

AUCKLAND UNITARY PLAN OPERATIVE IN PART

PROPOSED PLAN CHANGE 48 (Private):

Drury Centre Precinct

SUMMARY OF DECISIONS REQUESTED

Enclosed:

- **Explanation**
- **Summary of Decisions Requested**
- **Submissions**

Explanation

- You may make a “further submission” to support or oppose any submission already received (see summaries that follow).
- You should use Form 6.
- Your further submission must be received by 29 January 2021.
- Send a copy of your further submission to the original submitter as soon as possible after submitting it to the Council.

Summary of Decisions Requested

Plan Change 48 - Drury Centre Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
1	1.1	Dannielle Haerewa	dhaerewa@gmail.com	Support the Plan Change	Approve the plan change.
2	2.1	Doug Signal	wiseolddog@hotmail.com	Decline the plan change	Reject the plan change on the basis that all roads and intersections in the area need to be upgraded before zoning is granted, otherwise public and local residents would be impacted with years of traffic problems.
3	3.1	Fire and Emergency New Zealand	eloise.taylforth@beca.com	Support the Plan Change with amendments	Add new Policy to the Precinct provisions as follows: •Policy xx: <u>Ensure that development in Drury Centre is coordinated with supporting stormwater, wastewater and water supply infrastructure.</u>
4	4.1	Jack Philip Burton	jackburton_89@hotmail.com	Support the Plan Change with amendments	Extend plan change to cover land on southern side of Brookfield Road, and rezone this land to Business Mixed Use Zone.
5	5.1	Wendy Hannah	hannahshouse87@gmail.com	Support the Plan Change with amendments	Approve the plan change conditional on existing access rights to 228 Flanagan Road being maintained and access being provided to services and utilities to develop the property in future (note: property is outside the Private Plan Change 48 area).
6	6.1	Michael and Rachel Gilmore	mikejamesgilmore@gmail.com	Support the Plan Change	Approve the plan change.
7	7.1	Geoff Yu and Rebecca Mao	rebeccamaonz@hotmail.com	Support the Plan Change with amendments	Include the area generally bounded by Fitzgerald Road, Quarry Road and Brookfield Road within the plan change, and rezone to Residential Urban (with terrace housing / high density residential along Brookfield Road and Fitzgerald Road).
8	8.1	Phil Hogan	paulsousa@xtra.co.nz	Support the Plan Change with amendments	Include the property at 1A East Street Drury, currently zoned Future Urban Zone, in the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.
9	9.1	Brookfield Road Limited	ant.frith@g4group.co.nz	Support the Plan Change with amendments	Amend "Indicative Collector Road" on figure 1 to ensure the site at 61 Brookfield Road has a block depth of approximately 40m to the west of the indicative road.
10	10.1	Transpower New Zealand Ltd	environment.policy@transpower.co.nz	Support the Plan Change	Retain the application of the National Grid Corridor Overlay and associated Unitary Plan provisions to the plan change site.
11	11.1	Papakura Business Association	tcm@papakura.co.nz	Decline the plan change, but if approved make amendments	Reject the plan change, or alternatively place a lower order zoning on the land identified as Metropolitan Centre to appropriately limit the scope of development within the plan change area
12	12.1	Oyster Capital	jeremy@brabant.co.nz	Support the Plan Change	Approve the plan change.
13	13.1	Rodney Bremner	allrightladder@callplus.net.nz	Support the Plan Change	Approve the plan change.
14	14.1	Tony Chien	tchien2007@gmail.com	Support the Plan Change	Approve the plan change.
15	15.1	Kiwi Property Holdings No.2 Limited	dallan@ellisgould.co.nz	Support the Plan Change with amendments	Amend policy 19 as follows: In addition to the matters in Policy E.3.3(13), recognise that there may be no practicable alternative to stream works, including culverting, diversion and/or reclamation, where they are required to construct critical infrastructure. <u>(a) provide for stream works, including culverting, diversion and/or reclamation, required to construct the Drury Boulevard, where it can be demonstrated that there is no practicable alternative, and where there is a functional need to construct it in the location generally shown on Precinct Plan 1.</u> <u>(b) enable the planted riparian margins of identified streams to contribute to offsetting the effects of any stream works assessed under Policy (19)(a).</u>

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15	15.2	Kiwi Property Holdings No.2 Limited	dallan@ellisgould.co.nz	Support the Plan Change with amendments	Amend IX.4.1 Activity table to add a new discretionary activity (A21) for " <u>Stream works including reclamation and diversion within Stream A required to construct the Drury Boulevard as shown on Precinct Plan X which complies with new standard IX6.9, and which are not provided for as a permitted activity under Chapter E3.</u> ".
15	15.3	Kiwi Property Holdings No.2 Limited	dallan@ellisgould.co.nz	Support the Plan Change with amendments	Add new standard IX6.9 Stream works for the Drury Boulevard as follows: <u>IX6.9 Stream works for the Drury Boulevard</u> <u>Purpose:</u> • To provide for a limited extent of stream works to construct the Drury Boulevard to be assessed as a discretionary activity. • Where offsetting is determined to be appropriate in accordance with the effects management hierarchy and Policy E3.3(4), enable the planted riparian margins of identified streams to contribute towards it. (1) The extent of stream works to achieve the construction of Drury Boulevard shall be limited to diversion of Stream A or 60m of reclamation along Stream A as identified on IX10.4 Precinct Plan 4. (2) For the purpose of calculating the offset required for stream works provided for under IX7.1(1) the SEV and ECR methods will be used. (3) The area of riparian planting identified on IX10.4 Precinct Plan 4 will count towards the offset required under IX7.1(2).
	15.4	Kiwi Property Holdings No.2 Limited	dallan@ellisgould.co.nz	Support the Plan Change with amendments	Add new policy 21 to clarify stormwater management approach as follows: <u>Stormwater Management</u> <u>Policy IX.3(21): Require subdivision and development to be consistent with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.</u>
15	15.5	Kiwi Property Holdings No.2 Limited	dallan@ellisgould.co.nz	Support the Plan Change with amendments	Amend Standard IX6.6 as follows: <u>IX6.6 Stormwater Quality</u> (1) The activity rules and standards in E9 apply to development in the Drury Centre precinct as if the reference to 'high use roads', was a reference to 'all roads'. (2) For all other impervious surfaces inert building materials should be used.
15	15.6	Kiwi Property Holdings No.2 Limited	dallan@ellisgould.co.nz	Support the Plan Change with amendments	Amend building height limits on Precinct Plan 1 within sub precincts as follows: Sub-precinct E - 40.5m (was 32.5m) Sub-precinct C - 32.5m (was 25m) Sub-precinct F - 26m (was 18m).
16	16.1	Fulton Hogan Land Development Ltd	sue@berrysimons.co.nz	Support the Plan Change	Approve the plan change.
17	17.1	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the Plan Change	Consult Spark and the other telecommunication network providers throughout the plan change process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD.

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17	17.2	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the Plan Change	Consult Spark and the other telecommunication network providers to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development proposed.
17	17.3	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the Plan Change	Consult Spark and the other telecommunication network providers to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development.
17	17.4	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the Plan Change	Consult with Spark and the other telecommunication network providers to ensure funding is available through the infrastructure funding agreements.
17	17.5	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the Plan Change	Include telecommunications infrastructure within the triggers for the staged release of development.
18	18.1	Fletcher Residential Limited	mtweedie@frl.co.nz	Support the Plan Change	Approve the plan change.
19	19.1	Lomai Properties Limited	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Decline PPC48, unless the matters relating to alternative staging of development, provision of all required infrastructure and traffic are adequately resolved.
20	20.1	The Ministry of Housing and Urban Development (HUD), Te Puni Kōkiri and the Department of Corrections	Ernst.Zollner@hud.govt.nz	Support the Plan Change with amendments	Revise the plan change to be consistent with the requirements of the NPS-UD including the intensification policies and removal of minimum car parking rates, and the investigation of a six storey height in the THAB zone within the walkable catchment of Drury East rail station.
20	20.2	The Ministry of Housing and Urban Development (HUD), Te Puni Kōkiri and the Department of Corrections	Ernst.Zollner@hud.govt.nz	Support the Plan Change with amendments	Enable further open space through zoning (primarily refers to the PC49 area).
21	21.1	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Confirm ongoing iwi participation, consultation and engagement in the project.
21	21.2	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Acknowledge within the project design the history of Mana Whenua in the PPC48 area.
21	21.3	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Incorporate Te Aranga Principles in design concepts.
21	21.4	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Confirm iwi monitoring of the project.

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21	21.5	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Account for natural and cultural landscaping in the project design, identify and preserve landscapes including view shafts, hilltops, tuff rings and ridge lines.
21	21.6	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Apply a minimum of 20 metre riparian margin for all waterways, especially those to contain walkways / cycleways.
21	21.7	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.
21	21.8	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Require roof capture for reuse and groundwater recharge.
21	21.9	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Confirm park edge design adjacent to all waterways.
21	21.10	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Use native trees and plants only within the precinct.
21	21.11	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Protect ridgelines, hilltops and wetlands.
21	21.12	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Reflect sustainable development in the design and outcomes.

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22	22.1	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Ensure that the council's concerns about infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <p>a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded.</p> <p>b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects.</p> <p>c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include:</p> <ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). • Threshold rules are not used in circumstances where the extent and location of works have not been determined yet. • Use of prohibited activity status for infringement could be considered. <p>d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.</p> <ul style="list-style-type: none"> • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place.
22	22.2	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Include more policies and rules to give full effect to the direction in the NPS-FM, including but not limited to Te mana o te wai.</p>
22	22.3	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Amend the precinct to include additional policies and rules to manage the effects of stormwater as described in an approved SMP.</p> <p>This includes:</p> <ul style="list-style-type: none"> • New policy: <u>Require subdivision and development to be assessed for consistency with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.</u> • Additional matters of discretion/assessment criteria that would apply to any restricted discretionary activity in the area of the precinct to ensure that new development and subdivision can be assessed for consistency with the NDC and SMP. • Any other rules necessary to give specific effect to the SMP during development.
22	22.4	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Retain application of SMAF 1 to the plan change area.</p>

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22	22.5	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Add a new policy to the following effect: <u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u>
22	22.6	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Add a new policy to the following effect: <u>Provide sufficient floodplain storage within the Drury Centre precinct to avoid increasing flood risk upstream and downstream and manage increased flood risk within the precinct unless downstream infrastructure capacity means this is not required. This is subject to the upgrade of the downstream culvert upgrade.</u> And insert rules to give effect to this.
22	22.7	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Delete policy IX.3 (19).
22	22.8	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Retain and amend standard IX6.6 (1) Stormwater Quality but amend it to read as follows: "The activity rules and standards in E9 apply to development in the Drury Centre precinct as if the reference to 'high use roads', was <u>were</u> a reference to 'all existing, new, upgraded or redeveloped roads accessways and carparks'" or other amendments that would achieve the same environmental outcome. Insert new matters of control and discretion, in addition to those in E9, to the effect of: <ul style="list-style-type: none"> • <u>How the location and design of stormwater treatment assets reduces their operating costs.</u> • <u>The consolidation and community scale of stormwater treatment assets.</u> • <u>The location of stormwater treatment assets where they will be most effective in reducing contaminants.</u>
22	22.9	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include a new standard to the effect that: <u>Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.</u>
22	22.10	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Retain and amend IX.6.4(1) by including a cross reference to the matters in Appendix 15.6(3)(b-f) and (4) of the Auckland Unitary Plan.
22	22.11	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Replace standard IX.6.4(2) with a new standard and consequential amendments to effect that the riparian yards set for buildings in tables H13.6.5.1 Yards and H9.6.6.1 Yards read as follows: "Riparian - 40 <u>20</u> m from the edge of all permanent streams and <u>10m from the edge of all</u> intermittent streams" Other yards in these tables are not amended.

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22	22.12	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Add the following matters of discretion to IX.8.1(7): <u>... (b) Effects on floodplain management taking into account maximum probable development, climate change and the roughness coefficient of existing and planned planting.</u> <u>(c) Effects on stream bank stability taking into account the cohesiveness of the soil and steepness of the bank angle.</u> <u>(d) Effects on the ability to provide for any proposed paths, cycleways, infrastructure and facilities outside the 10m wide strip of riparian planting.</u> Add related assessment criteria at IX.8.2(6).
22	22.13	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include indicative permanent and intermittent streams and wetlands on the precinct plan.
22	22.14	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include the indicative blue-green corridor within the precinct plan based on the urban concept in the Urban Design Assessment.
22	22.15	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Retain policy IX.3(18).
22	22.16	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend policy IX.3(20) and add a new policy as follows, together with any other amendments that may be required to give effect to these matters: (20) Support <u>Ensure</u> improvements to water quality, and habitat and biodiversity, including by providing planting on the riparian margins of permanent and intermittent streams. <u>(x) Enable a network of open space, riparian corridors and park edge roads that provides for:</u> • <u>potential ecological corridors along streams between Te-Manukanuka-O-Hoturoa (Manukau Harbour) and the Hunua;</u> • <u>improvement of freshwater and coastal water systems; and</u> • <u>a safe and attractive walking and cycling network.</u>
22	22.17	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend policy IX.3(14) to read as follows: (14) In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contributes to a sense of place for the Drury Centre, including by: (a) incorporating distinctive site features; (b) reinforcing legibility within the centre; and (c) integrating with the stream network; <u>and</u> (d) <u>if Auckland Council ownership is proposed, the open spaces must be consistent with the council's open space and parks acquisition and provision policies.</u>
22	22.18	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Reduce the open space zoning along Hingaia Stream to a 20m wide strip adjoining the stream.
22	22.19	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include indicative open spaces in the precinct plan as shown in Attachment 1 to the submission.

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22	22.20	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend the IX.5 Notification rules (1) to (3) which require non-notification to apply the normal tests for notification under the relevant sections of the RMA.
22	22.21	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Ensure that the consent categories in IX.4.1 Activity table, matters of discretion in IX.8.1, and assessment criteria in IX.8.2 are the most appropriate to give effect to: matters raised in this submission, the objectives and policies of the precinct, the RPS and any national policy statement.
22	22.22	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Add a policy and standards to provide for increased density near RTN stations including:</p> <p>a. A policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u></p> <p>b. Building height standards enabling at least the Metropolitan Centre equivalent 22-23 storey building height in all zones within a short walkable radius of the RTN train station, and 7-8 storey building height within an extended walkable radius of the proposed RTN station;</p> <p>c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone;</p> <p>d. Any alterations to other building standards to respond to increased building height;</p> <p>e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.</p>
22	22.23	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Review the full extent and type of centre zoning to be applied to the Drury Centre taking into account the total business capacity available in all proposed and existing centres and business zones and the expected population demand for this capacity.
22	22.24	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Extend the Business – Metropolitan Centre Zoning west along Flanagan Road as far as Waihoehoe Road.
22	22.25	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Delete parts of sub-precinct D and the outer precinct boundary that that apply west and on top of the railway.
22	22.26	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Delete the indicative railway station shown on the precinct plan and make any other consequential changes to the precinct provisions.
22	22.27	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Delete the non-complying status of department stores in sub-precincts C and E and replace with discretionary status.
22	22.28	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Review the need for IX.6.5 if a notice of requirement has been lodged for the upgrade of Waihoehoe Road.
22	22.29	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Retain standards IX.6.7 Daylight and IX.6.8 Outdoor Living Space for the Business – Mixed Use Zone.

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22	22.30	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include amendments to standard H13.6.9(4) (Business – Mixed Use Zone Outlook Space) to the effect that the depth is measured from the external wall of the building where the window to which it applies is inset from the wall within an inset balcony.
22	22.31	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development taking into account the recommendations in the cultural values assessments. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.
22	22.32	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Enable and provide for accessible and affordable social housing for Māori.
22	22.33	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Provide a notable tree assessment and schedule any notable trees identified in that assessment.
23	23.1	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Provide information and suitable provisions through out the whole of the plan change to resolve the transport infrastructure issue.
23	23.2	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend the whole Plan Change (including Precinct Plans) to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).
23	23.3	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Ensure the plan change reflects the final location of the train station and achieves Objective 1 by providing a transit-orientated development that supports high density residential, employment-generating and retail activities close to rapid transit and prioritises public and active modes of transport to and within the centre.
23	23.4	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend the Precinct plans and zoning by extending the Metropolitan Centre zoning and sub-precinct A to incorporate sub-precinct E; make consequential amendments to Precinct Plan 2 in line with the NPSUD; and delete provisions relating to sub-precinct E.
23	23.5	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend the Precinct plans by reducing the spatial extent of sub-precinct B by 50%. The Sub-precinct B boundary should be moved in a southerly direction.
23	23.6	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Delete 'Access A' from Precinct Plan 3. On Precinct Plan 2, replace 'Access A' between the two yellow lines with a dashed orange line. Amend Precinct Plan 2 Legend as follows: Potential connection to Drury West and possible Access A to State Highway 1. Re-orientate the collector road which is currently shown to extend from Access A from an eastern alignment to a southerly one (i.e. so that it turns south to sub-precinct B).

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23	23.7	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend IX Precinct description as follows: The purpose of the Drury Centre Precinct is to provide for the development of a new, comprehensively planned and transit-orientated <u>high-density</u> centre at Drury that supports a quality compact urban form. ... • Sub-precinct B is zoned Business – Metropolitan Centre Zone and is intended to be the <u>primary only</u> location for large format retail, while also providing for other commercial and residential activities allowed in the zone. Development in this sub-precinct should ensure that a quality street environment is achieved;
23	23.8	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend IX.2 Objective 1 as follows: (1) Drury Centre is a transit-orientated development that supports high density residential, employment-generating and retail activities <u>close to within walking distance of</u> rapid transit and prioritises public and active modes of transport to and within the centre.
23	23.9	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend IX.2 Objective 3 as follows: (3) Development of the Drury Centre creates a distinctive sense of place <u>through delivery of high density activities and a mix of uses</u> , including by incorporating distinctive natural and built site features, responding to landform and respecting Mana Whenua values.
23	23.10	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend IX.3 Policy 2 as follows: (2) Recognise that sub-precinct B will be the <u>primary only</u> location for large format retail activities.
23	23.11	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain IX.3 Policy 1 .
23	23.12	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain IX.3 Policy 3.
23	23.13	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain IX.3 Policy 9.
23	23.14	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend IX.3 Policy 4 as follows: (4) Provide for attractively designed, safe and direct access to the Drury Central train station, with a particular focus on pedestrians and cyclists <u>at the same time as land use development</u> .
23	23.15	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain IX.3 Policy 5.
23	23.16	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain IX.3 Policy 6.
23	23.17	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain IX.3 Policy 7.
23	23.18	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain IX.3 Policy 15.
23	23.19	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend IX.3 Policy 17 as follows: (17) Provide for the staging of pedestrian and cycling connections to the Drury Central train station to encourage the use of public and active modes of transport <u>at the same time as land use development</u> .
23	23.20	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain Activity IX.4.1 (A1) .

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Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
23	23.21	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend and/or delete Activities IX.4.1 (A5), (A6), (A8) and (A9) in a manner which responds to Waka Kotahi's submission in its entirety.
23	23.22	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend the activity tables in IX.4.1 to make large format retail a non-complying activity in all sub-precincts except sub-precinct B.
23	23.23	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Either delete notification provision IX.5(3); or amend IX.5(3) to ensure that Activity E11.4.1(A1) (new public or private roads) and infringements to standards IX6.2 and 6.3 (transport upgrades and trip generation limits) are subject to normal notification tests.
23	23.24	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain IX.6 Standard (2)(b) as notified on the basis that transport, traffic or trip-generation provisions are retained in the precinct and that no permitted activities are enabled.
23	23.25	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Retain Standard IX.6.2(2) Staging of Development with Transport Upgrades.
23	23.26	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Delete the italicised note following IX.6.2 (3) Staging of Development with Transport Upgrades
23	23.27	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Delete Standard IX.6.2(3) Staging of Development with Transport Upgrades and consequentially delete Table IX6.2.2.
23	23.28	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend Table IX.6.2.1 Threshold for Development with 'Access A' not constructed to provide more specificity as to the details of works required in the right hand column by including upgrade details listed in Table 8.1 of the Integrated Transport Assessment supporting the proposal, column headed Revised (2020) Modelling – Infrastructure Upgrades Required.
23	23.29	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend Table IX.6.2.2 Threshold for Development with 'Access A' constructed to provide more specificity as to the details of works required by including upgrade details listed in Table 8.1 of the Integrated Transport Assessment supporting the proposal, column headed Revised (2020) Modelling – Infrastructure Upgrades Required.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
23	23.30	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	<p>Delete IX.6.3 Trip Generation Limit including Tables IX.6.3.1 and IX.6.3.2, and replace with provisions which provide for operational requirements and more specific transport network responses. Potential wording could include a new permitted activity standard with non-compliance being a restricted discretionary activity (consequential changes to Activity Table IX.4 would be required). Restricted discretionary activity assessment criteria/matters of discretion could include transport network improvements.</p> <p>An alternative compliance pathway would be for an applicant to propose and undertake transport network improvements to maintain LOS E i.e. comply (noting that all development requires consent so compliance could be considered as part of this process). <u>IX.6.3</u></p> <p><u>Transport Infrastructure Development and subdivision to comply with the following:</u></p> <p><u>(a) Great South Road/ Waihoehoe Road Intersection Operation:</u></p> <p><u>(i) Where the baseline intersection operation is at Level of Service E (LOS E) or better at the time of application, no subdivision or development shall generate traffic movements which result in:</u></p> <p><u>1) a Level of Service of less than LOS E; or</u></p> <p><u>2) have a degree of saturation higher than 95%.</u></p> <p><u>(ii) Where the baseline intersection operation is at Level of Service F (LOS F) at the time of application, no subdivision or development shall generate traffic movements which results in:</u></p> <p><u>1) degrees of saturation of more than the base line scenario, or</u></p> <p><u>2) delays of more than 10% greater than the baseline scenario.</u></p> <p>Other relief would include additional provisions which outline transport upgrades to be considered (as listed in Table 8.14).</p>
23	23.31	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend Tables IX.6.3.1 and IX.6.3.2, if submission point 23.30 is not accepted, to provide more specificity as to the details of works required in the right hand columns of both Tables by including upgrade details listed in Table 8.1 of the Integrated Transport Assessment supporting the proposal, column headed Revised (2020) Modelling – Infrastructure Upgrades Required.
23	23.32	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Delete italicised Note following provision IX.6.3 (2).
23	23.33	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	<p>Amend IX.8.1 Matters of discretion (1) as follows: (1) Development of public and private roads:</p> <p>(a)....</p> <p>(d)...</p> <p><u>(e) the outcome of engagement with the relevant road controlling authority.</u></p>
23	23.34	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	<p>Amend IX.8.1 Matters of discretion (5) as follows:</p> <p>(5) Development or subdivision that does not comply with Standard IX.6.2 Staging of Development with Transport Upgrades but complies with Standard IX.6.3 Trip Generation Limit:</p> <p>(a)....</p> <p><u>(d) the outcome of engagement with the relevant road controlling authority,</u></p> <p><u>(e) the utilisation of the development potential of the site (including its mix of uses) and its correlation with the public transport accessibility of the site.</u></p>

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
23	23.35	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend IX.8.2(1) Assessment criteria as follows: 1) Development of public and private roads: Location of roads (a) ... (e)(iii) Development in Sub-Precincts C and E provides for a direct and legible connection to the Drury Central train station via Drury Boulevard and any connecting local or collector roads and/or open spaces. <u>Road Controlling Authority</u> <u>(f) how the outcome of engagement with the relevant road controlling authority has been responded to.</u>
23	23.36	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the Plan Change with amendments	Amend assessment criteria IX.8.2(5) as follows: (5) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit: (a)... (d)... <u>(e) how the outcome of engagement with the relevant road controlling authority has been responded to.</u>
24	24.1	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Amend IX.1 Precinct Description to add: <u>The North Island Main Trunk railway line is protected from reverse sensitivity effects by ensuring that new buildings and activities will be designed and located to manage any adverse effects.</u>
24	24.2	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Add new Objective IX.2(8) as follows: <u>(8) The NIMT is protected from adverse effects, including reverse sensitivity effects, of subdivision, use and development by.</u> 1. setbacks within which incompatible activities will be managed; 2. standards designed to protect noise sensitive receiver's health and amenity.
24	24.3	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Add new policy IX.3 as follows: <u>(XX) Adverse effects on the operation of the regionally significant NIMT and on the health and safety of adjacent development and noise sensitive receivers are managed through setbacks and performance standards.</u>
24	24.4	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Amend IX.1 Precinct Description as follows: "precinct also provides for the highest employment generating activities and retail and residential densities around <u>in the vicinity of</u> the future Drury Central train station".
24	24.5	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Amend IX.1 Precinct Description by deleting fourth bullet point relating to sub-precinct D as follows: • Sub-Precinct D is zoned Business – Metropolitan Centre Zone and provides for the establishment of the Drury East Train Station and associated Park and Ride and transport interchange. A public plaza is provided for that will integrate the train station with the centre and will provide a high quality pedestrian experience.
24	24.6	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Insert new activity (A8) to Activity table IX.4.1 as set out below and renumber existing (A8) to (A20) accordingly. <u>(A8) Development that does not comply with IX6.9 Setback from NIMT and IX6.10 Noise Sensitive Activities within 100m of a Rail Network Boundary - RD</u>

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
24	24.7	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Add to IX.6 Standards a new standard IX.6.9 as follows: <u>IX.6.9 Setback from NIMT</u> <u>Buildings must be setback at least 5 metres from any boundary which adjoins the NIMT railway line.</u>
24	24.8	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Add to IX.6 Standards a new standard IX.6.10 to manage potential human health effects from rail noise and vibration where buildings containing noise sensitive activities are located adjacent to (within 100m of) the railway corridor. See submission for full proposed wording.
24	24.9	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Insert new matters of discretion in IX.8.1 as follows: <u>(12) Setback from NIMT and Noise Sensitive Activities within 100m of a Rail Network Boundary</u> <u>Effects from non-compliance with Standards IX.6.9 and IX.6.10.</u>
24	24.10	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Insert new assessment criteria in IX.8.2 as follows: <u>(11) Setback from NIMT</u> <u>(a) The size, nature and location of the buildings on the site.</u> <u>(b) The extent to which the safety and efficiency of railway operations will be adversely affected.</u> <u>(c) The outcome of any consultation with KiwiRail.</u> <u>(d) Any characteristics of the proposed use that will make compliance unnecessary.</u> <u>(12) Noise Sensitive Activities within 100m of a Rail Network Boundary</u> <u>(a) Whether the activity sensitive to noise could be located further from the railway corridor</u> <u>(b) The extent to which the noise and vibration criteria are achieved and the effects of any non-compliance</u> <u>(c) The character of and degree of amenity provided by the existing environment and proposed activity.</u> <u>(d) The reverse sensitivity effects on the railway corridor and the extent to which mitigation measures can enable their ongoing operation, maintenance and upgrade.</u> <u>(e) Special topographical, building features or ground conditions which will mitigate vibration impacts;</u> <u>(f) The outcome of any consultation with KiwiRail.</u>
24	24.11	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Remove the land within Sub-precinct D from the listed plans. In addition, remove the reference to Sub-precinct D from the legend in Precinct Plan 1.
24	24.12	KiwiRail Holdings Limited	Pam.butler@kiwirail.co.nz	Support the Plan Change with amendments	Move the 'future train station' and 'Station Plaza' symbols to the preferred location further north. In addition, annotate Precinct Plan 2 to make it clear that the 'future train station' and 'Station Plaza' are shown as indicative only. For ease of readership it would be preferable to have two legends, one for indicative features and one for confirmed features on Precinct Plan 2. Remove the land within Sub-Precinct D from the Plan Change area.
25	25.1	Pukekohe Business Association	kendyl@pukekohe.org.nz	Decline the plan change	Ensure there is a catchment to serve the Metropolitan Centre before progressing; stage the centre development as required by residential growth.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
25	25.2	Pukekohe Business Association	kendyl@pukekohe.org.nz	Decline the plan change	Reconsider whether the size and scope of the Metropolitan Centre is necessary.
25	25.3	Pukekohe Business Association	kendyl@pukekohe.org.nz	Decline the plan change	Do not delay development and business live zoning at Pukekohe due to this plan change, and do not prioritise Drury East based on MCZ classification .
26	26.1	Karaka and Drury Limited	helen@berrysimons.co.nz	Neither supports nor opposes the Plan Change	Approve plan change.
26	26.2	Karaka and Drury Limited	helen@berrysimons.co.nz	Neither supports nor opposes the Plan Change	Do not amend PPC 48 in any way that would impact on, impede or preclude: (i) The quality of planning outcomes that the submitter seeks to achieve for Drury West; or (ii) The timing in which those outcomes are delivered.
27	27.1	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Decline plan change unless submitter's concerns are addressed including about the funding, financing and delivery of required transport infrastructure and network improvements and services to support the 'out of sequence' development proposed.
27	27.2	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Decline plan change unless submitter's concerns are addressed, including about reliance on development triggers to stage transport infrastructure provision. In the alternative, amend the plan change to include alternative mechanisms/provisions, and/or include the amendments to provisions set out in AT's submission.
27	27.3	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend IX.1 Precinct Description as follows: The transport network in the wider Drury East area as defined on Precinct Plan 3 will be progressively upgraded over time to support development in the wider area. The precinct includes provisions to ensure that <u>any subdivision and the development of land for business and housing is coordinated with the funding and construction of the transport network upgrades in order to avoid, remedy and mitigate adverse effects on the local and wider transport network necessary to support it.</u>
27	27.4	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Objective IX.2(5) as follows: (5) Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network. A transport network that facilitates the safe and efficient movement of people, goods and services and manages effects on the safe and efficient operation of the surrounding and wider transport network.
27	27.5	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Objective IX.2(6) as follows: (6) Development is supported by appropriate infrastructure. Subdivision and development are supported by the timely and coordinated provision of robust and sustainable transport, stormwater, water, wastewater, energy and communications infrastructure networks.
27	27.6	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3 (15) as follows: (15) Ensure that the timing of subdivision and development in the wider Drury Centre Precinct area as defined on Precinct Plan 3 is coordinated with the funding and delivery of transport infrastructure upgrades necessary to avoid, remedy and mitigate the adverse effects of urbanisation development on the safe and efficient operation-effectiveness and safety of the immediately-surrounding and wider transport network.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
27	27.7	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new Infrastructure and Staging policy as follows: <u>(x) Avoid any subdivision and development in the wider Drury area as defined on Precinct Plan 3 until the required transport infrastructure is in place.</u>
27	27.8	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Rules IX.4.1 (A5), (A6), (A8) and (A9) to introduce more onerous activity status for any development and/or subdivision not complying with Standards IX6.2 Staging of Development and IX6.3 Trip Generation Limit (such as non-complying activity status). In the alternative, amend Rules IX.4.1 (A5) and (A6) as follows: (A5) Development <u>and/or subdivision</u> that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades but complies with Standard IX6.3 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent</u> - RD (A6) Development <u>and/or subdivision</u> that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades <u>and</u> or Standard IX6.3 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent</u> - NC-D As a consequential amendment, delete Rules IX.4.1 (A8) and (A9).
27	27.9	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend the IX.5 Notification rules (1) to (3) which require non-notification to require the normal tests for notification under the relevant sections of the RMA.
27	27.10	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Standard IX.6 (2)(b) as follows: (2) The following zone standards do not apply to activities listed in Activity Table IX.4.1 above: (a) H9.6.1 Building Height (b) E27.6.1 Trip generation
27	27.11	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Standards IX.6.2 (1) and (2) and delete Standard IX.6.2 (3) and the note as follows: IX.6.2 Staging of Development with Transport Upgrades (1) Development <u>and subdivision</u> within the area shown on IX.10.3 Precinct Plan 3 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational. (2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for those activities that have <u>are subject to a valid land use and/or building consent or subdivision that is subject to a subdivision consent.</u> that has a 224c certificate for vacant lots less than 1200m². (3) Table IX.6.2.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.3 Drury Centre: Precinct Plan 3. Table IX.6.2.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.3 Drury Centre: Precinct Plan 3. Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020 — Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below
27	27.12	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Table IX.6.2.1 as set out in full in the submission, including to specify additional transport infrastructure upgrades and network improvements required to be completed.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
27	27.13	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Table IX.6.2.2.
27	27.14	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Standards IX.6.3 (1), delete Standard IX.6.3 (2) and the note, and add a new clause as follows: IX.6.3 Trip Generation Limit (1) Development <u>and subdivision</u> within the Drury area shown on IX.10.3 Precinct Plan 3 must not exceed the thresholds in Table IX.6.3.1 and Table IX.6.3.2 until such time that the identified infrastructure upgrades are constructed and are operational. (2) Table IX.6.3.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.3 Drury Centre: Precinct Plan 3. Table IX.6.3.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.3 Drury Centre: Precinct Plan 3. Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020— Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below <u>(x) A Transport Assessment corresponding to the scale and significance of the proposed activity prepared by a suitably qualified expert must be provided in order to confirm compliance with this standard.</u>
27	27.15	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Table IX.6.3.1 as set out in full in the submission, including to specify additional transport infrastructure upgrades and network improvements required to be completed
27	27.16	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Table IX.6.3.2.
27	27.17	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend IX.8.1 (5) as follows: (5) Development <u>and/or</u> subdivision that does not comply with Standard IX.6.2 Staging of Development with Transport Upgrades but complies with Standard IX.6.3 Trip Generation Limit: (a) Effects on the transport network consistent with the trips generated by development specified in Table IX.6.3.1 or Table IX.6.3.2 ; (b) The rate of public transport uptake and travel management measures; and (c) The coordination of retail, commercial and residential development <u>in within the wider Drury area shown on IX.10.3 Precinct Plan 3; Drury East.</u> <u>(x) The degree of certainty around the provision of required infrastructure upgrades including confirmation of infrastructure funding or other such measures agreed; and</u> <u>(x) Any mitigation measures or review conditions required to address the effects from development occurring ahead of the required infrastructure upgrades.</u>

