



DRURY SOUTH PROPOSED PRIVATE PLAN CHANGE

DECEMBER 2019

REVISED: APRIL 2020

B&A

Urban & Environmental

CONTENTS

1.0	THE APPLICANT AND PROPERTY DETAILS	1
2.0	EXECUTIVE SUMMARY	2
3.0	INTRODUCTION	3
3.1	Background	3
3.2	Operative Auckland Unitary Plan	3
4.0	SITE LOCATION AND DESCRIPTION	5
4.1	Site Description	5
4.2	Surrounding Area / Local Context	7
5.0	DESCRIPTION OF THE PLAN CHANGE REQUEST	7
5.1	Description of the Proposal.....	7
5.2	Purpose and Reasons for the Plan Change	18
5.3	Accepting the Plan Change Request (Clause 25).....	19
6.0	POLICY FRAMEWORK	20
6.1	National policy documents	20
6.2	Council strategic plans	23
7.0	REGIONAL POLICY STATEMENT AND PLANS	24
7.1	Auckland Unitary Plan (Operative in Part)	24
7.2	Other Plans.....	26
8.0	ASSESSMENT OF ENVIRONMENTAL EFFECTS.....	30
8.1	Economic.....	31
8.2	landscape and visual effects	34
8.3	transport	35
8.4	Urban Form and quality built environment	38
8.5	Stormwater & Flooding.....	39
8.6	Reverse Sensitivity and Potential Effects on Residential Amenity.....	40
8.7	Summary of Effects	40
9.0	SECTION 32 ANALYSIS	41
9.1	Appropriateness of the Proposal to Achieve the Purpose of the Act	41
9.2	Appropriateness of the Provisions to Achieve the Objectives.....	44
9.3	Other Reasonably Practicable Options for Achieving the Objectives	46
10.0	CONCLUSION	8

APPENDICES:

Appendix 1: Proposed Plan Change

Appendix 2: Auckland Unitary Plan Objectives and Policies Assessment Table

Appendix 3: Economic Assessment

Appendix 4: Landscape and Visual Effects Assessment

Appendix 5: Transport Assessment

Appendix 6: Urban Design Report

Appendix 7: Stormwater Memo

Appendix 8: Acoustic Memo

Appendix 9: Approved Resource Consents

1.0 THE APPLICANT AND PROPERTY DETAILS

To:	Auckland Council
Site Address:	Quarry Road, Drury
Applicant's Name:	Drury South Limited
Address for Service:	Barker & Associates Ltd PO Box 1986 Shortland Street Auckland 1140 Attention: Rachel Morgan
Legal Description:	Refer to Certificates of Title as Appendix 2
AUP Zoning:	Business – Light Industry zone Business – Heavy Industry zone
Locality Diagram:	Refer to Figure 1 .
Brief Description of Proposal:	Private Plan Change request to rezone approx 20 ha of land from Heavy Industry to Light Industry and approx. 10 ha from Light Industry to Mixed Use, together with a number of minor amendments to the Drury South Industrial Precinct.

2.0 EXECUTIVE SUMMARY

Drury South Limited (**DSL**) is applying to Auckland Council for a Plan Change to the Auckland Unitary Plan - Operative in Part (**AUP**) to amend the precinct provisions and the underlying zoning of part of the Drury South Industrial Precinct. The proposal seeks to:

- Reduce the size of sub-precinct C to approximately 101 hectares and rezone it from Light Industry to Mixed Use and amend the provisions that apply within the sub-precinct to provide for a greater range of activities, reflecting the changing nature of the surrounding environment;
- Rezone approximately 20 hectares of land fronting Maketu Road, from Heavy Industry to Light Industry, to better meet current and future demand, and to manage potential reverse sensitivity and amenity effects arising from the proposed change of use in sub-precinct C.

Other amendments proposed are largely consequential to ensure an integrated planning framework across the precinct, with specific amendments proposed to the landscaping provisions.

The Plan Change responds to the specific characteristics of the Plan Change area, the future of the wider Drury area and gives effect to the relevant planning documents. In particular the Plan Change better achieves the objectives of the Regional Policy Statement, delivers a more quality compact urban form, and would better enable local residents to provide for their own social and economic well-being compared with the current planning provisions, by:

- Providing for a greater range of activities in sub-precinct C close to employment, open space amenity and future public transport (RPS B2.2.1(1));
- Increasing the supply of Light Industry zoned land to better meet current and future demand and manage conflicts between incompatible activities (RPS B2.5.1(1)).

An evaluation in accordance with Section 32 of the Resource Management Act 1991 (**RMA**) has been undertaken and concludes that the proposal will more effectively and efficiently achieve the objectives of the AUP, and the purpose of the RMA, compared with the current planning provisions that apply to the Plan Change area.

3.0 INTRODUCTION

3.1 BACKGROUND

Drury South Limited (DSL) is a subsidiary of Stevenson Group, and has significant landholdings in Drury South. They are currently developing the area for industrial and business uses and the development is known as Drury South Crossing. Vacant industrial lots in Stage 1 are currently for sale.

The Drury South Industrial Precinct (361 hectares) was zoned for urban development in 2013 through Plan Change 12 to the Papakura District Plan, Plan Change 38 to the Franklin District Plan, Plan Change 19 to the former Auckland Regional Policy Statement and Plan Change 3 to the former Auckland Regional Plan: Air, Land and Water. This followed a structure planning process that was initiated by Stevenson in 2007. These provisions were included in the Auckland Unitary Plan (AUP) through the submissions and hearings process (with minor amendments).

Following notification of the proposed AUP, DSL sought a Plan Variation to rezone approximately 101 hectares of the Drury South Industrial Precinct to a mix of Terrace Housing and Apartments Buildings zone, Mixed Housing Urban and Mixed Housing Suburban zones (Plan Variation 16 to the Proposed Auckland Unitary Plan). This followed the identification of this area as a Special Housing Area. This Plan Variation was approved by the Council on 13 September 2016. This area is currently being developed for housing and is within the Drury South Residential Precinct. The area has capacity to accommodate approximately 750 to 800 dwellings.

Similar planning provisions apply in the Drury South Industrial and Residential Precincts, particularly with respect to infrastructure provision, landscaping, stormwater, ecology and reverse sensitivity. This Plan Change provides the opportunity to correct some minor inconsistencies between the precinct provisions.

3.2 OPERATIVE AUCKLAND UNITARY PLAN

The extent of the Drury South Industrial and Residential Precincts are shown in Figure 1 below.

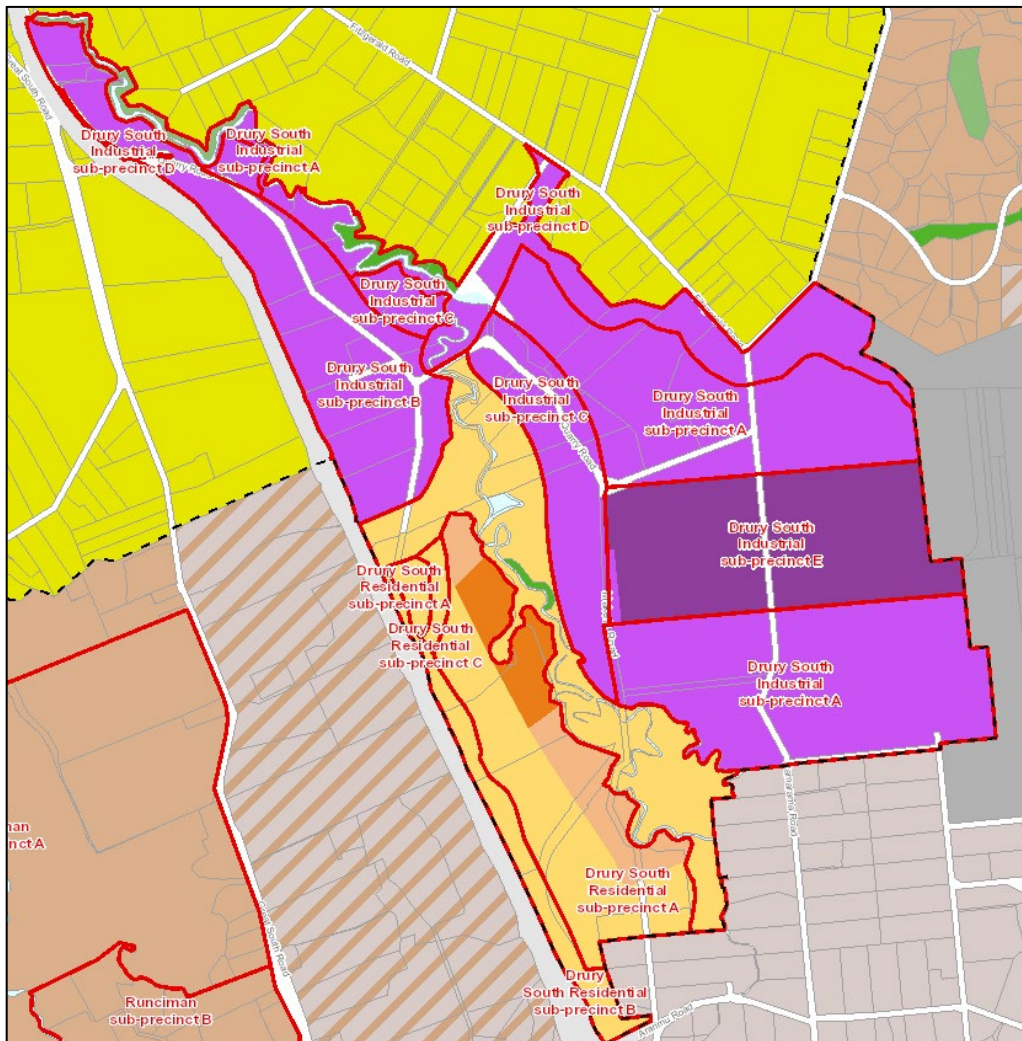


Figure 1: Showing the location of the Drury South Industrial and Residential Precincts.

The Drury South Industrial precinct is split into five sub-precincts for the following purposes:

- Sub-precinct A: this applies to the main Light Industry area. Additional landscaping controls apply in this area.
- Sub-precinct B: this applies to the northern end of the precinct and is also zoned Light Industry. Additional landscaping controls apply and new buildings require consent to manage the visual effects of development as seen from State Highway 1.
- Sub-precinct C: this applies to the central part of the precinct and is also zoned Light Industry. Offices, and commercial services and convenience retail e.g. food and beverage, are allowed in this area.
- Sub-precinct D: this applies to the stormwater management area and is also zoned Light Industry. Once developed the stormwater management area will be vested in, and maintained by, Auckland Council.

- Sub-precinct E: this applies to the Heavy Industry zone. Additional landscaping controls apply in this area.

Rules, policies and criteria in the precinct require development to be staged to coordinate with required upgrades to the transport, wastewater and water supply networks.

4.0 SITE LOCATION AND DESCRIPTION

4.1 SITE DESCRIPTION

The Drury South Industrial precinct is approximately 257 hectares and is currently being developed as an industrial business park. Civil works are well underway for the first stages of the development. Figure 2 below shows the extent of the precinct and the extent of development underway. The development is being constructed from south to north and the following aspects of the development are either complete or under construction:

- The upgraded Ramarama interchange;
- The southern section of Maketu Road and the bridge;
- The primary stormwater wetland area to the west of sub-precinct C;
- The roading network serving the industrial blocks to the east of Spine Road and the south of Quarry Road; and
- Potable water infrastructure is in place including the Quarry Road pump station.

The following resource consents have been granted for the development and form part of the existing environment for the purpose of this assessment, where they have not already been given effect to:

- Network Discharge Consent authorising the diversion of stormwater from future development within the Drury South Precincts that will enter Council's stormwater network; and to discharge the stormwater from the Council's stormwater network within the DSP area to the stream network (DIS60313540)
- Resource consent to undertake land development works including bulk earthworks, stream works (including stream reclamation and the diversion of surface water) and vegetation removal, disturbance of contaminated land and associated discharge of contaminants. Consent has been granted to undertake these works over the entirety of the Drury South Industrial Precinct and Drury South Residential Precinct area in a staged manner (BUN60305778)
- Resource consent to establish an overburden disposal area (OBDA) on the site, involving approximately 500,000m³ of fill over 29.7 hectares, and

reclamation of approximately 1,004 metres of permanent stream and 655 metres of intermittent stream and associated diversion and discharge of surface water (R/LUC/2016/4252, R/REG/2016/4253);

- Resource consent to subdivide the subject land by way of boundary adjustment, in two stages, and to construct and vest a high use road in a new lot formed through the subdivision (i.e. construct Spine Road) (SUB60311999 and LUC60319074);
- Resource consent for the staged subdivision of 26 industrial lots. The subdivision also includes the vesting of roads, a wetland, stormwater, wastewater, water-supply infrastructure, and land for drainage purposes. The subdivision also includes easements for overland flow paths, rights of way, and temporary access (SUB60325513).

Copies of the approved resource consents including the subdivision scheme plan approved as part of SUB60325513 are included at **Appendix 9**.

Figures 2 and 3 below show the current site conditions.



Figure 2: Showing the Drury South development as viewed from the south.



Figure 3: Showing the Drury South development as viewed from the east.

4.2 SURROUNDING AREA / LOCAL CONTEXT

The surrounding area is characterised by a mix of activities and building types. To the immediate north and north-west of the Plan Change area is the Drury Future Urban area, which is the largest Future Urban area in Auckland, with capacity to accommodate an additional 22,000 residents over the next 30+ years. Further detail on the land uses planned for this area is provided in the report below.

To the east of the Plan Change area is the operational Drury Quarry. Beyond that and to the north-east is the rural residential subdivision clustered around Macwhinney Drive. To the immediate west of the Plan Change area is the recently rezoned Drury South Residential precinct, which is under development and has capacity to accommodate approximately 750 dwellings. To the south of the Plan Change area are smaller rural residential sites within the Rural Production zone that accommodate residential and a mix of other activities, including kennels/catteries etc. Ramarama School is also located at the southern end of the Plan Change area.

