

MEMORANDUM



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To: Sanjay Bangs, Auckland Council

From: Rachel Morgan, Barker & Associates

Date: 22 April 2020

Re: Summary of responses to Council's RFI – Drury South Private Plan Change request

Dear Sanjay,

Below is a table summarising our responses to the RFI for the Drury South Private Plan Change request we received from Council on 17 February 2020. Many of the responses are addressed in the attached memos from the various specialists and/or updates to the specialist reports submitted with the Plan Change request.

#	Category of Information	Specific Request	Response
P1	Shape files	Please provide shape files showing the proposed spatial amendments to the zoning and Drury South Industrial Precinct.	These are attached to the email response.
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>Given that the Ngati Tamaoho Trust and Ngati Te Ata Waiohua have been the Mana whenua group that have historically been most engaged in the Drury South project, a meeting to discuss the proposed plan change was held with the Nagti Tamaoho Trust representatives, Lucie Rutherford and Dennis Kirkwood, and Ngati Te Ata representative Karl Flavell. The meeting was held on 24 June 2019. DSL provided a full outline of the proposed plan change. Those present generally indicated they were not concerned with the proposed plan change. No further feedback has been received to date.</p> <p>In addition, DSL also sent out consultation letters on the proposed plan change following Iwi Groups on 3 March 2020:</p> <ul style="list-style-type: none">• Ngai Tai Ki Tamaki

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			<ul style="list-style-type: none"> • Ngati Maru • Ngati Tamaoho • Ngati Te Ata • Ngati Whanaunga • Te Ahiwaru – Waiohua • Te Akitai Waiohua • Waikato – Taihui <p>To date, no responses have been received.</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.	<p>Plan Change consultation letters were also sent to the following parties:</p> <ul style="list-style-type: none"> • Fulton Hogan (operators of the Drury Quarry) • Ramarama School • Transpower • Balle Brothers (Landowners on the western side of State Highway 1) • Classic Developments (developing Drury South Residential) • Key Landowners in Drury East (Auranga and Kiwi Property). <p>To date, we have worked through several discreet discussions with the above parties, which will continue as needed.</p>
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.	<p>A meeting was held with NZTA on 2 March 2020 to provide an overview of the proposed plan change. DSL will engage with NZTA and their experts as the Plan Change request progresses.</p> <p>A meeting was held with Auckland Transport on 5 March 2020 to provide an overview of the proposed Plan Change. DSL will engage with Auckland Transport and their experts as the Plan Change request progresses.</p> <p>Over the past 12 months, DSL has been actively working with the Supporting Growth Alliance (SGA)</p>

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			<p>on the Mill Road alignment. In addition to these meetings, SGA has been advised and briefed on the proposed plan change. The dates of these meetings are as follows:</p> <ul style="list-style-type: none"> • 25 June 2019 • 28 August 2019 • 4 December 2019 • 21 February 2020
P5	Section 32 (See also Item UD9)	Please explain whether a Business – Local Centre Zone, or other commercial zones have been considered as a reasonable alternative to the Business – Mixed Use Zone, and update the Section 32 assessment to assess this option.	A range of alternative zones have been considered for Sub-Precinct C, and further analysis is provided in the S32 report. Overall, it is considered that the Mixed Use zone is the most efficient and effective means of achieving the objectives of the Plan Change and the AUP.
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>	A comparison of the activities requested is provided on pages 8, 10-12 of the revised S32 report.
P7	Trade suppliers	Please provide reasoning to justify the proposed permitted activity status for trade suppliers within Sub-precinct A.	See the response to P8 below. Please also refer to the additional analysis on pages 8 and 13 of the revised S32 report.
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 I1410.4.2 and I410.4.3.	The intent of this is to change the activity status of infringements to the standards in I410.6.2 from a discretionary activity to a restricted discretionary activity, consistent with the approach to standard infringements across the AUP zones generally. In accordance with the AUP approach, the standard assessment matters in C.1.9 of the