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
27	27.18	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend IX.8.2 (5) as follows: (5) Development <u>and/or</u> subdivision that does not comply with IX.6.42 Staging of Development with Transport Upgrades but complies with IX.6.23 Trip Generation Limit: (a) Whether the effects of the proposal on the transport network are consistent with the trips generated by development specified in Table IX.6.3.1 or Table IX.6.3.2 ; (b) Whether increased use of public transport provides additional capacity within the <u>local</u> transport network <u>included within the Drury area shown on IX.10.3 Precinct Plan 3</u> ; including by implementing travel demand management measures. (c) Whether residential development is coordinated with retail and commercial development within the wider Drury East area identified on Precinct shown on IX.10.3 Precinct Plan 3 to minimise trips outside of the precinct providing additional capacity within the transport network; (d) The effect of the timing and development of any transport upgrades; (x) <u>Where new, upgrades and/or extensions to transport infrastructure are required, whether infrastructure funding agreements or other agreements exist to ensure that the new, upgraded or extended infrastructure required to service the subdivision and/or development can be funded and delivered; and</u> (x) <u>Whether the effects of development proceeding ahead of the required transport upgrades are mitigated by any conditions of consent including those relating to the scale, staging or operation of an activity, review conditions or interim network improvements proposed by the applicant.</u>
27	27.19	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete all reference to 'Access A' under Standards IX.6.2 and IX.6.3. Remove 'Access A' from Precinct Plan 2 and Precinct Plan 3.
27	27.20	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend the precinct provisions to better address the following related matters: • Define the key transit-oriented development principles, characteristics and outcomes as they apply to the plan change area. • Ensure there is consistency through the suite of precinct provisions in regard to giving effect to the transit- oriented development related outcomes. • Applying appropriate mechanisms in the precinct provisions to support transit-oriented development related outcomes e.g. managing the provision of parking as part of the wider suite of travel demand management measures that are applied to transit- oriented development scenarios.
27	27.21	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Provide further assessment of the impacts of the proposal on accessibility to and from the Drury Central rail station for all modes including public transport and pedestrian access, focusing on safety, permeability and connectivity to and from the station.
27	27.22	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Extend the Business – Metropolitan Centre Zoning west along Flanagan Road.
27	27.23	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Include provisions in the plan change to ensure that funding for public transport services (i.e. bus services) is available to support and provide public transport connections between the developments and the Drury Central rail station upon its completion.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
27	27.24	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	<p>Amend the Precinct Description as follows:</p> <p>There are five Sub-precincts in the Drury Centre Precinct:</p> <ul style="list-style-type: none"> • Sub-precinct A is zoned Business - Metropolitan Centre Zone and contains the primary retail area, <u>Key Retail Main Street</u> and civic and green open spaces. The sub-precinct is the focal point for intensive retail, commercial and civic development, <u>with safe and convenient active transport access to and from the Drury Central rail station being enabled and prioritised and pedestrian activity;</u> • Sub-precinct B is zoned Business – Metropolitan Centre Zone and is intended to be the primary location for large format retail, while also providing for other commercial and residential activities allowed in the zone. Development in this sub-precinct should ensure that a quality street environment is achieved with the provision of safe and convenient active transport access to and from the Drury Central rail station being enabled and prioritised; ... • Sub-precinct E is zoned Business – Mixed Use Zone and provides for high density residential and a range of commercial activities that will complement the core centre and maximise the efficient use of land close to the rapid transport network. Eight to ten storey buildings are enabled, and flexible ground floor designs are encouraged in the sub-precinct with the provision of safe and convenient active transport access to and from the rail station being enable and prioritised, <u>reflecting its close proximity to the Drury Central train rail station;</u>
27	27.25	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	<p>Amend Objective IX.2(1) as follows:</p> <p>(1) Drury Centre is a transit-orientated development <u>which consists of that supports</u> high density residential, employment-generating and retail activities close to rapid transit and prioritises public and active modes of transport to and within the centre.</p>
27	27.26	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	<p>Amend Objective IX.2(4) as follows:</p> <p>(4) Drury Centre is <u>a walkable centre, with a street-based environment that provides a high standard of pedestrian amenity, safety and convenience quality-pedestrian experience,</u> with a particular emphasis on the Key Retail Street.</p>
27	27.27	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	<p>Add a new objective to IX.2 as follows:</p> <p><u>(x) The Drury Centre precinct develops and functions in a way which promotes:</u></p> <ul style="list-style-type: none"> • travel mode shifts to public and active modes of transport; and • a well-connected and legible network of pedestrian and cycling linkages throughout and connecting the precinct to the Drury Central rail station.
27	27.28	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	<p>Amend Policy IX.3(4) as follows:</p> <p>(4) Provide for attractively designed, safe and direct access to <u>and from the Drury Central train rail station, with the provision of active transport access being prioritised a particular focus on pedestrians and cyclists.</u></p>

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
27	27.29	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3(7) as follows: (7) Require streets to be attractively designed to appropriately provide for all modes of transport by: a) providing a high standard of <u>pedestrian amenity, safety and convenience for pedestrians in areas where high volumes of pedestrians are expected</u> ; and b) providing for safe separated access for cyclists on arterial and collector roads that link key destinations; and c) providing a level of landscaping that is appropriate for the function of the street; and d) providing for the safe and efficient movement of <u>public transport and private vehicles</u> .
27	27.30	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3(17) as follows: (17) Provide for <u>bus, pedestrian and cycling</u> the staging of pedestrian and cycling connections to the Drury Central train rail station upon its completion to encourage the <u>immediate</u> use of public and active modes of transport <u>as soon as practically possible</u> .
27	27.31	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new rule to IX.4.1 Activity Table as follows: <u>Long-term non-accessory parking facilities - NC.</u>
27	27.32	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new policy as follows: <u>(x) Recognise and provide for Drury Boulevard as the primary multi-modal access between the Precinct and the Drury Central train station.</u>
27	27.33	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new policy as follows: <u>(x) Require the closure of the northern end of Flanagan Road to provide for the Waihoehoe Road rail bridge replacement, while ensuring safe and efficient access to the Precinct.</u>
27	27.34	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add the following transport upgrade requirement into Tables IX.6.2.1 and IX.6.3.1 as a prerequisite for any development and/or subdivision: • <u>Construction of the northern end of Drury Boulevard as the primary multi-modal station access.</u>
27	27.35	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add the following transport upgrade requirement into Tables IX.6.2.1 and IX.6.3.1 to provide for the Waihoehoe Road rail bridge replacement:: • <u>Closure of the northern end of Flanagan Road.</u>
27	27.36	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Matter of discretion IX.8.1 (1)(c) and add a new clause as follows: (c) Location and design, <u>and sequencing</u> of connections to the Drury Central train rail station, in particular the provision of the northern end of Drury Boulevard; <u>(x) Closure of the northern end of Flanagan Road.</u>
27	27.37	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add two new assessment criteria under IX.8.2(1) as follows: <u>(x) Whether the northern end of Drury Boulevard is proposed as the primary multi-modal station access concurrently with the Drury Central rail station; and</u> <u>(x) Whether the closure of the northern end of Flanagan Road is provided for the Waihoehoe Road rail bridge replacement, while ensuring safe and efficient access to the Precinct.</u>

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
27	27.38	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend IX.10.2 Precinct Plan 2 as follows: • Include a notation for the northern end of Drury Boulevard as “primary multi-modal station access road”; and • Include a notation to close the northern end of Flanagan Road to provide for the Waihoehoe Road rail bridge replacement.
27	27.39	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new policy as follows: <u>(x) Recognise and protect the route for Waihoehoe Road as a multi-modal arterial which provides for the east-west movements between Great South Road and Drury Hills Road intersection.</u>
27	27.40	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new policy as follows: <u>(x) Restrict direct vehicle access onto Waihoehoe Road to support the safe and efficient operation of the transport network for walking, cycling and public transport.</u>
27	27.41	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend the building line restrictions in Standard IX.6.5 to reflect the final alignment and width required and ensure any yard requirements that apply are considered in addition to the building setbacks. The need for IX.6.5 should be reviewed if a notice of requirement is lodged for the upgrade of Waihoehoe Road.
27	27.42	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Retain the vehicle access restriction on Waihoehoe Road as per Rule E27.6.4.1 (3)(c) of the AUPOP.
27	27.43	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend IX.10.2 Precinct Plan 2 as follows: • Delete the notation of the future rail station; and • Delete the notation of Station Plaza.
27	27.44	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Remove Sub-Precinct D from the plan change area and delete provisions in IX.1 Precinct description relating to Sub-Precinct D as follows: and provides for the establishment of the Drury Central Train Station and associated Park and Ride and transport interchange. A public plaza is provided for that will integrate the train station with the centre and will provide a high-quality pedestrian experience.
27	27.45	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Assessment Criteria IX.8.2 (2)(a) and delete IX.8.2 (2)(d) and (e) as follows: Whether Homestead Park and Station Plaza are <u>is</u> provided in <u>a</u> locations generally consistent with their indicative locations shown on IX.10.2 Drury Centre Precinct Plan 2 and has <u>have</u> adequate street frontage to ensure the open spaces are visually prominent and safe; ... (d) Whether Station Plaza is designed as an open space which will act as a major entrance way to Drury Centre, integrating the train station with the Drury Centre; (e) Whether any buildings or kiosks which locate in the Station Plaza are designed to ensure they do not compromise or dominate the use of the space for public recreational use.
27	27.46	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Assessment Criteria IX.8.2 (3)(j) to (m).

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27	27.47	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Retain Policy IX.3(5).
27	27.48	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3(6) as follows: (6) Ensure that development <u>and subdivision</u> provides a local road network that achieves a highly connected street layout and integrates with the collector road network within the precinct, and the surrounding transport network, and supports the safety and amenity of the open space and stream network.
27	27.49	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Rule IX.4.1 (A1) as follows: "Development of <u>new</u> public or private road (this rule does not apply to Auckland Transport)" As a consequential amendment, the same changes are sought to the heading of IX.8.1 (1) matters of discretion and IX.8.2 (1) assessment criteria.
27	27.50	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new standard to require the vesting of proposed public roads in all sub-precincts as follows: <u>IX.6.X Road Vesting</u> <u>Proposed public roads (including separated pedestrian and bicycle routes) must be constructed and vested in Council upon subdivision or development of the relevant area at no cost to the Council.</u> As a consequential amendment, add a new rule as follows: <u>Development and/or subdivision that does not comply with IX.6.X Road Vesting - NC.</u>
27	27.51	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend matters of discretion IX.8.1 (1) as follows: (1) Development of <u>new</u> public and private roads: (a) Location and design of the collector <u>roads streets</u> , local <u>roads streets</u> and connections with neighbouring sites and to achieve an integrated street network; (b) Provision of <u>safe and efficient public transport</u> , cycling and pedestrian networks; (c) Location and design, <u>and sequencing</u> of connections to the Drury Central <u>train rail station</u> , in particular the provision of the northern end of Drury <u>Boulevard</u> ; <u>and</u> (d) Matters of discretion IX.8.1 (1)(a) - (c) apply in addition to the matters of discretion in E38.12.1:- <u>(x) Location and design of intersections with existing roads; and</u> <u>(x) Closure of the northern end of Flanagan Road.</u>

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
27	27.52	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Assessment criteria IX.8.2 (1)(a) as follows: (a) The extent to which the collector road network and the Key Retail Street are provided generally in the locations shown on IX.10.X Drury Centre: Precinct Plan 2 to achieve a highly connected street layout that integrates with the surrounding transport network and responds to landform. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters: (i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads; (ii) The need to achieve <u>a permeable</u> an efficient block structure and layout within the precinct suitable to the proposed activities; and (iii) The constructability of roads and the ability for it to be delivered by a single landowner.
27	27.53	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Assessment criteria IX.8.2 (1)(b) as follows: (b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility <u>and connectivity</u> , and supports <u>public and active modes of transport</u> a walkable street network . Whether subdivision and development provide for collector roads and local roads to the site boundaries to coordinate with neighbouring sites and support the integrated completion of the network within the precinct over time;
27	27.54	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Assessment criteria IX.8.2 (1)(c) as follows: (c) Whether the design of collector and local roads are generally in accordance with the <u>minimum road reserve widths and key design elements</u> road cross-sections provided in IX.11 Drury Centre: Appendix 1;
27	27.55	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Assessment criteria IX.8.2 (1)(d) as follows: (d) Whether the layout of the street network provides a good degree of accessibility <u>and connectivity</u> , and supports <u>the development of Drury Centre Precinct as a walkable centre and community street network</u> . As a general principle, the length of a block should be no greater than 180m, and the perimeter of the block should be no greater than 500m;
27	27.56	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Assessment criteria IX.8.2 (1)(e) as follows: (e) Whether the street network provides safe and legible pedestrian and cycle connections to the operational Drury Central <u>train rail</u> station as development occurs over time . In particular, whether the following is provided, or an alternative is provided that achieves an equal or better degree of connectivity: (i) Development in Sub-Precincts B and F provides for a direct, legible and safe pedestrian and cycle connection to the Drury Central <u>train rail</u> station via Drury Boulevard or the Key Retail Street shown on Precinct Plan 42; (ii) Development in Sub-Precinct A provides for a direct, legible and safe pedestrian and cycle connection to the Drury Central <u>train rail</u> station via the Key Retail Street and/or any connecting local or collector roads and/or open spaces; (iii) Development in Sub-Precincts C and E provides for a direct and legible connection to the Drury Central <u>train rail</u> station via Drury Boulevard and any connecting local or collector roads and/or open spaces.

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27	27.57	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new assessment criteria to IX8.2(1) as follows: <u>(x) Whether the layout of the street network supports the provision of a safe and efficient bus network;</u> <u>(x) Whether the design of collector and local roads includes safe and efficient intersection treatments with existing roads;</u> <u>(x) Whether the northern end of Drury Boulevard is proposed as the primary multi-modal station access to and from the station;</u> <u>(x) Whether the closure of the northern end of Flanagan Road is provided for the Waihoehoe Road rail bridge replacement, while ensuring safe and efficient access to the Precinct; and</u> <u>(x) Where development is adjacent to a rural road, whether the road is to be upgraded to an urban standard.</u>
27	27.58	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete IX.11 Appendix 1: Road Cross Section Details. Introduce provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and roads which need to be upgraded to urban standards including but not limited to: • Carriageway • Footpaths • Cycleways • Public Transport • Ancillary Zone (parking, street trees etc.) • Berm • Frontage • Building Setback • Design Speed As part of new provisions, retain vehicle access restriction provisions, as addressed above.
27	27.59	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add layers to the AUPOP maps for Arterial roads within the Precinct area, including Waihoehoe Road.
27	27.60	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Show the purpose (role) of all roads on the precinct plans.
27	27.61	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add key retail frontage provisions to the AUPOP map notations within the precinct area, and allow them to float with the indicative roads which may be located differently upon development.
27	27.62	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Rule IX.4.1 (A10) as follows: Sub-Precinct C and E – Mixed Use (A10) <u>Large Format Retail Department Stores - NC.</u>
27	27.63	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Make any necessary amendments to PPC 48 as required to achieve a consistency in approach, including in relation to objectives, policies, rules, methods and maps, across the private plan changes within the Drury growth area.
27	27.64	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new policy as follows: <u>Ensure that new activities sensitive to noise adjacent to arterial roads are located, designed and constructed to mitigate adverse effects of road noise on occupants.</u>

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
27	27.65	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new standard to IX.6 to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level). As a consequential amendment, add a new rule to Activity table IX4.1 as follows: <u>(X) Development that does not comply with IX.6.X Noise Mitigation - RD</u>
27	27.66	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new assessment criterion as follows: <u>The extent to which noise sensitive activities in proximity to arterial roads are managed.</u>
28	28.1	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Retain Objective 5.
28	28.2	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Retain Objective 6.
28	28.3	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Amend Policy 7(c) so that electrical infrastructure is taken into consideration when planning landscaping and planting of street trees; require consultation with Counties Power regarding species in the vicinity of overhead lines; and apply a typical road cross section for arterial roads to ensure that the berm is an acceptable width for the installation of underground electrical reticulation
28	28.4	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Retain Policy 15.
28	28.5	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Amend Policy 16 to include reference to electrical, telecommunications and other infrastructure.
28	28.6	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Retain Policy 17.
28	28.7	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Add new policy IX.3.(5)(e) as follows: Require subdivision and development to: ... <u>(e) Enable the reduction of CO2 emissions by promoting the use of renewable energy.</u>
28	28.8	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Add new policy IX.3(5)(f) as follows: Require subdivision and development to: ... <u>(f) Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.</u>
28	28.9	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Amend matters of discretion in IX.8.1(1) to consider provision of suitable space for installation of electrical infrastructure to meet the needs of the area or building, as well as adequate separation between the different utilities, landscaping and other road users. Where electrical infrastructure is required, vehicular access of a suitable construction standard must be provided to allow access for maintenance of electrical infrastructure.
28	28.10	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Include matter of discretion IX.8.1(3) as drafted but clarify whether the intent of the word 'servicing' includes provision of electrical infrastructure.
28	28.11	Counties Power Limited	jmichalakakis@align.net.nz	Support the Plan Change with amendments	Include matter of discretion IX.8.1(4) as drafted but clarify whether the intent of the word 'servicing' includes provision of electrical infrastructure.

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28	28.12	Counties Power Limited	jimichalakis@align.net.nz	Support the Plan Change with amendments	Amend IX.8.2(1) assessment criteria to recognise the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/ trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted; and provide a typical road cross-section for arterial roads to ensure that the berm is an acceptable width for installation of underground electrical reticulation.
28	28.13	Counties Power Limited	jimichalakis@align.net.nz	Support the Plan Change with amendments	Amend IX.8.2(3) assessment criteria to recognise the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/ trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted; and provide a typical road cross-section for planting in the vicinity of the train station to ensure that there will be no conflict with electrical infrastructure (potentially an assessment criterion).
28	28.14	Counties Power Limited	jimichalakis@align.net.nz	Support the Plan Change with amendments	Amend IX.11 Appendix 1 Road Cross Section Details to provide a typical road cross-section for each roading type (including arterial roads) to identify the proposed location of the street trees and landscaping and to ensure that the berm is an acceptable width for installation of underground electrical reticulation.
29	29.1	Ministry of Education	jess.rose@beca.com	Support the Plan Change with amendments	Amend Objective IX.2 (6) as follows: Development is supported by appropriate infrastructure (<u>including education infrastructure</u>).
29	29.2	Ministry of Education	jess.rose@beca.com	Support the Plan Change with amendments	Amend Policy IX.3 (16) as follows: Ensure that development in Drury Centre Precinct is coordinated with supporting <u>education</u> , stormwater, wastewater and water supply infrastructure.
29	29.3	Ministry of Education	jess.rose@beca.com	Support the Plan Change with amendments	Amend IX.8.1 Matter of discretion 1)(a) Development of public and private roads as follows: (a) Location and design of the collector streets, local streets and connections with neighbouring sites (<u>including schools</u>) to achieve an integrated street network.
29	29.4	Ministry of Education	jess.rose@beca.com	Support the Plan Change with amendments	Amend IX.8.2 Assessment criteria 1)(a)(ii) as follows: ii. The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities (<u>including provision of schools</u>); and.
29	29.5	Ministry of Education	jess.rose@beca.com	Support the Plan Change with amendments	Amend IX.8.2 Assessment criteria 1)(b) as follows: b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network. Whether subdivision and development provides for collector roads and local roads to the site boundaries to coordinate with neighbouring sites (<u>including potential future school sites</u>) and support the integrated completion of the network within the precinct over time;

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
29	29.6	Ministry of Education	jess.rose@beca.com	Support the Plan Change with amendments	Amend IX.8.2 Assessment criteria 1)(d) as follows: (d) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network, <u>including to existing schools or sites designated for this purpose</u> . As a general principle, the length of a block should be no greater than 180m, and the perimeter of the block should be no greater than 500m;
29	29.7	Ministry of Education	jess.rose@beca.com	Support the Plan Change with amendments	Amend plan change to ensure there is provision of appropriate public open space to support the surrounding community.
29	29.8	Ministry of Education	jess.rose@beca.com	Support the Plan Change with amendments	Retain Standard IX.6.2 Staging of Development with Transport Upgrades.
29	29.9	Ministry of Education	jess.rose@beca.com	Support the Plan Change with amendments	Retain objectives and policies relating to the provision of safe and legible walking and cycling connections through communities.
30	30.1	Leith McFadden	leith@playgrounds.co.nz	Support the Plan Change with amendments	Zone areas for parks and public space.
30	30.2	Leith McFadden	leith@playgrounds.co.nz	Support the Plan Change with amendments	Ensure infrastructure upgrades are tied to staging through precinct provisions.
31	31.1	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Undertake a fulsome archaeological assessment prior to the plan change occurring, or if effects on archaeology are to be dealt with during resource consenting or subdivision process, include conditions to this effect.
31	31.2	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Retain and re-use Flanagan Homestead R12/1125 in situ on its original site, with the park including an appropriate extent of its setting (including plants and trees with historical association to the homestead).
31	31.3	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Include Flanagan Homestead within Schedule 14.1 Schedule of Historic Heritage as a Category B Historic Heritage place. Alternatively, include provisions in the precinct which more accurately reflect the location of the homestead and its extent with suitable objectives, policies and rules for its ongoing protection.
31	31.4	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Amend IX.8.2(2)(c) to include any non-indigenous trees identified as having specific historic heritage association and values in relation to Flanagan Homestead.
31	31.5	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Include a condition in the precinct provisions that a heritage evaluation be undertaken if General Cameron's House R12/755 is to be affected by future development.
31	31.6	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	If general requirement for archaeological assessment prior to subdivision is not included within precinct provisions, include a provision to this effect in relation to the area surrounding General Cameron's House.
31	31.7	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Include within precinct provisions a record of intention for a further archaeological survey of the recorded Drury Tramway/Mineral Railway R12/1122, and if feasible, include some form of reference to the tramway/mineral railway in the future development.
31	31.8	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Include within precinct provisions a requirement for archaeological assessment of the riparian boundaries to inform plans, including planting.
31	31.9	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Extend the open space zoning slightly to the east in the northern part of the precinct where the Mixed Use zoning is closest to the Hingaia Stream.

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Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
31	31.10	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Include provisions to provide a buffer zone to the reported site of a mill associated with the Flanagan family (R12/967) and for any works in the reserve to avoid this area.
31	31.11	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Include appropriate conditions in the precinct provisions to address any Maori cultural values that may have been identified or as requested by iwi.
31	31.12	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the Plan Change with amendments	Explore the potential of commissioning a heritage interpretation plan for the wider Drury area subject to the four jointly notified plan changes.
32	32.1	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the Plan Change with amendments	Insert new policies to IX.3 Policies (Infrastructure and Staging) to: (a) Make adequate provision within the PC48 area to detain the 1% AEP event without adverse effects on the extent of flooding of upstream and downstream areas; and (b) Provide sufficient floodplain storage within the PC48 area to avoid increasing flood risk upstream and downstream, and manage increased flood risk within the precinct, to habitable rooms for all flood events.
32	32.2	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the Plan Change with amendments	Consider amending trip generation rule framework (Activity table IX.4.1(A5), (A6), (A8) and (A9) and standard IX.6.3) to replace with a simplified approach using GFA triggers alone, given the potential challenges in monitoring trip generation levels for a development of this scale.
32	32.3	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the Plan Change with amendments	Amend Table IX.4.1 by introducing two new discretionary activities: (a) Development that does not comply with Standard IX.6.6 (Stormwater Quality and Flooding); and (b) Subdivision that does not comply with Standard IX.6.6 (Stormwater Quality and Flooding).
32	32.4	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the Plan Change with amendments	Delete notification provision IX.5(3) so that an application for resource consent for a restricted discretionary activity listed in Table E11.4.1, Table E11.4.2 and Table 12.4.1 will be subject to the normal tests for notification under the RMA.
32	32.5	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the Plan Change with amendments	Delete notification provision IX.5(4) so that an application for resource consent for a restricted discretionary activity listed in Table E11.6.2 and Table E12.6.2 will be subject to the normal tests for notification under the RMA.
32	32.6	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the Plan Change with amendments	Amend IX.6(2)(b) so that any exemption is clear as to the activities that it applies to, and that the effects of those activities have been assessed through an ITA.
32	32.7	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the Plan Change with amendments	Amend Standard IX.6.2 to ensure that: (a) adequate upgrading of the surrounding road network (for example Waihoehoe Road, Great South Road, Fitzgerald Road and the proposed connections between the PC48 area and Quarry Road and Pitt Road / Great South Road shown on Precinct Plan 2) is undertaken; and (b) any non-compliance with this standard is a discretionary activity.
32	32.8	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the Plan Change with amendments	Assess the effects of the connections identified in Precinct Plan 2 - Spatial Features in the ITA and / or through the PC48 provisions, and include appropriate upgrades to mitigate any effects arising.

Plan Change 48 - Drury Centre Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
32	32.9	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the Plan Change with amendments	Amend Standard IX6.6 by adding the words “and Flooding” to the heading and adding the following clause (2): <u>(2) any stormwater management plan or earthworks proposed as part of subdivision or development must:</u> <u>(i) comply with any approved discharge consent;</u> <u>(ii) be effective in avoiding, remedying or mitigating the potential adverse effects of stormwater discharge on water quality and flood hazards. In the case of stormwater management facilities within private land this assessment will include how the operation and maintenance of such facilities is to be secured by way of appropriate covenants or consent notices;</u> <u>(iii) be effective in containing all the natural and diverted streams and their margins, wetlands, and other off-site stormwater management devices;</u> <u>(iv) provide for overland flowpaths;</u> <u>(v) ensure that subdivision and development does not result in increased flood risk to land for all flood events from the 50% and up to 1% AEP flood event downstream and upstream of the precinct.</u>
33	33.1	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Approve the plan change, subject to: •Identifying local open space areas within the Precinct and strengthening precinct provisionsto provide an integrated and connected open space network; •The inclusion of spatial zoning (i.e. Special Purpose Zone) and corresponding precinct provisions to enable the provision of identified future tertiary and hospital activities within the precinct provisions that are necessary to support the intensity of urbanisation sought; •Consequential amendments as-required to give effect to the relief sought.
33	33.2	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Retain the Drury Centre Precinct description (with any consequential amendments to reflect Kāinga Ora's submission).
33	33.3	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Retain Objective (3) subject to clarification and amendment around the phrase ‘...respects Mana Whenua values’, and whether a Cultural Values Assessment would be required for all applications within the precinct.
33	33.4	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Amend Objective (4) as follows: “Drury Centre is <u>an street-based</u> environment that provides a high-quality pedestrian <u>experience throughout the street network</u> , with a particular emphasis on the Key Retail Street.”
33	33.5	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Retain Objective (7).
33	33.6	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Amend Policy (3) as follows: “(3) Provide for high density residential and supporting intensive employment activities compatible with residential amenity values in Sub-Precinct C, E and F <u>without undermining the role that recognise the primacy</u> of Sub-Precinct A as the core centre. <u>Provide for a greater range of intensive employment activities and greater heights in Sub-Precinct E responding to its close proximity to rapid-transport, while recognising the primacy of Sub-Precinct A as the core centre.</u> ” <u>(4) Provide for a greater range of intensive employment activities and greater heights in Sub-Precinct E responding to its close proximity to rapid transport, while recognising the primacy of Sub-Precinct A as the core centre.</u>

Plan Change 48 - Drury Centre Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
33	33.7	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Amend Policy (5) as follows: "Require collector roads to be generally in the locations shown in IX.10.1 Drury Centre: Precinct Plan 2, while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network and is generally aligned with transitions in zoning".
33	33.8	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Retain Policy (15) subject to clarification and / or amendment of policies and associated provisions to account for public infrastructure upgrades.
33	33.9	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Delete Standard IX.6(2)(b), removing the exclusion of E27.6.1 Trip generation standard from within the Drury Centre Precinct.
33	33.10	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Retain Standard IX.6.2 subject to clarification and / or amendment of policies and associated provisions and thresholds to account for public infrastructure upgrades.
33	33.11	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Retain Standard IX.6.3 subject to clarification and / or amendment of policies and associated provisions and thresholds to account for public infrastructure upgrades.
33	33.12	Kāinga Ora	michael@campbellbrown.co.nz	Support the Plan Change with amendments	Retain Criteria IX.8.2 (1)(a) subject to the following amendment: i. The presence of natural features, natural hazards or contours and how this impacts the placement of roads; ii. The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and iii. The constructability of roads and the ability for it to be delivered by a single landowner; <u>and</u> iv. <u>The need to ensure that any alternative Collector Road location is generally aligned with transitions in zoning</u>
34	34.1	Watercare	ilze.gotelli@water.co.nz	Neither supports nor opposes the Plan Change	Amend Policy 16 as follows: (16) Ensure that development in Drury Centre Precinct is coordinated with, <u>and does not precede</u> , supporting stormwater, wastewater and water supply infrastructure
34	34.2	Watercare	ilze.gotelli@water.co.nz	Neither supports nor opposes the Plan Change	Add new Policy 16A as follows: <u>(16A) Manage subdivision and development to avoid, remedy or mitigate adverse effects on infrastructure, including reverse sensitivity effects or those which may compromise the operation or capacity of existing or authorised infrastructure.</u>
35	35.1	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Confirm ongoing iwi participation, consultation and engagement in the project.
35	35.2	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Acknowledge within the project design the history of Mana Whenua in the PPC48 area.
35	35.3	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Incorporate Te Aranga Principles in design concepts.
35	35.4	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Confirm iwi monitoring of the project.
35	35.5	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Account for natural and cultural landscaping in the project design, identify and preserve landscapes including view shafts, hilltops, tuff rings and ridge lines.