5.0 DESCRIPTION OF THE PLAN CHANGE REQUEST

5.1 DESCRIPTION OF THE PROPOSAL

This Proposed Plan Change seeks to amend the precinct provisions and the underlying zoning of part of the Drury South Industrial Precinct. As a result of these changes, the Precinct is proposed to become the Drury South Industrial and Mixed

use Precinct. The Drury South Industrial precinct is proposed to exclude the Drury South Residential precinct given that it has its own precinct provisions applying to it, which were introduced through the Housing Accords and Special Housing Areas Act 2013. No changes are proposed to the Drury South Residential precinct. However, amendments are proposed to the Drury South Industrial Precinct for consistency with the Drury South Residential precinct and the wider AUP framework including the following:

- Amended Objective 10 to better align with the wording of Objective 1 of the Heavy Industry zone. The intent of the Objective is the same, but the revised wording more appropriately aligns with the Objectives in B2.5.1 and H16.2;
- Amended Objectives 9 and 10 to be consistent with Objectives 11 and 12 of the Drury South Residential Precinct;
- Amended and renumbered Policies 10, 13, and 23 to be consistent with Policies 12, 13 and 23 of the Drury Residential Precinct.

The proposed amendments to the zoning and precinct provisions are detailed below.

By way of background, it is important to note that the Drury South Industrial Precinct was largely developed prior to the AUP becoming operative. The provisions were formulated under various plan changes to the previous planning framework¹ applying to the site, and was included in the AUP with minor amendments. By the time the AUP was made operative, these provisions were at least 17 years old. This provides necessary context when comparing the operative Precinct provisions with the proposed amendments contained in this proposed Plan Change. Several of the amendments outlined below are proposed to make the precinct provisions consistent with the wider AUP framework, and where there are no environmental, economic or other site-specific reason for retaining it their current form.

5.1.1 Sub-Precinct C (Commercial Services)

Sub-Precinct C is proposed to reduce in size from approximately 21 hectares to approximately 10 hectares and rezoned from Business - Light Industry zone to Business - Mixed Use zone. The proposed reduction in extent of Sub-Precinct C will result in additional land being included within Sub-Precincts A and D. This includes the land to the south of Quarry Access Road to the west of Maketu Road, that will be included within Sub-Precinct D.

Sub-precinct C under the operative AUP is intended to provide for employment generating activities including primarily offices, commercial services and convenience retail (I410.3 Policy (10)). Since these planning provisions were

¹ Auckland Regional Policy Statement 1999, Papakura District Plan 1999 & Franklin District Plan 2000.

originally introduced the planning and policy context has changed considerably, including:

- The Drury South Residential Precinct has been introduced, providing capacity for new higher density residential development within walking distance;
- The Drury-Opaheke area to the north of the Plan Change area has been included within the Future Urban zone and the Council has prepared a Structure Plan, indicating a significant increase in the surrounding residential population;
- Under the AUP, a greater policy emphasis is placed on achieving a quality compact urban form that makes efficient use of infrastructure and promotes social and cultural vitality (RPS B2.2.1), specifically enabling higher residential intensification close to public transport, social facilities and employment (RPS B 2.2.2(5));
- Under the AUP, commercial activities, including offices, are encouraged to locate within a network of centres.

To respond to this changing context, this Plan Change proposes to rezone sub-precinct C to Mixed Use. In principle, this zone would enable a broader range of activities, including residential, to locate within the Plan Change area.

To recognise the strategic accessibility offered by the future Mill Road Corridor, the need to provide for the day-to-day needs of future residents and workers and the greenfield nature of the Plan Change area, a bespoke set of policies, activity rules, standards and criteria are proposed in sub-precinct C to provide for retail and office activities.

The intent of these provisions is to provide for a range of retail activities that will better serve the local catchment, including the future residents and workers in Drury South. Provisions are proposed to ensure that the development of these activities is coordinated with the rate of development in the wider area, to recognise the centres identified in the Council's Structure Plan for Drury-Opaheke. This intent is reflected in proposed policy 26 and 27 of the Drury South Industrial precinct, which are intended to replace Policy I410.3(10) to provide further guidance regarding the degree of employment generating provisions within Sub-precinct C:

(26) Provide for a range of commercial activities in Sub-Precinct C that will not compromise the role and amenity of the Business – Metropolitan Centre zone, Business – Town Centre zone (either zoned or identified in the Council approved Structure Plan for Drury) beyond those effects ordinarily associated with trade effects on trade competitors. In particular:

- a) Discourage the concentration of retail activity in one part of sub-precinct C, having regard to the effects of the scale and type of retail activity proposed;*

- b) Appropriately stage the provision of retail (including supermarkets) in Sub-Precinct C over time as development in the surrounding area occurs;
- c) Enable appropriately scaled office activities to establish in sub-precinct C that support surrounding land uses in the Drury South precinct.

(27) Encourage a complementary mix of convenience activities to locate in the southern part of sub-precinct C, where it would be most accessible to the Drury South Residential precinct and would support a local community focal point.

The following precinct provisions are proposed to implement this policy, which amend the underlying Mixed Use zone:

Mixed Use zone	Sub-Precinct C (Operative Drury South Industrial Precinct)	Proposed status	Reasons
Offices			
Offices up to 500m ² per site: P Offices greater than 500m ² per site: D	Offices: P	Offices up to 500m ² per tenancy: P Offices between 501m ² -1000m ² per tenancy: RD Offices greater than 1001m ² per tenancy: D Offices GFA greater than 15,000m ² in sub-precinct C: D	A 'per site' activity control is too restrictive in a greenfield context, which has larger site sizes. Offices of a scale that would not detract from the amenity and vitality of future centres are enabled. Total office floor space is controlled to manage potential cumulative effects. An RD activity status for offices between 501m ² -1000m ² per tenancy is proposed given the site's greenfield location and capacity to accommodate a greater volume of office space given the demand created by the adjoining industrial and residential uses. This is detailed in the Economic report included at Appendix 3. The discretionary activity status for offices over 1001m ² per tenancy signals that larger companies are not anticipated as these should locate in the Drury Metropolitan Centre. Furthermore, the effects of larger offices can be identified and therefore matters for discretion can be limited to transport and effects on the Drury Metropolitan Centre.
Supermarkets			
Supermarkets up to 450m ² per tenancy: P Supermarkets exceeding 450m ² and up to 2000m ² per tenancy: RD	Retail over 450m ² : Pr	A single supermarket greater than 2000m ² : RD Assessment criteria ensure that a supermarket in sub-precinct C is staged to coordinate with the rate of	Provides for convenience retail in a future accessible location that will efficiently meet the needs of the local catchment.

Mixed Use zone	Sub-Precinct C (Operative Drury South Industrial Precinct)	Proposed status	Reasons
Supermarkets greater than 2000m ² per tenancy: D		growth in the local catchment.	
Department Stores			
Department stores: D	Retail over 450m ² : Pr	Department Stores: NC	To provide additional policy direction to discourage retail anchor activities locating in sub-precinct C.
Other Retail			
Retail up to 200m ² per tenancy: P Retail greater than 200m ² per tenancy: D	Retail over 450m ² : Pr Retail under 450m ² is as per the Light Industry zone. Retail accessory to an industrial activity on the site, where the goods sold are manufactured on site and the retail gross floor area does not exceed 10 per cent of all buildings on the site: P Retail not otherwise provided for: NC	Retail up to 200m ² per tenancy: P Retail greater than 200m ² per tenancy: D Other retail up to 1000m ² in sub-precinct C: P Other retail greater than 1000m ² and up to 4,500m ² in sub-precinct C: RD Other retail greater than 4,500m ² in sub-precinct C: D Note: this does not include one supermarket greater than 2000m ² , service stations, trade suppliers, garden centres, motor vehicle sales, marine retail and food and beverage.	To appropriately control the size of retail tenancies and manage the overall scale of retail consistent with the expected demand of the local catchment, and manage potential effects on the future amenity and vitality of future centres in Drury-Opaheke. An RD activity status for specified retail activities within Sub-Precinct C which are between 1000m ² - 4500m ² is proposed. In our view this is appropriate for the following reasons: <ul style="list-style-type: none"> • The effects of the activity on the environment are known and can be specified; • The growth expected in the surrounding catchment is likely to create a sustainable demand for this amount of retail floorspace, without adversely affecting the role, amenity and vitality of existing or planned centres, as outlined in the economic assessment; • The amenity effects of these activities are appropriately managed through the assessment matters and criteria for new buildings.
Other			
Trade suppliers, garden centres, marine retail, motor vehicle sales: D	Retail over 450m ² : Pr Although arguably trade suppliers are currently permitted, given that they are permitted in the Light Industry zone.	Trade suppliers, garden centres, marine retail, motor vehicle sales: P Note: new buildings will require resource consent as a restricted discretionary activity. Additional assessment criteria apply to manage the amenity effects of these activities to adjoining sites and the street.	Appropriately designed, these activities may be compatible within a mixed use environment in Drury South. The effects of these activities are appropriately managed through the assessment criteria for new buildings.

Additional development standards apply to residential development within Sub-Precinct C to ensure the existing Heavy Industry zone is not compromised. These standards require mechanical ventilation and require and noise barriers such as insulation to manage noise levels in habitable rooms. These standards are supported by matters for discretion and assessment criteria to guide the assessment of any potential infringements. The standards also require restrictive non-complaint covenants to be registered. These standards and assessment matters are consistent with those applied in the Drury South Residential Precinct.

A height limit of 25m is sought within Sub-Precinct C (Commercial Services), consistent with the height allowed in Sub-Precinct E (Heavy Industry). The height allowed in sub-precinct C under the operative provisions is 20m, as per the Light Industry zone.

5.1.2 Heavy Industry rezoning

It is proposed to rezone the block of land bounded by Maketu Road, New Quarry Road and Quarry Road from Heavy Industry to Light Industry. This is to respond to the current and future demand for light industrial land, and to minimise the potential for reverse sensitivity and amenity effects between the Heavy Industry zoned land the Residential Precinct (SHA) any potential residential activities in sub-precinct C.

5.1.3 Landscaping Amendments

The current landscaping requirements within the Drury South Precinct require a row of Leyland Cypress, Casuarina or Macrocarpa along side and rear boundaries. We understand that the intention of this requirement was to break up the ‘sea of roofs’ in views from the elevated catchment to the east (Macwhinney Drive/Peach Hill Road environs) although this is not specifically stated in the precinct policies. The “sea of roofs” is somewhat mitigated by the introduction of the Residential Precinct (SHA) and smaller subdivision pattern that has been consented in the Industrial precinct to date.

This provision is proving to be overly onerous and ineffective and therefore the Plan Change seeks to delete it and rely on the landscaping provisions in the underlying Light Industry zone. Recognising the potential visual effects of development on the elevated catchment to the east, a new development standard is also proposed to manage the reflectivity value of building roofs.

No amendments are proposed to the landscaping requirements for Sub-Precinct B (Motorway Edge).

5.1.4 Activity Status for Infringing Standards

Sub-Precinct A has an underlying zone of Light Industry. The activities within Sub-precinct A are subject to additional standards including a tailored height in relation to boundary standard, compliance with road traffic noise – acoustic standard, controls for roof flexibility and overall site permeability. Under the operative precinct provisions, it is a discretionary activity to infringe these standards. This is inconsistent with the precedent within the AUP where applications to infringe development standards are a restricted discretionary activity by way of Standard C1.9(2), rather than a full discretionary activity. Therefore, it is proposed to amend the activity status for infringements to the standards in I419.6.2 to restricted discretionary for consistency with the wider precedent within the AUP. Restricted discretionary activity status for infringing standards is also proposed in sub-precinct B & C for the same reasons. The matters for which discretion is restricted to are set out within C1.9(3) and include:

- (a) any objective or policy which is relevant to the standard;
- (b) the purpose (if stated) of the standard and whether that purpose will still be achieved if consent is granted;
- (c) any specific matter identified in the relevant rule or any relevant matter of discretion or assessment criterion associated with that rule;
- (d) any special or unusual characteristic of the site which is relevant to the standard;
- (e) the effects of the infringement of the standard; and
- (f) where more than one standard will be infringed, the effects of all infringements considered together.

As noted above, additional matters of discretion and assessment criteria are proposed to apply to infringements to the noise and ventilation standards in Sub-Precinct C.

5.1.5 Trade Suppliers

Under the Operative provisions, Sub-Precinct A does not provide for trade suppliers. Retail over 450m² is a prohibited activity in Sub-Precinct A. However, trade suppliers are a permitted activity within the Light Industry zone as this activity does not have a high amenity expectation and the activity does not adversely affect the role, amenity and vitality of the Light Industry zone, as determined through the AUP Hearings.

Rule J1.1.2(1) in the AUP provides that:

Where an activity is included in a nesting table, the class or activity status of that activity in any activity table also applies to the nested activities set out to the right of that activity in the nesting table, unless an activity table expressly provides otherwise for a particular overlay, zone, Auckland-wide or precinct.

While trade suppliers are included to the right of retail in the commercial activities nesting table, the introduction to the Rule I410.4 in the Precinct states that: *“The provisions in any relevant overlays, zone and the Auckland-wide apply in this precinct unless otherwise specified below.”* As noted above, Rule H17.4.1 (A24) in the Light Industry zone expressly lists “trade suppliers” as a permitted activity in that zone and therefore trade suppliers are arguably permitted in sub-Precinct A through the underlying zoning provisions (although it is not very clear).

Therefore, the Plan Change is seeking to expressly make trade suppliers a permitted activity within Sub-precinct A.

An additional proposed rule requires restricted discretionary activity consent for trade suppliers greater than 11,000m². The transport assessment prepared in support of this Plan Change finds that the effects of trade suppliers up to 11,000m² is acceptable, however, an assessment will be required for trade suppliers above this level to assess the effects of the activity on the transport network and determine if any upgrades are required. Matters of discretion and assessment criteria are proposed consistent with this purpose.