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			<p>AUP would apply to infringements of I410.6.2.</p> <p>Please refer to the further detail on pages 8 and 12 of the revised S32 report.</p>
P9	Reverse sensitivity	<p>Please explain the amendments to Objectives I410.2(8) and (9), and whether alternative language has been considered.</p>	<p>Objective 9 was amended to be consistent the wording of objective 11 in the Drury South Residential Precinct, and this amendment is considered editorial rather than substantive.</p> <p>Objective 8 has been further amended to be consistent with the policy intent of the Heavy Industry zone (refer Objective 1 of the Heavy Industry zone). This change addresses reverse sensitivity effects in a manner consistent with the wider AUP policy framework.</p> <p>This matter is addressed in the revised s32 report at pages 8-14.</p>
P10	Employment generating activities	<p>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.</p>	<p>Policy 10 is proposed to be deleted and replaced with Policies 25 and 26 that address activities and development in Sub-Precinct C. This matter is addressed in more detail in the revised 32 report at page 9.</p>
P11	Retail and office activity	<p>Please comment on why a restricted discretionary activity status has been proposed for office and retail activity in Sub-precinct C compared to discretionary in the underlying Mixed Use Zone.</p>	<p>The effects of these activities on the environment are well defined, which make a restricted discretionary activity status suitable. Please refer to the additional reasoning on pages. 9-11 of the revised S32 report.</p>
P12	Notification	<p>Please justify the proposed amendments to Standard I410.5(1) precluding restricted discretionary activities from limited or public notification.</p>	<p>The effects of the restricted discretionary activities are well defined and have been broadly assessed as part of the Plan Change request, which in our view makes non-notification appropriate.</p> <p>Please refer to the additional reasoning on page 13 of the revised S32 report.</p>

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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.	These provisions were amended to be consistent with the wording of the same provisions in the Drury South Residential Precinct, and these amendments are considered editorial rather than substantive. This matter is addressed in the revised s32 report at pages 13-14.
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.	These provisions were amended to be consistent with the wording of the same provisions in the Drury South Residential Precinct, and these amendments are considered editorial rather than substantive. This matter is addressed in the revised s32 report at pages 13-14.
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.	We agree that matters of discretion and assessment criteria should be included for infringements to this rule. Please refer to the updated Precinct provisions at Appendix 1 and the additional commentary on page 11 of the revised s32 report.
P16	Precinct Plan	Please provide road names on proposed Precinct Plan 1, particularly Maketu Road.	Please refer to the updated Precinct Plan 1 in the Precinct provisions at Appendix 1.
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.	No reduction in the extent of Sub-Precinct D is proposed. In fact, an increase in the land area for Sub-Precinct D is proposed, resulting from the inclusion of the land to the south of Sub-Precinct C. The reduction in the number referenced on the Precinct Description from 101 hectares to 41 hectares is a result of removing the Drury South Residential Precinct from the current Industrial and Mixed Use Precinct. This is considered to be an editorial change rather than a substantive one.

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.	The urban design strategy illustrates one way that the site can be developed. The design policies and criteria in the Precinct will ensure that the quality built environment objectives of the Unitary Plan would be achieved. This is addressed further on page 36 of the revised s32 report.
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.	The Precinct provisions are proposed to be amended to apply a restricted discretionary activity status to Trade Suppliers 11,000m ² GFA across Sub-precincts A and C. Please refer to the transport RFI response and the updated s32 report for detailed reasoning and analysis of this.
T2	Assessment of transport effects in sub-precinct C	Please explain and justify the proposed exemption from Standard E27.6.1 Trip Generation from I140.6 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).	The assessment of future land-use consents is appropriately addressed through the combination of the proposed Precinct provisions relating to restricted discretionary activities. Please refer to the transport RFI response and the revised s32 (page 12) for more detail.
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 Table I410.4.4 rather than in Standard I410.6.1.	Given that the GFA caps are proposed to apply across multiple precincts we have retained the provisions in a separate rule. However, we would be happy to consider any alternative wording suggested by the Council.

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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.	Precinct Plan 1 has been updated to show the indicative connection between the Drury South Residential Precinct and Sub-Precinct C. An additional assessment criterion is proposed to enable this to be assessed as part of resource consent applications for development (refer proposed criterion I410.8.2(c)(ii)).
T5	Traffic distribution	Please confirm the expected change in estimated number of jobs that will result within Drury South from the PPC.	Information has been provided by Market Economics in relation to the number of jobs expected within the Precinct. By around 2043, the proposed Precinct is expected to accommodate at the lower end around 5,000 jobs and up to 6,400 jobs. This range is comparable and potentially exceeds the around 5,500 jobs identified by Council, which are assumed in the regional traffic models. For more information on these estimates, please refer to the transport and economic RFI responses.
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.	The previously identified Link Road and Avenue Road intersection with the Maketu Road is now much less likely to eventuate. While the connection of the Avenue Road with the Spine Road and Link Road intersection will result in an unconventional alignment, there is the potential that this indicative connection can be further reviewed and addressed through subsequent design phases, should this need to be progressed. We assess connectivity in this area in the transport RFI response.
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	We agree and propose to delete these references from the Appendix 1 Design Guidelines.