Plan Change 48 - Drury Centre Precinct

Summary of Decisions Requested

Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
35	35.6	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Apply a minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways.
35	35.7	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.
35	35.8	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Require roof capture for reuse and groundwater recharge.
35	35.9	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Confirm park edge design adjacent to all waterways.
35	35.10	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Use native trees and plants only within the precinct.
35	35.11	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Reflect sustainable development in the design and outcomes.

Submissions

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 48 (Private) - Dannielle Haerewa
Date: Sunday, 6 September 2020 6:30:19 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Dannielle Haerewa

Organisation name:

Agent's full name:

Email address: dhaerewa@gmail.com

Contact phone number:

Postal address:
115 Waihoehoe Road
Auckland
Auckland 2113

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:
Just wanting to be kept updated.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
Just wanting to be kept updated.

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

Details of amendments:

Submission date: 6 September 2020

Attend a hearing

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

Declaration

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

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

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

Yes

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

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 48 (Private) - Doug Signal
Date: Tuesday, 29 September 2020 3:16:13 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Doug Signal

Organisation name:

Agent's full name: Doug Signal

Email address: wiseolddog@hotmail.com

Contact phone number: 0273223727

Postal address:
 wiseolddog@hotmail.com
 Drury
 auckland 2577

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
 Roading

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

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

The reason for my or our views are:

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

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

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

Submission date: 29 September 2020

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

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

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

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

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

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

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

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



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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

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

Organisation Name (if submission is made on behalf of Organisation)
Fire and Emergency New Zealand

Address for service of Submitter

PO Box 6345, Auckland 1142

Telephone: 93009044 Fax/Email: eloise.taylforth@beca.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number PC 48

Plan Change/Variation Name Drury Centre Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s) That future development is supported by water supply infrastructure

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I **support** the specific provisions identified above ☒

I **oppose** the specific provisions identified above ☐

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

Please refer to attached letter prepared by Beca on behalf of FENZ

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

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

Decline the proposed plan change / variation ☐

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

Please refer to attached letter

I wish to be heard in support of my submission ☐

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

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

Etayl South

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

8.10.20
Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

Form 13

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

To: Auckland Council

Submission on: Private Plan Change 48

Name of submitter: Fire and Emergency New Zealand

Address for service: c/o Beca Ltd

Attention: Eloise Taylforth

PO Box 6345

Auckland

eloise.taylforth@beca.com

+64 9 300 9044

This is a submission on the proposed private plan change 48 (PPC 48) at Drury East, Auckland by Barker and Associates on behalf of Kiwi Property (the Applicant) to Auckland Council. The Applicant requests to change the zoning of the plan change area (approximately 95 hectares) from Future Urban to Business – Metropolitan centre, Business – Mixed Use and Open Space – Informal Recreation Zones. This submission is written on behalf of Fire and Emergency New Zealand (FENZ).

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

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

Background:

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

The Fire and Emergency submission is:

PPC48 is located at 108 Flanagan Road, 120 Flanagan Road, 133 Fitzgerald Road, and 97 Brookfield Road in Drury and is currently zoned as Future Urban under the Auckland Unitary Plan: Operative in Part (AUP: OP). Kiwi Property seeks to rezone the plan change area to accommodate a local community centre for retail, commercial, office, leisure activities as well as residential housing in accordance with the Drury-Opāheke Structure Plan.

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

Fire and Emergency supports the proposal to construct a reticulated network throughout PPC48 to service development.

To complement the rezoning, the Applicant proposes a new precinct with associated provisions as part of PPC48. The proposed precinct provisions do not currently require the integration of land use development with infrastructure. It is essential that water supplies, including for firefighting purposes are developed at the same time (or in advance of) land use so they are available in event of an emergency. Fire and Emergency seeks a new policy relating to the provision of water supply so infrastructure (including water) supply is coordinated with development of the site.

Fire and Emergency seeks the following Policy be added to the Precinct; which is consistent with the wording proposed for adjacent precincts in Drury ¹:

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

3.1

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

Fire and Emergency Supports in part this private plan change, to the extent identified above.

Fire and Emergency is not a trade competitor.

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



Eloise Taylforth

Planner

Beca

Date: 07/10/2020

¹ As proposed by Private Plan Change 49.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 48 (Private) - Jack Philip Burton
Date: Tuesday, 13 October 2020 7:46:15 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jack Philip Burton

Organisation name:

Agent's full name:

Email address: jackburton_89@hotmail.com

Contact phone number: 0273055623

Postal address:

44 Brookfield Road

Drury

Papakura 2577

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:

The rezoning of land along Brookfield Road to Business Mixed Use Zone.

Property address: 44 Brookfield Road Drury

Map or maps: Appendix 2 : Plan Change Zoning Map

Other provisions:

The "Business Mixed Use Zone" boundaries cut five properties out on the south side of Brookfield Road, but include two. I propose that all properties on Brookfield Road are included in the Business Mixed Use zone. By making this change both sides of the road can be developed as a block.

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

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

The reason for my or our views are:

I own a property on Brookfield Road. Brookfield Road has been proposed to become a main thoroughfare (from it's current dead end). Therefore both sides of Brookfield Road should become "Business Mixed Use Zone".

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

Details of amendments: Rezone land along both sides of Brookfield Road to Business Mixed Use Zone.

Submission date: 13 October 2020

Attend a hearing

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

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

Declaration

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

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

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

No

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

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 48 (Private) - Wendy Hannah
Date: Monday, 19 October 2020 6:30:38 PM
Attachments: [228 Flanagan Road Map_20201019181629.213.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Wendy Hannah

Organisation name: God Save The Flag Ltd

Agent's full name:

Email address: hannahshouse87@gmail.com

Contact phone number: 0273342444

Postal address:
PO Box 38513

Howick
Auckland
Auckland 2012

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:

Property address: 228 Flanagan Road Drury 2113

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

Other provisions:

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

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

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

The reason for my or our views are:

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

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

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

| 5.1

Submission date: 19 October 2020

Supporting documents

228 Flanagan Road Map_20201019181629.213.pdf

Attend a hearing

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

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

Declaration

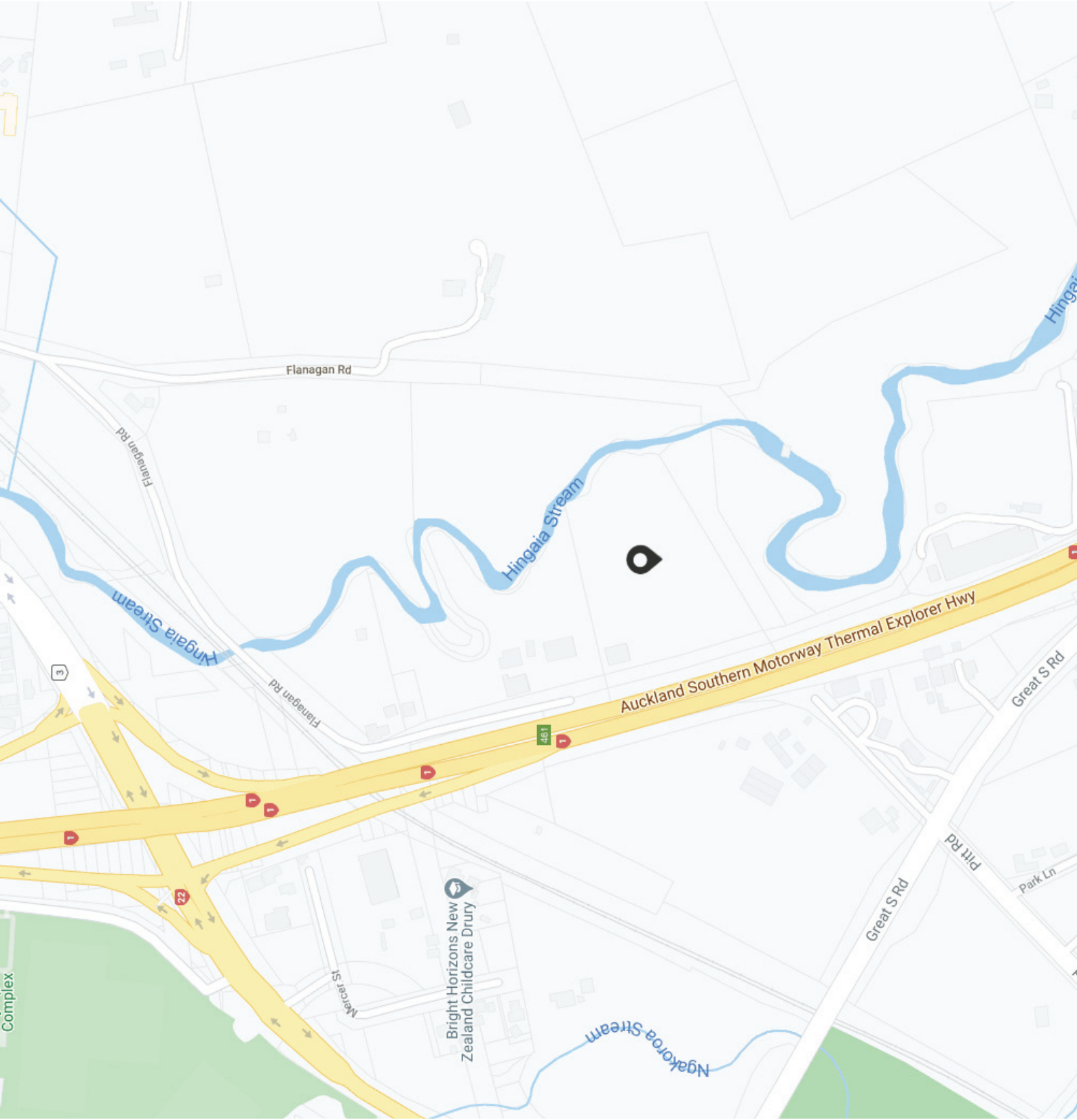
Could you gain an advantage in trade competition through this submission? No

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

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

Yes

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



From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 48 (Private) - Michael and Rachel Gilmore
Date: Monday, 19 October 2020 8:15:40 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Michael and Rachel Gilmore

Organisation name:

Agent's full name:

Email address: mikejamesgilmore@gmail.com

Contact phone number:

Postal address:

20 Flanagan Rd

Drury

Auckland 2113

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:

Property address:

Map or maps: Kiwi property 2048 master plan

Other provisions:

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

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

The reason for my or our views are:

In general we support the proposed zone change.

We agree that the area needs to move away from being commuter based and move towards having its own business district providing local jobs for local people.

We thus support the intent of having a medical precinct as this is needed in the area.

We feel Drury will be a future hub for families and agree that the area needs more schooling and quality greenspaces and would urge developers to provide playgrounds etc.

We support the proposed new train station/bus interchange as being generally located as shown in the kiwi properties documents and Auckland transports preferred option 1 being location DC2B.

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

6.1

Details of amendments:

Submission date: 19 October 2020

Attend a hearing

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

Declaration

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

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

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

No

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

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 48 (Private) - Geoff Yu and Rebecca Mao
Date: Tuesday, 20 October 2020 12:45:35 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Geoff Yu and Rebecca Mao

Organisation name:

Agent's full name:

Email address: rebeccamaonz@hotmail.com

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:

Property address:

Map or maps:

Other provisions:
plan change boundary

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

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

The reason for my or our views are:

With this plan change, as well as PC49 and the Stevenson's development nearby, it would make a better sense and help to speed things up if the current Future Urban area generally bounded by abovementioned 3 areas, or at least all the properties along Brookfield Road, could be included in the plan change, and to be rezoned to Residential Urban with Terrace Housing / high density residential along Brookfield Road and Fitzgerald Road.

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

Details of amendments: To include the Future Urban area generally bounded by Fitzgerald Road, Quarry Road and Brookfield Road in the plan change, and rezone to Residential Urban (with Terrace Housing / high density residential along Brookfield Road and Fitzgerald Road.

7.1

Submission date: 20 October 2020

Attend a hearing

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

Declaration

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

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

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

No

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

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 48 (Private) - Phil Hogan
Date: Tuesday, 20 October 2020 4:15:48 PM
Attachments: [Location Diagram for 1A East Street Drury.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Phil Hogan

Organisation name: Britmat Holdings Ltd

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

Email address: paulsousa@xtra.co.nz

Contact phone number: 0272595070

Postal address:
12A Mace Terrace,
Oakura
New Plymouth 4314

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:

The creation of a new Business - Metropolitan Centre Zone and Business - Mixed Use Zone on Rural Land when parcels of land exist within or adjoin the existing centre of Drury that have not been considered for inclusion in the plan change and in so doing result in an incoherent land use pattern within the existing urban area and serves to extinguish other land being able to be used for businesses purposes, despite being the most suited land use, due to an over supply of business land arising from the proposed plan change.

Property address: 1A East Street, Drury

Map or maps: The proposed Drury Centre - Zoning Plan included in the plan change and its exclusion of the centre of Drury, particularly 1A East Street.

Other provisions:

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

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

The reason for my or our views are:

Parcels of land exist within or adjoin the existing centre of Drury that have not been considered for inclusion in the plan change and in so doing result in an incoherent land use pattern within the existing urban area and PC48 serves to extinguish other land being able to be zoned/used for businesses purposes, despite being the most suited land use in certain instances, due to an over supply of business land arising from the proposed plan change.

The proposed plan change in conjunction with the taking of land at 236 - 250 Great South Road, Drury for the Drury Train Station result in the loss of opportunities for smaller businesses to remain in proximity to the traditional centre of Drury and the Great South Road when opportunities remain within the existing urban environment, namely at 1A East Street.

1A East Street adjoins land zoned Business - Local Centre Zone. The expansion of this existing business zone, intended for small 'neighbourhood' friendly businesses onto 1A East Street would be an appropriate zoning as it would provide insulation of the existing tavern activity existing on the adjoining land at 200 - 212 Great South Road and but most importantly will provide a suitable location for the small businesses displaced by the new train station and its surrounds and who are not suited to large scale 'business - commercial' centres, the development of which may be some time off.

1A East Street has access to available and ready infrastructure and existing access to the Great South Road via East Street or 200 - 212 Great South Road and as such there is no constraints to its immediate take up and development to 're-house' those businesses displaced by the new train station and not suited the proposed Business - Metropolitan Centre Zone and Business - Mixed Use Zone, which will take some time to establish following the plan change being made operational given the infrastructure works that must occur first.

Therefore, the inclusion of 1A East Street in Plan Change 48 would assist the transition of the area from its current local business hub to a larger metropolitan hub by providing immediate options for those small scale businesses being displaced by the changes occurring in this established environment as well as other small neighbourhood friendly activities not suited to the large expanse of the commercial centre arising from Plan Change 48 as presently proposed.

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

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

8.1

Submission date: 20 October 2020

Supporting documents
Location Diagram for 1A East Street Drury.pdf

Attend a hearing

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

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

Declaration

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

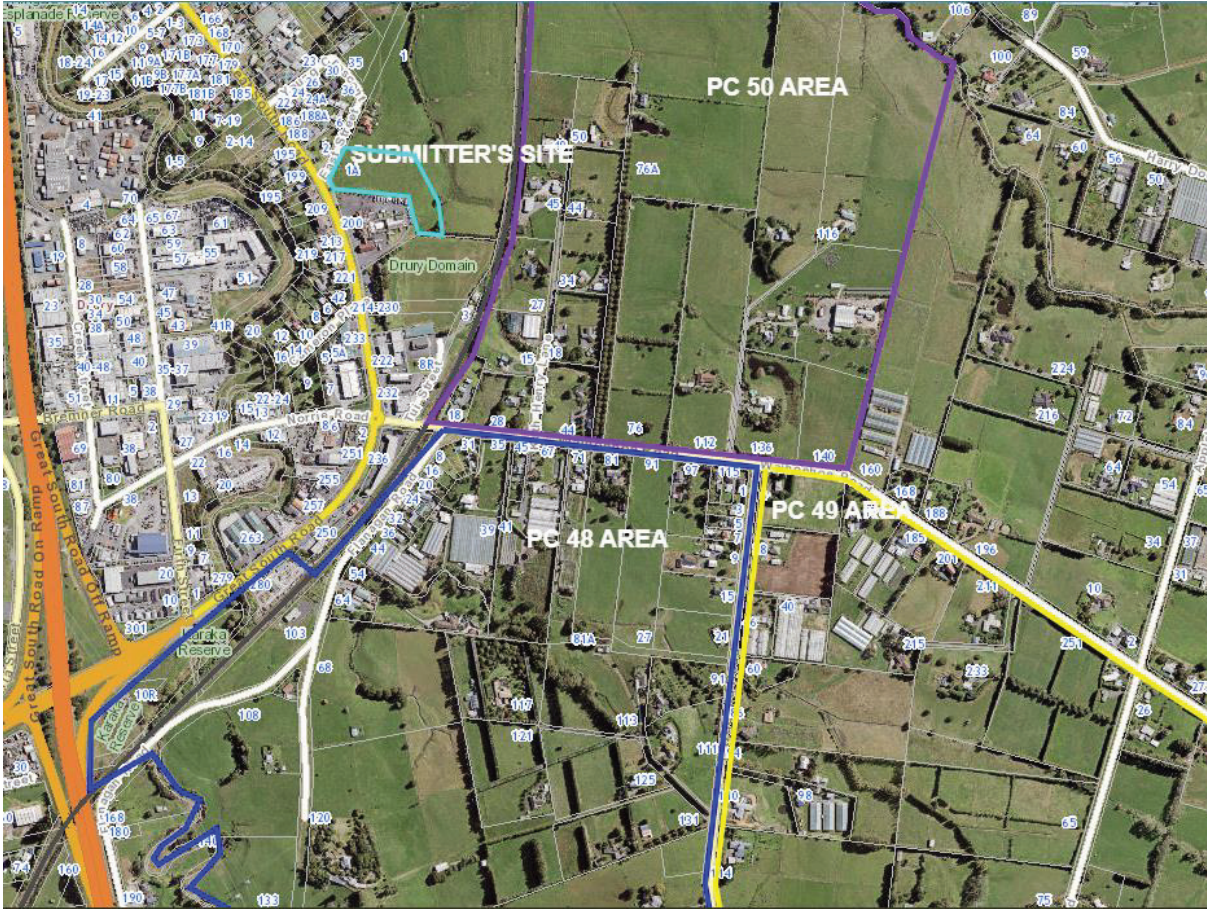
Are you directly affected by an effect of the subject matter of this submission that:

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

Yes

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

LOCATION OF 1A EAST STREET RELATIVE TO PRIVATE PLAN CHANGES 48, 49 AND 50



BROOKFIELD ROAD LIMITED

PO Box 37680

Parnell

Auckland 1151

Submission on Proposed Private Plan Change 48 – Drury Centre Precinct to the Auckland Unitary Plan (Operative in Part)

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

To: **Auckland Council**

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

This is a submission on Proposed Private Plan Change 48 (PC48) to the Auckland Unitary Plan – Operative in Part (AUP).

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

2. BACKGROUND

Brookfield Road Limited has previously made submissions on the Drury Structure Planning process supporting the establishment of a Centre in the location proposed by Plan Change 48. Brookfield Road Limited has also previously supported the establishment of a range a residential zone to the east of the State Highway 1, and for those areas to be zoned and made development ready as soon as possible Plan Changes 49 and 50.

3. SCOPE OF SUBMISSION

The specific aspects and provisions of PC48 that this submission relate to are:

- Ensuring the “Indicative Collector Road” identified on Drury Centre Precinct Plan 2 (**Figure 1**) is located so that feasible development parcels are retained on either side of the proposed road; and
- Support for the Plan Change, assuming a suitable outcome is able to be achieved to the point above.



Figure 1: Subject site identified in blue, with indicative collector road identified in orange

4. SUBMISSION

Brookfield Road Limited supports PC48 in its notified form, subject to the amendment of the location of the collector road identified in **Figure 1**.

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

- 1) The proposed plan change is consistent with the Drury-Opāheke Structure Plan that was supported by Brookfield Road Limited. This plan change is part of a wider strategy prepared in conjunction with PC 49 and PC 50 which will enable an integrated vision for Drury East to be developed in a coordinated manner;
- 2) The Metropolitan Centre zone will support a wide variety of uses and services and is accessible to the local community via active and public transport modes;
- 3) The Mixed-Use zone provides a range of activities to support the Drury centre and will encourage high density residential and employment activities in close proximity to the centre and the proposed train station;
- 4) The adverse effects of urban development on the natural environment, including the Hingaia Stream and its tributaries can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced;
- 5) The proposed re-zoning enables a clear and efficient roading network to be utilised. The proposed high-quality transport network will also provide for all transportation modes; and
- 6) The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

5. Decision Sought

Brookfield Road Limited seeks the following relief from Auckland Council on PC48:

- a) That PC48 be approved, subject to the following amendment:

- b) “Indicative Collector Road” identified in Figure 1 is amended in location to ensure the site at 61 Brookfield Road has a block depth of approximately 40m to the west of the indicative road. Brookfield Road Limited is willing to work with the applicant on the final location of the proposed road.

9.1

Brookfield Road Limited wishes to be heard in support of this submission.

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

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



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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name) _____

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

Transpower New Zealand Limited

Address for service of Submitter

Attention Rebecca Eng, PO Box 17215, Greenlane, Auckland 1546

Telephone:

09 590 7072

Fax/Email:

environment.policy@transpower.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 48

Plan Change/Variation Name

Drury Centre Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify) Refer attached submission

Submission

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

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☐

I wish to have the provisions identified above amended Yes ☐ No ☐

The reasons for my views are:

Refer attached submission

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☒

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

Decline the proposed plan change / variation ☐

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

Refer attached submission

I wish to be heard in support of my submission ☒

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

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



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

20 October 2020

Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

Submission on PC48: Drury Centre Precinct by Transpower New Zealand Ltd

Transpower New Zealand Limited (“Transpower”) is the State-Owned Enterprise that plans, builds, maintains, owns and operates New Zealand’s high voltage electricity transmission network (the National Grid) which links generators to distribution companies and major industrial users. The National Grid, which extends from Kaikohe in the North Island down to Tiwai in the South Island, transports electricity throughout New Zealand.

The National Grid comprises around 12,000 kilometres of transmission lines and over 160 substations. This is supported by a telecommunications network of some 300 telecommunication sites that link together the components that make up the National Grid.

The national significance of the National Grid is recognised, in the context of the RMA, by the National Policy Statement on Electricity Transmission (2008) (the NPSET). Section 75(3)(a) of the RMA requires district plans to “give effect to” the NPSET.

Within Auckland, the following National Grid transmission lines traverse the western portion of the site subject to PC48 (traversing the site in a north-south direction, refer Figure 1. Kiwi Drury - Zoning Plan August 2019, Source: PC48 - Appendix 13: Engineering and Infrastructure Report below):

- Bombay – Otahuhu A 110kV transmission line on steel lattice towers (BOB-OTA A line); and
- Huntly – Otahuhu A 220kV transmission line on steel lattice towers (HLY-OTA A line).

The transmission lines appear to be located within the Proposed Open Space Zone. The BOB-OTA A line and a portion of the HLY-OTA A line border the Proposed Metropolitan Centre Zone (noting the transmission lines cross each other at a point on the plan change site).

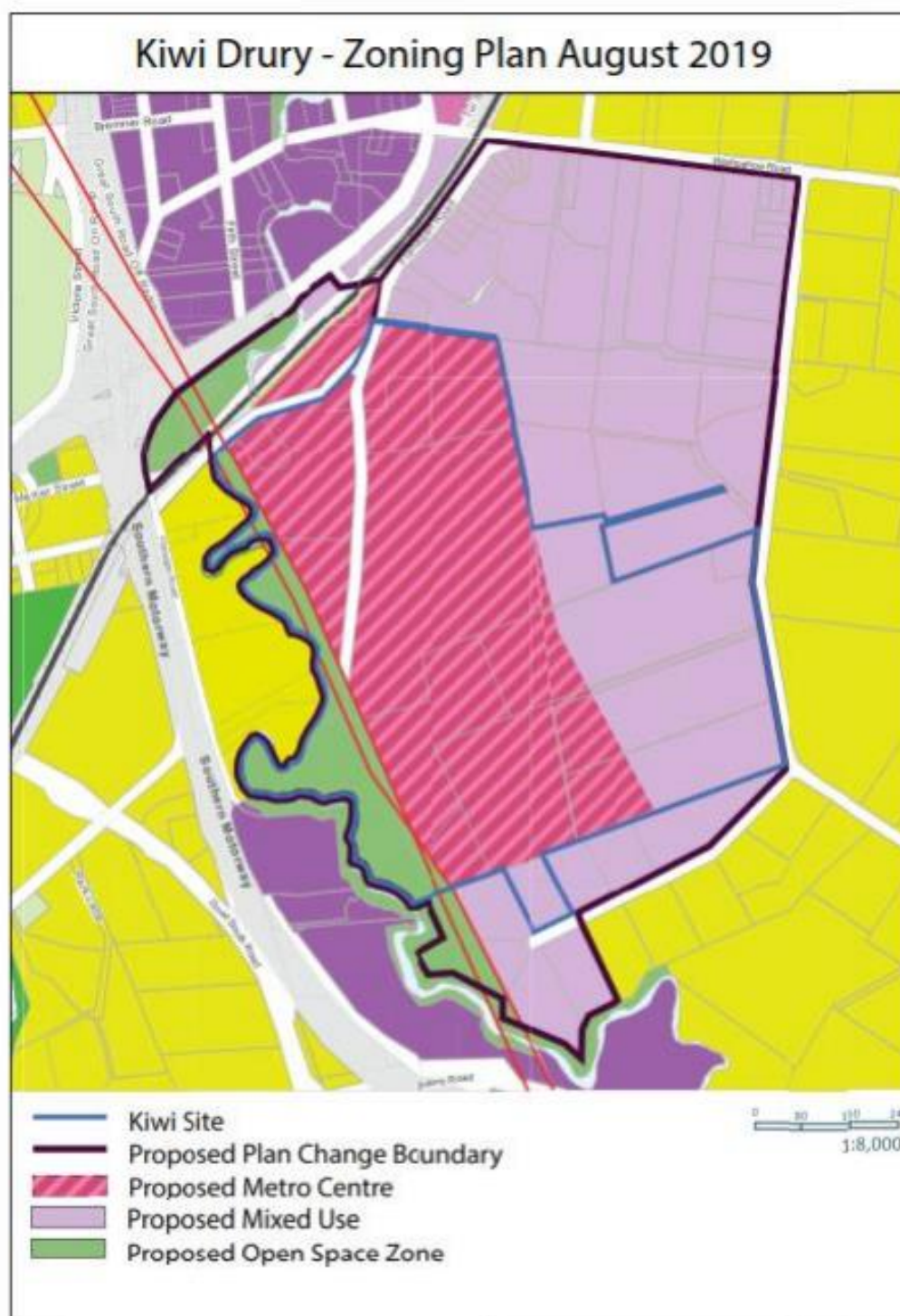


Figure 1. Kiwi Drury - Zoning Plan August 2019, Source: PC48 - Appendix 13: Engineering and Infrastructure Report

As outlined in *Appendix 13: Engineering and Infrastructure Report* accompanying the plan change application, the plan change site is subject to the National Grid Corridor Overlay as identified in the Auckland Unitary Plan. The National Grid Corridor Overlay is comprised of the National Grid Yard (Compromised and Uncompromised) and National Grid Subdivision Corridor (variable width). As applied to the plan change site, the National Grid Yard is identified

as Uncompromised¹. Refer Figure 2. National Grid Corridor Overlay – National Grid Yard Uncompromised.



Figure 2. National Grid Corridor Overlay – National Grid Yard Uncompromised. Source: Source: PC48 - Appendix 13: Engineering and Infrastructure Report

The operative National Grid Corridor Overlay provisions within the Auckland Unitary Plan are supported and Transpower seeks they continue to apply to the plan change site.

10.1

In respect of the relationship of the proposed plan change zoning to the National Grid Corridor Overlay provisions, while not entirely clear from the planning maps and text provided in the

¹ Uncompromised areas are not generally compromised by the presence of existing buildings and are subject to limitations on new development.

plan change application², Transpower understands from the *RFI Response: Planning*³ that the boundary between the Open Space zone and the Metropolitan Centre zone has been designed to align with the extent of the overhead transmission lines rather than the extent of the National Grid Corridor Overlay. As such while the transmission line itself is located outside the Metropolitan Centre zone, the National Grid Corridor overlay provisions extend into and would apply to the Metropolitan Centre zone. Transpower understands the purpose of this alignment is to allow flexibility for the development of roads along the edge of the centre, as opposed to all development⁴.

On the basis the National Grid Corridor Overlay and associated provisions continue to apply to the plan change site, Transpower is **neutral** on the plan change itself and on the location of the boundary between the Open Space Zone and Metropolitan Centre Zone, noting the same National Grid Corridor provisions apply regardless of the zoning.

² PC 48: Appendix 6 AUP Objectives and Policies, Page 8, B3.2 *"The proposed zoning pattern has taken into account the extent of the presence of the transmission lines. The Metropolitan Centre zone is not underneath the transmission lines."* And Page 24 E26.2. *"The proposed zoning pattern has taken into account the extent of the presence of the transmission lines and the National Grid Yard Overlay. The Business-Metropolitan Centre zone is outside of the 12m exclusion zone under the National Grid Yard Overlay"*.

³ PC 48 – RFI Response: Planning, UD11, Page 30. *"The boundary between the Open Space – Informal Recreation zone and the Business – Metropolitan Centre zone has been designed to align with the extent of the overhead transmission lines. The zoning boundary has been aligned with transmission lines rather than the extent of the National Grid Corridor Overlay. The National Grid Corridor overlay provisions restrict any sensitive activities developing however the overlay does not restrict all development. Therefore, the inclusion of the land within the eastern portion of the National Grid Corridor overlay allows flexibility for the development of roads along the edge of the centre."*

⁴ PC 48 – RFI Response: Planning, UD11, Page 30.

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

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



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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

Paula Schultz, Chairperson, Papakura Business Association

Organisation Name (if submission is made on behalf of Organisation) Papakura Business Association

Address for service of Submitter PO Box 272 1783, Papakura 2244

Telephone:

09 298 8996

Fax/Email:

tcm@papakura.co.nz

Contact Person: (Name and designation, if applicable)

Paula Schultz, Chairperson,
Papakura Business Association

Scope of submission

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

Plan Change/Variation Number

PC 48

Plan Change/Variation Name

Drury Centre Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

All; please see attached submission

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☒

I wish to have the provisions identified above amended

Yes ☒

No ☐

The reasons for my views are:

Please see attached submission.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

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

Decline the proposed plan change / variation ☒

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

Please see attached submission.