5.1.6 E27.6.1. Trip Generation

The Plan Change proposes to exclude rule E27.6.1 from activities and development in the Drury South Industrial and Mixed Use precinct. In our view, activities within the precinct would be exempt from this control in any case due to the following exemption in clause E27.6.1(2)(b):

(2) Standard E27.6.1(1) does not apply where:

...

(b) 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

The exemption is proposed to make it clear that rule E27.6.1 does not apply, and in this regard, the proposed change is considered to be administrative rather than substantive. The transport assessment prepared to support this Plan Change has made a range of conservative assumptions about the scale and range of activities that may locate in sub-precinct C. In addition, a transport assessment would be required for trade suppliers greater than 11,000m² and other discretionary and non-complying activities.

5.1.7 Notification

Applications for restricted discretionary activities in the Drury South Industrial and Mixed Use precinct are proposed to 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 section 95A(4) of the Resource Management Act 1991.

The public will be able to comment on the appropriateness of restricted discretionary activities through this Plan Change application. Furthermore, the applicant is the majority landowner within Drury South. For these reasons we consider that this approach to notification provides an appropriate balance in terms of reducing risks to applicants (time and costs associated with uncertainty around notification) and providing for appropriate opportunities for public participation on applications for restricted discretionary activities.

5.1.8 Reverse Sensitivity and Amenity

A rule is proposed to apply to sub-precinct C to manage the effects of development on the amenity values of noise sensitive activities fronting Maketu Road. The proposed rule is similar to the rule applying in the Drury South Residential precinct, with some amendments. Principally, the rule requires the noise level in noise sensitive spaces to not exceed 40 db, assuming that traffic noise from Maketu Road is 75 db measured at 10m from the nearest traffic lane. In addition, the rule requires that the noise level at the façade of a residential building fronting Maketu Road to not exceed 70 db. These rules are in addition to the standard rules for noise sensitive spaces that apply in the Mixed Use zone under E25.

Further, a rule is proposed that will require residential activities in sub-precinct C to be subject to a restrictive no-complaints covenant in favour of the Drury Quarry. This is the same as the rule that applies in the Drury South Residential precinct, and the rule will effectively manage reverse sensitivity effects on the Drury Quarry, in combination with the physical separation achieved between the zones and the internal noise standards noted above.

5.1.9 Amendments for Consistency with the Drury South Residential Precinct

To the immediate west of the Plan Change area is the recently rezoned Drury South Residential precinct, which is under development and has capacity to accommodate approximately 750 dwellings. The Drury South Residential and Industrial precincts form a significant development area on land immediately south of the Future Urban zone. It is important that there is a level of consistency between the precinct to ensure the development of an integrated urban area. For this reason, amendments

are proposed to the Drury South Industrial precinct to improve consistency with the Drury South Residential precinct.

Amendments are proposed to Objectives I410.2(8) and (9) of the Drury South Industrial precinct which relate to reverse sensitivity effects of development on the quarry and key infrastructure networks respectively. The operative wording seeks to avoid reverse sensitivity. The Plan Change seeks to amend Objective (8) to be consistent with Objective (1) of the Heavy Industry zone, which seeks to ensure heavy industry operates efficiently and is not unreasonably constrained by other activities. Amendments to Objective (9) are to be consistent with the same objective in the Drury South Residential precinct.

Amendments are proposed to Standard I410.6.3(1), to remove the requirement to develop and vest roads at no cost to the Council. Further changes to the assessment criteria will allow a degree of flexibility within the internal road layout for sub-precinct C (Avenue Road) and provide for a pedestrian connection to the Drury South Residential Precinct. This will ensure an integrated approach to land use and transport can be achieved throughout the Drury South Industrial and Drury South Residential precincts. These amendments are consistent with the Drury South Residential precinct which does not require the applicant to develop and vest roads at no cost to Council.

It is also proposed to amend to Standard I410.6.3(2) to remove the requirement to develop and vest reserves and stormwater management areas at no cost to the Council. This requirement is inconsistent with both the Drury South Residential Precinct and E38 Subdivision – Urban where there is no requirement to develop and vest reserves and stormwater management areas at no cost to Council.

5.1.10 Summary

Figures 4 and 5 below show the proposed zoning plan and the sub-precinct boundaries.

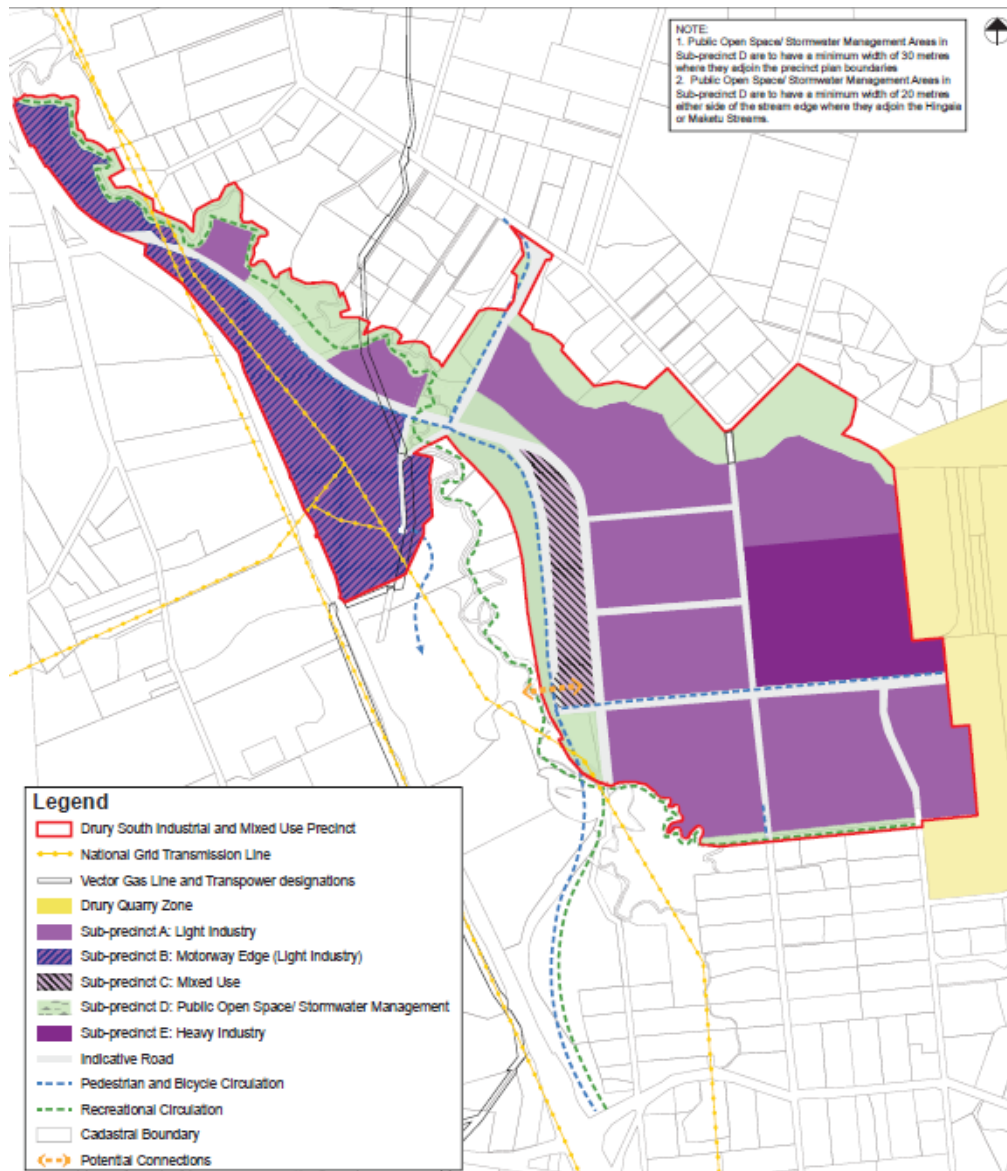


Figure 4: Showing the proposed zoning pattern in the Drury South Industrial Precinct.

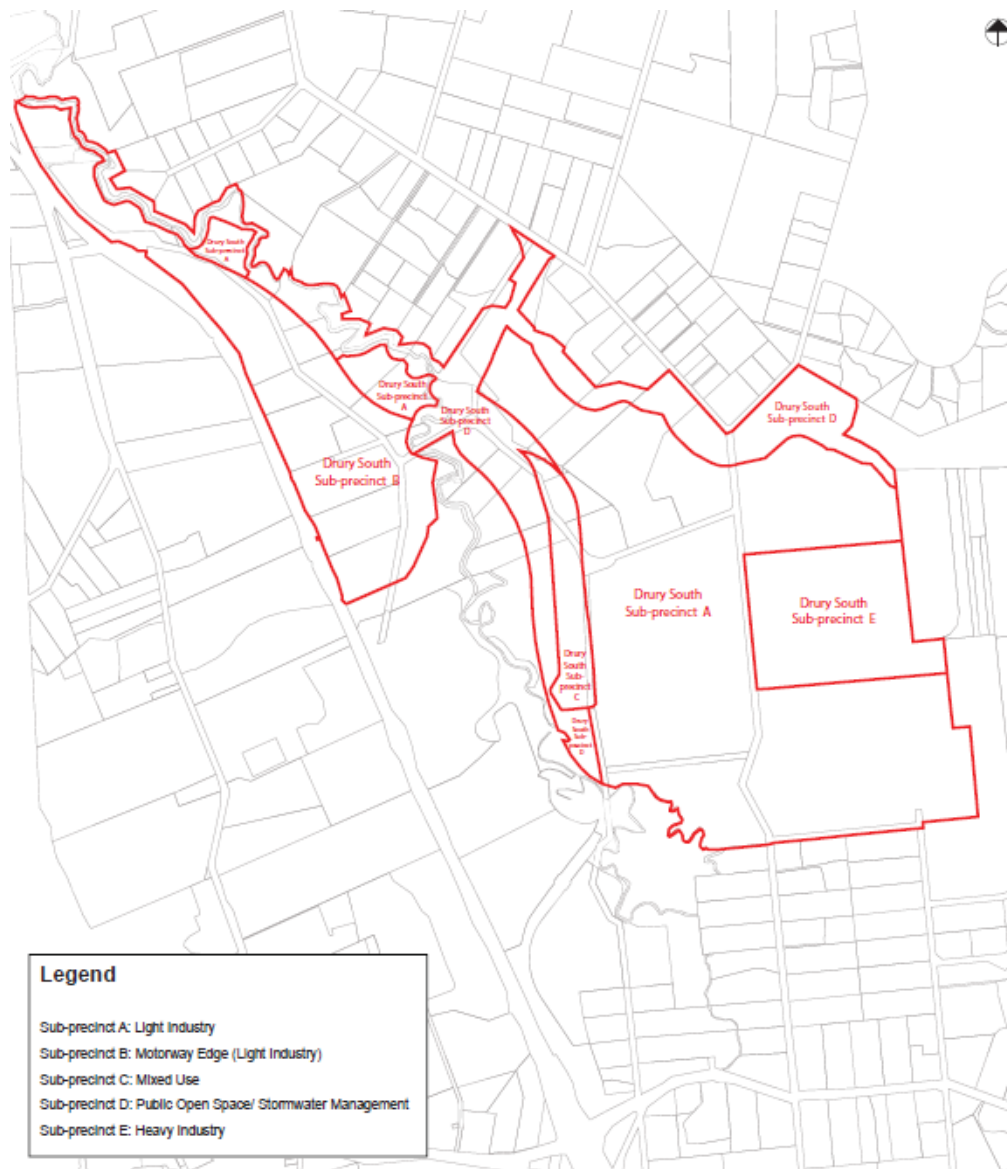


Figure 4: Showing the proposed sub-precinct boundaries in the Drury South Industrial Precinct.

5.2 PURPOSE AND REASONS FOR THE PLAN CHANGE

Clause 22(1) of the RMA requires that a Plan Change request explains the purpose of, and reasons for the proposed plan change.

The purpose and reasons for the Plan Change are detailed in Section 5.1 above with respect to the specific amendments proposed. Overall, the Plan Change is proposed to amend the underlying zoning and the precinct provisions applying to the Drury South Industrial precinct to better align with the current planning and policy context and to ensure that the provisions are the most efficient and effective option for

achieving the relevant objectives of the Auckland Regional Policy Statement and District Plan.

5.3 ACCEPTING THE PLAN CHANGE REQUEST (CLAUSE 25)

The Council has discretion to accept or reject a Plan Change request in accordance with Clause 25 of Schedule 1 of the Resource Management Act 1991 (RMA), subject to the matters set out in Clause 25(4)(a)-(e). Given that the AUP has now been operative for more than two years, the Council is able to reject the Plan Change request only on the following grounds:

- a) The Plan Change request is frivolous or vexatious (clause 25(4)(a));
- b) The Plan Change request is not in accordance with sound resource management practice (clause 25(4)(c));
- c) The Plan Change request would make the plan inconsistent with Part 5 – Standards, Policy Statements and Plans (clause 25(4)(d)).

In relation to (a), considerable technical analysis has been undertaken to inform the Plan Change, which is detailed in the report below. For this reason, the proposal cannot be described as frivolous or vexatious.

In relation to (b), ‘sound resource management practice’ is not a defined term under the RMA, however, previous case law suggests that the timing and substance of the Plan Change are relevant considerations. This requires detailed and nuanced analysis of the proposal that recognises the context of the Plan Change area and its specific planning issues.

In this context, the Plan Change is considered to be in accordance with sound resource management practice as the proposed zoning and amendments to the precinct provisions will enable land use and development that more effectively utilise the land to achieve the outcomes sought in the Auckland Plan and Regional Policy Statement.

