frequency content) this</p>
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			level of attenuation will likely become impracticable to achieve, especially if operable windows or doors (onto balconies or juliet balconies) are desired. Achieving this level of noise reduction will require considerable effort and expense, with high quality windows and frames, heavy (masonry) facades and a high degree of care during the design and construction phases.
A3	Traffic noise exposure	<p>Please identify whether Proposed Standard I410.6.4 should be amended to control traffic noise from the future Mill Road network, and if not, the reasons why;</p> <p><u>Advice note:</u> If additional controls are necessary, Proposed Standard I410.6.4 should be amended to include traffic noise levels from the Mill Road alignment.</p>	<p>The Transport Assessment Report discusses the future delivery of the Mill Road corridor. The indicative Spine Road/ Mill Road corridor configuration is shown on page 5 of the Assessment, and shows the south-south-west alignment traversing the northern tip of Sub-Precinct C.</p> <p>While Proposed Standard I410.6.4 will insulate noise sensitive activities from traffic noise on Maketu Road to the east, it will not mitigate the potentially high traffic noise levels from the Mill Road corridor to the west of Sub-Precinct C. Given the high future traffic volumes on this alignment, it is likely that noise sensitive activities on Sub-Precinct C may be affected by traffic noise from the future Mill Road corridor, in addition to traffic noise from Maketu Road.</p> <p>The MDA Assessment or PPC documentation does not provide a discussion on future Mill Road traffic noise levels, and whether noise sensitive activities within Sub-Precinct C will be affected (i.e. in a similar way to traffic noise from Maketu Road),</p>
A4	Quarry noise exposure	Please provide an assessment that demonstrates the level of noise from quarrying that could be received in the precinct if the quarry was to generate the maximum level of noise it is permitted to make under its resource consents or AUP provisions.	<p>The Drury Quarry Zone is located approximately 1km to the east of Sub- Precinct C. Proposed Standard I410.6.5 Sub-Precinct C requires residential activities in Sub Precinct C to be subject to a restrictive non-complaint covenant in favour of the Drury Quarry. The purpose of the covenant is to prevent the landowner (and successors in title) to not complain as to the effects generated by the “lawful operation of the quarry, including heavy vehicle movement noise... limited to the effects that could be lawfully generated by quarry activities at the time the agreement is entered into”.</p>

			<p>The Section 32 Assessment notes this requirement is consistent with the requirements of the Drury South Residential Precinct.</p> <p>There is no acoustical assessment of the noise levels from quarrying that may be received in Sub-Precinct C. It is not therefore possible to understand</p>
A5	Interface noise limits	Please demonstrate whether the reduced noise limits at the interface between the Light Industry Zone (LIZ) and Heavy Industry Zone (HIZ) will result in any new constraint on existing industrial activities.	<p>The zoning pattern arising from the PPC will result in the rezoning of land currently zoned LIZ to BMUZ, and the rezoning of HIZ land to LIZ. The establishment of zoning interfaces between the LIZ and HIZ will result in noise generating activities within the HIZ (and affecting the LIZ) being required to meet the noise limits for the LIZ, (65dB LAeq) at all times (rather than the HIZ noise limits of 70dB LAeq). In effect, this will lower the operational noise limits for some noise generating activities by 5dB LAeq (at all times).</p>
Stormwater and flooding matters – Danny Curtis and Carmel O’Sullivan, Healthy Waters			
SW1	Stormwater – change in management of stormwater	<p>While the change in zoning may have a limited impact in terms of total volume of stormwater the change in land use may mean that a different approach to stormwater management is sought in order to utilise the land and manage effects of stormwater.</p> <p>Please provide an explanation of how the alternative approach to stormwater management is best practice and will manage stormwater from the area undergoing a change in land use zoning.</p>	<p>The PPC proposal creates incentives for a different approach to stormwater management. Understanding what is proposed that is different from the current SMP is important to assess the potential impacts of stormwater discharges and to enable Healthy Waters to evaluate if the precinct plan provisions are appropriate to support the stormwater management approach proposed.</p> <p>We note that T&T have provided a memo indicating there is no substantive change in stormwater discharge overall. However, they have not described why a change in approach is preferable.</p>