I wish to be heard in support of my submission ☒

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

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



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

20th October 2020

Date

Notes to person making submission:

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

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Submission on Plan Change 48 – Drury Centre Precinct

Introduction

This submission relates to the group of four plan changes, PC48, 49, 50 and 51, which together seek to rezone land to the east of the existing Drury village. Specifically, our submission relates to PC48 - Drury Centre Precinct, which amongst other things seeks the rezoning of 35ha of land to Business - Metropolitan Centre on the south western edge of the area covered by the plan changes.

Our main concern is that the rezoning of the land to Metropolitan Centre will have an adverse impact on the ability to fully establish a Metropolitan Centre in Papakura.

The Papakura Business Association (PBA) is registered as an Auckland Council BID (Business Improvement District) since March 2011, with a formal constitution. Prior to this it was organised as a Business Association.

We operate with a team of two full time and one part time staff members including a Town Centre Manager, Safety Coordinator and office help.

We work closely with the Papakura Local Board, for the good of Papakura; the town, the businesses, the community. Over the last three years the Commercial Projects Team made up of the PBA, Local Board and Council have worked together on plans for the revitalisation of the town - working towards our Metropolitan Centre status.

It is noted in *'Open All Hours – Main Street Papakura c.1865 -c1938'*¹ that *'Papakura was built around concepts of family, community, business and industry'*. The same remains true today. Papakura is not a modern shopping mall which contains only shops and food outlets but is the heart of the Papakura community and the local service centre for surrounding communities and villages. As such it provides a wide range of services and facilities, including the Council Service Centre, Local Board Office, Police Station, Court, many churches, a library, museum, pools, banks, post office, solicitors, accountants, employment agencies, real estate agencies, budgeting services, recreation centre, sports centre, theatre/cinema, community theatre, RSA,

¹ Open All Hours – Main Street Papakura c.1865 -c1938, Michelle Smith, Papakura & Districts Historical Society, 2016

all within or immediately adjoining the Metropolitan Centre. As such it is in many ways closer to the notion of a fully functioning Metropolitan Centre than other similarly identified areas, such a Botany Town Centre, which whilst having a broader range of shops fail to provide the range of other activities needed to create a well-functioning community.

Papakura as a Metropolitan Centre

Papakura was initially identified as a Metropolitan Centre, along with Auckland's other nine Metropolitan Centres, in the Auckland Plan 2012, with the identification continuing into the updated Auckland Plan 2050. Drury is identified as a Local Centre.

The 2012 Auckland Plan noted that Papakura, along with Henderson and New Lynn were '*considered to require some form of regeneration to help stimulate development*'.² We believe that this was in recognition that Papakura town centre was not at that time, and is still not, operating as a full Metropolitan Centre in relation to its retail offering, but that it is strategically positioned to service its surrounding area, including Drury.

The relevant Metropolitan Centre zoning for Papakura was put in place through the Auckland Unitary Plan 2016.

We recognise that the centre is still not operating as a full Metropolitan Centre. However, as noted above it does provide a number of the features expected of a metropolitan centre³. In addition to these, it including a sub-regional transport hub with high frequency public transport. The train station is the sixth busiest in Auckland and will continue to serve a number of outlying communities, including Hunua, Clevedon, Kingseat, and Clarks Beach, even if the line is electrified as far as Pukekohe and new stations built at Drury. The latter three of these areas are experiencing significant expansion; the greater use of public transport from Papakura for these new residents is critical if the southern motorway is not to become clogged by additional traffic. Papakura will therefore become central to the daily lives of these new residents.

² Auckland Plan 2012 Table 10.1

³ Auckland Plan 2012 Table 10.2

The Auckland Plan 2050 notes that *'An Integrated Area Plan for Manurewa, Takanini and Papakura was completed in 2017 and proposes to continue the revitalisation work already underway. This includes improvements to wayfinding for cycling and walking through the town centre, along greenways and to the station. The Southern Initiative is coordinating a long-term programme of investment to boost social, economic conditions and education opportunities in the area.'*⁴ However, from our perspective this means little on the ground action within Papakura and does not bring forward the expected regeneration needed to stimulate development in the centre. There have been no specific on the ground projects progressed by either Auckland Council or Panuku Development Auckland which seek to actively encourage regeneration in Papakura. This is at odds with the action we see in other lower order centre such as Northcote where Panuku have pursued a long term regeneration project which has included the amalgamation of land to allow the redevelopment of the town centre. Auckland Transport were in 2018/2019 pursuing a Safer Communities project which would have improved walking safety within the Metropolitan Centre, but funding to this was cut and the project put on hold.

However, we do commend the action of the Papakura Local Board, who despite significant funding limitations have established the Commercial Centre Projects Group, which as noted above brings together the Local Board, ourselves and key Council representatives. This group has produced a Framework for Action to provide a vision for the centre and to identify future projects and has advocated for and overseen a number of other projects in the centre. However, this is all within the limited budget constraints available to the Local Board and does not represent the full regeneration project expected following the Auckland Plan 2012.

Recent projects and initiatives have included:

- Beginning a project to deliver a shared space in Broadway, in the centre of our town.
- Introduction of a hashtag for the town - # Live Papakura and sub hashtags being #Eat Local, #Shop Local and #Love Local
- Branding for the town via Radio and Flags

⁴ Auckland Plan 2050 - Development Area Papakura

- A strong Social Media presence with two Facebook pages and an Instagram page
- Installation of a new sign on the fountain in our town square, highlighting our status as a New Metro Centre
- Over 100 branded flags across the centre
- Volunteer work to beautify our town including:
 - Over 30 planters throughout town with beautiful plants flowers and shrubs
 - 6 Bikes with planter baskets
 - Fairy Lights on all main corners in the town and now being put on individual buildings
 - 16 Murals have been done on blank walls that are hot graffiti spots – with more to come
- Working with Auckland Transport to upgrade lighting and to install additional lighting to meet Crime Prevention Through Environmental Design recommendations
- New lighting and footpath improvements in Central Park
- Events in Central Park and Centre Court
- Coordinating 34 CCTV cameras around town – 27 dual lens, 4 PTZ and 4 License plate recognition cameras with two part time paid monitors working in the CCTV Office located at the Police station
- A full time Safety Co Ordinator funded by the Local Board to address safety, lighting, graffiti, landlords and building maintenance, big and good relationship with the Police, crime prevention seminars, coffee with a cop, lighting audits and safety surveys to name but a few parts of this role

Impact of a New Metropolitan Centre at Drury

We note that in their report prepared for Kiwi Property, the advocates of PC48, Market Economics state that

‘Currently the Metropolitan centre that is intended to serve the southern area of Auckland is Papakura, which is only 5km north of the Drury interchange. Metropolitan centres are highest in Auckland’s retail hierarchy behind the Auckland CBD, and therefore afforded primacy over all other centres. However, Papakura is unique among Auckland’s Metropolitan centres, because it is by far the smallest of the 10 centres and has struggled competitively for many years in the South Auckland retail market, despite a number of initiatives designed to encourage the centre’s development.’⁵

and:

‘It is clear that Papakura is not functioning as a Metropolitan centre, and probably hasn’t done so for many years. Currently, over 30% of core retail and hospitality demand that arises within the Papakura primary catchment leaks out to other centres, implying that Papakura is not fulfilling its Metropolitan centre retail role. This is borne out by a quick assessment of employment and business activity in Papakura since 2000. Figure 2.1 shows that the number of household focused businesses has dropped by 17% since 2000 while employment in these sectors has declined by 19%. In total the centre has stayed roughly the same size (an increase in 10 actual businesses since 2000), but total employment has dropped by more than 500 workers (17%) since 2000.’⁶

It appears to us that Market Economics have missed the key point. It is not the case the Papakura was once a Metropolitan Centre (as defined in the Auckland Plan 2012) and now is not operating as such. The intention of the Auckland Plan 2012 was to identify Papakura, as a result of its appropriate location and future potential, as the location of a Metropolitan Centre and for Auckland Council to facilitate development and initiate change in the centre through regeneration projects.

Market Economics’ reference to ‘a number of initiatives designed to encourage the centre’s development’ provides the impression that a large regeneration project has been underway

⁵ Market Economics 2.3

⁶ Market Economics 2.3

and has failed. As outlined above this has not been the case. Whilst we feel that progress has been made on the journey towards Papakura becoming a Metropolitan Centre, between us and the Local Board we have not had sufficient funds to truly pursue the regeneration of the centre since its identification as a Metropolitan Centre. We have lobbied for Panuku to assist but due to the existing limited Council land ownership in the centre we have not been successful in securing any significant support, despite knowing that they have established the public works act as a tool for regeneration and amalgamated sites within other centres to encourage regeneration. It seems to us that a key reason that Papakura has not progressed and is not able to provide the full range of goods and services expected within a Metropolitan Centre is a result of the lack of support that has been given to it. This is not a reason to give up on it, but more a reason to recognise its potential and to support its ongoing development to serve its existing community and hinterland.

In their report Market Economics have focused on the existing Papakura and note that:

‘This means that the volume of trade estimated to be diverted to Drury represents only 13% of the anticipated growth in catchment expenditure. When combined with the fact that there is currently a very high level of leakage from Papakura (i.e. much of that volume of trade that will be diverted to Drury will already be leaking from Papakura to other centres), there is very high likelihood that Papakura stores will experience no adverse impact at all.’⁷

Given the lack of support that has been given to the regeneration of Papakura, we believe that Market Economics have considered the wrong question; rather than considering the impact on the Papakura Metropolitan Centre as existing, they should instead be considering the impact of the proposed development at Drury on the ability to deliver a full service Metropolitan Centre in Papakura.

Market Economics’ assertion that *‘there are two possibilities: either there is no alternative Metropolitan centre developed in the south, and the large new pool of consumers will continue to travel out of the area to access high level retail and commercial centres; or some other*

⁷ Market economics 6.2.1

*location is chosen to provide new supply locally.*⁸ is therefore clearly misplaced and missing the third option, advocated by the Auckland Plan 2012, to actively encourage the regeneration of Papakura. In recent months we are seeing increasing numbers of residential sites around the perimeter of the Metropolitan Centre being developed for medium density development, as initially encouraged by the Auckland Plan 2012, and zoned for under the Unitary Plan. These are encouraging signs of change and are indicative that the economics of development within Papakura is changing. Now is therefore the right time to bring forward the regeneration of the Metropolitan Centre, and not encourage a new competing Metropolitan Centre only 5km to the south.

In any event we find it hard to accept the Market Economics conclusion that Papakura stores will suffer no adverse impact from the development of a new Metropolitan Centre in Drury. Our experience tells a different story. Papakura has in recent years already suffered from decisions to allow new retail developments within its natural catchment. Developments at Takanini, including Southgate and Takanini Village, have already led to a significant number of stores moving out of the town centre. In recent years this has included all of the following stores moving out of the Metropolitan Centre to new buildings at Takanini; with an appropriate regeneration project in place this exodus could have been discouraged and stores encouraged to return:

- | | |
|------------------------|---------------------|
| - Vodafone | - 2 x Travel Stores |
| - Warehouse Stationary | - Bunnings |
| - Spark | - Mitre 10 |
| - 2 Degrees | - Mad Butcher |
| - The Warehouse | - Flight Centre |
| - Stonez Jewellers | - Bin Inn |
| - AMI Insurance | - Chances Clothing |
| - Kiwi Bank | - Repco |

⁸ Market Economics 2.3



#LivePapakura

Conclusion

It is clear to us, as a local organisation representing businesses and working with the community within the existing Papakura Metropolitan Centre, that the development of a new Metropolitan Centre at Drury would have a significant impact on the ability of Papakura to develop into a full service Metropolitan Centre.

We therefore ask that Plan Change 48 not be accepted, or alternatively that an alternative lower order zoning be placed on the land identified as Metropolitan Centre within it to appropriately limit the scope of development within the plan change area.

11.1

Paula Schultz

Chairperson, Papakura Business Association

19th October 2020

Submission on Proposed Private Plan Change 48 – Drury Centre Precinct to the Auckland Unitary Plan (Operative in Part)

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

.....

To: **Auckland Council**

1. SUBMITTER DETAILS

Name of Submitter: **Oyster Capital**

This is a submission on Proposed Private Plan Change 48 (PC48) to the Auckland Unitary Plan – Operative in Part (AUP).

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

2. BACKGROUND

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

3. SCOPE OF SUBMISSION

The submission relates to PC 48 as a whole.

4. SUBMISSION

Oyster Capital supports PC48 in its notified form.

Of particular relevance to Oyster Capital's submission, the following matters are noted:

- a) The proposed zoning pattern is generally consistent with the Drury-Opāheke Structure Plan and the three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East;
- b) The Metropolitan Centre zone will support a wide variety of uses and services for the local community within a walkable distance and provide opportunities to establish new community facilities and a range of public open spaces. The centre will contain the key open spaces and the key retail streets that are the focal point for intensive retail, commercial and civic development and pedestrian activity within the precinct;
- c) The residentially focused Mixed Use zone provides a range of activities to support the Drury centre and will encourage high density residential and employment activities in close proximity to the centre and the proposed train station;

- d) The extent of business zoned land proposed has been sufficiently sized to support the local needs of the population over the next 30 years. The proposed land uses will contribute to an improvement in the balance of residential and business growth to support Drury as a self-sustaining community now and into the future;
- e) Establishing a Metropolitan Centre in Drury East is unlikely to have any adverse effects on existing centres such as Papakura, as the physical constraints and fractured ownership patterns have limited Papakura's ability to deliver Metropolitan Centre services to the southern community;
- f) The adverse effects of urban development on the natural environment, including the Manukau Harbour, Hingaia Stream and its tributaries can be effectively managed, and key natural features within the Plan Change area will be maintained and enhanced;
- g) The zoning pattern and proposed Precinct enables a connected and high-quality road network to be established that provides appropriately for all transportation modes; and
- h) The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

5. Decision Sought

Oyster Capital seeks the following relief from Auckland Council on PC48:

- a) That PC48 be retained and approved, as notified.

12.1

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

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

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

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

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

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

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

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



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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Rodney Rex Bremner

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

Address for service of Submitter

81 Waihoehoe Road, Drury

Telephone:

021997874

Fax/Email:

allrightladder@callplus.net.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 48

Plan Change/Variation Name

Drury Centre Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

Plan Change 48 as a whole

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I **support** the specific provisions identified above ☒

I **oppose** the specific provisions identified above ☐

I wish to have the provisions identified above amended

Yes ☐

No ☐

The reasons for my views are: The proposed plan change is consistent with the Drury Structure Plan, and is a good place to locate a new Metropolitan Centre as it is close to the motorway and railway.

I support my land (located on Waihoehoe Road and Fitzgerald Road) to be rezoned as Mixed Use Zone.

The new centre and surrounding land will allow for Drury to provide jobs and housing for South Auckland, as well as new services and amenity to existing residents (continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation	<input checked="" type="checkbox"/>	13.1
Accept the proposed plan change / variation with amendments as outlined below	<input type="checkbox"/>	
Decline the proposed plan change / variation	<input type="checkbox"/>	
If the proposed plan change / variation is not declined, then amend it as outlined below.	<input type="checkbox"/>	

I wish to be heard in support of my submission	<input type="checkbox"/>
I do not wish to be heard in support of my submission	<input checked="" type="checkbox"/>
If others make a similar submission, I will consider presenting a joint case with them at a hearing	<input type="checkbox"/>

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

20/10/20
 Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

Tony Chien
113 Fitzgerald Road
Drury
Auckland, 2577

October 20 2020

Auckland Council
Plans and Places Team

By email: unitaryplan@aucklandcouncil.govt.nz

To Whom it May Concern,

Re: Private Plan Change 48 – Drury Central Precinct

This letter provides feedback on Private Plan Change 48 (PC48) as it specifically affects our property (**Figure 1**). We are aware of the proposal from Kiwi Property to develop a new major centre adjacent our site, and we fully support their proposed plan change.



Figure 1: 113 Fitzgerald Road outlined in blue.

Submission

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

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

Decision Sought: That PC48 be approved, as notified.

| 14.1

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

Kind Regards,

Tony Chien & Zhenhao Tang

Submission on Proposed Private Plan Change 48 – Drury Centre Precinct to the Auckland Unitary Plan (Operative in Part)

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

To: **Auckland Council**

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

1. SUBMITTER DETAILS

1.1 This is a submission on Proposed Private Plan Change 48 (PPC48) to the Auckland Unitary Plan – Operative in Part (AUP) Kiwi Property Holdings No.2 Limited (Kiwi Property).

1.2 Kiwi Property is the applicant for PPC48 and could not gain an advantage in trade competition through this submission.

2. SCOPE OF SUBMISSION

2.1 This submission is in support of PPC48 in its entirety, incorporating the amendments specified below.

2.2 Specific aspects and provisions of PPC48 that this submission relates to are:

- a) The traffic modelling relied on in PPC48. In particular, the submission provides an update to the traffic modelling which demonstrates that the development enabled by the Drury Centre, Drury East and Waihoehoe Plan Changes does not rely on the transport upgrades identified within the Drury Transport Investment Programme.
- b) Proposed new provisions to recognise there may be a functional need to undertake stream reclamation to facilitate the development of Drury Boulevard;
- c) Proposed amendments to the stormwater policies to ensure consistency between the Drury Centre Precinct and the Stormwater Management Plan;
- d) Incorporation of a new standard requiring the use of inert building materials to manage the quality of stormwater runoff within the precinct; and
- e) Proposed amendments to the height limit of sub-precinct E, C and F to 40.5m, 32.5m and 26m respectively to better align with the National Policy Statement for Urban Development 2020 (NPS - UD).

3. Background

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

3.2 Consistent with other greenfield precincts within the Auckland Unitary Plan, PPC48 incorporates a Drury Centre Precinct which includes place-based provisions that create a spatial framework for development. The precinct provisions are appropriately focused on the layout of development necessary to achieve the objectives of the AUP, including:

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

3.3 In addition to the precinct, the Auckland-wide stormwater quality and Stormwater Management Area Flow 1 (SMAF 1) provisions will apply within the area subject to PPC48 which will manage sediment and contaminant runoff which could make its way into the freshwater and coastal receiving environment.

3.4 Since notification Kiwi Property has identified three aspects of the proposed precinct provisions which warrant amendment to provide better access to Drury Centre and improved stormwater quality outcomes.

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

4. Additional Transport Modelling

4.1 The transport modelling that is attached to Appendix 10: Integrated Transport Assessment of the PPC48 application was completed in 2019 and based on the Strategic Growth Alliance decades and timing available at the time.

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

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

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

- Jesmond Rd Extension
- Waihoehoe Road WEST Upgrade
- Paerata Rail Station & Southern connector
- Jesmond Road Upgrade

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

4.4 Therefore, as part of the Clause 23 response the Drury East developers produced revised transport modelling that incorporated the NZUP and DTIP upgrades. The updated modelling is included within the Request for Further Information Response: Transport publicly notified with PPC48. The revised transport modelling resulted in further understanding the transport upgrades necessary to support development enabled by the Drury Centre, Drury East and Waihoehoe Plan Changes. This has informed proposed development standards IX6.2 Staging of Development with Transport Upgrades and Standard IX6.3 Trip Generation Limit within PPC48.

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

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

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

4.7 Kiwi Property notes that the Council has advised that there is a \$1 billion funding shortfall to support the full build out of the wider Drury Opaheke Structure Plan area. Kiwi Property understands that this estimate represents the full build out of Drury Opaheke area (essentially 30 years of development). The Drury East developers have proposed as part of the Plan Changes a number of upgrades to mitigate the effects of the proposed Drury East developments. The Drury East developers are committed to working to resolve funding issues to ensure that

infrastructure can practically be provided in a staged manner to support development over time.

5. Stream Reclamation to facilitate the development of Drury Boulevard

5.1 Kiwi Property has developed a concept masterplan to guide the development of the Plan Change area over a 30-year timeframe. While it is intended that the Masterplan will be reviewed and updated over time, it does incorporate key physical design elements for Drury Centre including the Drury Boulevard that will remain fixed. The Drury Boulevard forms the main northern vehicle access to the centre and the proposed alignment fulfils a functional need.

5.2 As discussed in the Section 32 assessment report¹ some stream reclamation may be required to facilitate the development of Drury Boulevard. Therefore, Kiwi Property is proposing amendments to the Drury Centre Precinct provisions to provide more certainty in relation to the streams that could be impacted as a result of the proposed Drury Boulevard alignment.

5.3 The proposed amendments are intended to be used to provide for limited stream works, where they are required to construct Drury Boulevard as a discretionary activity (as opposed to a non-complying activity). The associated standard and precinct plan identifies the area of stream reclamation and the area of riparian planting that can be counted towards the required offset.

5.4 Given that discretionary activity is required to use these provisions, the decision to reclaim and offset will need to be justified through the resource consent process. In particular any proposal will require an assessment against the relevant objectives and policies of the AUP including E3.3((13), which will require consideration of whether the stream works can be avoided through alternative designs. An assessment will also need to be made against the national policies for river loss required to be inserted into the AUP under Section 3.24 of the National Policy Statement on Freshwater Management 2020:

“The loss of river extent and values is avoided, unless the council is satisfied:

(a) that there is a functional need for the activity in that location; and

(b) the effects of the activity are managed by applying the effects management hierarchy.”

5.5 The proposed amendments are set out in **Attachment A** and below:

IX.3 Policies

....

(19) In addition to the matters in Policy E.3.3(13):

(a) provide for stream works, including culverting, diversion and/or reclamation, required to construct the Drury Boulevard, where it can be demonstrated that there is no practicable

15.1

¹ Drury Centre Plan Change Request Section 32 Assessment Report Section 10.5.1

alternative, and where there is a functional need to construct it in the location generally shown on Precinct Plan 1.

(b) enable the planted riparian margins of identified streams to contribute to offsetting the effects of any stream works assessed under Policy (19)(a).

....

Table IX.4.1 Activity table

....

Sub-Precinct C and E – Mixed Use

Activity		Activity Status
Use		
Commerce		
(A10)	
Streams (rp)		
(A21)	<u>Stream works including reclamation and diversion within Stream A required to construct the Drury Boulevard as shown on Precinct Plan X which comply with IX6.9, and which are not provided for as a permitted activity under Chapter E3.</u>	<u>D</u>

.....

IX6.9 Stream works for the Drury Boulevard

Purpose:

- To provide for a limited extent of stream works to construct the Drury Boulevard to be assessed as a discretionary activity.
- Where offsetting is determined to be appropriate in accordance with the effects management hierarchy and Policy E3.3(4), enable the planted riparian margins of identified streams to contribute towards it.

- (1) The extent of stream works to achieve the construction of Drury Boulevard shall be limited to diversion of Stream A or 60m of reclamation along Stream A as identified on IX10.4 Precinct Plan 4.
- (2) For the purpose of calculating the offset required for stream works provided for under IX7.1(1) the SEV and ECR methods will be used.
- (3) The area of riparian planting identified on IX10.4 Precinct Plan 4 will count towards the offset required under IX7.1(2).

Analysis

Functional Requirement for the Drury Boulevard Alignment

5.6 The proposed alignment of Drury Boulevard within the Masterplan will necessitate stream works within Stream A. While the Plan Change does not include provisions to require this particular alignment of the Boulevard, there is a functional need which has influenced the proposed alignment within the Masterplan. Consequently, the general locality and alignment of the Boulevard is unlikely to change significantly through detailed design. The drivers for the functional need and current location and alignment include:

- Drury Boulevard is critical to the development of Drury Centre as it forms the primary northern collector road access, connecting the centre to Waihoehoe arterial road;
- Drury Boulevard forms the primary northern collector road access to the Drury Centre Train Station, connecting the station with Waihoehoe arterial road;
- The proposed alignment of the Drury Boulevard has been spaced at 400m Fitzgerald Road, the existing collector road, to provide good urban environments that support walking; and
- As the northern collector road access Drury Boulevard will function as the key public transport connection for buses and the key cycling route linking Waihoehoe arterial road to the centre and the Drury Central Train Station via Station Road.

5.7 Drury Boulevard is a key piece of infrastructure for the Drury Centre. Its indicative location is driven by a functional need to provide northern collector road access to the centre and Train Station while promoting an efficient urban form. On balance, it is appropriate to provide greater certainty within the Precinct regarding the Drury Boulevard development and the associated ecological impacts. However, the proposed provisions enable a more detailed assessment to occur at the resource consent stage as a discretionary activity for a limited extent of stream works, consistent with the requirements of the National Policy Statement: Freshwater Management, National Environmental Standard: Freshwater and the Auckland Unitary Plan (E3 in particular).

Assessment of Stream Loss to Facilitate Drury Boulevard

5.8 Kiwi Property has undertaken comprehensive mapping of ecological features within its landholdings and consequentially, understands the ecological features that could be impacted under the proposed Drury Boulevard alignment. The supplementary Assessment of Ecological Effects included within **Attachment B** provides further detail on the potential ecological effects associated with the indicative Drury Boulevard alignment, and assesses the indicative reclamation of Stream A, with specific reference to the relevant matters of discretion and policies included within the AUP.

5.9 The supplementary Assessment of Ecological Effects finds that 60m of reclamation along Stream A is the maximum ecological effect that can be enabled while enabling the effects to be offset within the Drury Centre Precinct. The assessment identifies the location and nature of the mitigation/offset works required to support 60m of reclamation along Stream A. These findings have been incorporated directly into the package of stream works provisions that Kiwi Property

is now proposing to enable the development of Drury Boulevard. As such reclamation that is proposed as a discretionary activity is limited to what can be offset within the Precinct. Furthermore, the location and nature of mitigation/offset works incorporated within the precinct is also consistent with the findings of the supplementary Assessment of Ecological Effects.

Consistency with the National Policy Statement on Freshwater Management and the National Environmental Standard for Fresh Water Management

5.10 The National Policy Statement for Freshwater Management 2020 (**NPS FM**) and the National Environmental Standard for Freshwater Management (NES FM) came into effect on 3 September 2020. The NPS FM includes a policy direction to avoid to the extent practicable the loss of river extent and values (Policy 7). As discussed above Section 3.24 of the NPS FM also requires Council to insert a policy into the AUP which will ensure the loss of river extent and values is avoided unless there is a functional need for the activity and the effects of the activity are managed by applying the effects management hierarchy. The NES FM directs that any reclamation of the bed of any river is a discretionary activity (Section 57).

5.11 The proposed amendments to the Drury Centre precinct are consistent with Policy 7 of the NPS FM. As discussed above Drury Boulevard is a key piece of infrastructure for the Drury Centre and its alignment is driven by a functional need to provide northern collector road access to the centre and Train Station while promoting an efficient urban form. The proposed amendments will still require an assessment as part of a resource consent application which demonstrates how each step in the effect's management hierarchy will be applied to any loss of extent or values of the river.

5.12 The proposed amendments to the Drury Centre precinct are consistent with the NES FM as they apply a discretionary activity status for the reclamation of streams.

Consistency with the AUP

5.13 While it is anticipated that the AUP will soon be updated to give effect to the NPS FM, Policy E3.3(13) provides the current direction in relation to the reclamation of streams. This policy direction requires reclamation to be avoided unless all of the following apply:

(a) there is no practicable alternative method for undertaking the activity outside the lake, river, stream or wetland;

(b) for lakes, permanent rivers and streams, and wetlands the activity is required for any of the following:

(i) as part of an activity designed to restore or enhance the natural values of any lake, river, stream or wetland, any adjacent area of indigenous vegetation or habitats of indigenous fauna;

(ii) for the operation, use, maintenance, repair, development or upgrade of infrastructure; or

(iii) to undertake mineral extraction activities; and

(c) the activity avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on Mana Whenua values associated with freshwater resources, including wāhi tapu, wāhi taonga and mahinga kai.

5.14 In relation to Policy E3.3(13)(a) the final extent of reclamation which may be required along Stream A to facilitate the development of Drury Boulevard will not be fully understood until detailed design is undertaken as part of a subdivision or resource consent application. Therefore, the proposed discretionary activity status will trigger an assessment of a proposal against this policy direction to take place as part of the resource consent application. This assessment will need to demonstrate that there are no other practicable design alternatives for Drury Boulevard which will avoid stream loss.

5.15 As previously discussed, Drury Boulevard is a key piece of infrastructure for the Drury Centre. Therefore, the proposed amendments are consistent with Policy E3.3(13)(b) as the stream reclamation which is proposed to be enabled as a discretionary activity is necessary to facilitate the Drury Boulevard and therefore is specifically tied to the development of a key piece of infrastructure.

5.16 Finally, in relation to consistency with Policy E3.3(13)(C) the supplementary Assessment of Ecological Effects finds that there are potential adverse ecological effects associated with the alignment and construction of Drury Boulevard which include sediment discharge, fish injury and mortality, restricting fish passage and loss of stream habitat. There are measure available however, to mitigate these potential effects.

5.17 The unavoidable modification and/or loss of some of Stream A could be mitigated (in part) by a stream diversion to reduce the potential effect of loss of stream length. If the loss and/or modification of Stream A results in the need for offsetting, riparian planting can be undertaken within Kiwi landholdings to enhance existing stream habitat to achieve no net loss of ecological function. The supplementary Assessment of Ecological Effects finds that that up to 60m of streambed area could be reclaimed and offset within Stream A and B (potential offset areas shown in **Error! Reference source not found.**).

5.18 As these freshwater ecological effects are anticipated and enable the provision of a key piece of infrastructure, being the main northern access to the centre, it is appropriate to provide greater certainty within the Precinct.

6. Kiwi Property's Proposed Amendments to the Stormwater Policies and Standards

6.1 The proposed approach to managing stormwater within the PPC48 area is to utilise the existing AUP provisions. It is proposed to apply the Stormwater Management Area Control – Flow 1

(SMAF 1) across the Plan Change area to manage the increase in stormwater discharge to sensitive stream environments. In accordance with the Council's recently approved Network Discharge Consent, a Stormwater Management Plan (SMP) has been prepared by Tonkin & Taylor, and is included at Appendix 12 to the Plan Change application. This SMP is proposed to be adopted by the Council to form part of the Network Discharge Consent and outline the stormwater management requirements in the Plan Change area.

- 6.2 Kiwi Property is proposing amendments to the Drury Centre Precinct to clarify this approach to stormwater management within the Plan Change area. In particular it is proposed to add an additional policy and amend Standard IX6.6 Stormwater Quality. The proposed amendments are set out in **Attachment A** and below:

Stormwater Management

Policy IX.3(21): Require subdivision and development to be consistent with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.

15.4

IX6.5 Stormwater Quality

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

15.5

Analysis

Additional Stormwater Quality Policy

- 6.3 Currently the policies within the Drury Centre Precinct do not provide specific direction for the approach to stormwater management within Drury Centre. There is no recognition that subdivision and development will have to be in accordance with the SMP which is adopted under the Network Discharge Consent. The proposed policy will clarify this relationship and is consistent with the approach taken within the proposed approach in Plan Change 51Drury 2 Precinct.

Inert Building Materials Standard

- 6.4 The SMP aims to align the proposed stormwater management approach for the Plan Change area with the requirements of the AUP, taking into account the catchment specific issues, constraints and opportunities. An integrated stormwater management approach has been proposed as a 'Stormwater Management Toolbox' which incorporates a range of measures to manage potential effects associated with the proposed change in land use and outlines the devices proposed within each of the proposed zones.
- 6.5 The 'Stormwater Management Toolbox' is proposing a higher standard of stormwater management than what is required within SMAF 1 and the AUP. In particular the SMP proposes to manage water quality through appropriately designed SMAF 1 devices, treatment of all roads

(rather than just high use roads as required by Chapter E9 of the regional rules) and the use of inert building materials.