The Drury South Industrial Precinct is a significant employment area and the Plan Change will enable the co-location of supporting commercial and retail services, as well as introducing flexibility to provide residential use in a future accessible location close to open space and employment. The Plan Change area is serviced by infrastructure and it is anticipated that as the wider Drury area develops over time, public and active transport modes will connect Drury South to the planned centre east of the Drury interchange and the planned Drury Central train stations². The proposed zoning layout takes into account the potential for effects on the amenity and vitality of existing and planned centres in Drury-Opaheke. It also takes into account the potential for reverse sensitivity between heavy industry activities and

² Drury – Opāheke Structure Plan

more sensitive land uses, and additional controls have been incorporated to ensure residential development does not compromise operations within the Heavy Industry zone.

Furthermore, all necessary statutory requirements have been met, including an evaluation in accordance with section 32³ with supporting evidence.

In relation to (c), the Plan Change is considered to be consistent with the sustainable management purpose of the RMA as detailed throughout this report.

On this basis, the merits of the proposal should be allowed to be considered through the standard Schedule 1 process.

6.0 POLICY FRAMEWORK

A number of strategic and statutory planning documents have informed the Plan Change process. This section provides a summary of those documents.

6.1 NATIONAL POLICY DOCUMENTS

6.1.1 The National Policy Statement on Urban Development Capacity

The National Policy Statement on Urban Development Capacity 2016 (NPS on Urban Development Capacity) came into effect on 1 December 2016. It recognises the national significance of urban environments and provides direction to decision-makers on planning for urban environments. The NPS on Urban Development Capacity seeks 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.

Policy PA1 sets out housing and business land development capacity that local authorities are required to provide in the short, medium and long-term. The NPS-UDC requires that high growth councils (of which Auckland Council is one) must produce a future development strategy that demonstrates there will be sufficient, feasible development capacity in the medium and long terms and that the minimum targets will be met.

In relation to business land development capacity, the industrial zoning at Drury South was initially put in place to protect both the operation of the quarry and the and the routes to and from the motorway from reverse sensitivity issues that might arise. Over time however, the growth needs of Auckland have seen the city expand towards this area resulting in a range of changes within Drury South and surrounds.

³S32 of the RMA

These changes include the identification of the area surrounding the Drury interchange as Future Urban, which will eventually accommodate 30,000 dwellings, and a portion of land to the south of the Precinct has been identified and developed for residential purposes (SHA) which is now known as the Drury South Residential Precinct. The Drury South Industrial Precinct will become a significant employment area for people living in the Drury South Residential Precinct and the wider Drury Future Urban area.

In light of this evolving backdrop, the Plan Change seeks to utilise the land within Sub-Precinct C to become a focal point for the wider industrial and residential precinct. It achieves this by enabling supporting retail and service activities that meet the needs of the local catchment and by providing opportunities for living in an accessible location adjacent to employment and high amenity open space/stormwater management area. The Economic Assessment undertaken in support of this Plan Change has confirmed that there is demand within the Drury South Industrial Precinct for the levels of commercial provided for through the Plan Change (refer **Appendix 4**).

The Economic Assessment has also confirmed that the rezoning of Heavy Industry land to Light Industry to create a separation between the proposed Mixed Use precinct and Heavy Industry is appropriate given the changing nature of the industrial market in Auckland (refer to page 25 of the Economic Assessment at **Appendix 4**).

For these reasons, the Plan Change is considered to give effect to the NPS-UDC.

6.1.2 Discussion Document - National Policy Statement on Urban Development

In August 2019 the Ministry for the Environment released a Discussion Document on a proposed National Policy Statement on Urban Development (**NPS – Urban Development**). This Discussion Document does not have any statutory weight but foreshadows the Government’s policy intent with respect to urban development. The Discussion Document emphasises the need for District Plan to allow for growth ‘up’ and ‘out’ in a way that contributes to a quality urban environment, and to ensure that rules do not necessarily constrain growth.

The proposed objectives and policies ensure that urban environments provide for diverse and changing amenity values. Councils must also enable higher density development in areas close to employment, amenity, infrastructure and demand. There is an emphasis on undertaking responsive planning if development capacity is not being taken up.

This proposal is consistent with the proposed policy direction of the NPS – Urban Development. In particular, providing for a greater range of uses close to future public transport, employment and open space amenity is consistent with the desire to make efficient use of land and infrastructure and support a quality built

environment. Careful consideration has been given to mix of activities enabled in relation to the potential effects on the vitality and amenity of future centres in Drury-Opaheke.

6.1.3 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement 2010 (NZCPS) contains objectives and policies relating to the coastal environment to achieve the purpose of the RMA. The NZCPS is applicable to this Plan Change as Te Mānukanuka o Hoturoa (the Manukau Harbour) is the ultimate receiving environment for the streams which drain the Plan Change area.

No changes are proposed to the stormwater management provisions of the Drury South Industrial Precinct. Tonkin & Taylor has prepared a memo at **Appendix 8** confirming that the proposed rezoning will not impact the quality or flow of stormwater and therefore no adverse effects on the receiving environment are anticipated.

6.1.4 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2011 (NPSFM) sets a national policy framework for managing freshwater quality and quantity. The NPSFM was updated in August 2017 to incorporate amendments from the National Policy Statement for Freshwater Amendment Order 2017. The amendments came into effect on 6 September 2017 and include provisions that seek to improve fresh water quality with a target to increase the proportion of rivers and lakes suitable for primary contact to 90 per cent by 2040. There are also new provisions that enable the use of freshwater for economic wellbeing.

As above, no changes are proposed to the stormwater management provisions of the Drury South Industrial Precinct and Tonkin & Taylor has confirmed that the zoning change will not result in any substantive changes from a stormwater perspective.

6.1.5 National Planning Standards

The National Planning Standards came into effect on 5 April 2019. These codify the structure, mapping, definitions and noise/vibration metrics of District, Regional and Unitary Plans. Auckland Council has 10 years to implement these changes. This Plan Change applies the standard AUP zone, precinct and rule framework to the Plan Change area, which is broadly consistent with the planning standards.

6.1.6 National Environmental Standards

The National Environmental Standards (NES) that are relevant to this Plan Change include:

- NES for Assessing and Managing Contaminants in Soil to Protect Human Health;
- NES for Air Quality.

The Plan Change will not result in any change in effects on human health arising from potential soil contaminants given the greenfield nature of the development. The proposed reduction in the amount of Heavy Industry zoned land is likely to have a positive effect on air quality given that the potential for activities emitting dust and odour will be reduced.

6.2 COUNCIL STRATEGIC PLANS

6.2.1 Auckland Plan 2050

The Auckland Plan is the key strategic document which sets the Council's social, economic, environmental and cultural objectives. A key component of the Auckland Plan is the Development Strategy which sets out how future growth will be accommodated up to 2050. The Auckland Plan focusses on a quality compact approach with future development focused within Auckland's urban footprint.

In terms of the form of development, the Auckland Plan takes a quality compact approach to growth and development. The Auckland Plan defines this as⁴:

- Most development occurs in areas that are easily accessible by public transport, walking and cycling;
- Most development is within reasonable walking distance of services and facilities including centres, community facilities, employment opportunities and open space;
- Future development maximises efficient use of land; and
- Delivery of necessary infrastructure is coordinated to support growth in the right place at the right time.

The initial zoning of the Drury South Industrial Precinct was focused around protecting the quarry and transport routes to the quarry. As the surrounding context of the precinct has evolved, there is a demand for commercial and retail development to support the industrial workforce and the residential development, currently under development in the Drury South Precincts. The Mixed Use zone is considered the best fit in terms of utilising the land to create quality compact

⁴ Auckland Plan 2050, pg. 206.

neighbourhoods. The Mixed Use zone will enable the establishment of a focal point for the wider Drury South area which services the local commercial and retail needs, and also provides the flexibility to incorporate residential development. The recreational needs of any future residents will be catered for through the generously proportioned open space corridor/stormwater management area which, defines the western and southern edges of Sub Precinct C.

Additionally, the Plan Change is in keeping with a quality compact approach to growth as the precinct enables the future implementation of public transport via bus services, and it is anticipated that as the development of the wider Drury Future Urban zone commences, Drury South will be serviced by public transport. In particular, it is expected that the future public transport network will be extended to connect Drury South with the future urban areas in the north and west given that this is a key employment area. The broader range and mix of activities now proposed in the Precinct will also support the potential viability of services. There is provision made for buses to utilise Maketu Road as well as other roads within the precinct. Subdivision consents issued to date within the precinct require a dedicated bi-directional cycle path that connects through to Drury village where the Drury-Opāheke Structure Plan identifies a new train station to be constructed. This will be further upgraded as part of the development of the Future Urban zoned land in Drury East.

These strategic objectives of the Auckland Plan are reflected in the AUP objectives and policies, which are assessed in detail below.

7.0 REGIONAL POLICY STATEMENT AND PLANS

7.1 AUCKLAND UNITARY PLAN (OPERATIVE IN PART)

The Regional Policy Statement (**RPS**) sets out the overall strategic statutory framework to achieve integrated management of the natural and physical resources of the Auckland Region. The RPS broadly gives effect to the strategic direction set out in the Auckland Plan.

B2.2, B2.3 and B2.4 - Urban Growth and Form, Quality Built Environment and Residential Growth

Of particular relevance to this Plan Change is Chapter B2 of the RPS which contains provisions directing urban growth and form in Auckland. There is strong direction to achieve a quality compact urban form, with growth primarily located within the Metropolitan area as defined in Appendix 1A of the AUP. Sufficient development capacity is required to accommodate residential and commercial growth with social facilities to support growth. There is an emphasis on achieving a higher quality urban environment and better use of existing infrastructure, through enabling higher

residential intensities in areas closest to centres, the public transport network, open space and large social facilities and amenities.

Overall the Plan Change will give effect to this policy direction for the following reasons:

- The broadening of activities in sub-precinct C supports a higher quality urban environment that better provides for social and cultural vitality and makes efficient use of infrastructure investment planned for Drury South (RPS B2.2.1(1));
- The Plan Change area is located within the Metropolitan area as defined in Appendix 1A of the AUP (RPS B2.2.1(2));
- The proposed rezoning is better aligned with projected demand for commercial and industrial activities in Drury South (RPS B2.2.1(3));
- Providing for residential in sub-precinct C (through the underlying zoning) supports higher residential intensification close to public transport that is likely to be provided in the future, close to social facilities/open space and employment (RPS B2.2.2(5));
- The quantum of commercial and retail activities envisaged in sub-precinct C will ensure that the hierarchy of centres identified in the Drury-Opaheke Structure Plan is maintained to support a quality compact urban form (RPS B2.2.2(6));
- The proposed change to Mixed Use and the requirement for all new buildings to be assessed for design and appearance will ensure that the form and design of future subdivision contributes to the safety of the site, street and neighbourhood and achieves a high level of amenity (RPS B 2.3.2(1)). This is more effectively achieved by the restricted discretionary activity consent required by the Mixed Use zone than the controlled activity status in the operative Drury South Industrial precinct. It also enables a range of built forms and supports an appropriate choice of activity and building form (RPS B2.3.2(2)).
- Enabling more intensive residential activity in sub-precinct C will support an increase in housing capacity and housing choice in south Auckland (RPS B2.4.1(4)) and will ensure that land close to future public transport, employment and social facilities is a focus for residential intensification, in a manner that ensures the area will be attractive, healthy and safe (RPS B2.4.1(2)-(4)). This is achieved by concentrating residential close to open space amenity and including appropriate amenity controls (noise attenuation) for residential, and providing for an appropriate transition between the Heavy Industry zone and residential activities in the precinct.

B2.5 Commercial and Industrial Growth

The objectives and policies within Chapter B2.5 seek to ensure that commercial and industrial activities meet future demands. There is an emphasis on ensuring that commercial growth and activities are primarily focused within a hierarchy of centres to support a compact urban form. Industrial growth is enabled in manner that promotes the efficient use of buildings, land and infrastructure in industrial zones and manages conflicts between compatible activities.

The Plan Change seeks to rezone Light Industry land to Mixed Use zone and rezone a block of Heavy Industry zoned land to Light Industry. While the Mixed Use zone will allow for some retail and commercial activities, the limitations proposed on these activities in the precinct provisions seek to ensure that this does not affect the viability of the planned network of centres and will ensure that they remain the primary focus for commercial growth in Drury-Opaheke (RPS B 2.5.2(1)-(2)). This is articulated in proposed Policy 26 of the Drury South Industrial precinct.

The rezoning of the block of land bounded by Maketu Road, New Quarry Road and Quarry Road from Heavy Industry to Light Industry will give effect to Policy B2.5.2(10) as it creates a separation between heavy industry and the more sensitive land uses in Sub-Precinct C to manage reverse sensitivity. The proposed rezoning is in keeping with B2.5.1(1) as it also continues to ensure the supply of industrial land is met, and is in keeping with expressed demand for light industry as discussed further in Section 8. There are additional controls for residential development within Sub-Precinct C to ensure that the operation of the Heavy Industry zone is not compromised.

Summary

A comprehensive assessment of the proposed rezoning against the relevant objectives and policies of the RPS are provided at **Appendix 3**. This demonstrates that the proposed rezoning and precinct provisions will give effect to the RPS.

7.2 OTHER PLANS

7.2.1 Drury-Opāheke Structure Plan

Auckland Council has developed a Structure Plan for the wider Drury-Opāheke area which was reported to, and adopted by Auckland Council's Planning Committee on Tuesday 6 August 2019.

The Plan Change area is not included within the structure plan as it already has an urban zoning however, the structure plan shows the arrangement of various land uses (centres, housing businesses and parks) and infrastructure in the wider Drury-Opāheke FUZ that are relevant to this Plan Change.

Overall the development of the Drury – Opāheke structure plan area over 30 years is estimated to provide about 22,000 houses and about 12,000 jobs with a population

B&A

of about 60,000. There is a distance of approximately 4-5km (by road) from the Plan Change area and further 5km from the Residential Precinct, to the Drury interchange and the proposed largest centre in the Drury – Opāheke area. A train station is shown adjacent to the Drury Village and proposed centre. While not strictly required given the current Future Urban zoning, the potential effects of the proposal on the network of centres shown in the Structure has been assessed in detail by Market Economics (refer to **Appendix 4**).