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		whether this may be problematic for consenting.	
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.	We agree and propose to delete these references from the Appendix 1 Design Guidelines.
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.	Please refer to Table 4-1 and 4-2 of the TAR, in the transport RFI response.
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.	It is confirmed that the with and without pedestrian phase results are correctly recorded from the traffic modelling results included in Appendix D. Please refer to the transport RFI response.
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.	<p>Drury South Residential Precinct (south and west of Sub-precinct C) makes some provision for neighbourhood centre activities in appropriate locations and these are indicatively shown in Precinct Plan 2. Due to planning controls, any retail activities will be small-scale and serve local convenience needs, which is reflected in Objective 2 and Policy 2 of the Precinct.</p> <p>We understand that Classic Homes who are undertaking development in the Drury South Residential precinct are not proposing any commercial activities.</p>

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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.	Please see Figure 2.6 in the economic RFI response. In short, numbers of households and workers anticipated in the Drury South development reach their maximum in 2028 and 2038 respectively under the base run and in 2033 and 2043 under the high run.
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.	Please refer to the economic RFI response.
E4	Infra timing	Please explain the timing of Mill Road being developed, and whether this changes the timings of demand for retail or office activities	Please refer to the economic RFI response.
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.	Please refer to the economic RFI response.
E6	Retail spend	Please clarify the basis for the Drury South Industrial Precinct retail assumptions in relation to spend captured locally.	Please refer to the economic RFI response.
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.	Please refer to the economic RFI response.
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	Please refer to the economic RFI response.

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		encouraged in Council's Drury-Opaheke Structure Plan.	
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	The 'slip lane' shown parallel to part of Maketu Road in Option 1 is neither proposed nor required by the Plan Change. There is the potential for development of an access lane in the location where the slip lane is shown, however, via a future resource consent application. Please refer to the urban design RFI response.
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.	Please refer to the scale drawing of the illustrative design strategy included with the urban design RFI response.
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	Parking is managed in Sub-precinct C, by the Sub-precinct's underlying Business-Mixed Use zone. Please refer to the urban design RFI response.
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.	Please refer to the urban design RFI response.
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	Please refer to the RFI response to T4 above.
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.	Please refer to the urban design RFI response. In summary, the position of the Spine Road shown in the Plan Change's proposed Precinct Plan 2 mirrors what is shown in the operative version of the Precinct and is consistent with what has been consented by Council.

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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	Please refer to the consenting plans for Maketu Road included with the urban design RFI response.
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.	Please refer to the urban design RFI response, noting that amendments are proposed to the Precinct provisions to make the link between the design guidance and the precinct provisions clear.
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.	Please refer to the response to RFI P5 above.
UD10	Access to schools	Please provide comment on the location of nearest schools (existing or planned) and the expected travel routes.	The location of the schools are detailed in the urban design RFI response. It is also anticipated that any residential dwellings in the Sub-Precinct will be well served by schools that will be required in that area.
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.	We have included a rule in the revised precinct provisions that expressly state rule E25.6.10 in Sub-Precinct C.
A2	Traffic noise exposure	Please confirm whether or not an acoustic buffer zone is intended or required over Sub-Precinct C. <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 	Providing an acoustic buffer is one way of achieving compliance with proposed rule I410.6.4, and providing flexibility for development to achieve compliance with this rule is considered the most efficient and effective way to give effect to the objectives of the Plan Change and AUP.

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		revised indication of facade constructions (similar to that provided on page 3 of the MDA 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.	Despite this, an additional rule is proposed in the Plan Change that would limit the noise level at the façade of a residential building fronting Maketu Road to 70 dB LAeq(24 hour). Please refer to the acoustic RFI response for further discussion on this matter.
A3	Traffic noise exposure	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; Advice note: If additional controls are necessary, Proposed Standard I410.6.4 should be amended to include traffic noise levels from the Mill Road alignment.	Please refer to the acoustic RFI response.
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.	The Quarry will readily comply with the more stringent 55 dB LAeq noise limit for Mixed Use Zones and the acoustic effect of the Quarry activities on the nearest potential habitable dwellings would be insignificant. Please refer to the acoustic RFI response.
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.	Please refer to the updated acoustic RFI response.
SW1	Stormwater – change in management of stormwater	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	The stormwater approach has also been the subject of detailed discussions with the Council and stakeholders over a number of years.

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		<p>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 approach is for a large portion of the area ("Block 11") to be treated by Wetland 1 which is in accordance with the current version of the SMP. The alternative Stormwater approach is intended for the balance of the area ("Block 10).</p> <p>DSL has had Tonkin and Taylor consider this alternative approach previously and Tonkin and Taylor's advice is outlined in their RFI response. That advice confirms the appropriateness of the proposed stormwater management approach for the Plan Change area.</p> <p>This alternative approach will only be implemented once the SMP is updated, approved and adopted. That process is currently underway and Healthy Waters, AT and Council have agreed in principle and already participated in related pre-application meetings for that.</p>
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