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

7. Height Limit within Sub Precinct F

- 7.1 Currently the Plan Change proposes a 32.5m height limit within sub-precinct E, a 25m height limit within sub-precinct C and an 18m height limit within sub-precinct F. The purpose of this transition in height is to achieve greater height and density in close proximity to the train station. To ensure the Plan Change is consistent with the National Policy Statement on Urban Development (**NPS – UD**) it is now proposed to increase the height limits to 40.5m in sub-precinct E, 32.5m in sub-precinct C and 26m in sub-precinct F as shown in **Attachment A**.

Analysis

- 7.2 In August 2020 the NPS – UD came into effect replacing the National Policy Statement on Urban Development Capacity. The NPS – UD contains objectives and policies that require councils to carry out long term planning to accommodate growth and ensure well-functioning urban environments. The NPS-UD is also more directive around where intensification should occur. Within Tier 1 urban environments, which includes Auckland, building heights of at least 6 storeys must be accommodated within a walkable catchment of Metropolitan Centre zones and rapid transit stops (Policy 3). The height and density requirements can only be modified in these areas to the extent necessary to accommodate a qualifying matter (Policy 4). The NPS-UD provides guidance on the consideration of qualifying matters within sub-part 6 and essentially requires a significant amount of evaluation to be undertaken to demonstrate why the area is subject to a qualifying matter which justifies limiting the height/density.
- 7.3 Sub-Precinct F is within a walkable catchment of the proposed Drury Metropolitan Centre zone and therefore to ensure the Plan Change is consistent with the NPS - UD, buildings of six stories must be enabled within this sub-precinct. Consequently, it is now proposed to increase the height limit from 18m to 26m. This has resulted to subsequent proposed changes to the height limits within sub-precincts E and C to ensure that the transition in height and density is maintained.

8. Decision Sought

- 8.1 Kiwi Property seeks the following relief from Auckland Council (or other relief or other consequential amendments as are considered appropriate or necessary to address the concerns set out in this submission):
- Amend the Drury Centre Precinct as per the amendments set out within **Attachment A**.
 - Any consequential amendments required for completeness or consistency.

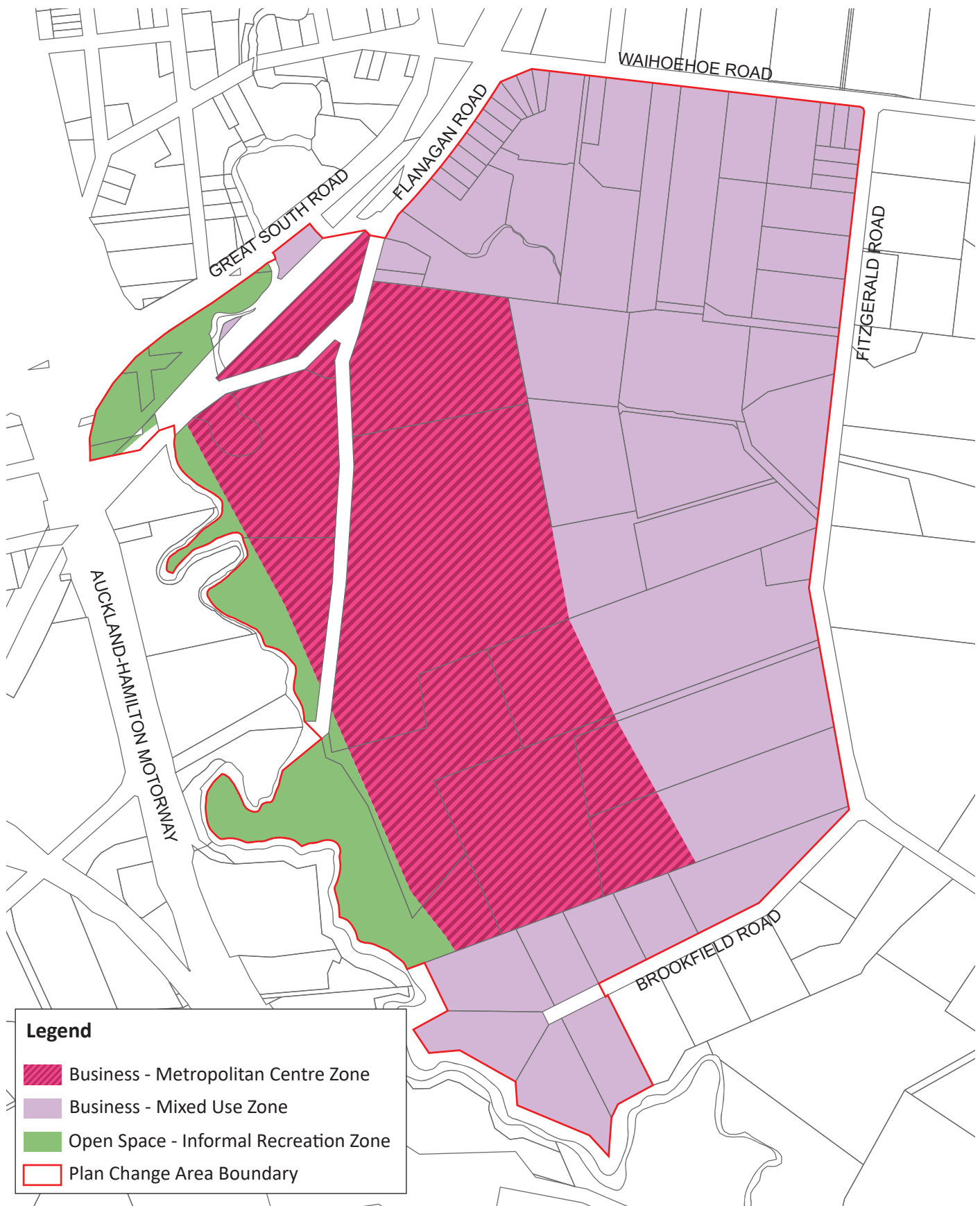
- c) Such further or other relief as the Council considers appropriate to give effect to this submission.

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

Attachment A

Drury Centre Precinct

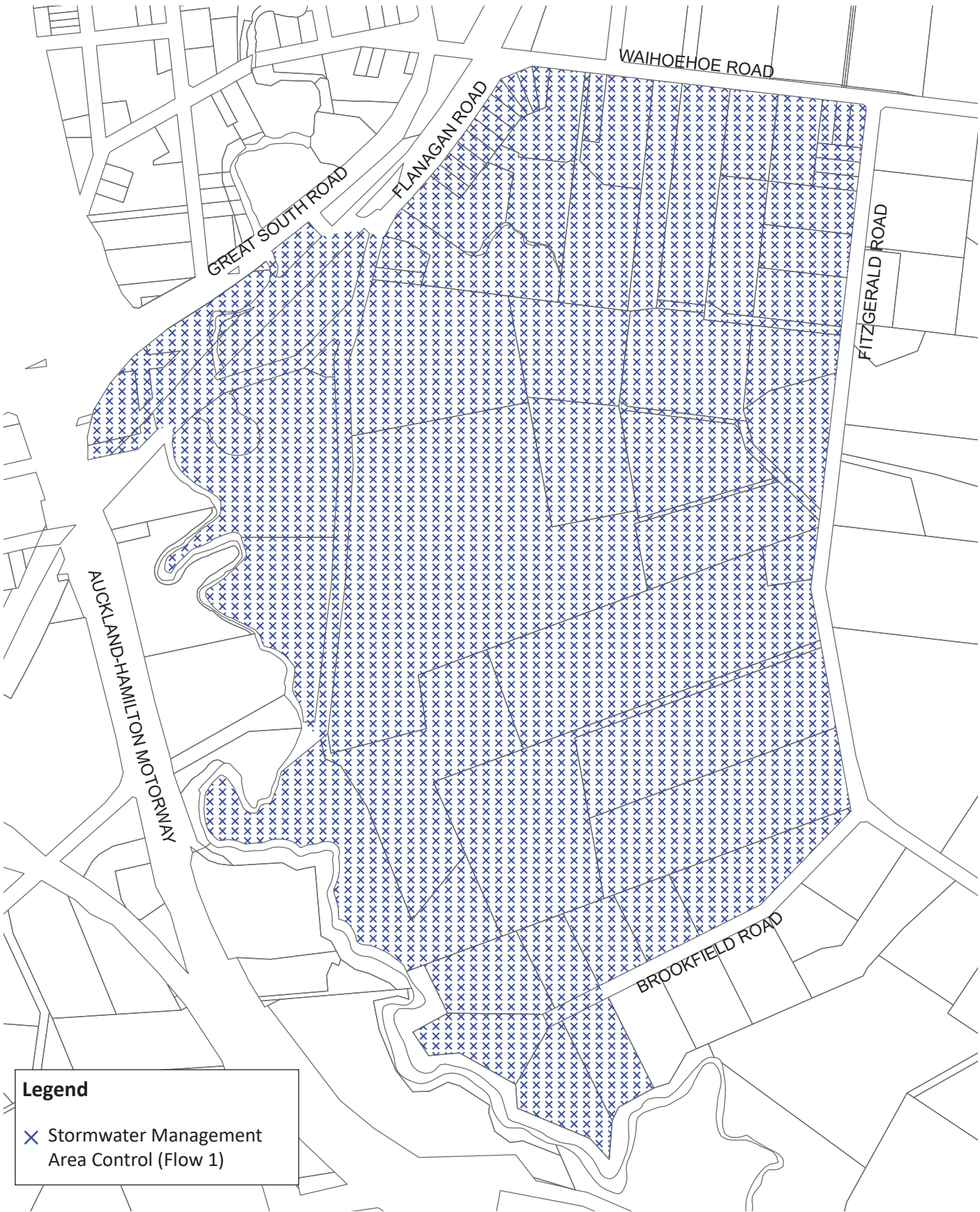
Drury Centre - Zoning Plan



Drury Centre - Precinct Plan



Drury Centre - Stormwater Management Area Control (Flow 1)



IX. Drury Centre Precinct

IX.1 Precinct Description

The purpose of the Drury Centre Precinct is to provide for the development of a new, comprehensively planned and transit-orientated centre at Drury that supports a quality compact urban form. The precinct achieves this by prioritising access to and within the centre by public and active modes and integrating rail, bus, pedestrian and cycle networks to connect key destinations. The precinct also provides for the highest employment-generating activities and retail and residential densities around the future Drury Central train station. At the same time, the precinct emphasises the need for development to create a unique sense of place for Drury, by integrating existing natural and built site features with development and respecting the landform.

The precinct provides for a wide range of activities that will support the establishment of a new metropolitan centre in Drury. The precinct comprises of the core centre, anchored by a future train station in the north, a retail main street and quality open spaces. The main street will provide a vibrant pedestrian experience, typically with fine grain retail frontages and a high amenity street environment.

The core centre will be surrounded by supporting activities, including high density residential to the north and east, and large format retail and associated activities to the south. The streets through the high density residential areas to the north and south of the centre will offer a high quality pedestrian environment, while allowing some residential to locate at ground floor.

There is a network of streams throughout the Drury Centre Precinct, including the Hingaia stream and Fitzgerald stream. The precinct seeks to maintain and enhance these waterways and integrate them with the open space network as a key feature.

There are five Sub-precincts in the Drury Centre Precinct:

- Sub-precinct A is zoned Business - Metropolitan Centre Zone and contains the primary retail area, Main Street and civic and green open spaces. The sub-precinct is the focal point for intensive retail, commercial and civic development and pedestrian activity;
- Sub-precinct B is zoned Business – Metropolitan Centre Zone and is intended to be the primary location for large format retail, while also providing for other commercial and residential activities allowed in the zone. Development in this sub-precinct should ensure that a quality street environment is achieved;
- Sub-precinct C is zoned Business - Mixed Use Zone and provides for high density residential and a range of commercial activities that will complement the core centre and maximise the efficient use of land close to the rapid transport network. Six to eight storey buildings are enabled in this sub-precinct to provide a transition to surrounding residential zones.
- Sub-Precinct D is zoned Business – Metropolitan Centre Zone and provides for the establishment of the Drury Central Train Station and associated Park-and-Ride and transport interchange. A public plaza is provided for that will integrate the train station with the centre and will provide a high quality pedestrian experience.
- Sub-precinct E is zoned Business – Mixed Use Zone and provides for high density residential and a range of commercial activities that will complement the core centre and

maximise the efficient use of land close to the rapid transport network. Eight to ten storey buildings are enabled, and flexible ground floor designs are encouraged in the sub-precinct, reflecting its close proximity to the Drury Central train station.

- Sub-Precinct F is zoned Business – Mixed Use Zone and applies to the south-eastern part of the Drury Centre Precinct. Additional assessment criteria apply to the staging of pedestrian and cycle connections to the Drury Central Train Station in Sub-Precinct F and additional residential standards apply.

The transport network in the wider Drury East area as defined on Precinct Plan 3 will be progressively upgraded over time to support development in the wider area. The precinct includes provisions to ensure that the development of land for business and housing is coordinated with the construction of the transport network upgrades necessary to support it.

The zoning of the land within the Drury Metropolitan Centre Precinct is Business – Metropolitan Centre, Business - Mixed Use, and Open Space – Informal Recreation.

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

IX.2 Objectives

- (1) Drury Centre is a transit-orientated development that supports high density residential, employment-generating and retail activities close to rapid transit and prioritises public and active modes of transport to and within the centre.
- (2) Drury Centre is the pre-eminent centre serving Drury and the wider area and is the primary location for retail, civic, recreation and intensive employment activities, creating a focal point for the community and supporting their social and economic well-being.
- (3) Development of the Drury Centre creates a distinctive sense of place, including by incorporating distinctive natural and built site features, responding to landform and respecting Mana Whenua values.
- (4) Drury Centre is a street-based environment that provides a high quality pedestrian experience, with a particular emphasis on the Key Retail Street.
- (5) Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network.
- (6) Development is supported by appropriate infrastructure.
- (7) Freshwater and sediment quality is progressively improved over time in the Drury Centre precinct.

IX.3 Policies

Land Use

- (1) Provide for the greatest density of retail and commercial activities with supporting community and residential activities within Sub-Precinct A.

- (2) Recognise that Sub-Precinct B will be the primary location for large format retail activities.
- (3) Provide for high density residential and supporting intensive employment activities compatible with residential amenity values in Sub-Precinct C, E and F that recognise the primacy of Sub-Precinct A as the core centre. Provide for a greater range of intensive employment activities and greater heights in Sub-Precinct E responding to its close proximity to rapid transport, while recognising the primacy of Sub-Precinct A as the core centre.
- (4) Provide for attractively designed, safe and direct access to the Drury Central train station, with a particular focus on pedestrians and cyclists.

Street Network and Built Form

- (5) Require collector roads to be generally in the locations shown in IX.10.1 Drury Centre: Precinct Plan 2, while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network.
- (6) Ensure that development provides a local road network that achieves a highly connected street layout and integrates with the collector road network within the precinct, and the surrounding transport network, and supports the safety and amenity of the open space and stream network.
- (7) Require streets to be attractively designed to appropriately provide for all modes of transport by:
 - (a) providing a high standard of amenity for pedestrians in areas where high volumes of pedestrians are expected; and
 - (b) providing for safe separated access for cyclists on arterial and collector roads that link key destinations; and
 - (c) providing a level of landscaping that is appropriate for the function of the street;
 - (d) providing for the safe and efficient movement of vehicles.
- (8) Manage building height and form where adjacent to large publicly accessible open spaces to minimise shading effects.
- (9) Ensure that Sub-Precinct A is the compact, pedestrian orientated retail core of the precinct with a comprehensively planned mix of large and small-scale retail activities integrated with other commercial and office activities, leisure, tourist, cultural, residential, community and civic services with streets that are open to the sky.
- (10) Ensure that development in Sub-Precinct A positively addresses and engage with the street by:
 - (a) Maximising street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality on the Key Retail Street.

- (b) Achieving a reasonable level of street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality on other local roads in Sub-Precinct A.
- (11) Recognise that residential at ground floor may be appropriate on some local roads in Sub-Precinct A away from the Key Retail Street, including where residential adjoins public open space.
- (12) Require large format retail activities in Sub-Precinct B to provide for the visual quality and interest of streets and other public places, having regard to the functional requirements of that activity.
- (13) Enable residential activities at high densities in Sub-Precinct C and E that provide quality on-site amenity for residents, including privacy and outlook, outdoor living space and access to daylight.
- (14) In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contributes to a sense of place for the Drury Centre, including by:
 - (a) incorporating distinctive site features;
 - (b) reinforcing legibility within the centre; and
 - (c) integrating with the stream network.

Infrastructure and Staging

- (15) Ensure that the timing of development in Drury Centre Precinct is coordinated with the transport infrastructure upgrades necessary to mitigate the adverse effects of development on the effectiveness and safety of the immediately surrounding transport network.
- (16) Ensure that development in Drury Centre Precinct is coordinated with supporting stormwater, wastewater and water supply infrastructure.
- (17) Provide for the staging of pedestrian and cycling connections to the Drury Central train station to encourage the use of public and active modes of transport.

Ecology

- (18) In addition to the matters in Policy E1.3(8), manage erosion and associated effects on stream health and values arising from development in the precinct, including parts of the Fitzgerald and Hingaia streams, and enable in-stream works to mitigate any effects.
- (19) In addition to the matters in Policy E.3.3(13), ~~recognise that there may be no practicable alternative to stream works, including culverting, diversion and/or reclamation, where they are required to construct critical infrastructure.~~
 - (a) provide for stream works, including culverting, diversion and/or reclamation, required to construct the Drury Boulevard, where it can be

demonstrated that there is no practicable alternative, and where there is a functional need to construct it in the location generally shown on Precinct Plan 1.

15.1

- (b) enable the planted riparian margins of identified streams to contribute to offsetting the effects of any stream works assessed under Policy (19)(a).

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

Stormwater Management

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

15.4

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

IX.4 Activity table

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

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

Table IX.4.1 Activity table

All Sub-Precincts

Activity		Activity Status
Development		
(A1)	Development of public or private roads	RD
(A2)	Development of publicly accessible open spaces greater than 1000m ²	RD
(A3)	New buildings	RD
(A4)	Additions and alterations to buildings not otherwise provided for	RD
(A5)	Development that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades but complies with Standard IX6.3 Trip Generation Limit	RD
(A6)	Development that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades	D

	or Standard IX6.3 Trip Generation Limit	
(A7)	Development that does not comply with IX.6.5 Building Setback along Waihoehoe Road	D
Subdivision		
(A8)	Subdivision that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades but complies with Standard IX6.3 Trip Generation Limit	RD
(A9)	Subdivision that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades or Standard IX6.3 Trip Generation Limit	D

Sub-Precinct C and E – Mixed Use

Activity		Activity Status
Use		
Commerce		
(A10)	Department stores	NC
(A11)	Drive through restaurants	NC
(A12)	Motor vehicle sales	NC
(A13)	Service stations with frontage to an arterial road	RD
(A14)	Service stations with no frontage to an arterial road	NC
(A15)	Trade suppliers	NC
Industry		
(A16)	Industrial laboratories	D
(A17)	Light manufacturing and servicing	D
(A18)	Repair and maintenance services	NC
(A19)	Storage and lockup	NC
(A20)	Warehousing and storage	NC
<u>Streams (rp)</u>		
(A21)	<u>Stream works including reclamation and diversion within Stream A required to construct the Drury Boulevard as</u>	<u>D</u>

	<u>shown on IX.10.4 Precinct Plan 4 which comply with IX6.9, and which are not provided for as a permitted activity under Chapter E3.</u>	
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IX.5 Notification

- (1) An application for resource consent for a restricted discretionary activity new buildings and alterations and additions to buildings not otherwise provided for listed in Activity Table IX.4.1 above will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.
- (2) An application for resource consent for a restricted discretionary activity to infringe IX.6.5 Daylight and IX.6.6 Outdoor Living Space will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.
- (3) An application for resource consent for a restricted discretionary activity listed in Table E11.4.1, Table E11.4.2 and Table 12.4.1 will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.
- (4) An application for resource consent for a restricted discretionary activity to infringe E11.6.2 General Standards and E12.6.2 General Standards will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under sections 95A(9) or 95B(10) of the Resource Management Act 1991.
- (5) Any application for resource consent for an activity listed in Activity Table IX.4.1 and which is not listed in IX.5(1)-(4) will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.
- (6) When deciding who is an affected person in relation to any activity for the purpose of section 95E of the Resource Management Act 1991 the Council will give specific consideration to those persons listed in Rule C1.13(4).

IX.6 Standards

- (1) Unless specified in Standard IX.6(2) and IX.6(4) below, all relevant overlay, Auckland-wide and zone standards apply to the activities listed in Activity Table IX.4.1 above.
- (2) The following Auckland-wide and zone standards do not apply to activities listed in Activity Table IX.4.1 above within all sub-precincts:
 - (a) H9.6.1 Building Height

- (b) E27.6.1 Trip generation
- (3) In addition to IX.6 (1) activities listed in Activity Table IX.4.1 must comply with the following standards:
 - (a) IX.6.1 Building Height
 - (b) IX.6.2 Staging of Development with Transport Upgrades
 - (c) IX.6.4 Riparian Planting
 - (d) IX.6.5 Building Setback along Waihoehoe Road
 - (e) IX.6.6 Stormwater Quality

Sub-Precinct C, E and F

- (4) Within Sub-Precinct C the following zone standards do not apply to activities listed in Activity Table IX.4.1 above:
 - (a) H13.6.1 Building Height
- (5) Within Sub -Precincts C Activities listed in Activity Table IX.4.1 must comply with the following standards:
 - (a) IX.6.7 Daylight
 - (b) IX.6.8 Outdoor Living Space

All Sub-Precincts

IX.6.1 Building Height

- (1) Buildings must not exceed the height shown in metres on IX.10.1 Drury Centre: Precinct Plan 1.

IX.6.2 Staging of Development with Transport Upgrades

- (1) Development within the area shown on IX.10.3 Precinct Plan 3 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational.
- (2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for those activities that have a valid land use consent or subdivision that has a 224c certificate for vacant lots less than 1200m².
- (3) Table IX.6.2.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.3 Drury Centre: Precinct Plan 3. Table IX.6.2.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.3 Drury Centre: Precinct Plan 3.

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

Table IX.6.2.1 Threshold for Development with 'Access A' as shown on IX.10.3 Drury Centre: Precinct Plan 3 not constructed

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

Table IX.6.2.2 Threshold for Development with 'Access A' as shown on IX.10.3 Drury Centre: Precinct Plan 3 constructed

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

IX.6.3 Trip Generation Limit

- (1) Development within the area shown on IX.10.3 Precinct Plan 3 must not exceed the thresholds in Table IX.6.3.1 and Table IX.6.3.2 until such time that the identified infrastructure upgrades are constructed and are operational.
- (2) Table IX.6.3.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on

IX.10.3 Drury Centre: Precinct Plan 3. Table IX.6.3.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.3 Drury Centre: Precinct Plan 3.

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

Table IX.6.3.1 Threshold for Development with 'Access A' as shown on IX.10.3 Drury Centre: Precinct Plan 3 not constructed

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

Table IX.6.3.2 Threshold for Development with 'Access A' as shown on IX.10.3 Drury Centre: Precinct Plan 3 constructed

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

IX.6.4 Riparian Margins

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

IX.6.5 Building Setback along Waihoehoe Road

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

- (1) A building or parts of a building must be set back from the 2020 Waihoehoe Road boundary by a minimum depth of 6m.

IX.6.6 Stormwater Quality

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

15.5

Sub- Precinct C, E and F

IX.6.7 Daylight

- (1) Buildings which include dwellings, units in an integrated residential development, visitor accommodation and boarding houses within Sub-Precincts C, E and F must comply with H6.6.14 Daylight.

IX.6.8 Outdoor Living Space

- (1) Buildings which include dwellings, supported residential care and boarding houses must have an outdoor living space in the form of a balcony, patio or roof terrace that:
 - (a) is at least 5m² for studio and one-bedroom dwellings and has a minimum dimension of 1.8m; or
 - (b) is at least 8m² for two or more bedroom dwellings and has a minimum dimension of 1.8m; and
 - (c) is directly accessible from the dwelling, supported residential care unit or boarding house; and
 - (d) except that, a balcony or roof terrace is not required where the net internal floor area of a dwelling is at least 35m² for a studio and 50m² for a dwelling with one or more bedrooms.

IX6.9 Stream works for the Drury Boulevard

Purpose:

- To provide for a limited extent of stream works to construct the Drury Boulevard to be assessed as a discretionary activity.
 - Where offsetting is determined to be appropriate in accordance with the effects management hierarchy and Policy E3.3(4), enable the planted riparian margins of identified streams to contribute towards it.
- (1) The extent of stream works to achieve the construction of Drury Boulevard shall be limited to diversion of Stream A or 60m of reclamation along Stream A as identified on IX.10.4 Precinct Plan 4.
 - (2) For the purpose of calculating the offset required for stream works provided for under IX7.1(1) the SEV and ECR methods will be used.
 - (3) The area of riparian planting identified on IX.10.4 Precinct Plan 4 will count towards the offset required under IX7.1(2).

15.3

IX.7 Assessment – controlled activities

There are no controlled activities in this precinct.

IX.8 Assessment – restricted discretionary activities

IX.8.1 Matters of discretion

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

- (1) Development of public and private roads:
 - (a) Location and design of the collector streets, local streets and connections with neighbouring sites to achieve an integrated street network;
 - (b) Provision of cycling and pedestrian networks;
 - (c) Location and design of connections to the Drury Central train station; and
 - (d) Matters of discretion IX8.1 (1)(a) - (c) apply in addition to the matters of discretion in E38.12.1.
- (2) Development of publicly accessible open space greater than 1000m²:
 - (a) Location and design of the indicative publicly accessible open spaces shown in 10.X.1 Precinct Plan 2;
 - (b) Location and design of any other publicly accessible open spaces greater than 1000m²; and
 - (c) Matters of discretion IX8.1 (2)(a) - (b) apply in addition to the matters of discretion in E38.12.1.

- (3) New buildings, and alterations and additions to buildings not otherwise provided for in the underlying zone within Sub-Precincts A, B and D:
 - (a) The design and appearance of buildings and development as it relates to all the matters set out in H9.9.8.1(2)(a)-(i) and the future amenity values of Drury
 - (b) The design and layout of the train station and transport interchange;
 - (c) Servicing; and
 - (d) Matters of discretion IX8.1 (3)(a) - (C) apply in addition to the matters of discretion in H9.8.1 (2).
- (4) New buildings, alterations and additions to buildings not otherwise provided for in the underlying zone within Sub-Precincts C, E and F:
 - (a) The design and layout of buildings and development insofar as it affects the existing and future residential amenity values and the amenity values of public streets and open spaces;
 - (b) Servicing;
 - (c) Matters of discretion IX8.1 (4)(a) - (b) apply in addition to the matters of discretion in H13.8.1 (3).
- (5) Development or subdivision that does not comply with Standard IX.6.2 Staging of Development with Transport Upgrades but complies with Standard IX6.3 Trip Generation Limit:
 - (a) Effects on the transport network consistent with the trips generated by development specified in Table IX.6.3.1 or Table IX.6.3.2;
 - (b) The rate of public transport uptake and travel management measures; and
 - (c) The coordination of retail, commercial and residential development in Drury East.
- (6) Infringement to standard IX.6.1 Building height:
 - (a) Matters of discretion H13.8.1(7) apply.
- (7) Infringement to standard IX6.4 Riparian Margins:
 - (a) Effects on water quality and stream habitat.
- (8) Infringements to standard IX6.6 Stormwater Quality
 - (a) Matters of discretion E9.8.1(1) apply.
- (9) Infringement to standard IX.6.7 Daylight:
 - (a) Matters of discretion H13.8.1(7) apply.
- (10) Infringement to standard IX.6.8 Outdoor Living Space:
 - (a) Matters of discretion H13.8.1(7) apply.

- (11) Infringement to standard H9.6.5 – Residential at Ground Floor in Sub-Precinct A:

(a) Matters of discretion H13.8.1(7) apply.

IX.8.2 Assessment criteria

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

(1) Development of public and private roads:

Location of roads

- (a) The extent to which the collector road network and the Key Retail Street are provided generally in the locations shown on IX.10.X Drury Centre: Precinct Plan 2 to achieve a highly connected street layout that integrates with the surrounding transport network and responds to landform. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:
 - (i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads;
 - (ii) The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and
 - (iii) The constructability of roads and the ability for it to be delivered by a single landowner.
- (b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network. Whether subdivision and development provides for collector roads and local roads to the site boundaries to coordinate with neighbouring sites and support the integrated completion of the network within the precinct over time;

Design of roads

- (c) Whether the design of collector and local roads are generally in accordance with the road cross sections provided in IX.11 Drury Centre: Appendix 1;
- (d) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network. As a general principle, the length of a block should be no greater than 180m, and the perimeter of the block should be no greater than 500m;
- (e) Whether the street network provides safe and legible pedestrian and cycle connections to the operational Drury Central train station as development occurs over time. In particular, whether the following is provided, or an alternative is provided that achieves an equal or better degree of connectivity:
 - (i) Development in Sub-Precinct B and F provides for a direct, legible and safe pedestrian and cycle connection to the Drury Central train station via Drury Boulevard or the Key Retail Street shown on Precinct Plan 1;

- (ii) Development in Sub-Precinct A provides for a direct, legible and safe pedestrian and cycle connection to the Drury Central train station via the Key Retail Street and/or any connecting local or collector roads and/or open spaces;
- (iii) Development in Sub-Precincts C and E provides for a direct and legible connection to the Drury Central train station via Drury Boulevard and any connecting local or collector roads and/or open spaces.

(2) Development of publicly accessible open space greater than 1000m²:

Location and design of publicly accessible open spaces greater than 1000m² in Sub-Precinct A

- (a) Whether Homestead Park and Station Plaza are provided in locations generally consistent with their indicative locations shown on IX.10.2 Drury Centre Precinct Plan 2 and have adequate street frontage to ensure the open spaces are visually prominent and safe;
- (b) Encourage the existing Homestead building to be retained, repurposed and incorporated into a high amenity urban park for informal recreation, which forms a focal point of the Drury Centre;
- (c) Whether existing indigenous trees are retained within Homestead Park where possible;
- (d) Whether Station Plaza is designed as a open space which will act as a major entrance way to Drury Centre, integrating the train station with the Drury Centre;
- (e) Whether any buildings or kiosks which locate in the Station Plaza are designed to ensure they do not compromise or dominate the use of the space for public recreational use.
- (f) Whether a civic open space is integrated with the Key Retail Street that functions as an urban plaza and is a focus of civic and public activity.

Location and design of any other open spaces greater than 1000m² including any riparian planting

- (g) Whether the subdivision or development provides for the recreation and amenity needs of residents by providing suitably sized open spaces that are prominent and accessible to pedestrians within a neighbourhood;
- (h) Encourage the location and design of open spaces to integrate with surrounding natural features including the network of permanent and intermittent streams;
- (i) Whether a network of pedestrian and cycle paths are provided along both sides of permanent streams and one side of intermittent streams within proposed open spaces; and
- (j) Where pedestrian and/or cycle paths are proposed within proposed open spaces, whether they are located adjacent to, and not within the 10m planted riparian area.