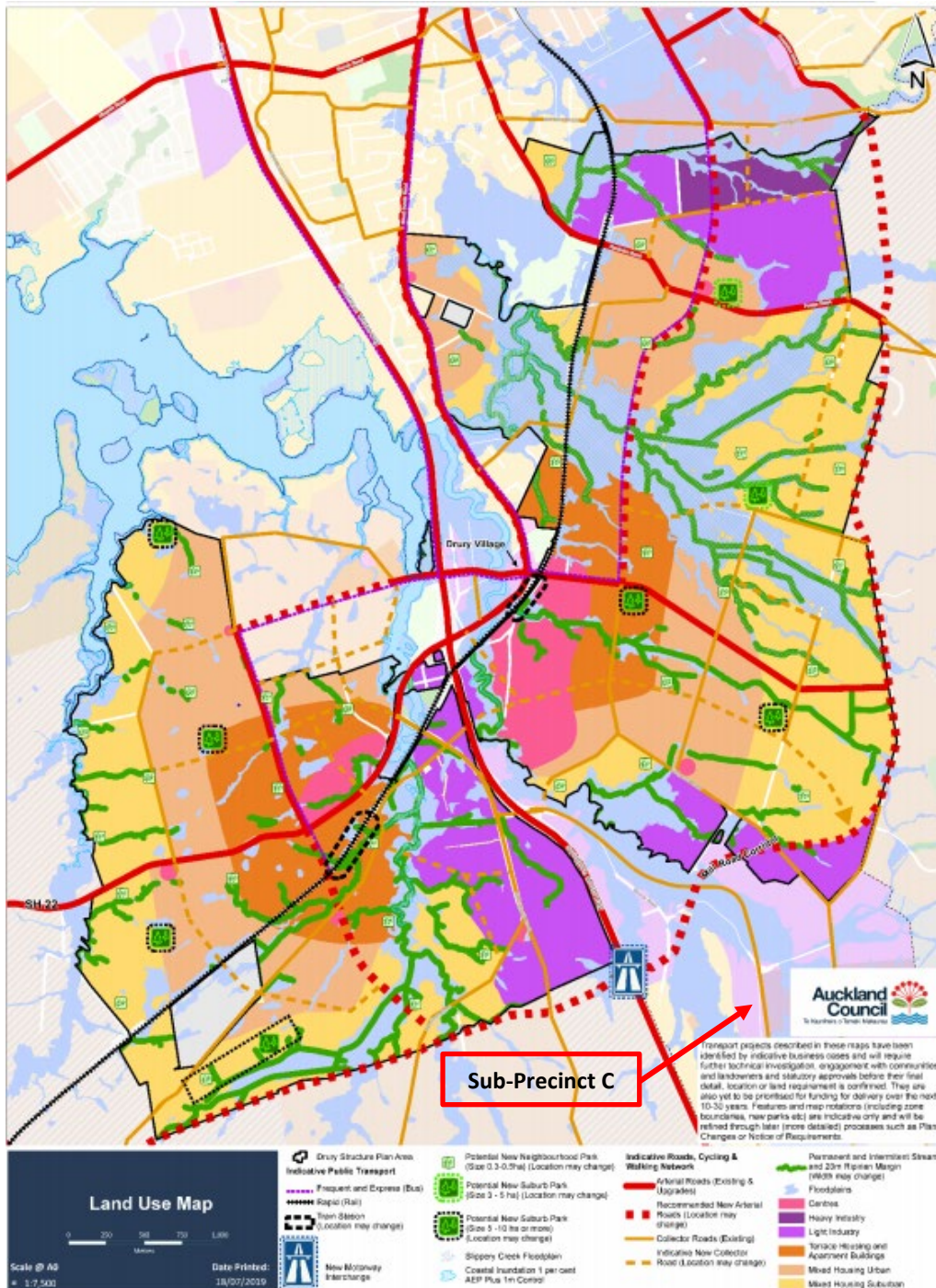


Figure 5: Drury – Opāheke Structure Plan (August 2019).

7.2.2 Supporting Growth Alliance – Preferred Network

The Supporting Growth Alliance (SGA) is a collaboration between Auckland Transport and the NZ Transport Agency to plan transport investment in Auckland’s future urban zoned areas over the next 10 to 30 years. The SGA has released its preferred network for Drury, including an indicative alignment for the Mill Road Corridor (refer Figure 6 below). This alignment is different to that shown in the Structure Plan above. We understand that the SGA are still investigating alignment options for the southern section of the Mill Road Corridor and that a decision on an alignment is likely in 2020. In any scenario, it is likely that the Mill Road Corridor will locate generally at the northern end of sub-precinct C to connect with a future interchange immediately to the south of the Transpower substation.



Figure 6: Showing the SGA's preferred alignment for the Mill Road Corridor.

7.2.3 Iwi Planning Documents

Ngati Tamaoho and Ngati Te Ata Waiohua have been heavily involved in the previous Plan Changes for Drury South, and more recently the resource consenting for development. Both iwi have been contacted regarding this Plan Change and to date no response has been received.

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.

In addition, DSL also sent out consultation letters on the proposed plan change following Iwi Groups on 3 March 2020:

- Ngai Tai Ki Tamaki
- Ngati Maru
- Ngati Tamaoho
- Ngati Te Ata
- Ngati Whanaunga
- Te Ahiwaru – Waiohua
- Te Akitai Waiohua
- Waikato – Tainui

To date, no responses have been received.

7.2.4 Other Consultation

DSL has consulted with the following parties in preparing this Plan Change:

- Fulton Hogan (operators of the Drury Quarry);
- Ramarama School;
- Transpower;
- Balle Brothers (landowners on the western side of State Highway 1)
- Classic Homes (developing Drury South residential);
- Remaining landowners within the Drury South Industrial precinct;
- Key landowners in Drury East;
- Auranga and MADE.

Consultation with these parties will be on-going throughout the Plan Change process.

8.0 ASSESSMENT OF ENVIRONMENTAL EFFECTS

Section 76 of the RMA states that in making a rule, the territorial authority must have regard to the actual or potential effect on the environment of activities including, in particular, any adverse effect. This section details the actual and potential effects that the proposed Plan Change provisions may have on the environment. This assessment is based on analysis and reporting undertaken by various experts, which are attached as appendices to this report.

8.1 ECONOMIC

An Economic Assessment for the Plan Change has been prepared by M.E Consulting and is included as **Appendix 4**. This assessment informs planning for the provision of retail and commercial office space at Drury South and has assessed the potential effects of the Plan Change the proposed network of centres within the wider Drury Future Urban zone shown in the Drury – Opāheke Structure Plan.

8.1.1 Provisions for Retail

To ensure that retail activities at Drury South service the local residential and industrial needs while ensuring the benefits of the local retail hierarchy are achieved, the Economic Assessment proposes an overall retail threshold of 4,500m² (above which resource consent is required as a discretionary activity). This retail threshold is based on a market-based assessment to determine the level of retail Drury South could support locally. It then tests this result against a further analysis of the average amount of retail space sustained in Local and Neighbourhood Centres in Auckland per household.

According to the Economic Assessment, retail demand in the wider Drury FUZ area, will grow from \$150 million in 2018 to approximately \$1.18 billion by 2048. While the proposed large centre east of the Drury interchange⁵ will dominate retail trade arising from the wider Drury FUZ, the Drury South Industrial Precinct will have a small role serving local households and the local workforce, and is expected to eventually contribute around \$49 million.

The key households that Drury South Industrial Precinct will serve include the local needs of the Drury South Residential Precinct. This residential development is only a very small share of the household growth within the wider Drury FUZ⁶ however, it is anticipated that Drury South will also serve a wider catchment, drawing from both the east and west areas, and especially for supermarket, home-based and trade-based retail⁷.

In addition to the household growth, Sub-Precinct C will also service the local retail needs (takeaway, specialty foods, convenience retail and a limited range of specialty goods) of the Drury Industrial Precinct workforce. The industrial area is anticipated to accommodate over 3,000 workers increasing to 6,000 workers when fully

⁵ As shown on the Drury – Opāheke Structure Plan.

⁶ 1.7%, or up to 950 households.

⁷ The Drury East catchment will increase by 13,570 households, and the Drury West catchment by 14,640 households. The total FUZ trade area for Drury centres will grow by 27,600 households by 2048, representing a twenty-five-fold increase over current residential levels. The total study area household count increases by over 55,000 households to over 80,200 by 2048.

developed. Sub-Precinct C could provide for approximately 750 office workers. Additionally, it is also anticipated that other workers in retail, trade suppliers and other non-industrial activities will locate in close proximity to the Maketu Road.

The Economic Assessment concludes that the growth in Drury South and capture from development around Drury South could potentially support:

- 4,000m² supermarket;
- Up to 950m² of additional grocery retail space (above the 4,000m² supermarket);
- 750m² of other food and liquor;
- 2,950m² of convenience retail;
- 3,370m² of hospitality – cafes and restaurants; and
- 15,300m² of home-based retail space.

The exclusions from the proposed retail threshold include hospitality and home-based retailing (furniture, appliances etc). Home based retail goods will seek to co-locate with any large trade-based timber and hardware suppliers that will more naturally want to locate within the light industrial land on the eastern side of the main Spine Road. Hospitality would be entirely demand driven and the Economic Assessment has found that it is likely that the business market at Drury South will require a reasonably significant hospitality presence.

Overall, therefore, the Economic Assessment concludes that the proposed precinct provisions that manage the provision of retail within Drury South will meet the local and neighbourhood needs of local residents and workers while ensuring that the development does not impact on the planned retail hierarchy across the wider Drury FUZ.

The analysis undertaken by M.E. is based on theoretical build out rates in the surrounding greenfield area. To ensure that any retail development in Drury South would serve the local catchment, it is important to ensure that the rate of retail development is coordinated with the rate of growth in the wider area. To ensure this, the proposed precinct provisions require consent for a new large-scale supermarket and other retail greater than 1000m².

8.1.2 Provision for Commercial Services - Office

To ensure that office activities within the Drury South Industrial Precinct do not impact planned centres in Drury-Opaheke, the Economic Assessment concludes that a maximum 15,000m² GFA of office space can develop within Sub-Precinct C.

The proposed GFA threshold is derived by determining the ratios of office employment to industrial employment in the more established industrial areas at Wiri and Highbrook/East Tamaki and the office demand arising from the

approximately 1,500 dwellings planned. The final figure has then been adjusted to take into account the large centre planned to the east of the Drury interchange within 2-5km of the Drury South Industrial Precinct⁸, which is expected to cater for up to 50% of the office requirements arising from the Drury South Industrial Precinct.

In addition to an overall commercial office threshold within Sub-Precinct C the Economic Assessment also recommends a per tenancy threshold of 500m². The Mixed Use zone provisions currently limit commercial space at 500m² per site to ensure commercial development does not undermine centres. As Sub-Precinct C is a 10 hectare super lot this provision will hamstring the operation of the industrial areas at Drury South and many of the convenience needs of the residential areas will not be able to be met locally. Restricting commercial space on a tenancy basis rather than a parcel basis will enable development that meets the needs of both the industrial areas and residential developments within the Precinct. The 500m² threshold is appropriate as the majority of Auckland's office businesses are less than 25 workers (90%) and therefore will fit into a 500m² footplate.

In order to provide some flexibility, the Economic Assessment recommends that offices up to 1,000m² per tenancy be provided for as a restricted discretionary activity. With discretion restricted to impacts on the existing or proposed centres. This provides sufficient flexibility to allow a range of businesses to potentially locate within Sub-Precinct C but excludes the very large office businesses that would best locate within a higher order centre.

8.1.3 Heavy to Light Industry Rezone

The Economic Assessment has also considered the proposed rezoning of the block of land bounded by Maketu Road, New Quarry Road and Quarry Road from Heavy Industry to Light Industry. This block is proposed to be rezoned to provide an appropriate separation distance between the proposed Mixed Use zone and the Heavy Industry zone east of Quarry Road. The Economic Assessment finds that this proposed rezoning is appropriate because as Auckland's industrial economy evolves and New Zealand engages more widely with the international community, local heavy manufacturing has reduced. Therefore, this proposal aligns with expressed demand. This trend does not apply to the same extent to activities that can locate on Light Industrial zoned land as there has been significant rises in storage and logistics associated with the import of products and their distribution across the country.

⁸ As shown on the Drury – Opāheke Structure Plan.

8.1.4 Summary

The Economic Assessment concludes that the proposed amendments to the Drury South Industrial Precinct will not adversely affect the planned future centre hierarchy proposed for the wider Drury area. We agree with the conclusions of this report and consider that the proposed precinct provisions will enable an appropriate amount of retail and commercial floorspace that can be developed over time to coordinate with the rate of development in the wider area and ensure that any potential effects on the amenity and vitality of the future network of centres in Drury-Opaheke are appropriately managed. Further, the proposed increase in Light Industry zoned land and decrease in Heavy Industry zone land will appropriately meet current and future demand.

8.2 LANDSCAPE AND VISUAL EFFECTS

The landscape and visual effects of the Plan Change have been assessed by Bridget Gilbert Landscape Architecture Limited (refer **Appendix 5**). In particular the Landscape and Visual Assessment has assessed the impact of the following amendments:

- Amending the building height from 20m to 25m within Sub-Precinct C;
- Amending the front yard landscaping requirements for Sub-Precinct A and Sub-Precinct E, such that landscape requirements are in accordance with the underlying zone provisions (Light Industry zone and Heavy Industry zone respectively); and
- Amending the side and rear yard landscaping requirements for all of the Light Industry and Heavy Industry Sub Precincts (i.e. Sub Precincts A, B, C and E), except for side and rear yards in Sub Precinct B that front State Highway 1 (SH1).