(3) New buildings, and alterations and additions to buildings not otherwise provided for, within Sub-Precinct A, B and D:

The design and appearance of buildings and development as it relates to all the matters set out in H9.9.8.1(2)(a)-(i) and the future amenity values of Drury

- (a) The relevant assessment criteria in H9.8.2(2) of the Business – Metropolitan Centre Zone for buildings or alterations and additions to buildings apply in addition to the criteria below;
- (b) Whether the height and form of buildings provides for four hours of sunlight access to over 75% of the net site area of Station Plaza and Homestead Park and other publicly accessible open spaces greater than 3,000m², between the hours of 10am-4pm during the Equinox (22 September. Demonstrating this may require the height of buildings to be reduced below that allowed by Rule IX.6.1 Building Height.
- (c) Whether buildings along the Key Retail Street shown on IX.10.2 Drury Centre: Precinct Plan 2 maximise pedestrian amenity, safety and visual quality through:
 - (i) achieving an appropriate level of definition and sense of enclosure to the street by providing a frontage height of at least 8m;
 - (ii) providing activities that engage and activate the street and open space at ground and first floor levels;
 - (iii) ensuring buildings are generally aligned with the street and have continuous verandah cover except where open space is provided;
 - (iv) locating clearly identifiable and accessible pedestrian entrances to the street;
 - (v) requiring internal space at all levels within buildings to maximise outlook onto the street and open space; and
 - (vi) minimising or integrating servicing elements on building facades.
- (d) Whether other local streets in Sub-Precinct A achieve a reasonable level of street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality.
- (e) Whether buildings fronting Homestead Park and Station Plaza provide activities that engage and activate the open space at ground floor level.
- (f) Whether large format retail activities within Sub-precinct B provide for the visual quality and interest of streets and other public places, having regard to the functional requirements of these activities, including typically larger building footprints, and areas of carparking.
- (g) Whether development incorporates Te Aranga Maori Design Principles.
- (h) Whether the height of retaining walls to streets and public open spaces are minimised where practicable. Where retaining walls are required, they should be stepped and landscaped.
- (i) Whether development fronting Collector roads and any local roads that provide direct connections to the Drury Central train station provides a safe and attractive environment for pedestrians and provides opportunities for a range of commercial activities at ground floor. This includes providing floor to floor heights that enable flexibility for buildings to accommodate varying commercial activities over time.

The design and layout of the train station and transport interchange

- (j) Whether the location of the train station and transport interchange is generally in accordance with IX.10.2 Drury Centre: Precinct Plan 2;
- (k) Whether the bus interchange is designed and located to minimise conflict with the pedestrian focused Station Plaza;
 - (i) Prioritising pedestrian amenity (active frontages, building entrances etc) on collector roads;
 - (ii) Screening carparking areas from streets and open spaces; and
 - (iii) Integrating landscaping with parking areas.
- (l) Whether the design of the railway station enables for users to access platforms on either side of the railway and in doing so creating connections between Drury Village and Drury Centre, by way of example this could be achieved through a pedestrian overbridge; and
- (m) Whether the design of the railway station integrates with the proposed Station plaza shown on IX.10.2 Drury Centre: Precinct Plan 2;

Servicing:

- (n) Whether there is adequate capacity in the existing or proposed public reticulated water supply, wastewater and stormwater network to service the proposed development having particular regard to the capacity of the Fitzgerald culvert and culverts under Great South Road;
- (o) Where adequate network capacity is not available, whether adequate mitigation or staging is proposed.

(4) New buildings, and alterations and additions to buildings not otherwise provided for, within Sub-Precinct C, E and F:

- (a) The relevant assessment criteria in H13.8.2(3) of the Business – Mixed Use Zone for buildings or alterations and additions to buildings apply in addition to the criteria below;
- (b) Whether residential development contributes to achieving attractive and safe streets and open spaces. Methods to achieve this include:
 - (i) Providing windows and entrances to the street to encourage passive surveillance;
 - (ii) Use of soft landscaping and planted elements to the street;
 - (iii) Minimising the visual dominance of garage doors and car parking areas to the street;
 - (iv) Minimising the frequency of vehicle crossings to the street and encouraging rear access, taking into account the context of the site, including orientation and topography
- (c) Whether residential development:
 - (i) orientates and locates windows to optimise privacy and encourage natural cross ventilation within the dwelling;

- (ii) optimises sunlight access based on orientation, function, window design and location, and depth of the dwelling floor space;
- (iii) provides secure and conveniently accessible storage for the number and type of occupants the dwelling is designed to accommodate;
- (iv) provide the necessary waste collection and recycling facilities in locations conveniently accessible and screens from streets and public open spaces.

Servicing:

- (d) Whether there is adequate capacity in the existing or proposed public reticulated water supply, wastewater and stormwater network to service the proposed development having particular regard to the capacity of the Fitzgerald culvert and culverts under Great South Road; and
- (e) Where adequate network capacity is not available, whether adequate mitigation or staging is proposed.

(5) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit:

- (a) Whether the effects of the proposal on the transport network are consistent with the trips generated by development specified in Table IX.6.3.1 or Table IX.6.3.2;
- (b) Whether increased use of public transport provides additional capacity within the transport network including by implementing travel demand management measures.
- (c) Whether residential development is coordinated with retail and commercial development within the wider Drury East area identified on Precinct to minimise trips outside of the precinct providing additional capacity within the transport network.
- (d) The effect of the timing and development of any transport upgrades.

(6) Infringement to standard IX.6.4 Riparian Planting

- (a) Whether the infringement is consistent with Policy IX.3(20).

(7) Infringement to IX.6.6 Stormwater Quality

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

(8) Infringement to standard IX.6.7 Daylight:

- (a) Whether the proposal is designed to meet the day to day needs of residents by providing adequate access to daylight to principal living rooms and bedrooms and providing a sense of space between buildings on the same site.

(9) Infringement to standard IX.6.8 Outdoor Living Space:

- (a) Whether the proposal provides outdoor living space that is useable and accessible having regard to the functional requirements of the type of residential activity proposed.

(10) Infringements to standard H9.6.5 – Residential at Ground Floor on local streets within Sub-Precinct A

- (a) Whether dwellings establishing at ground floor in Sub-Precinct A are located away from the Key Retail Street and positively contribute to the adjoining street or open space while achieving privacy and a good standard of amenity for occupiers of the dwelling.

IX.9 Special information requirements

(1) Riparian planting plan

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

IX.10 Precinct plans

IX.10.1 Drury Centre: Precinct plan 1 – Building Height

IX.10.2 Drury Centre: Precinct plan 2 – Road Network and Spatial Features

IX.10.3 Drury Centre: Precinct plan 3 – Transport Staging Boundary

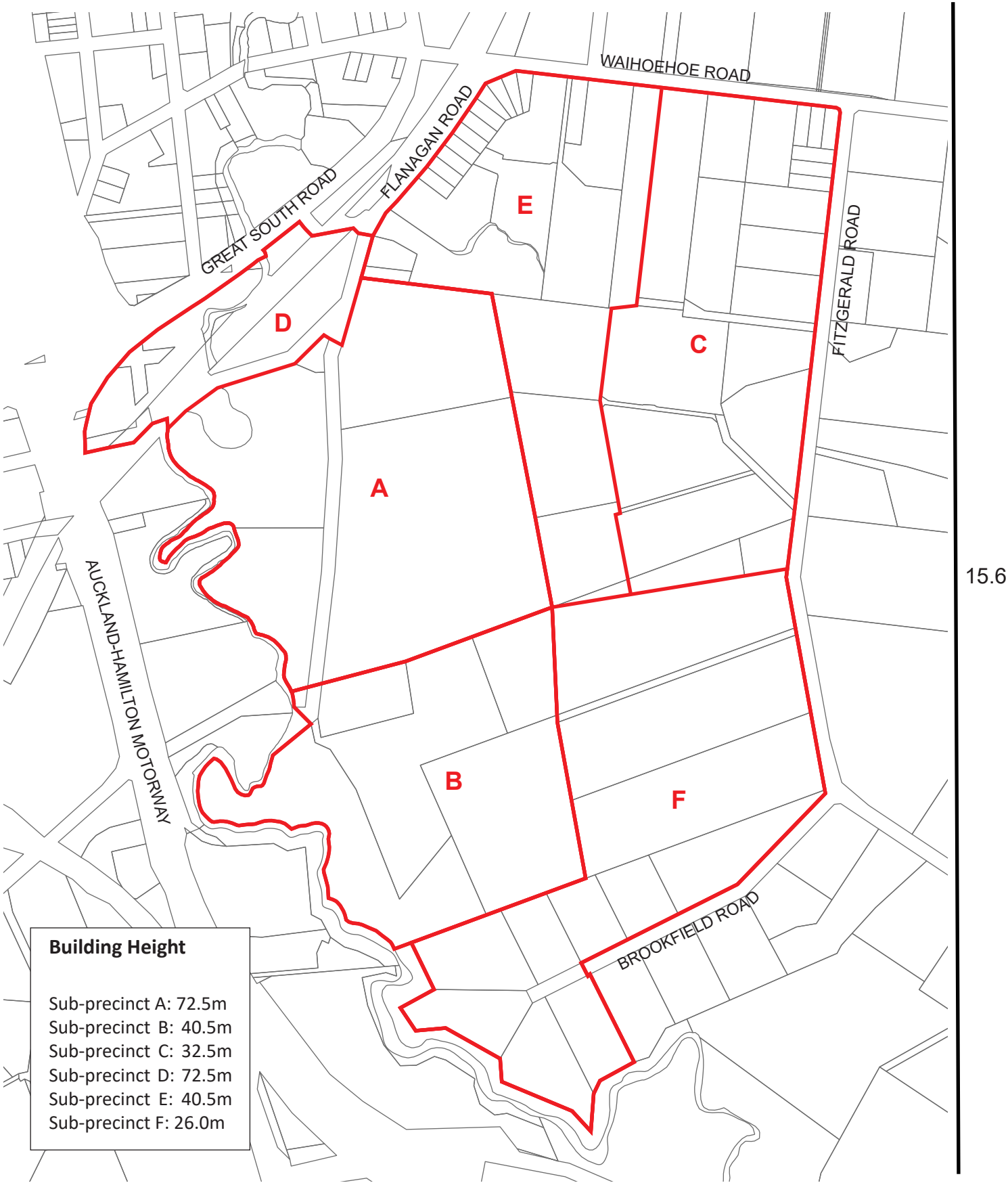
IX.10.4 Drury Centre: Precinct plan 4 - Streams

IX.11 Appendices

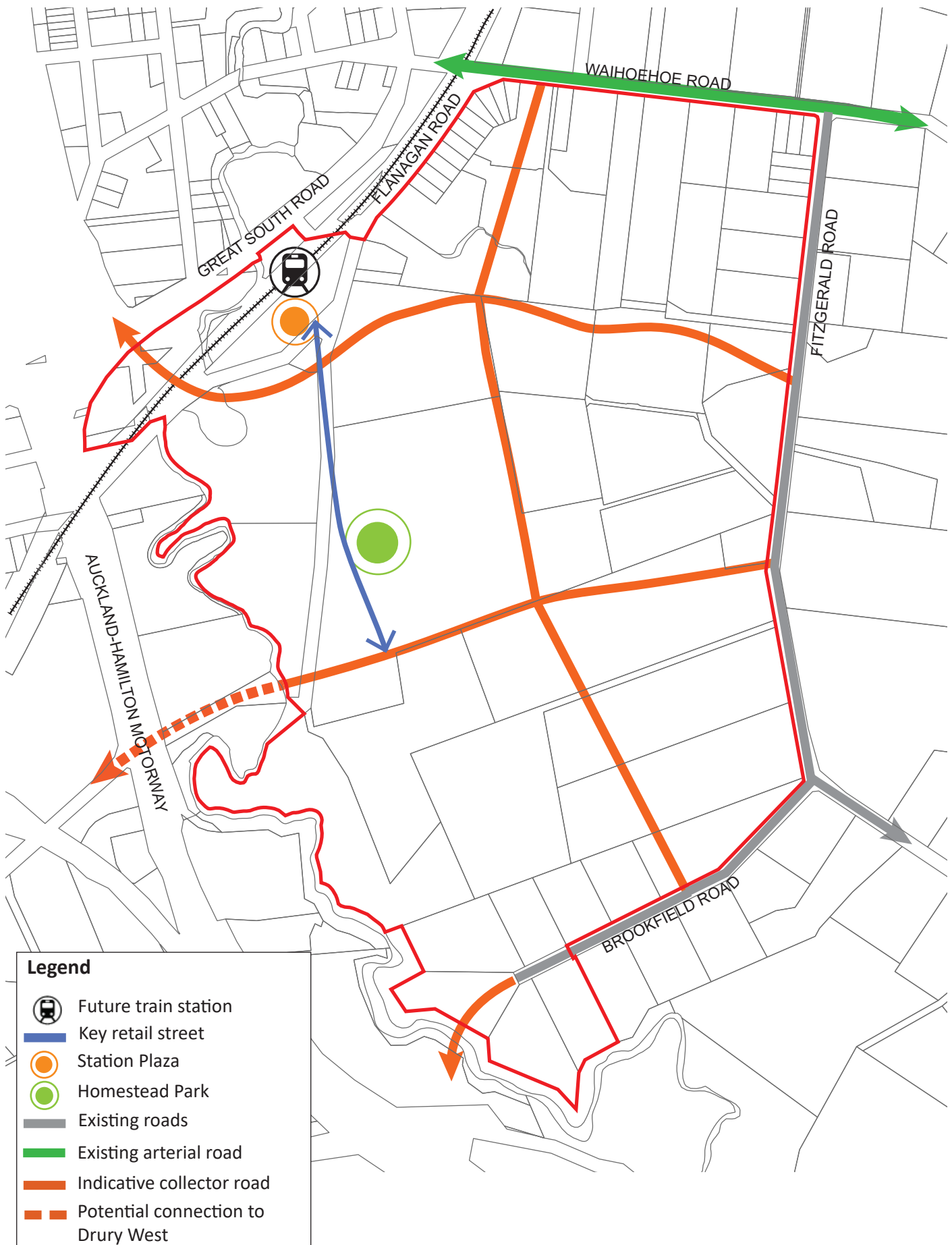
Appendix 1: Road Cross Section Details

Road type	Corridor width	Carriageway	Median	Cycle Paths	Street trees / Rain Garden / Parking	Footpath	Design Speed	Vehicle Access Restriction
Arterial Road (Waihoehoe Rd)	29.6m - 32m	12.4m – 14m	3m solid median	2.1m each side plus buffers	Trees / Rain garden 1.5m minimum each side, ideally between cycle path and footpath On-street parking (interspersed between trees) minimum 2.2m.	2.4m each side	40-50kph	Yes – as per E27.6.4.1(3)(c)
Collector Road	23m - 23.5m	6.4m - 7m	Not required	1.8m each side plus buffers	Trees / Rain garden 1.5m minimum each side, ideally between cycle path and footpath On-street parking (interspersed between trees) minimum 2.2m.	1.8m each side	40kph	No
Local Road	16m	6m	Not required	Not required	Trees / Rain garden 1.5m minimum each side On-street parking (interspersed between trees) minimum 2.2m.	1.8m each side	30kph	No
Local Road – Park Edge	13.5m	6m	Not required	3m reserve shared path	Trees / Rain garden 1.5m minimum each side On-street parking (interspersed between trees) minimum 2.2m.	1.8m on lot side	30kph	No
Key retail street/main street	20m	6m	Not required	Not required	Landscaping can be provided in the footpath zone using tree pits instead	3m each side	30kph	Yes – as per E27.6.4.1(1)(b)

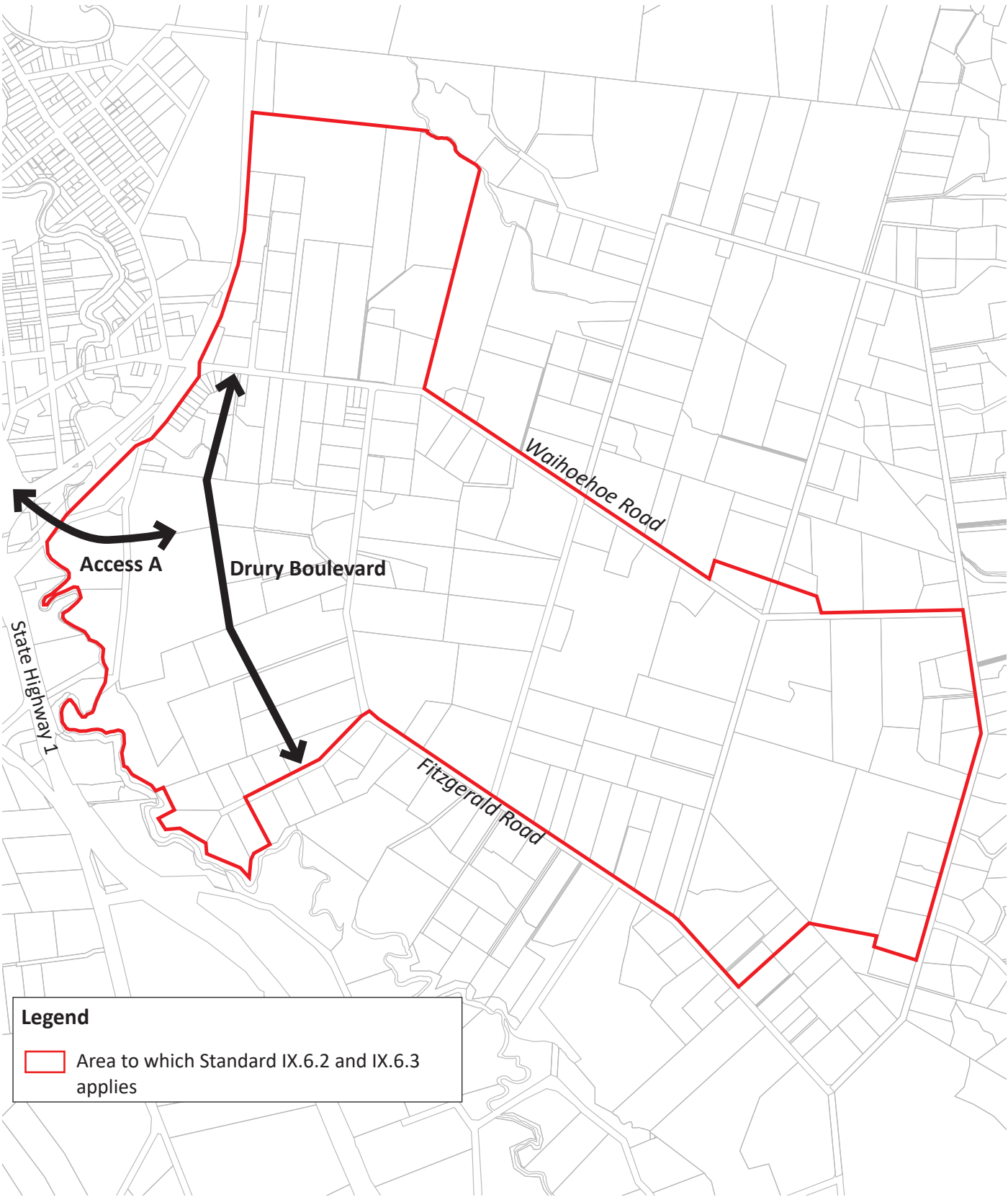
Drury Centre Precinct Plan 1 - Building Height



Drury Centre Precinct Plan 2 - Spatial features



Drury Centre Precinct Plan 3 - Transport Staging Boundary



Attachment B

Supplementary Assessment of Ecological Effects

Job No: 1003297.6000
16 September 2020

Kiwi Property Group Limited
C/- Ellis Gould
Level 17, Vero Centre,
48 Shortland Street,
Auckland 1010

Attention: Douglas Allan

Dear Douglas

Drury Metropolitan Centre - Assessment of Ecological Effects Addendum

This letter report has been prepared to accompany Kiwi Property Group Limited's submission related to the Drury Centre Plan Change application.

The purpose of this letter¹ is to provide ecological justification and assessment to support the proposed precinct provisions in relation to the ecological effects associated with the proposed Drury Boulevard.

1 Background

The level of ecological detail used to inform plan changes in Auckland is typically high level and does not involve comprehensive mapping of ecological features. Further, assessments of effects at plan change level are quite general and do not get into the specific effects that may occur to enable the landuse as it is envisaged through the plan change and often shown on Precinct Plans. For example, road networks may be shown and agreed to in a Precinct Plan, but the stream crossing effects are not quantified and the effects assessment is left to a future resource consent phase, even though the effects were anticipated to enable the landuse.

Kiwi have undertaken comprehensive mapping of ecological features within their landholdings and consequentially, understand the ecological features that could be impacted under the proposed master plan. It is also recognised that the Drury Boulevard is required to enable the landuse to be 'opened up' and an approximate alignment has been proposed which meet multiple drivers.

It is our intention to provide an assessment of ecological effects to address the effects anticipated to enable the proposed landuse as envisaged through the plan change process.

This letter is supplementary to the Assessment of Ecological Effects² prepared to support the plan change included within the main application materials. It provides further detail on the potential effects and assesses the likely residual adverse effects, associated with the proposed Drury Boulevard, with specific reference to the relevant matters of discretion and policies.

¹ This work has been completed in accordance with variation 01, dated 30 July 2020 and referenced as 1013297.6000.

² Drury Metropolitan Centre Assessment of Ecological Effects (V1.2), prepared by Tonkin & Taylor Limited for Kiwi Property Group Limited, dated 17/09/2019.

2 Proposed effects

The construction of the Drury Boulevard is critical to enable the development of the Drury Centre as it forms the primary northern access. There are some anticipated ecological effects associated with the alignment of the Drury Boulevard, including specifically potential modification of the upper reaches of Stream A (refer Appendix A).

As these effects are related to infrastructure required to enable the landuse change to occur, we consider that it is appropriate that these effects be assessed and authorised through the plan change process. The full quantum of effects will be determined as the Drury Boulevard design is refined. This letter provides an outline of the maximum extent of stream that could be reclaimed on Stream A, while still providing for all offset requirements to be met within the Drury Centre Plan Change area.

3 Assessment of effects

As described in the Assessment of Ecological Effects report (AEcE), the Ecological Impact Assessment Guidelines (EclAG) have been used as a robust and transparent method to assess the level of effect. This involves assessment the ecological values, the magnitude of the effect and the overall level of effect. The following provides an assessment of ecological values and potential effects expected from the proposed Drury Boulevard. The exact alignment of the Drury Boulevard is indicated within the masterplan however it is likely to change through the detailed design work which is yet to occur. As such, an assessment of effects has been undertaken based on the maximum potential effect while enabling offset to remain within the Drury Centre Plan Change area.

Stream values of Stream A in the potential impact area are moderate (Photograph 3.1). This is based on a current stream ecological valuation (SEV) score of 0.55, existing barriers to fish passage restricting access to the headwaters, unrestricted stock access and lack of a vegetated riparian margin. Taking into account the proposed urban development and a riparian margin of 10 m, the potential values of Stream A are expected to be moderate (SEV of 0.65) if retained and enhanced under the proposed plan change. There is no vegetated riparian margin, so this assessment relates only to potential effects on stream habitat, rather than any vegetation clearance or fauna effects.



Photograph 3.1: View into Stream A headwaters. Perched culvert shown, downstream of the two upper branches of Stream A.

The potential effects associated with the alignment and construction of Drury Boulevard include at a high level:

- Potential for sediment to be discharged to the receiving environment of Stream A and the Hingaia Stream during in-stream works.
- Potential for fish injury or mortality during any in-stream works.
- Potential for fish passage to be restricted to remaining upstream habitat if culverts placed on Stream A.
- Potential for modification or loss of stream habitat resulting from culverts or reclamation of Stream A.

Many of these potential effects can be mitigated through the following measures:

- Fish passage to be provided for any in-stream structures in general accordance with the NZ Fish Passage Guidelines³.
- Fish salvage and relocation to be undertaken in affected reaches prior to in-stream works commencing.
- Erosion and sediment controls implemented in accordance with Auckland Council Guideline Document 05 (GD05⁴) at time of construction to manage potential sediment effects resulting from the construction of the road.

The unavoidable modification and/or loss of some of Stream A could be mitigated (in part) by a stream diversion to reduce the potential effect of loss of stream length. The details of this are not yet known and may not be feasible. Irrespective, the loss and/or modification of habitat is likely to result in residual adverse effects that will need to be offset.

Offsetting is '*a measurable conservation outcome resulting from actions designed to compensate for residual adverse biodiversity effects arising from activities after appropriate avoidance, remediation, and mitigation measures have been applied*'⁵. To be considered an offset, the conservation outcomes resulting should be consistent with a set of offsetting principles, including the goal of 'no net loss'.

If the loss and/or modification of Stream A results in the need for offsetting, riparian planting can be undertaken within the Drury Centre Plan Change area to enhance existing stream habitat to achieve no net loss of ecological function. At this stage, the final alignment of Drury Boulevard and the consequential extent of stream impact is unknown. We have identified what effects could be offset within the Drury Centre Plan Change area, based on the SEV undertaken at Stream A. The full details of the ECR calculations are included in Appendix B.

In brief, up to 45 m² of Stream A could be reclaimed and offset by the enhancement of Stream A. Stream B could provide a further 150 m² of streambed area for enhancement which could provide for an additional 15 m² of reclamation of Stream A.

In total, this means that up to 60 m² of streambed area could be reclaimed and offset within Stream A and B (potential offset areas shown in Appendix A).

Alternative scenarios may also play out. For example, Stream A may instead be diverted, which would mitigate the loss of stream length within the catchment, and the ecological benefits of this could still be calculated using SEV and ECR once the final design is known. For the purposes of this

³ Franklin, P, Gee, E, Baker, C, and Bowie S. (2018). New Zealand Fish Passage Guidelines for structures up to 4 metres. Prepared by NIWA. Client Report 2018019HN.

⁴ Leersnyder, H., Bunting, K., Parsonson, M., and Stewart, C. (2016). Erosion and sediment control guide for land disturbing activities in the Auckland region. Auckland Council Guideline Document GD2016/005. Incorporating amendment 1. Prepared by Beca Ltd and SouthernSkies Environmental for Auckland Council.

⁵ Maseyk, F, Ussher, G, Kessels, G, Christensen, M, and Brown, M (2018). Biodiversity offsetting under the Resource Management Act – A guidance document September 2018.

assessment, it is considered that reclamation is the most the likely option and authorisation is sought to incorporate this anticipated effect into the proposed precinct provisions.

4 Policies and objectives

When considering if the precinct provisions should include the anticipated ecological effects associated with the Drury Boulevard, we have assessed the approach against the relevant objectives and policies including the principles of biodiversity guidance (as set out in Policy E3.3.(4) and Appendix 8 of the AUP), including specifically:

- Areas of higher ecological value along Stream A will be avoided, as the upper reaches are of lower quality than further downstream.
- Where effects cannot be avoided, measures will be made to reduce effects as much as practicable through design, including for example incorporating stream diversions over reclamation where practicable.
- Where mitigation cannot be achieved (at the point of impact), those unavoidable effects will be offset within the Kiwi landholdings.
- The offset options are proximate to the impact being either on the downstream reach of Stream A or within the same landholdings and catchment (Stream B a tributary of the Hingaia Stream).
- The offset proposed includes a combination of intermittent and permanent stream, which is similar in type and character to that being impacted, therefore is considered to be 'like for like'.
- The quantum of offsetting required to achieve no net loss has been calculated using a robust and transparent method, for two potential stream effect scenarios.
- All planting undertaken on site will be eco-sourced and will be maintained until such time that the margins are self-sustaining; and
- The proposed offset and wider approach to ecological enhancement within the site will result in degraded ecosystems being enhanced which will improve ecological corridors and biodiversity values.

5 Proposed precinct provisions

Barkers + Associates have drafted provisions for the Drury Centre Precinct including some specifically related to the potential effects on freshwater ecology resulting from the Drury Boulevard.

It is proposed that reclamation or diversion of Stream A required to construct the Drury Boulevard, would be a Discretionary activity (proposed Rule (A21)). Standards are provided within the proposed provisions.

The standards identify a maximum extent of reclamation, based on the amount that could be offset to achieve no net loss of ecological function, as described in this report. These standards further require that the SEV and ECR method be used to quantify offset requirements.

Under Chapter E3 of the AUP, reclamation and diversion are Non-complying or Discretionary activities respectively. The proposed reduction in activity status to Discretionary does not negate the requirements to assess the ecological effects at the time of consenting. Further, this approach maintains consistency with the Discretionary activity status for reclamation under the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (Freshwater NES).

Of most importance to ensure that the unavoidable ecological effects are managed, is consistency with AUP Policy E3.3(4). The principles of offsetting (which go beyond this policy) are addressed in section 4 above. Policy E3.3.(4) identifies that the SEV and ECR method should be referred to for guidance on how the extent of offset may be calculated and assessed. The proposed standards require that the SEV and ECR method is used.

It is considered that the proposed provisions enable Auckland Council to have discretion over the ecological matters that would normally be considered in a Non-complying consent application. Adopting these provisions, and including the riparian planting on site to address expected effects, provides some certainty and better ecological outcomes when the effects can be addressed in proximity to the impact.

6 Summary

Drury Boulevard is required to enable the Drury Centre to function and therefore is critical to the plan change being sought. Potential freshwater ecological effects resulting from the alignment and construction of the Drury Boulevard are anticipated based on the alignment submitted with the plan change application.

As these freshwater ecological effects are anticipated, it is appropriate to consider them at this stage of the plan change application, to inform the precinct provisions. The level of detail provided within the plan change assessment of ecological effects report and this supplementary letter is sufficient to justify the proposed precinct provisions.

Specifically, provisions are sought which enable reclamation of the Stream A to a maximum extent of 60 m² streambed area as a discretionary activity. Further, as effects are anticipated and identified through this plan change process, the use of riparian planting on site is identified as contributing to a future offset package, to the maximum extent identified in this assessment, for works triggering the proposed discretionary consent.

7 Applicability

This report has been prepared for the exclusive use of our client Kiwi Property Group Limited, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

We understand and agree that our client will submit this report as part of a private plan change application and that Auckland Council as the consenting authority will use this report for the purpose of assessing that application.

Tonkin & Taylor Ltd

Environmental and Engineering Consultants

Report prepared by:



.....
Justine Quinn
Senior Freshwater Scientist

Authorised for Tonkin & Taylor Ltd by:



.....
Tim Fisher
Project Director

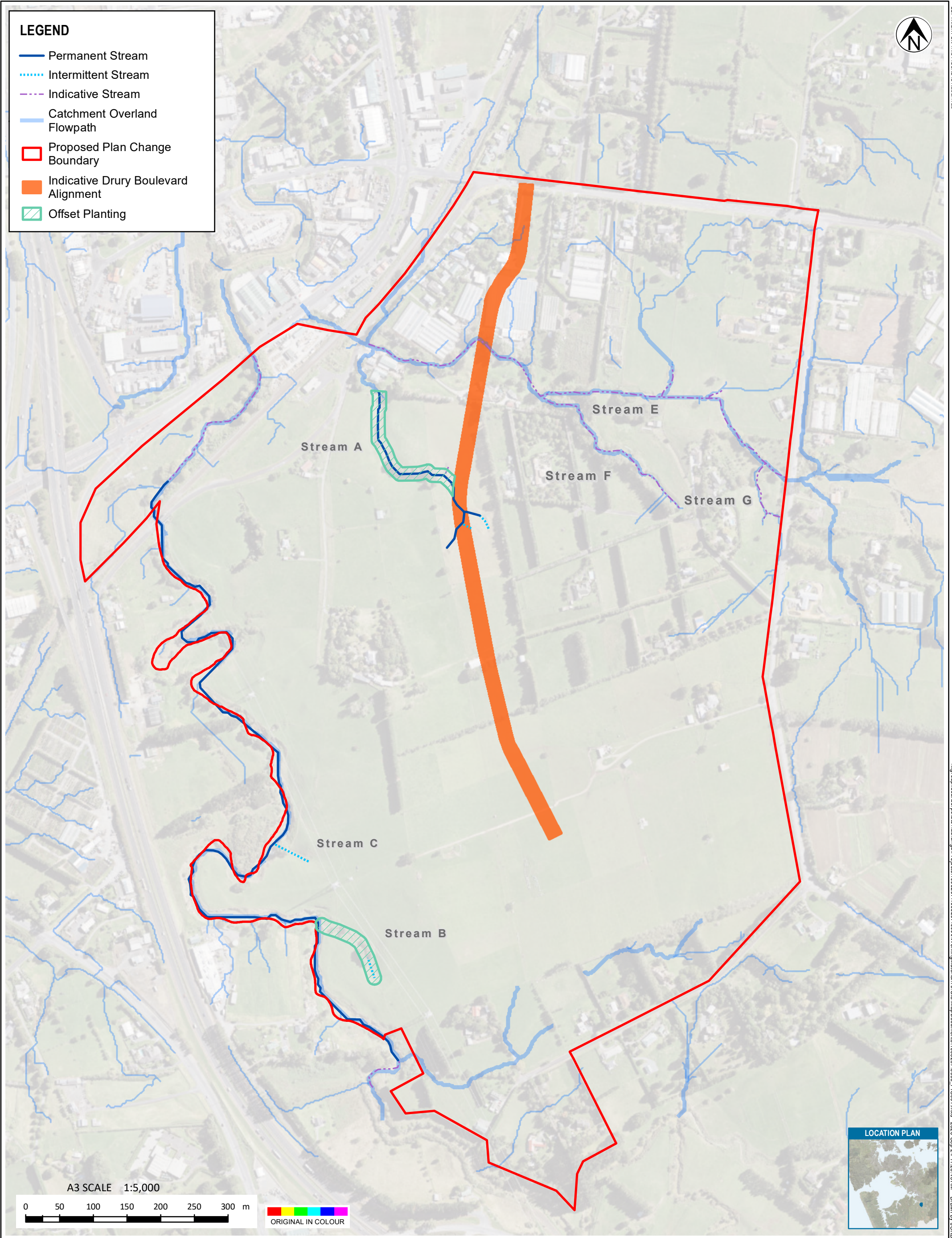
Technical review: Josh Markham, Senior Ecologist


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Appendix A: Drury Boulevard Alignment

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NOTES:
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REV	DESCRIPTION	GIS	CHK	DATE
0	First version	JORB	MOLI	14/09/20

PROJECT No.	1003297		
DESIGNED	JORB	SEP.20	
DRAWN	JORB	SEP.20	
CHECKED	JQU	SEP.20	

APPROVED	DATE

CLIENT KIWI PROPERTY LIMITED
PROJECT DRURY CENTRE PLAN CHANGE
TITLE DRURY BOULEVARD INDICATIVE ALIGNMENT AND OFFSET PLANTING

SCALE (A3) 1:5,000 FIG No. FIGURE Page 47 of 63 REV 0

Appendix B: SEV and ECR calculations

An environmental compensation ratio (ECR) has been calculated to estimate the quantum of enhancement or restoration required to offset the effects of any reclamation and/or construction on Stream A related to Drury Boulevard. The ECR is a means of quantifying the amount of streambed area that needs to be restored relative to the amount lost to maintain a 'no net loss' in ecological function as a result of the activity (as required by Policy E3.3.(4)).

The ECR calculation formula requires a SEV score to be calculated for both the impact and proposed offset sites. This provides a basis from which to quantify and scale the likely loss in values and functions at an impact site and the increase in stream value and functions at an offset site.

$$ECR = [(SEVi-P - SEVi-I) / (SEVm-P - SEVm-C)] \times 1.5$$

Where: *SEVi-P is the potential SEV value for the site to be impacted.*

SEVi-I is the predicted SEV value of the stream to be impacted after impact.

SEVm-C is the current SEV value for the site where environmental compensation is applied.

SEVm-P is the potential SEV value for the site where environmental compensation is applied.

$$\text{Restoration length required} = (\text{impact area} \times \text{ECR}) / \text{restoration channel width}$$

The impact score for reclamation is 0 due to the level and permanence of the impact. These values are accepted by Auckland Council as being standard best practice when assigning impact values.

Potential SEV scores were modelled for Stream A to determine the ecological enhancement possible, based on 10 m riparian margins and urban development in the wider catchment. The ECR was used to quantify the amount of stream that could be modified or lost resulting from the construction of Drury Boulevard while still achieving no net loss of ecological function within the Drury Centre Plan Change area (Appendix B Table 1). The assumptions for this are included in Appendix B Table 2 and the SEV scores in Appendix B Table 3.

ECR have been calculated based on a single scenario, being reclamation, and applied to Stream A to determine how much stream could be impacted, while still achieving no net loss of ecological function onsite. This does not consider additional potential benefits that could be achieved through creation of diversions (new habitat) with the Drury Centre Plan Change area.

Appendix B Table 1: ECR calculations for potential future stream impacts.

Stream A Reclamation	
SEVi-P	0.65
SEVi-I	0
SEVm-C	0.55
SEVm-P	0.65
ECR	9.47
Offset site – Stream A	
Stream A bed area available (estimated) (m ²)	480
Area that could be impacted while still achieving no net loss onsite (m ²)	45
Offset site – Stream B	
Stream B bed area available (estimated) (m ²)	150
Area of Stream A that could be impacted while still achieving no net loss onsite (m ²)	15
Combined area of Stream A that could by impacted while still achieving no net loss on site.	60

Note: Stream A SEV values have been used when estimating the ECR for enhancement on Stream B.

Appendix B Table 2: SEV Assumptions for Stream A

Function Category	Variable	Stream ID: Watercourse A, Drury Centre SEV: SEVi-P and SEVm-P
Hydraulic	Vchann	Expect improvement in channel following planting of riparian margins. Reduced macrophyte growth following shading.
	Vlining	Assumes a reduction in fine silts following development.
	Vpipe	Expect several pipes to be required following development.
	Vbank	Change to reflect addition of urban development to the margin of the riparian area (floodplain).
	Vrough	Assumes retention of mature exotics for amenity value (0.2), with the remainder of the margin comprised of low diversity regen with stock excluded (0.7) and some mown grassed areas along the banks (0.1).
	Vbarr	No change
	Vchanshape	Auto-populated
Biogeochemical	Vshade	Assumes high and very high shading following riparian planting, and recognition of the relatively narrow stream channel.
	Vdod	No change as already 'sub-optimal' and don't anticipate an improvement following urban development.
	Vveloc	No change
	Vdepth	No change
	Vripar	Increased to 10 m on each bank (0.5) to enable development on either side.
	Vdecid	While exotics will remain, the proportion relative to other vegetation will be reduced.
	Vmacro	Assumes reduction in surface reaching macrophytes from the increased stream shading and reduce nutrients entering the stream once stock fencing is undertaken.
	Vretain	Auto-populated
	Vsurf	Assumes minor decrease in silt, with addition of small gravels (from roads) and small wood (from increased riparian vegetation). Reduced emergent macrophytes.
	Vripfilt	Assumes high filtering activity from riparian margin enhancement to 10 m being no more than 5 x width of the stream.
Habitat Provision	Vgalspwn	Assumes no change.
	Vgalqual	Assumes no change.
	Vgobspawn	Autopopulated.
	Vphyshab	Assumes increase in both aquatic habitat diversity, abundance, and hydrologic heterogeneity following removal of stock. Assumes increase to channel shade and riparian vegetation integrity due to planting of 10 m margins.
	Vwatqual	Increased shade in upper catchment following planting and urban development.
	Vimperv	Assumes high level of imperviousness with water sensitive design (high control).
Biodiversity	Vfish	-
	Vmci	-
	Vept	-
	Vinvert	-
	Vripcond	Autopopulated.
	Vripconn	Change based on change in plants with deeper rooting systems (compared to pasture grass).

Appendix B Table 3: SEV scores for current and potential Stream A.

Variable (code)	Stream A - Current	Stream A - Potential
Vchann	0.53	0.59
Vlining	0.8	0.96
Vpipe	1	0.3
NFR	0.62	0.21
Vbank	0.6	0.54
Vrough	0.3	0.72
FLE	0.18	0.39
Vbarr	1	1
CSM	1	1
Vchanshape	0.65	0.54
Vlining	0.8	0.96
CGW	0.75	0.82
Hydraulic	0.64	0.61
Vshade	0.6	0.9
WTC	0.6	0.9
Vdod	0.6	0.6
DOM	0.6	0.6
Vripar	0.25	0.5
Vdecid	0.7	0.88
OMI	0.21	0.47
Vmacro	0.78	0.96
Vretain	0.58	0.74
IPR	0.58	0.74
Vsurf	0.91	0.84
Vripfilt	0.2	0.8
DOP	0.56	0.82
Biogeochemical	0.51	0.71
Vgalspwn	1	1
Vgalqual	0.75	0.75
Vgobspwn	1	1
FSH	0.88	0.88
Vphyshab	0.47	0.78
Vwatqual	0.21	0.42
Vimperv	0.7	0.3
HAF	0.46	0.57
Habitat provision	0.67	0.72
Vripcond	0.22	0.59
Vripconn	0.50	0.65
RVI	0.11	0.38
Biodiversity	0.11	0.38
SEV scores (Excl FFI, IFI)	0.55	0.65

Attachment C

Additional Traffic Modelling

To:	Nick Roberts Barker & Associates	From:	Daryl Hughes, Gabriela Surja Stantec
File:	Additional Traffic Modelling for Drury East Private Plan Changes: No DTIP Upgrades (July 2020)	Date:	15 October 2020

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

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

TRANSPORT MODELLING OVERVIEW

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

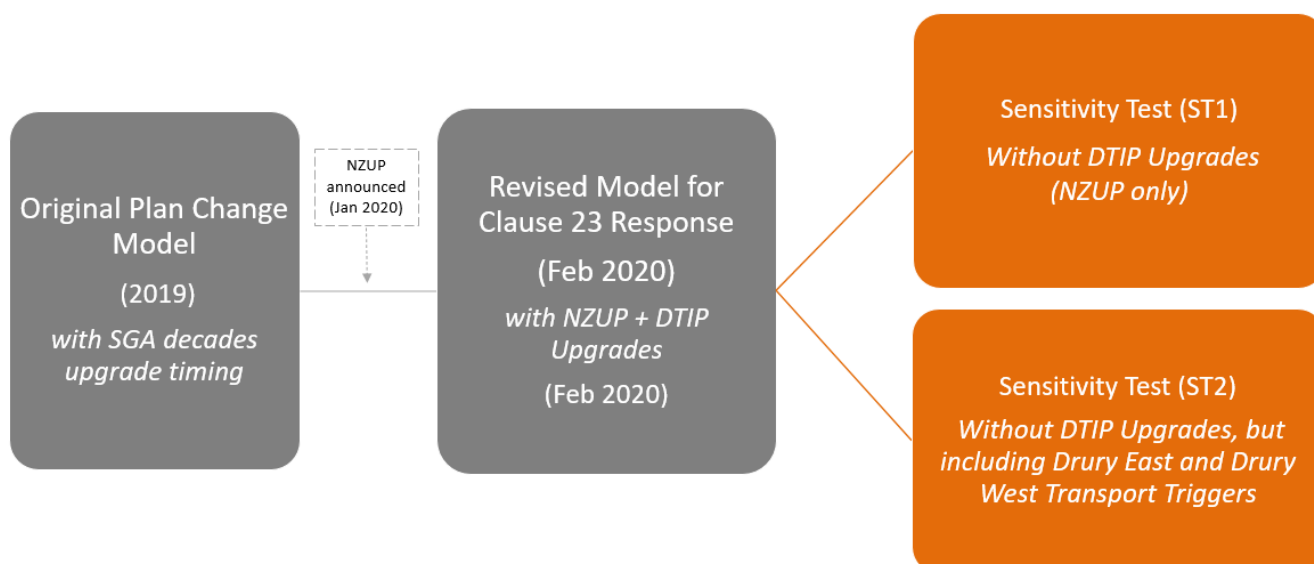


Figure 1: Transport Modelling Overview

ASSUMPTIONS

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

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

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

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

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

Figure 2: Relevant Transport Upgrades

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

● Upgrade(s) Included

Figure 3: Assumptions for the Sensitivity Tests

MODELLING RESULTS

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

SENSITIVITY TEST 1 RESULTS

ST1: 2028

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

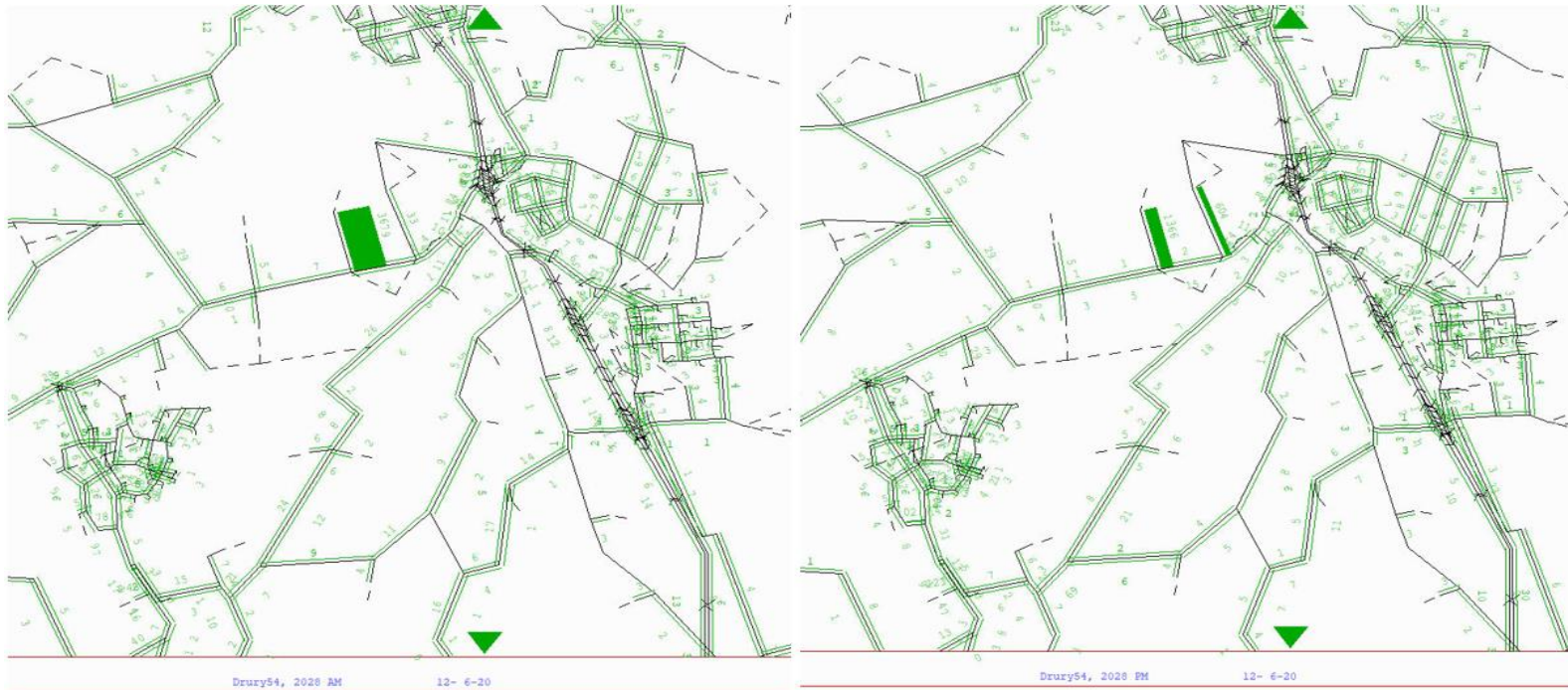
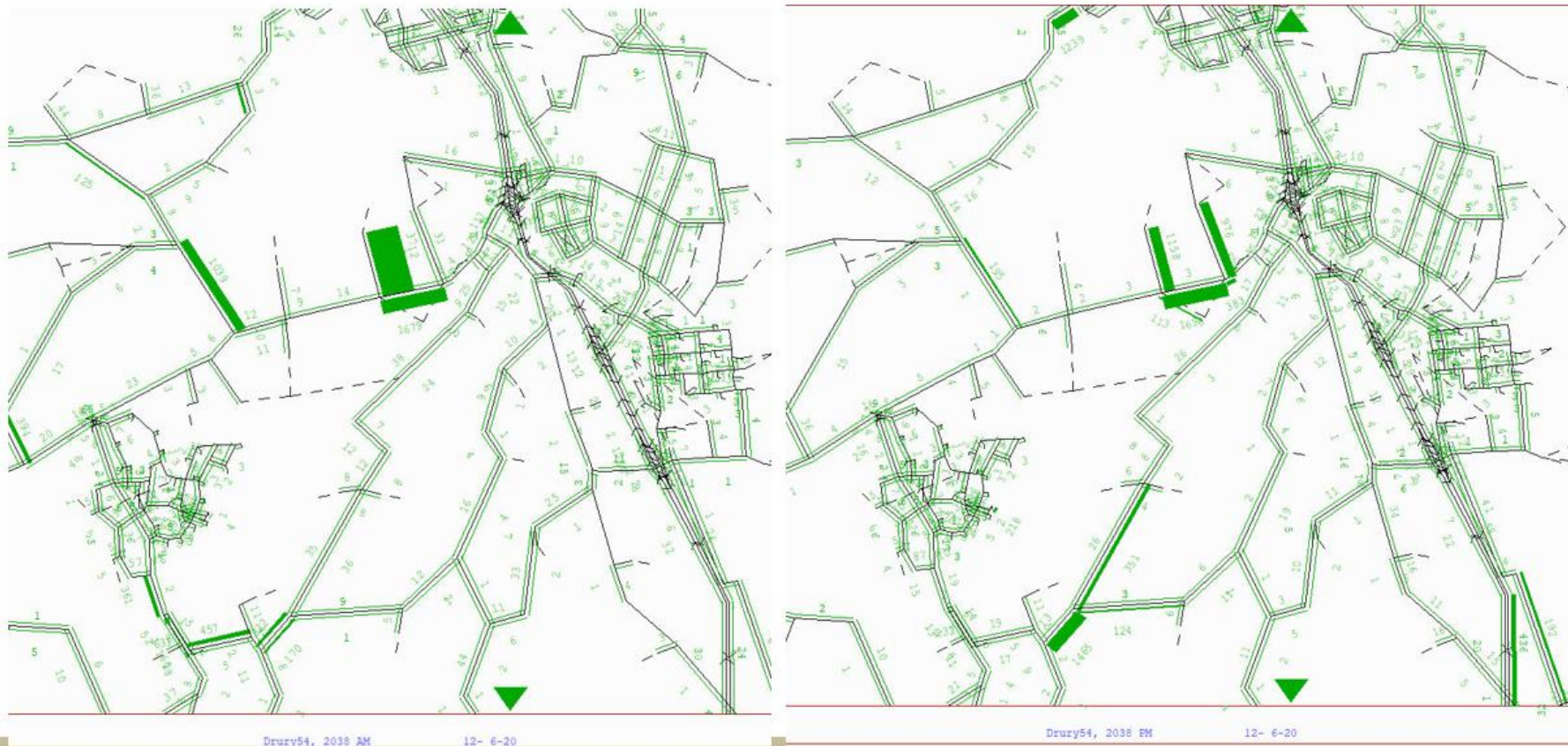


Figure 4: ST1Results – Delay in 2028 (AM and PM)

ST1: 2038

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

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

ST1: 2048

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

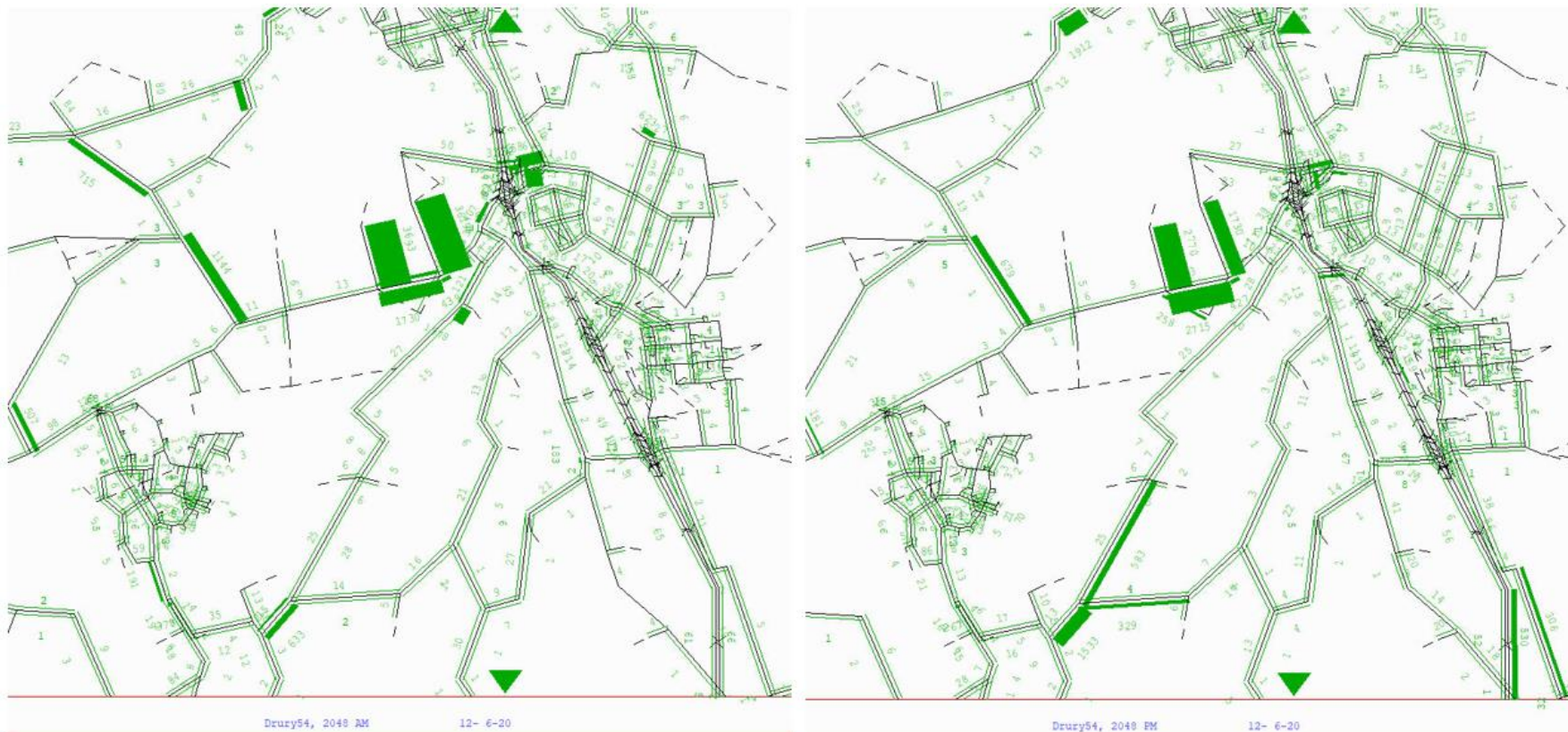


Figure 6: ST1 Results - Delay in 2048 (AM and PM)

SENSITIVITY TEST 2 RESULTS

ST2: 2028

- Drury East and Drury West work well.

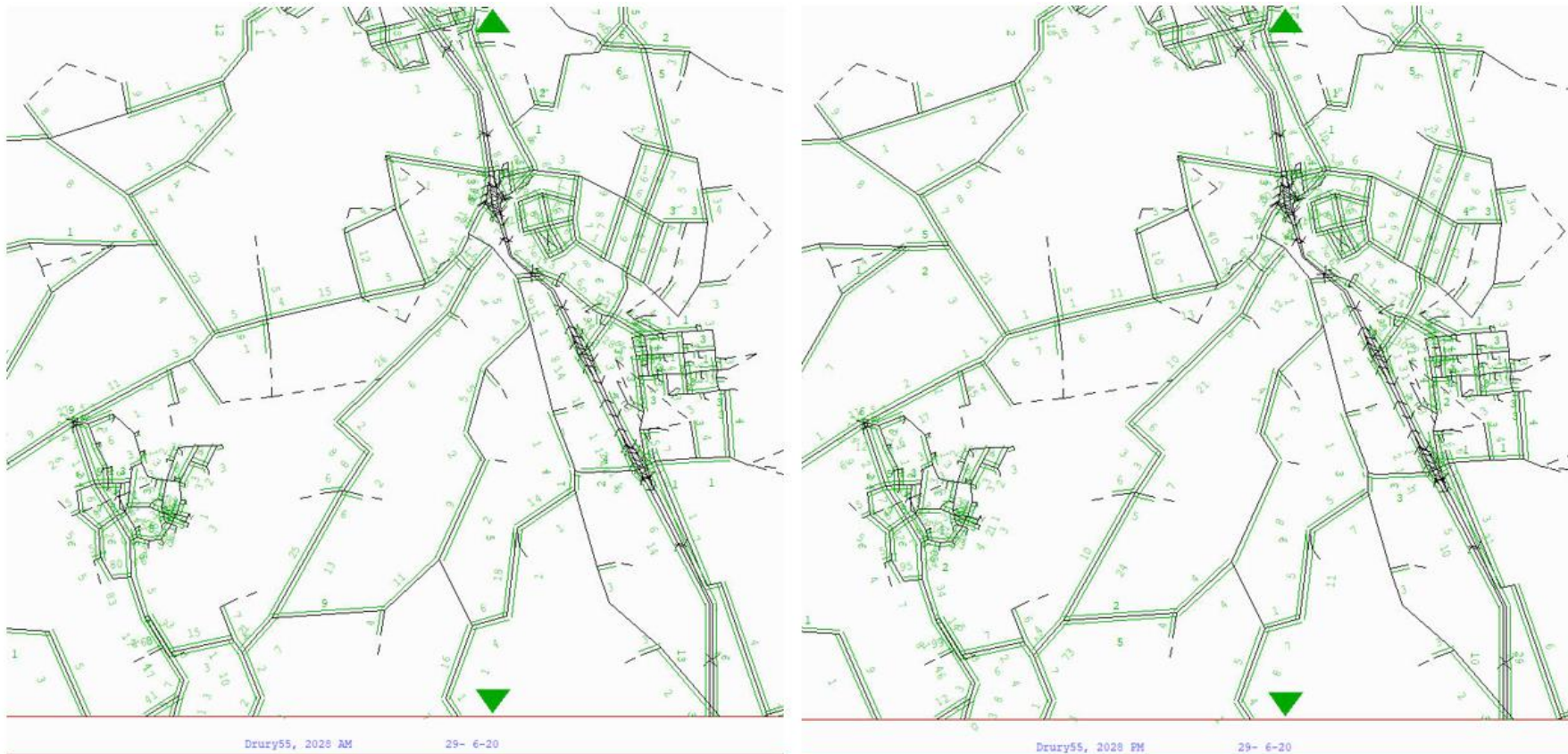


Figure 7: ST2 Results – Delay in 2028 (AM and PM)

ST2: 2038

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

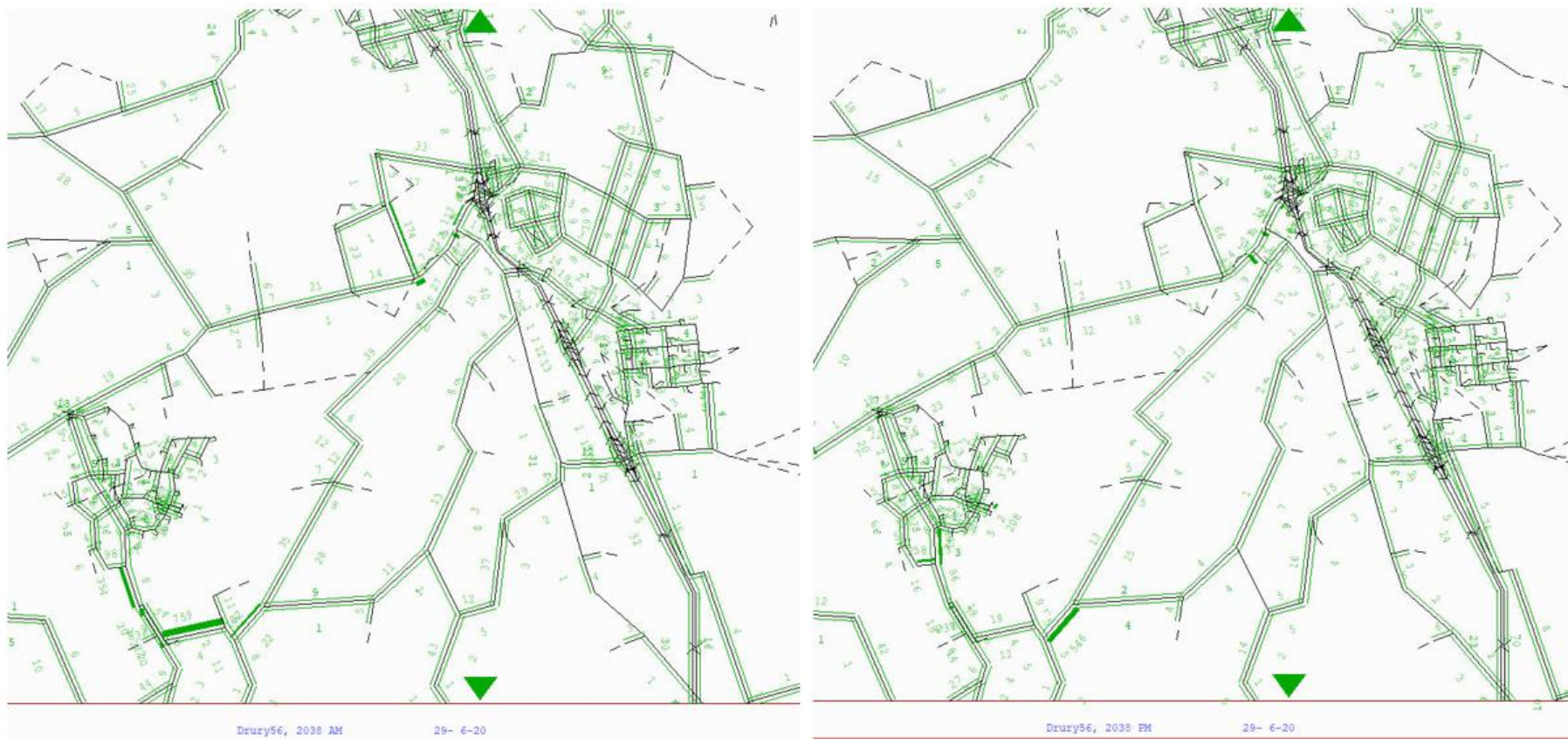


Figure 8: ST2 Results – Delay in 2038 (AM and PM)