On balance the Landscape and Visual Assessment finds that the effects arising from the increase in building height from 20m to 25m are very low. Height limits of 20m and 25m apply across the Drury South Industrial Precinct and therefore a 25m height limit in Sub-Precinct C will result in a 'visual fit' when viewed from within and outside the precinct. Furthermore, the proposed change in building height will be barely discernible from the external viewing audience which includes the elevated rural properties (and roads) some 1.5km to the east of the precinct throughout Peach Hill Road and Macwhinney Drive. The generously proportioned combined open space and stormwater management corridor, which defines the western and southern edges of Sub-Precinct C, will separate, and in time screen, Sub-Precinct C from the residential precinct, state highway network and the rural properties further to the west.

The effects from the proposed change to the front yard requirements for sub-precincts A and E, which sees the 3m width flax planting requirement 'reverting' to the

underlying AUP zone provisions (i.e. 2m width tree, shrub, and groundcover planting), are found to be very low. This amendment will also result in positive effects, because it will enable tree planting in the front yards that can complement streetscape plantings and assist with the integration of large-scale buildings and paved areas that are typical of light industrial and heavy industrial areas.

The requirement within the Drury South Precinct to incorporate a row of Leyland Cypress, Casuarina or Macrocarpa alongside and rear boundaries was intended to break up the 'sea of roofs' in views from the elevated catchment to the east (Macwhinney Drive/Peach Hill Road environs). The Landscape and Visual Assessment concludes that the landscape and visual effects arising from the deletion of this control can be minimised to an acceptable level through the incorporation of a standard that ensures that the reflectivity of roofs of new buildings does not exceed 30%. Accordingly, this standard is proposed to be included within the Drury South Industrial Precinct (refer **Appendix 1**).

For the reasons given above, in our view, the proposed amendments to the landscaping provisions and the increase in height in sub-precinct C will have minor adverse effects on the environment with respect to visual and landscape matters.

8.3 TRANSPORT

A Transport Assessment has been prepared by Beca and is included within **Appendix 6** to this report. The Transport Assessment builds on previous transport assessments that have been undertaken in relation to the Industrial Precinct, as well as ongoing work by the SGA and Council, relating to the future land use and transport infrastructure in the Drury area.

8.3.1 Proposed Transport Network

The transport network for the Drury South Industrial Precinct is illustrated on Precinct Plan 1 and is proposed to be amended to reflect the latest subdivision consent, which removes the roads shown to the east of Road 4. No change is proposed to the two east west connections shown on Precinct Plan 1 between Maketu Road and Road 4.

Much of this planned transport network has already been consented through the approved subdivision of approximately 65 hectares within the Precinct. As part of the approved subdivision consents for the precinct, transport assessments have identified the external transport upgrades that have already been provided or will be constructed prior to the approved subdivision lots becoming operational.

The future Mill Road Corridor has been identified by the SGA, as necessary to support the wider surrounding growth in the Drury / Opaheke FUZ. The precinct does not

rely on the future Mill Road corridor or include it within the transport infrastructure necessary to support the precinct. Depending on the corridors timing however, the Corridor has the potential provide a transport network that will provide an alternative network to address the transport effects of the Precinct, meaning some of the Transport Network Development Requirements (TNRD) projects to the north of the Precinct would not be necessary.

The Plan Change does not amend the walking and cycling provisions and it is noted that the cycle paths provided through approved subdivision consents exceed those indicated on Precinct Plan 1. In particular there is dedicated bi-directional cycle path on west side of Maketu Road, along the frontage of Sub-precinct C and a recreational shared path to west of Sub-precinct C. These shared paths connect to a shared path that will be provided through initial subdivision consents to the north to Drury village.

It is expected that the future public transport network will be extended to connect Drury South with the future urban areas in the north and west given that this is a key employment area. There is provision made for buses to utilise Maketu Road as well as other roads within the precinct, based on lane widths provided for through subdivisions. The mixed use activities within Sub-Precinct C will be located within a reasonable walk distance of Maketu Road, should AT provide bus services. The broader range and mix of activities now proposed in the Precinct will also support the potential viability of services.

8.3.2 Traffic Effects

The Transport Assessment has assessed predicted trip generation based on a range of development scenarios enabled by the Plan Change within Sub-Precinct C, and as a result of rezoning from heavy to light industry.

Within Sub-Precinct C the trip generation assessment finds that development enabled by the Plan Change will only be slightly more in the weekday evening peak and notably less than the morning peak. The proposed changes will result in a very low percentage change compared to the overall precinct traffic generation. It is noted that this is based on a development scenario that assumes a high rate of development in a greenfield context. This scenario consists of retail and office focused activities which generate more traffic than residential activities, particularly in the weekday evening peak. It is considered that this scenario is at the upper end of what is likely to be feasible to construct and it is also anticipated that development of Sub-Precinct C will have a residential focus. Consequently, the traffic assessment concludes that the traffic effects associated with the Plan Change will not be notably discernible from the current precinct provisions with the planned precinct transport infrastructure improvements.

The external traffic generation enabled by the proposed rezoning of approximately 20 hectares of land from heavy industry to light industry activities represent a low percentage change in the overall precinct traffic generation. The warehousing traffic generation rates have been applied to a range of potential GFA to site area ratios (i.e. 20 to 40%) to determine the potential traffic generation. The predicted additional vehicle movements represent increases of up to around 5% and 3% during the morning and evening peak hours respectively, based on the higher 40% GFA to site area ratio.

As the trip generation assessment has indicated that the external effects associated with the proposed amendments to the precinct are unlikely to be discernibly different, it is unlikely that traffic modelling of the external transport network will identify the need for any additional transport projects than those previously identified within the assessment criteria for the precinct. Further, the form and design of 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.

The Traffic Assessment has also assessed the traffic effects arising from the Plan Change within the Drury South Industrial Precinct. This assessment has indicated that the Plan Change may affect the performance of future intersections with Spine Road, however these are within an acceptable range and are within the theoretical design capacity of the intersections.

In terms of public transport, while not forming part of the existing environment, it is noted that Maketu Road has been designed to accommodate buses in the future that would connect the major employment area in Drury South to residential development occurring the Future Urban area to the north. Rail stations are planned for Drury East and Drury West. These measures will support a reduction in reliance on private cars to and from the Drury South precinct over time.

8.3.3 Summary

The Traffic Assessment concludes that the proposed amendments to the Drury South Industrial Precinct can be satisfactorily accommodated by the proposed internal transport network, including provisions for pedestrians, cyclists and buses, and the previously identified TNR for internal and external transport projects. Any effects on the planned internal transport network will be minor and can be resolved through the form and design of upgrades which will be considered as part of future subdivision consents. We agree with the findings of the transport assessment and conclude that the effects of the proposed rezoning on the transport network will be acceptable and no additional precinct provisions are required.

8.4 URBAN FORM AND QUALITY BUILT ENVIRONMENT

An urban design assessment has been prepared by B&A and is included within **Appendix 6** to this report. This report assesses the visual and amenity effects associated with the proposed change of zoning and the precinct provisions that seek to provide for a greater range of activities.

Overall, the assessment concludes that a high level of amenity would be available to potential residential use that might establish in Sub-Precinct C due to:

- the significant amenity benefit of the adjoining Hingaia Stream open space/stormwater management corridor;
- access to the bike and pedestrian circulation paths required in the area;
- the extent of discretion afforded to Council to achieve high quality buildings through a restricted discretionary activity consent process;
- the range of services likely available to residents enabled by Business-Mixed Use zoning; and
- an improved streetscape environment along Maketu Road due to the requested change in zoning of a block of Business-Heavy Industry zoned land, opposite Sub-Precinct C on Maketu Road, to Business-Light Industry.

Further the report concludes that the potential adverse visual effects on streetscapes and on adjoining activities that might establish in Sub-Precinct C from trade suppliers, garden centres, motor vehicle sales yards, marine retail businesses and a single large supermarket greater than 2,000m² gross floor area, which are proposed to have permitted activity status in the Sub-Precinct, are appropriately managed by:

- the restricted discretionary activity status for new buildings in the Business-Mixed Use zone, which provides the Council with discretion on building design and site layout; and
- a proposed assessment criterion that focuses on addressing amenity conditions along side and rear yard boundaries between these uses and the range of other uses Business-Mixed Use zoning enables, in addition to streetscape interfaces.

In terms of the proposed rezoning of the block on the eastern side of Maketu Road from Heavy Industry to Light Industry, the assessment concludes that it would result in overall positive benefits to the visual quality of adjoining streets, including Avenue Road and Maketu Road, by (variously) the discretion on design matters restricted to Council for new buildings and the nature of the uses that are enabled in those zones.

While the visual and landscape effects of the proposed increase in height in sub-precinct C have been considered by the assessment of BGLA, the urban design

assessment concludes that any additional shading or dominance effects on the open space/stormwater management corridor adjoining Sub-Precinct C from the proposed 5m increase in permitted height in that Sub-Precinct would be very low.

The assessment also concludes that the Plan Change would result in improved amenity outcomes for the adjoining Drury South Residential Precinct. This is due to the potential for an area of convenience activities at the southern end of Sub-Precinct C, conveniently located by a potential connection to Sub-Precinct C, and views across to the western frontage of Sub-Precinct C likely being of a higher quality, due the restricted discretionary status of new buildings in the Business-Mixed Use zone.

The urban design assessment identifies opportunities for pedestrian and cycling circulation, recreational circulation, potential connections between Sub-precinct C and the recreation reserve and the Drury South Residential Precinct (Appendix 6b pg 20). These proposals illustrate one way in which this integration can be achieved between these different areas to maximise amenity. The Drury South Industrial precinct includes policies, matters for discretion and assessment criteria which will guide new development and subdivision within Sub-precinct C to achieve an integrated urban environment and urban design outcomes. Overall, we agree with the urban design assessment and consider that the proposed zoning and amendments to the precinct provisions will have positive visual and amenity effects on the environment compared with the existing zoning for the reasons outlined above.

8.5 STORMWATER & FLOODING

The Drury South Industrial Precinct includes specific provisions for stormwater and flooding. DSL has recently obtained a Network Discharge Consent for the development consistent with these provisions, referenced in Section 4.1 of the report above.

Tonkin & Taylor has reviewed the Plan Change and they confirm that the change of zoning will not result in any discernible change to the methodology for managing stormwater and flooding within the precinct given that there will be no change in impervious area, and given that the sub-precinct extents that are proposed to be redefined are consistent with the approved resource consents. We agree with their conclusions and consider that the proposed rezoning will not change the approach to stormwater and flood management within the precinct.

A memo setting out Tonkin & Talyor's opinion on the Plan Change is included at **Appendix 8**.

8.6 REVERSE SENSITIVITY AND POTENTIAL EFFECTS ON RESIDENTIAL AMENITY

The proposed change to Mixed Use in sub-precinct C will permit residential activities in close proximity to industrial activities and Maketu Road, which will be future freight route. Any residential activities within sub-Precinct C would also be in reasonably close proximity to the Drury Quarry. It is therefore relevant to consider the extent to which this change in use will give rise to reverse sensitivity effects on industrial activities and adverse effects on the future amenity of residential activities. In this regard, we make the following comments:

- The proposed rezoning of the block of land on Maketu Road from Heavy Industry to Light Industry will provide an appropriate separation (at least 500m) between any residential in sub-precinct C and Heavy Industry;
- The interface of Mixed Use to Light Industry as will occur across Maketu Road is a common and accepted occurrence in Auckland⁹;
- Given the likelihood of Maketu Road accommodating freight traffic, an additional control is proposed that would require any residential dwellings to achieve appropriate internal noise levels based on a noise level of 75 dBA on Maketu Road. This is likely to require residential buildings to be setback from Maketu Road or a greater degree of acoustic insulation to be provided on the Maketu Road frontage of any residential buildings. This is appropriate in our opinion, to manage potential amenity effects arising from residential locating within a potentially noisier street environment. This is consistent with the requirements of the Drury South Residential precinct;
- To manage potential reverse sensitivity effects on the Drury Quarry arising from any residential establishing in sub-precinct C, a rule is proposed in the precinct requiring that a 'no complaints' covenant to apply to all residential activities. This is consistent with the requirements of the Drury South Residential precinct.

Marshall Day Acoustics has provided a memo that recommends applying the Spine Road noise control to residential activities in sub-precinct C, noting that it is achievable to comply with this requirement (refer **Appendix 9**).

Fur the reasons given above, the effects of the Plan Change on reverse sensitivity and residential amenity are considered acceptable.

8.7 SUMMARY OF EFFECTS

The actual and potential effects of the Plan Change have been considered above, based on extensive reporting and analysis undertaken by a wide range of technical

⁹ Other examples include Gloucester Park Road/Selwyn Street, Onehunga, Princes Street, Onehunga, Massey Road, Mangere East 622 Great South Road, Papatoetoe, Gordan Road/Argyle Street, Morningside, Wolverton Street, Avondale, Cartwright Road, Kelston, Hulme Place/Heremai Street, Henderson.

experts. On the basis of this analysis, it is considered that the effects of the proposal on the environment with respect to transport, visual and landscape, stormwater & flooding, design and reverse sensitivity and residential amenity will be acceptable. In addition, the Plan Change is considered to have positive effects on the environment in terms of the social and economic wellbeing of the community.

9.0 SECTION 32 ANALYSIS

9.1 APPROPRIATENESS OF THE PROPOSAL TO ACHIEVE THE PURPOSE OF THE ACT

Section 32(1)(a) of the RMA requires an evaluation to examine the extent to which the objectives of the proposed Plan Change are the most appropriate way to achieve the purpose of the RMA.

9.1.1 Objectives of the Plan Change

The purpose, or overarching objective of the Plan Change is to provide for a greater range of activities in sub-precinct C reflecting the changing planning and policy context; more appropriately provide for light industrial activities, and more efficiently and effectively manage the visual effects of development on the surrounding area through amendments to the landscaping and building form precinct provisions.

The proposed precinct as amended by the Plan Change incorporates the following objectives to guide development within the Plan Change area:

- (1) Development maintains and enhances the stream ecology and the natural vegetation and habitat values of the Hingaia and Maketu streams.*
- (2) The cultural heritage values of the precinct are maintained and enhanced.*
- (3) Landscape and visual amenity values within the precinct are maintained and enhanced (particularly when viewed from State Highway 1).*
- (4) The air quality, acoustic and other amenity values of surrounding areas are protected.*
- (5) The establishment of a convenient and well-designed industrial area with good quality streetscapes and a ~~commercial-service~~ mixed use precinct is facilitated.*
- (6) The timely and co-ordinated provision of robust and sustainable road, stormwater, water, wastewater, energy and communications infrastructure networks are provided.*
- (7) A transport network to facilitate the safe and efficient movement of people, goods and services and manage effects on the safe and efficient operation of the surrounding transport network.*

- ~~(8) Development and subsequent land use within the precinct avoids reverse sensitivity effects on the operations of t~~ The Drury Quarry, activities within the Business – Heavy Industry Zone or the adjoining rural area operate efficiently and are not unreasonably constrained by other activities.
- (9) Development and land use within the precinct avoids or minimises adverse effects on significant existing high voltage electricity, natural gas and communications infrastructure.
- (10) Subdivision and development in the precinct area avoids or mitigates the adverse effects of stormwater runoff on surface and groundwater quality and avoids increased flood risks to habitable buildings upstream and downstream of the precinct.
- (11) Visual and physical links to the surrounding area are protected.
- (12) Landscaping themes are complementary, consistent and coherent throughout the precinct.
- (13) Activities sensitive to traffic noise are controlled on the strategic freight network (Spine Road and New Quarry Access Road) serving the Drury Quarry.
- (14) Activities sensitive to noise in Sub-Precinct C are protected from unreasonable levels of land transport noise.

9.1.2 Assessment of the objectives against Part 2

Section 5 of the RMA identifies the purpose of the RMA as being the sustainable management of natural and physical resources. This means managing the use, development and protection of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being and health and safety while sustaining those resources for future generations, protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

The objectives of the Plan Change are consistent with Part 2 of the RMA, given that the Plan Change seeks to provide flexibility regarding land use so that Sub-Precinct C can appropriately meet the changing community's social and economic needs. The Plan Change will enable Sub-Precinct C to become a focal point for the industrial employment area and the surrounding residential development within Drury South Residential Precinct. Sub-Precinct C will provide for local retail convenience needs and eventually become the public transport hub for this wider area. The Plan Change supports the health and safety of future residents within Sub-Precinct C through ensuring the zoning pattern enables appropriate separation distance between heavy industry and sensitive land uses. The Auckland-wide provisions in relation to stormwater and stream management will ensure that the life supporting capacity of ecosystems would be protected while at the same time mitigating the adverse effects of development on the environment.

Section 6 of the Act sets out a number of matters of national importance which need to be recognised and provided for in achieving the purpose of the RMA. This includes the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins; protection of outstanding natural features and landscapes, the protection of areas of significance indigenous vegetation and significant habitats of indigenous fauna; maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers; the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga; the protection of historic heritage; the protection of protected customary rights and the management of significant risks from natural hazards.

The Plan Change does not compromise the recognition of, or provision for these matters of national importance. The objectives of the Drury South Industrial Precinct seek to ensure that development maintains and enhances the stream ecology and the natural vegetation and habitat values of the Hingaia and Maketu streams. The objectives further seek to ensure that the cultural, landscape and heritage values of the precinct are maintained and enhanced. The proposed amendments to the landscaping provisions will have a very low effect on landscape and visual values as set out in Section 9 of the report above. The proposal will not involve significant risks from natural hazards.

Section 7 of the RMA identifies a number of “other matters” to be given particular regard by Council. Specific matters from section 7 that are relevant to the Plan Change include:

- *b) The efficient use and development of natural and physical resources* – The Plan Change will support the efficient use of natural and physical resources by applying land uses zones that appropriately respond to the changing needs of the surrounding community. The land uses will be accessible to establishing employment and residential areas, thereby reducing reliance on vehicle trips out of the area to service local needs.
- *c) The maintenance and enhancement of amenity values and f) Maintenance and enhancement of the quality of the environment* – The proposed zoning pattern will enable a high quality urban environment to be achieved that responds to the specific land characteristics of the Plan Change area and edge conditions. The provisions that will apply to future development under the AUP will ensure that a high quality, built environment is achieved at the street block and site scale.

Section 8 requires Council to take into account the principles of the Treaty of Waitangi. It is considered that this proposal will not offend against the principles of the Treaty of Waitangi.

The Plan Change is a more effective means of achieving the sustainable management purpose of the RMA than the current zone or an alternative (as detailed below). It is considered that the objectives of the Plan Change are the most appropriate way to achieve the purpose of the RMA.

9.2 APPROPRIATENESS OF THE PROVISIONS TO ACHIEVE THE OBJECTIVES

9.2.1 The Objectives

Section 32(1)(b) of the RMA requires an evaluation to examine whether the provisions (i.e. policies and methods) of the proposed Plan Change are the most appropriate way to achieve the objectives of the plan by:

- Identifying other reasonably practicable options for achieving the objectives;
- Assessing the efficiency and effectiveness of the objectives;
- Summarising the reasons for deciding on the provisions.

As the proposed Plan Change is amending the AUP, the above assessment must relate to the provisions and objectives of the Plan Change, and the objectives of the AUP to the extent that they are relevant to the Plan Change and would remain if the Plan Change were to take effect¹⁰.

In addition to the objectives of the plan change which are outlined above, the AUP objectives with particular relevance to this plan change are summarised below:

Within the RPS:

- A quality compact urban form that enables better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects¹¹.
- Ensure there is sufficient development capacity to accommodate growth and require the integration of land use planning with the infrastructure to service growth¹²;
- A quality built environment where subdivision, use and development respond to the intrinsic qualities and physical characteristics of the area, reinforce the hierarchy of centres and corridors, contribute to a diverse mix of choice and maximise resource and infrastructure efficiency¹³.

¹⁰ RMA s32(3)

¹¹ B2.2.1(1)

¹² B2.2.1(3)

¹³ B2.3.1(1)

- Ensure residential intensification supports a quality compact urban form and land within and adjacent to centres and corridors or in close proximity to public transport is the primary focus for residential intensification¹⁴;
- Ensure employment and commercial and industrial opportunities meet current and future demands¹⁵;
- Ensure commercial growth and activities are primarily focused within a hierarchy of centres and identified growth corridors that supports a compact urban form¹⁶;
- Industrial growth and activities are enabled in a manner that promotes the efficient use of land and infrastructure and manages conflicts between incompatible activities¹⁷; and
- Ensure recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities and that public access to streams is maintained and enhanced¹⁸.

Within the business zones:

- Support a strong network of centres that are attractive environments and attract ongoing investment, promote commercial activity, provide employment, housing and goods and services at a variety of scales¹⁹.
- Development is of a form, scale and design quality so that centres are reinforced as focal points for the community²⁰.
- Development positively contributes towards planned future form and quality, creating a sense of place²¹.
- Business activity is distributed in locations, and is of a scale and form, that: provides for the community's social and economic needs; improves community access to goods, services, community facilities and opportunities for social interaction; and manages adverse effects on the environment, including effects on infrastructure and residential amenity²².
- Local centres enable commercial activity which primarily services local convenience needs and provides residential living opportunities²³.

¹⁴ B2.4.1(1) & B2.4.1(3)

¹⁵ B2.5.1(1)

¹⁶ B2.5.1(2)

¹⁷ B2.5.1(3)

¹⁸ B2.7.1(1)

¹⁹ H13.2(1)

²⁰ H13.2(2)

²¹ H13.2(3)

²² H13.2(4)

²³ H11.2(6)

- Moderate to high intensity residential activities and employment opportunities are provided for in areas in close proximity to Metropolitan and Town Centre zones and public transport²⁴;
- Activities within the Mixed Use zone do not compromise the function, role and amenity of the Metropolitan Centre zone²⁵; and
- Adverse effects on amenity values and the natural environment, both within the Light Industry zone and on adjacent areas, are managed²⁶.

Auckland – wide:

- Auckland- wide objectives relating to stormwater and land disturbance seek to avoid adverse effects where possible but recognise the need to use land identified for future urban land uses efficiently²⁷.
- Auckland-wide objectives relating to subdivision seek to ensure that subdivision has a layout which is safe, efficient, convenient and accessible and that Infrastructure supporting subdivision and development is planned and provided for in an integrated and comprehensive manner²⁸.
- Auckland-wide objectives relating to transport seek to ensure that an integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for²⁹.

The following sections address the matters set out in Schedule 1 and Section 32 of the RMA.

9.3 OTHER REASONABLY PRACTICABLE OPTIONS FOR ACHIEVING THE OBJECTIVES

In determining the most appropriate method for achieving the objectives of the Plan Change, consideration has been given to the following other reasonably practicable options:

- *Option 1 – Retain the current planning provisions*
This option involves retaining the current zoning pattern and precinct provisions within the Drury South Industrial Precinct.
- *Option 2: Rezone the Plan Change area in accordance with the Plan Change zoning layout and rely on land use activity controls and residential controls within the underlying zones*

²⁴ H13.2(6)

²⁵ H13.2(7)

²⁶ H17.2(3)

²⁷ E1.2,(1), E1.2,(2), E1.2 (3), E11.2(1), E11.2(2), E11.2(3) & E12.2(1)

²⁸ E38.2(4) & E38.2(6)

²⁹ E27.2(2)

This option involves rezoning Sub-Precinct C from Light Industry to Mixed Use and rezoning the block of land bounded by Maketu Road, New Quarry Road and Quarry Road from Heavy Industry to Light Industry. This option relies on the underlying zoning and does not amend the Drury South Industrial Precinct to introduce specific controls to manage the extent of retail and office activity that can develop. It also does not introduce residential controls to manage reverse sensitivity between residential and heavy industry activities.

The height limit would be 18m in accordance with the underlying zone.

Under this option, no amendments to the bespoke landscaping provisions included within the Drury South Industrial Precinct are included.

- *Option 3: Rezone the Plan Change area Business- Local Centre Zone*

This option involves rezoning Sub-Precinct C from Light Industry to Business – Local Centre and rezoning the block of land bounded by Maketu Road, New Quarry Road and Quarry Road from Heavy Industry to Light Industry. This option relies on the underlying zoning and does not amend the Drury South Industrial Precinct to introduce specific controls to manage the extent of retail and office activity that can develop. It also does not introduce residential controls to manage reverse sensitivity between residential and heavy industry activities.

The height limit would be 18m in accordance with the underlying zone.

- *Option 4: Preferred option – Proposed Plan Change*

This option involves rezoning Sub-Precinct C from Light Industry to Mixed Use and rezoning the block of land bounded by Maketu Road, New Quarry Road and Quarry Road from Heavy Industry to Light Industry. This option amends the Drury South Industrial Precinct to introduce specific controls to manage the extent of retail and office activity that can develop. It also introduces residential controls to manage reverse sensitivity between residential and heavy industry activities.

Under this option the height limit is amended to 25m.

This option also proposes amendments to the bespoke landscaping provisions included within the Drury South Industrial Precinct.

9.3.1.1 Evaluation of Other Reasonably Practicable Options

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in Table 1.

Table 1: Summary of Options Analysis Addressing S32(2) Matters

Benefits	Costs	Efficiency and Effectiveness
Option 1: Do Nothing (Retain Light and Heavy Industry zones and current Drury South Industrial Precinct Provisions)		
Removes the cost of initiating a plan change for the applicant.	This option does not provide for the efficient use of the land as it applies a zoning which no longer reflects the most appropriate use of the land, given the changing context of the surrounding development and zoning.	Ineffective as the current precinct provisions provide for unrestricted offices, including large scale offices. This is not in keeping with B2.5.1(1) ³⁰ and H13.2(4) ³¹ which seeks to concentrate commercial activity within a network of centres.
Retains a landscaping provision which has been accepted by the community.	There is currently no limit on the amount of office which can establish in Sub-Precinct C. This will impact the viability of the planned network of centres within the wider Drury area.	This option is ineffective and is inconsistent with the policy direction of B2.4.1(4) as land within close proximity of future public transport, employment and social facilities is not being utilised as a focus for residential intensification.
Retains a consistent height with what is already enabled within Sub-Precinct C.	This option does not utilise land that is close to future public transport, employment and social facilities for residential intensification as residential is a non-complying activity.	This option is inefficient and not in keeping with B2.5.1(1) ³² and H13.2(4) ³³ as the Economic Analysis undertaken to inform this Plan Change application shows that there is a need for local convenience retail at Drury South in addition to that provided through the future network of centres.
	There is limited ability under the current provisions to fulfil the local convenience retail requirements of the surrounding residential and industrial areas. This will result in will result in local employees and residents travelling out of	Prohibited activity status for retail over 450m ² is not efficient in achieving B2.3.1(e) ³⁴ as development within Sub-Precinct C is not capable of adapting to changing needs as a landowner is unable to make an application.

³⁰ B2.5.1(1) Employment and commercial and industrial opportunities meet current and future demands.

³¹ H13.2.(1) Business activity is distributed in locations, and is of a scale and form, that: provides for the community's social and economic needs; improves community access to goods, services, community facilities and opportunities for social interaction; and manages adverse effects on the environment, including effects on infrastructure and residential amenity.

³² As per footnote 25.

³³ As per footnote 26.

³⁴ B2.3.1(e)A quality built environment where subdivision, use and development do all of the following: are capable of adapting to changing needs.

Benefits	Costs	Efficiency and Effectiveness
	the area to meet local convenience needs.	
	This option retains an overly onerous landscaping development standard, which is resulting in high costs to industrial landowners/developers.	This option is inefficient as the current landscaping standards are overly onerous and expert landscape evidence shows that visual and landscaping effects can be managed by a less onerous set of provisions.
Option 2: Rezone the Plan Change Area in accordance with the Plan Change zoning layout and rely on land use activity controls and residential controls within the underlying zones		
Applies a more appropriate land use pattern which responds to the context of the surrounding development and zoning.	This option does not include provisions to manage reverse sensitivity between the existing heavy industry zoning and residential activities which establish within the Mixed Use zone.	This option is not efficient or effective at achieving B2.5.1(2) ³⁵ or H13.2(1) ³⁶ as it does not stage the development of retail and commercial land use to ensure that development within Sub-Precinct C does not adversely affect the proposed network of centres within the wider Drury area.
A less complex set of planning provisions will apply within the Plan Change area.	This option retains an overly onerous landscaping development standard, which is resulting in high costs to the developer.	This option does not effectively manage conflicts between residential uses established in the mixed use zone and industrial activities and therefore does not effectively achieve H13.2(8) ³⁷ .
This option utilises land that is close to future public transport, employment and social facilities for residential intensification.	This option incorporates a height limit that is inconsistent with the rest of the Drury South Industrial Precinct.	Providing a Mixed Use zone rather than the Light Industry zone is efficient as it gives flexibility for a range of uses should office and retail not be required, ensuring that future demands in the area can be

³⁵ B2.5.1(2) Commercial growth and activities are primarily focussed within a hierarchy of centres and identified growth corridors that supports a compact urban form.

³⁶ H13.2(1) A strong network of centres that are attractive environments and attract ongoing investment, promote commercial activity, and provide employment, housing and goods and services, all at a variety of scales.

³⁷ H.13.2(8) A mix of compatible residential and non-residential activities is encouraged.

Benefits	Costs	Efficiency and Effectiveness
		managed in accordance with B2.5.1(1) ³⁸ and H13.2(4) ³⁹ .
This option allows for the local convenience retail requirements of the surrounding residential and industrial areas to be met locally.		The proposed change to Mixed Use and the requirement for all new buildings to be assessed for design and appearance will ensure that the form and design of future subdivision contributes to the safety of the site, street and neighbourhood and achieves a high level of amenity B2.3.1(3) ⁴⁰ and H13.2(3) ⁴¹ . This is more effectively achieved by the restricted discretionary activity consent required by the Mixed Use zone than the controlled activity status in the operative Drury South Industrial precinct. It also enables a range of built forms and supports an appropriate choice of activity and building form.
Retains a landscaping provision which has been accepted by the community.		Without the guidance of a precinct, the Plan Change area is unlikely to be developed in a comprehensive and coordinated manner.
Enables the flexibility to develop land for medium to high residential densities in close proximity to an employment area.		Area - specific approaches are not considered which is less effective in giving effect to B2.3.1(1)(a) ⁴² and H13.2(3) ⁴³ .

³⁸ As per footnote 25.

³⁹ As per footnote 26.

⁴⁰ B2.3.1(3) A quality built environment where subdivision, use and development do all of the following:
The health and safety of people and communities are promoted.

⁴¹ Development positively contributes towards planned future form and quality, creating a sense of place.

⁴² B2.3.1(1)(a) A quality built environment where subdivision, use and development do all of the following:
respond to the intrinsic qualities and physical characteristics of the site and area, including its setting.

⁴³ As per footnote 36.

Benefits	Costs	Efficiency and Effectiveness
		This option is inefficient as the current landscaping standards are overly onerous and expert landscape evidence shows that visual and landscaping effects can be managed by a less onerous set of provisions.
Option 3: Rezone the Plan Change area Business – Local Centre Zone		
<p>A Local Centre zone generally provides for a range of residential and small-scale retail and commercial activities, which is broadly consistent with the policy intent for sub-precinct C.</p> <p>However, importantly, the Local Centre zone is more enabling of other key activities that are not envisaged for sub-precinct C, including department stores. There is a need to manage those activities to ensure surrounding centres fulfil their role in the centres hierarchy.</p>	<p>The Local Centre zone is intended to apply to small centres. As Sub-precinct C is 10 hectares the application of the Local Centre zone to this land will result in a local centre that is of a scale and size which is inconsistent with the intention for this zone. In this regard, applying the Local Centre zone would indicate that a broader range of retail and commercial activities are anticipated for sub-precinct C, where this is not supported by the findings of the economic analysis provided as part of this Plan Change.</p> <p>It is not appropriate to reduce the land area of Sub-Precinct C to a scale consistent with the Local Centre zoning as this would not provide flexibility to locate commercial activities in response to future transport connections.</p> <p>While a convenience centre is now required within Sub-Precinct C, the precinct provisions proposed as part of Option 4 provide a more tailored set of provisions that make for provisions for convenience retail in a way</p>	<p>This option will not efficiently or effectively achieve B2.3.1(1)⁴⁴ or H13.2(2)⁴⁵ as a local centre of 10 hectares is not in keeping with the small scale nature of the Local Centre zone and therefore is not consistent with the centres hierarchy.</p> <p>The application of the Local Centre zone to Sub-Precinct C does not provide the tailored provisions and level of flexibility required to cater for the specific convenience needs of the locality, given the greenfield nature and the mix of industrial and residential neighbouring land uses of the surrounding area. Therefore, this option will not effectively provide for the community's social and economic needs.</p> <p>The application of the Local Centre zone to Sub-Precinct C will not efficiently or effectively contribute toward planned future form and quality which creates a sense of place as it does not take into account the strategic location of the Plan Change area at the end of the potential future Mill Road corridor and its location relative to the existing and</p>

⁴⁴ B2.3.1(e)A quality built environment where subdivision, use and development do all of the following: reinforce the hierarchy of centres and corridors.

⁴⁵ H13.2(2) Development is of a form, scale and design quality so that centres are reinforced as focal points for the community.

Benefits	Costs	Efficiency and Effectiveness
	<p>that it is appropriate for this greenfield context.</p> <p>The Plan Change area is strategically located at the end of the potential future Mill Road corridor. As the Mixed Use zone is typically located along Public Transport corridors this location is more suited to Mixed Use Zone rather than Local Centre zone.</p>	<p>planned centre network, making this land more suitable for the Mixed Use zone which is typically applied along public transport corridors.</p>
Option 4: Proposed Plan Change		
<p>Applies a more appropriate land use pattern which responds to the context of the surrounding development and zoning through a bespoke set of precinct provisions.</p>	<p>Introduces a more complex set of planning provisions. However, in our view this is warranted given the need to enable an appropriate range of activities consistent with technical advice received, while managing their effects on the environment.</p>	<p>Efficient as the broadening of activities in sub-precinct C supports a higher quality urban environment that better provides for social and cultural vitality and makes efficient use of infrastructure investment planned for Drury South which is in keeping with B2.2.1(1)⁴⁶ and H13.2(4)⁴⁷.</p>
<p>Considers the viability of the planned network of centres within the wider Drury area through introducing a limit on the office and retail space and requiring resource consent for these activities above a certain level to ensure it is appropriately staged.</p>		<p>This option is efficient as the Economic Analysis undertaken to inform this Plan Change has concluded that the proposed provisions will align with projected demand for commercial and industrial activities in Drury South B2.5.1(1)⁴⁸ and H13.2(4)⁴⁹.</p>
<p>This option utilises land that is close to future public transport, employment and social facilities for residential intensification.</p>		<p>Effectively provides for residential intensification close to public transport that is likely to be provided in the future, close to social facilities/open space and employment and</p>

⁴⁶ A quality compact urban form that enables all of the following: (a) a higher-quality urban environment; (b) greater productivity and economic growth; (c) better use of existing infrastructure and efficient provision of new infrastructure; (d) improved and more effective public transport; (e) greater social and cultural vitality; (f) better maintenance of rural character and rural productivity; and (g) reduced adverse environmental effects.

⁴⁷ As per footnote 26.

⁴⁸ As per footnote 25.

⁴⁹ As per footnote 26.

Benefits	Costs	Efficiency and Effectiveness
		therefore is in in keeping with B2.4.1(3) ⁵⁰ .
This option allows for the local convenience retail requirements of the surrounding residential and industrial areas to be met locally to a scale commensurate with anticipated sustainable demand.		Effective at achieving B2.5.1(1) ⁵¹ and H13.2(1) ⁵² as the limits on office floor space will ensure that large scale office activity is concentrated within the future network of centres.
This option incorporates a height limit which is consistent with the rest of the Drury South Industrial Precinct and which expert landscape evidence has concluded is a good visual fit.		Providing a Mixed Use zone rather than the Light Industry zone is efficient as it gives flexibility for a range of uses should office and retail not be required, ensuring that future demands in the area can be managed in accordance with B2.5.1(1) ⁵³ and H13.2(4) ⁵⁴ .
Applies a less onerous landscape control which still manages the visual and landscape effects of development enabled by the precinct.		The proposed change to Mixed Use and the requirement for all new buildings to be assessed for design and appearance will ensure that the form and design of future subdivision contributes to the safety of the site, street and neighbourhood and achieves a high level of amenity B2.3.1(3) ⁵⁵ and H13.2(3) ⁵⁶ . This is more effectively achieved by the restricted discretionary activity consent required by the Mixed Use zone than the controlled activity status in the operative

⁵⁰ B2.4.1(3) Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification.

⁵¹ As per footnote 25.

⁵² As per footnote 31.

⁵³ As per footnote 25.

⁵⁴ As per footnote 26.

⁵⁵ B2.3.1(3) A quality built environment where subdivision, use and development do all of the following: The health and safety of people and communities are promoted.

⁵⁶ As per footnote 32.

Benefits	Costs	Efficiency and Effectiveness
		Drury South Industrial precinct. It also enables a range of built forms and supports an appropriate choice of activity and building form.
Introduces specific controls to manage any potential reverse sensitivity between heavy industry and residential use.		Effectively manages conflicts between residential uses establishing in the mixed use zone and industrial activities and therefore is in keeping with B2.5.1(3) ⁵⁷ and H13.2(8) ⁵⁸ .
Will effectively integrate with future development in the wider neighbourhood.		

9.3.1.2 Summary of Reasons for Deciding on the Provisions

Option 4 is preferred and is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed Mixed Use zone provides for residential intensification close to public transport that is likely to be provided in the future, close to social facilities/open space and employment in accordance with B2.4.1(3)⁵⁹ and the proposed additional controls and assessment criteria for buildings will ensure that development positively contributes towards planned future form and quality, creating a sense of place H13.2(3)⁶⁰.
- The application of a Mixed Use zone within Sub-Precinct C ensures sufficient flexibility to meet future demand for either business or residential land in accordance with B2.5.1(1)⁶¹ and will ensure that the community's social and economic needs are provided for in accordance with H13.2(4)⁶².
- The proposed change to Mixed Use and the requirement for all new buildings to be assessed for design and appearance will ensure that the form and design of future subdivision contributes to the safety of the site, street and neighbourhood

⁵⁷ B2.5.1(3) Industrial growth and activities are enabled in a manner that manages conflicts between incompatible activities.

⁵⁸ As per footnote 32.

⁵⁹ B2.4.1(3) Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification.

⁶⁰ As per footnote 32.

⁶¹ As per footnote 25.

⁶² As per footnote 26.

and achieves a high level of amenity in accordance with B2.3.1(3)⁶³ and H13.2(3)⁶⁴.

- The proposed zoning layout takes into account reverse sensitivity and additional controls have been incorporated to ensure residential development does not compromise operations within the Heavy Industry zone in accordance with B2.5.2(3)⁶⁵ and H13.2(8)⁶⁶.
- Expert Economic evidence has shown that the proposed provisions will ensure that any retail and office development provided would not undermine the hierarchy of centres in accordance with B2.5.1(2)⁶⁷ and H13.2(1) and (7).
- Expert Landscape evidence has shown that the proposed height limit and landscaping control will not result in adverse landscape or visual effects.
- Option 4 is preferred to Option 3 (applying the Local Centre zone) given that a 10 ha Local Centre zone would enable a greater scale retail and commercial activities than is supported by the economic analysis prepared to inform this Plan Change. This would have the potential to impact the future function, role and amenity of the surrounding centre network.

9.3.2 Risk of Acting or Not Acting

In this case, there is sufficient information about the subject matter of the provisions to determine the range and nature of environmental effects of the options set out in Table 1 above. For this reason, an assessment of the risk of acting or not acting is not required.

10.0 CONCLUSION

This report has been prepared in support of DSL's request for a Plan Change to the provisions of the AUP to rezone amend the precinct provisions and the underlying zoning of part of the Drury South Industrial Precinct. The proposed amendments largely relate to Sub-Precinct C (Commercial Services) and seek to increase the flexibility for how this sub-precinct could develop to better respond to the changing nature of the surrounding development. Other amendments proposed are largely consequential to ensure an integrated planning framework across the precinct, with specific amendments proposed to the landscaping provisions which are proving overly onerous.

⁶³ B2.3.1(3) A quality built environment where subdivision, use and development do all of the following: The health and safety of people and communities are promoted.

⁶⁴ As per footnote 32.

⁶⁵ B2.5.2(3) Industrial growth and activities are enabled in a manner that manages conflicts between incompatible activities.

⁶⁶ As per footnote 32.

⁶⁷ B2.5.1(2) Commercial growth and activities are primarily focussed within a hierarchy of centres and identified growth corridors that supports a compact urban form.

The request has been made in accordance with the provisions of Schedule 1; Section 32 of the Resource Management Act 1991.

Based on an assessment of environmental effects and specialist assessments, it is concluded that the proposed Plan Change will have positive effects on the environment in terms of the social and economic well-being of the community. Other potential effects are able to be managed through the application of the proposed precinct, AUP zone and Auckland-wide provisions.

An assessment against the provisions of section 32 of the RMA is provided in section 10 of the report. This includes an analysis with respect to the extent to which the objectives of the Plan Change are the most appropriate to achieve the purpose of the RMA and an examination of whether the provisions of the Plan Change are the most appropriate way to achieve the objectives.

For the above reasons, it is considered that the Plan Change accords with the sustainable management principles outlined in Part 2 of the RMA and should be accepted and approved.