ST2: 2048

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

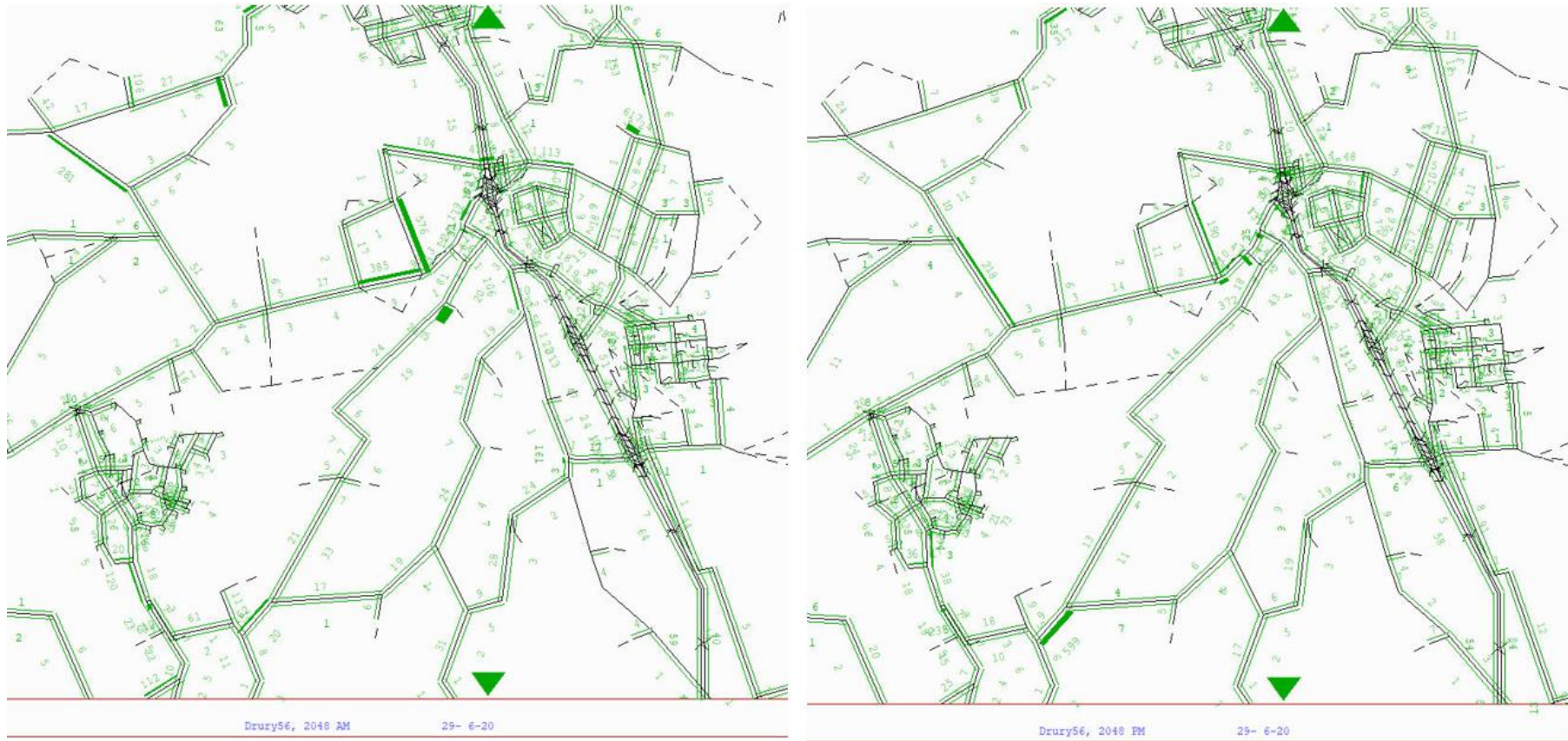


Figure 9: ST2 Results – Delay in 2048 (AM and PM)

SUMMARY OF SENSITIVITY TESTS

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

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

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

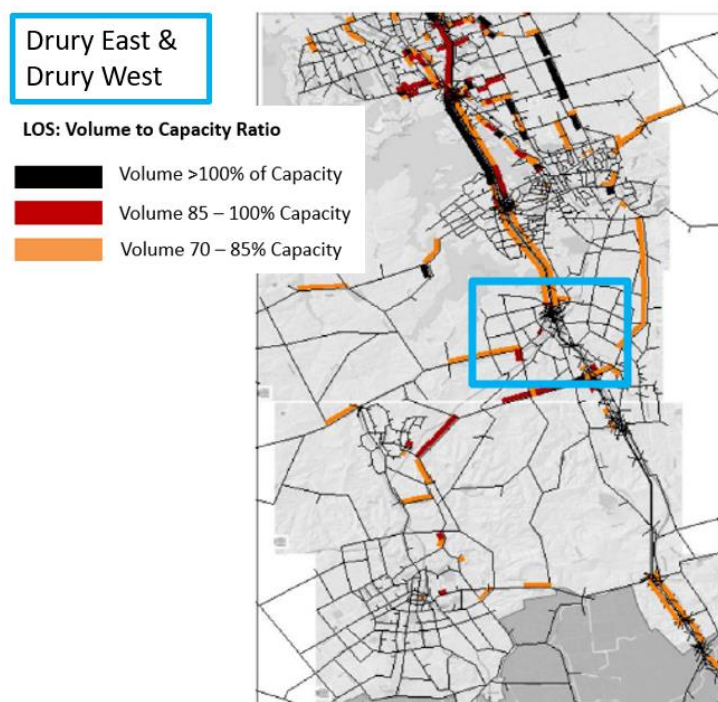
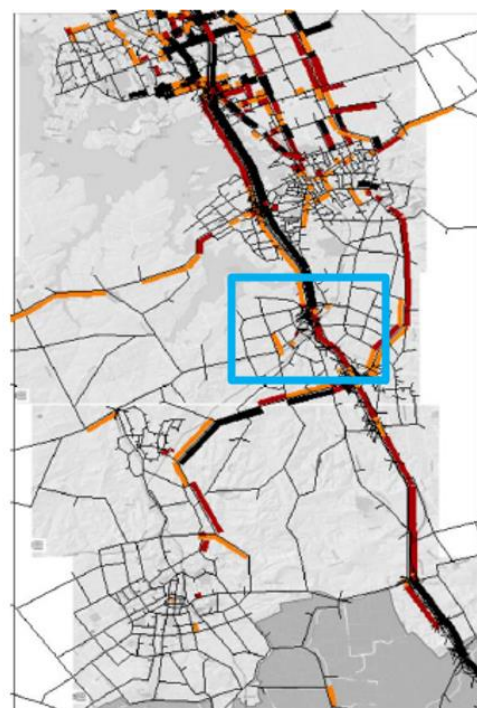
Sensitivity Test 2 – with NZUP and the following PC local upgrades: capacity upgrade of Great South Road / Waihoehoe Road intersection by 2038 (Drury East), capacity upgrade of SH22 / Jesmond Road by 2028 (Drury West), and new link between Oira Road and Jesmond Road.

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

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

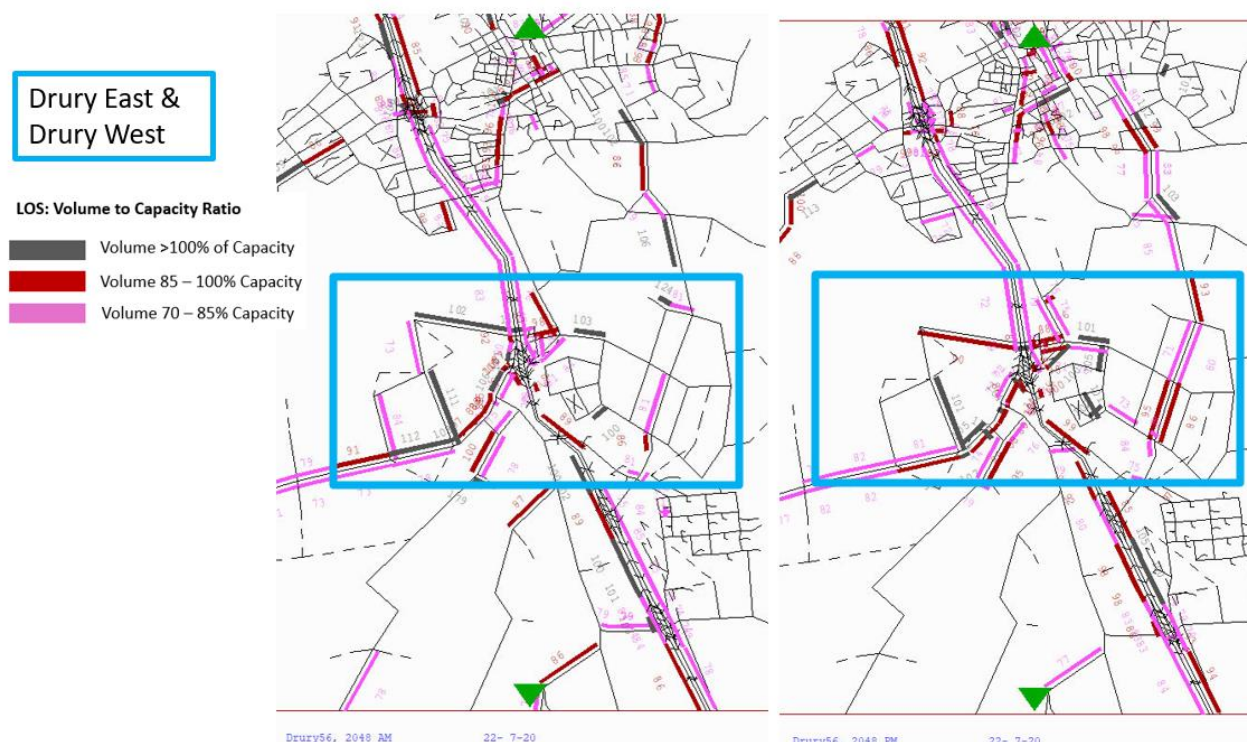
COMPARISON BETWEEN THE SGA 2048+ AND PPC SENSITIVITY TEST 2

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

SGA 2048+**Figure 8-7 – 2048 AM Peak V/C****Figure 8-9 – 2048 PM Peak V/C****Figure 10: SGA 2048+ V/C Profile**

The SGA 2048+ V/C Assessment indicates that:

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

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

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

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

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

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

Stantec

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

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

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



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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full Name)

SUE SIMONS

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

FULTON HOGAN LAND DEVELOPMENT LTD

Address for service of Submitter

BERRY SIMONS, PO BOX 3144 SHORTLAND ST, AUCKLAND

Telephone:

09 969 2300

Fax/Email:

sue@berrysimons.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 48

Plan Change/Variation Name

Drury Centre Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

SEE ATTACHED SUBMISSION

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I **support** the specific provisions identified above ☒

I **oppose** the specific provisions identified above ☐

I wish to have the provisions identified above amended

Yes ☐

No ☐

The reasons for my views are:

SEE ATTACHED SUBMISSION

(continue on a separate sheet if necessary)

I seek the following decision by Council:

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

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

Signature of Submitter

(or person authorised to sign on behalf of submitter)

Date

22/10/20

Notes to person making submission:

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

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

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

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

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

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

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

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

AND

IN THE MATTER of a submission pursuant to Clause 6 of
 Schedule 1 of the Act in respect of
PLAN CHANGE 48 to the **AUCKLAND
 UNITARY PLAN**

**SUBMISSION ON PLAN CHANGE 48 (DRURY CENTRE PRECINCT) TO THE AUCKLAND
 UNITARY PLAN**

TO: Auckland Council
 Private Bag 92300
 Auckland 1142

Name of submitter: Fulton Hogan Land Development Limited

1. INTRODUCTION

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

- 1.5 Plan Changes 48-50 have been prepared concurrently to enable holistic consideration of the future land use pattern proposed for Drury East and an integrated approach to the planning and delivery of supporting infrastructure.
- 1.6 This submission relates to PC 48 in its entirety.
- 1.7 FHLD supports PC 48 in its notified form. Of particular relevance to FHLD's submission, the following matters are noted:
- (a) The proposed zoning pattern is consistent with the Drury-Opāheke Structure Plan and has been prepared concurrently with PC 49 and PC 50 to allow holistic consideration of the future land use pattern proposed for Drury East;
 - (b) The Metropolitan Centre zone will support a wide variety of uses and services for the local community within a walkable distance and provide opportunities to establish new community facilities and a range of public open spaces.
 - (c) The Mixed Use zone provides a range of activities to support the Drury Centre and will encourage high density residential and employment activities in close proximity to the centre and the proposed train station;
 - (d) The extent of business zoned land proposed has been sufficiently sized to support the local needs of the population over the next 30 years. The proposed land uses will contribute to an improvement in the balance of residential and business growth to support Drury as a self-sustaining community now and into the future;
 - (e) Establishing a Metropolitan Centre in Drury East is unlikely to have any adverse effects on existing centres such as Papakura, as the physical constraints (including the lack of visibility, through traffic, supporting employment base and opportunities for expansion) and fractured ownership patterns have limited Papakura's ability to deliver Metropolitan Centre services to adjacent areas;
 - (f) Any adverse effects of urban development on the natural environment, including the Manukau Harbour, Hingaia Stream and its tributaries can be effectively managed, and key natural features of the PC 48 area will be maintained and enhanced;
 - (g) The zoning pattern and proposed Drury Centre Precinct enable a connected and high-quality road network to be established that provides appropriately for all transportation modes; and

- (h) The PC 48 area is able to be serviced by infrastructure, with appropriate upgrades in place.

Decision Sought

1.8 FHLD seeks the following relief from Auckland Council on PC 48:

- (a) That PC 48 be approved; and
- (b) Any further or alternative relief that may be required to address the matters raised in this submission.

16.1

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

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

FULTON HOGAN LAND DEVELOPMENT LIMITED

by their solicitors and duly authorised agents
BERRY SIMONS



S J Simons / K A Storer

Address for service of Submitter:

Berry Simons
PO Box 3144
Shortland Street
AUCKLAND 1140

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

Contact details

Full name of submitter: Spark New Zealand Trading Limited

Organisation name:

Agent's full name:

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

Contact phone number: 021 772005

Postal address:
Private Bag 92300
Victoria Street West
Auckland 1142

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:
Refer to the attached submission

Property address:

Map or maps:

Other provisions:

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

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

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

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

Details of amendments: Refer to the attached submission

Submission date: 22 October 2020

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

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Form 5

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

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

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

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

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

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

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

Signed: 

On behalf of Spark New Zealand Trading Limited

Dated at Auckland this 22 day of October 2020.

Address for Service:

Spark New Zealand Trading Limited
L6 Mayoral Drive Building
31 Airedale Street
Auckland

Contact Details:

Attention: Fiona Matthews
Telephone: 021772005
E-mail: fiona.matthews@spark.co.nz

Alternate contact details

Graeme McCarrison
027 4811 816
graeme.mccarrison@spark.co.nz



Introduction

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

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

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

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

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

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

¹ Commerce Commission Annual Telecommunications Monitoring Report 2019

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

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

Development Planning

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

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

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

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

Plan Change 48, 49 & 50.

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

Purpose of the plan changes have been outlined as:

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

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

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

Each plan change incorporates the following objective:

- Development is supported by appropriate infrastructure.

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

Funding

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

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

Planning

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

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

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

NPSUD Objective 1 seeks to ensure:

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

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

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

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

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

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

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

17.5

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

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

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

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

Current Spark Assets

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

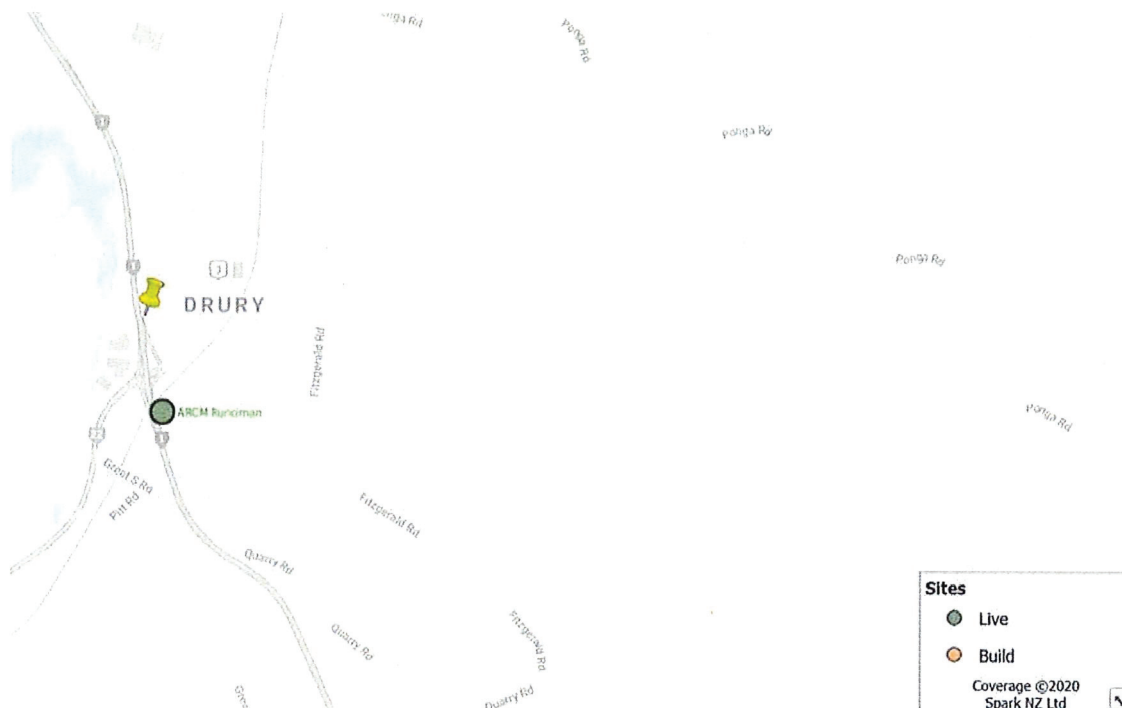


Figure 1. Drury Mobile site (Spark) (Source: Ventura GIS Mapping)

Future Development Strategy

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

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

Submission

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

- | | |
|---|------|
| 2. Spark and the other telecommunication network providers are consulted with throughout the Plan Change Process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD. | 17.1 |
| 3. Spark and the other telecommunication network providers are consulted to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development/s proposed in Plan Changes 48, 49 and 50. | 17.2 |
| 4. Spark and the other telecommunication network providers are consulted to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development/s. | 17.3 |
| 5. Spark and the other telecommunication network providers are consulted with to ensure funding is available through the infrastructure funding agreements. | 17.4 |

Conclusion

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

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

Yours sincerely,



Fiona Matthews
Senior Environmental Planner

The address for service and contact details are:

Fiona Matthews

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Private Bag 92028
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021772005

Contact details

Full name of submitter: Mitchell Tweedie

Organisation name: Fletcher Residential Limited

Agent's full name:

Email address: mtweedie@frl.co.nz

Contact phone number: 021453331

Postal address:
810 Great South Road
Penrose
Auckland 1061

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:
All Plan Change rules

Property address: Total Plan Change Area

Map or maps:

Other provisions:

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

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

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

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

18.1

Details of amendments:

Submission date: 22 October 2020

Supporting documents
201022 Fletcher Submission - Drury Centre Plan Change .pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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

Submission on Proposed Private Plan Change 48 – Drury Centre Precinct to the Auckland Unitary Plan (Operative in Part)

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

.....

To: **Auckland Council**

1. SUBMITTER DETAILS

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

This is a submission on Proposed Private Plan Change 48 (PC48) to the Auckland Unitary Plan – Operative in Part (AUP).

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

2. BACKGROUND

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

3. SCOPE OF SUBMISSION

The submission relates to PC 48 as a whole.

4. SUBMISSION

Fletcher Living supports PC48 in its notified form.

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

- a) The proposed zoning pattern is generally consistent with the Drury-Opāheke Structure Plan and the three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East;
- b) The Metropolitan Centre zone will support a wide variety of uses and services for the local community within a walkable distance and provide opportunities to establish new community facilities and a range of public open spaces. The centre will contain the key open spaces and the key retail street that are the focal point for intensive retail, commercial and civic development and pedestrian activity within the precinct;
- c) The residentially focused Mixed Use zone provides a range of activities to support the Drury centre and will encourage high density residential and employment activities in close proximity to the centre and the proposed train station;
- d) The extent of business zoned land proposed has been sufficiently sized to support the local needs of the population over the next 30 years. The proposed land uses will contribute to

an improvement in the balance of residential and business growth to support Drury as a self-sustaining community now and into the future;

- e) Establishing a Metropolitan Centre in Drury East is unlikely to have any adverse effects on existing centres such as Papakura, as the physical constraints and fractured ownership patterns have limited Papakura's ability to deliver Metropolitan Centre services to the southern community;
- f) The adverse effects of urban development on the natural environment, including the Manukau Harbour, Hingaia Stream and its tributaries can be effectively managed, and key natural features within the Plan Change area will be maintained and enhanced;
- g) The zoning pattern and proposed Precinct enables a connected and high-quality road network to be established that provides appropriately for all transportation modes; and
- h) The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

5. Decision Sought

Fletcher Living seeks the following relief from Auckland Council on PC48:

- a) That PC48 be retained and approved, as notified.

18.1

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

SUBMISSION ON PLAN CHANGE 48 (PRIVATE): DRURY CENTRE PRECINCT

To: Auckland Council

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

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 48: Drury Centre Precinct (**PPC48** or the **Plan Change Request**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. Lomai could not gain an advantage in trade competition through this submission.
3. This submission relates to the entire Plan Change Request; however, the Submitter is particularly interested in:
 - (a) the proposed alternative staging for Drury that PPC48 relies on; and
 - (b) the potential traffic effects arising from PPC48.
4. Lomai opposes PPC48 for the reasons outlined in this submission.
5. Lomai could potentially support PPC48 if it did not have adverse implications for the timing and cost of giving effect to Stage 1 of the Drury-Opāheke Structure Plan and it can be demonstrated that any adverse traffic effects are appropriately avoided, remedied or mitigated.

BACKGROUND

Lomai Properties Ltd

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

Proposed Plan Change 48 (Drury Centre Precinct)

10. PPC48 is one of three plan change requests that have been submitted simultaneously by three separate developers Oyster Capital Ltd, Fulton Hogan – Land Development Ltd and Kiwi Property No. 2 Ltd (**Kiwi**). Together, the three plan change requests seek to develop 328ha of land in Drury East to enable approximately 7,000 new dwellings, 58,000m² GFA of new office space and 119,000m² GFA of new retail space, among other facilities and services.
11. All three plan change requests are within the Structure Plan area, but are identified in the FULSS and the Structure Plan as being 'development ready' in the first half of decade two (2028-2032).
12. The current Plan Change Request, PPC48, has been lodged by Kiwi and seeks to rezone 95 hectares of land to the eastern side of the Southern motorway, south of the Drury interchange from Future Urban zone to a mixture of Metropolitan Centre (35ha) surrounded by Mixed Use zone.
13. The effect of PPC48 would be to create a high density retail and commercial centre.

REASONS FOR SUBMISSION

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

Alternative Staging

15. A key feature of PPC48 is to vary the staging in the Structure Plan to bring forward development of land in Drury East, and to defer development of land west of Jesmond Road, to the south, west and east of Pukekohe, and within flood plains in the Slippery Creek catchment. This is a significant concern of Lomai, who are currently in the process of seeking to rezone land west of Jesmond Road and who do not believe their legitimate right to develop as part of Stage 1 should be forsaken so that Kiwi can bring forward the development of their land into Stage 1. Should Kiwi wish to do so they simply need to confirm that they will provide the transport and other infrastructure requirements to service their development and not justify their approach based on deferral of Stage 1 development.
16. Lomai opposes the proposed early release of land in Drury East, and the deferral of development to the west of Jesmond Road to Decade 2.
17. Lomai disagrees with the analysis included in the Plan Change Request that supports this alternative staging. Specifically:
 - (a) The premise that Drury East is more connected to existing urban areas than Drury West (and therefore more suitable for immediate development) is unfounded. Drury Village is very small. PPC48 will not extend the village but rather it is likely to adversely affect it. In contrast, Drury West is strategically located on State Highway 22 (which is to be upgraded) and is also connected to Karaka and the existing Metropolitan area of Pukekohe.
 - (b) The Metropolitan Centre could be damaging to the Drury, Papakura and Takanini commercial centres by detracting customers away from them. The Structure Plan carefully managed this risk by staging residential development before commercial centres, so as to increase the population first.

- (c) Development of Drury West would not create an “urban island” as is suggested by the Plan Change Request. Development of Drury West is already underway and the area is well connected to existing development through State Highway 22 and to the north of the Waipupuke site. The Structure Plan also anticipates a range of land uses in Drury West, many of which are already underway. These land uses create opportunities for employment, recreation, shopping and education, reducing the degree to which residents in Drury West would need to travel for these services.
- (d) For example, housing in Waipupuke is within walking distance from both a primary and a secondary school that have been confirmed by the Ministry of Education. The Waipupuke development itself is expected to contain several pre-schools.
- (e) Contrary to assertions made in the Plan Change Request, Drury West is not fragmented, or is no more fragmented than Drury East. There are several large blocks of land in Drury West that are held in single ownership – including the 56ha Waipupuke site that is owned in full by the Submitter. Drury West is perfectly positioned to deliver housing and employment on a large scale, evidenced by the fact that the Submitter has lodged a private plan change request to live zone the Waipupuke site.
- (f) We also note that the land east of Jesmond Road is not all owned or controlled by MADE and is in fact highly fragmented itself. It is therefore no better placed for immediate development than Drury West is (and in the Submitter’s view, is worse placed).
- (g) The Structure Plan was prepared under provisions of the Local Government Act 2002 and in accordance with structure plan guidelines in the AUP. It has been through an extensive consultation process with all major landowners in the area, and was subject to technical analysis. The Council had the opportunity to change the staging of development contained in the FULSS through this extensive process, and chose not to.
- (h) Importantly, the owners of land in Drury East had the opportunity to, and did, contribute to this process. Their ‘alternative staging’ has already been considered by the Council alongside other input. After weighing all relevant considerations, the Council determined that it was appropriate for Drury East to be developed in Decade 2, and Drury West to be developed in Decade 1.
- (i) The alternative staging proposed in PPC48 contradicts the community’s expectations of what and when development will occur in Drury. For the Council to adopt this alternative staging after the significant public consultation process has concluded would undermine the trust that the community (both local residents and developers) has in the Council’s plan making and consultation processes.
- (j) It would also undermine the extent to which developers can rely on, and make decisions based on, the Council’s planning documents generally. This could have significant implications for the effectiveness and efficiency of the Council’s planning documents.
- (k) The analysis in PPC48 fails to factor in the significant investment decisions that have already been made on the basis of the staging adopted in the Structure Plan. Its assessment of development of Drury East is

undertaken in a vacuum which appears to assume that no development would occur if the Plan Change was not approved. From a section 32 perspective, this kind of analysis is insufficient.

18. Overall, the alternative staging proposed in PPC48 is not the most efficient and effective method for achieving the sustainable management purpose of the RMA and the Regional Policy Statement.

Traffic Effects

19. Putting the alternative staging proposal to one side, the Submitter is concerned that PPC48 would result in adverse traffic effects on the broader Drury roading network. The Submitter is concerned that Kiwi has not provided sufficient modelling to demonstrate that the proposed trigger rules would adequately avoid, mitigate or remedy adverse traffic effects to an appropriate level.
20. Lomai seeks greater clarification that the adverse traffic effects external to the PPC48 site will be appropriately avoided, remedied or mitigated.

DECISION SOUGHT

21. Lomai seeks the following decision from Auckland Council: Decline PPC48, unless the matters relating to alternative staging of development, provision of all required infrastructure and traffic are adequately resolved.
22. Lomai wishes to be heard in support of its submission.
23. Lomai would consider presenting a joint case if others make similar submissions.

19.1

22 October 2020



Bill Loutit / Rachel Abraham
On behalf of Lomai Properties Limited

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Telephone: +64 21 839 422
Postal address: Private Bag 92518, Auckland 1141, New Zealand
Contact person: Bill Loutit, Simpson Grierson

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

22 October 2020

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

mail: unitaryplan@aucklandcouncil.govt.nz

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

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

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

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

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

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

Wider Context

Auckland Housing and Urban Growth Programme

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

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

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

The National Policy Statement on Urban Development

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

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

Transit-orientated development

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

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

Drury-Opāheke Structure Plan

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

NZ Upgrade Programme

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

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

Auckland Future Urban Land Supply Strategy

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

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

Scope of Submission

The submission relates to the Plan Changes in their entirety.

The Submission is in parts A-C below:

PART A: Joint Comments on the entire Plan Changes

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

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

PART B: Comments from HUD

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

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

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

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

HUD requests that further open space is zoned

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

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

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

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

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

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

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

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

20.1

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

Decisions Sought

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

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

20.2

20.1

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

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

Hearings

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

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

Signature of person authorized to sign on behalf of submitters:



Brad Ward

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

Address for service of person making submission:

Ministry of Housing and Urban Development

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SUBMISSION ON PLAN CHANGE 48 (PRIVATE): DRURY CENTRE PRECINCT

To: Auckland Council

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

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 48: Drury Centre Precinct (**PPC48**) by Kiwi Property Holdings No 2 Ltd (**applicant**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. PPC48 seeks to rezone 95 hectares of land in the area generally bounded by Great South Road, Waihoehoe Road, Fitzgerald Road and the Hingaia Stream from Future Urban to a mixture of Business: Metropolitan Centre and Business: Mixed Use land. PPC48 also amends provisions of the Drury South Industrial Precinct at Maketu Road, Quarry Road and Fitzgerald Road in Drury South to create a new commercial centre.
3. The Submitter could not gain an advantage in trade competition through this submission.
4. This submission relates to the entire PPC48.
5. The Submitter's key interests are to ensure the protection, preservation and appropriate management of natural and cultural resources in a manner that recognises and provides for Mana Whenua interests and values and enables positive environmental, social and economic outcomes.
6. As the proposal currently stands, the Submitter **opposes** PPC48 on the basis that:
 - (a) The applicant's engagement with Mana Whenua has been too little and too late and not met our expectations of a meaningful partnership; and
 - (b) As a result, Mana Whenua have not had the opportunity to provide input into the design and detail of the proposal to ensure that their values are reflected in PPC48, and that adverse environmental, social and cultural effects are avoided, remedied or mitigated.
7. Ngāti Te Ata Waiohua prepared a Cultural Values Assessments for the applicant which set out in detail the cultural connections that Ngāti Te Ata Waiohua has with the PPC48 land and the surrounding Drury-Opāheke area. We do not repeat this detail provided in the CVA.

SUBMISSION

8. The Submitter considers that PPC48 is inconsistent with Part 2 of the RMA, including:
 - (a) The purpose of the RMA to promote the sustainable management of natural and physical resources, including by safeguarding the life-supporting capacity of air, water, soil and ecosystems;

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- (b) Section 6(a) the preservation of the natural character of the coastal environment, wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development;
 - (c) Section 6(e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other Taonga;
 - (d) Section 6(f) the protection of historic heritage from inappropriate subdivision, use and development;
 - (e) Section 6(g) the protection of protected customary rights;
 - (f) Section 7(a) which requires all persons exercising functions and powers under the RMA to have particular regard to kaitiakitanga; and
 - (g) Section 8 which requires all persons exercising functions and powers under the RMA to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
9. It is vital for the people of Ngāti Te Ata Waiohū that the mana of the land subject to PPC48 is upheld, acknowledged and respected and that their people have rangatiratanga (opportunity to participate and be involved in decision making) over their ancestral land and Taonga. In addition, the people of Ngāti Te Ata Waiohū have responsibility (alongside other iwi holding Mana Whenua in the area) as kaitiaki to fulfil their obligation and responsibilities to the environment in accordance with customs passed down, and to be accountable to the people (current and future generations) in these roles as custodians.
10. The Submitter is concerned that PPC48 will result in adverse environmental and cultural effects, as it is currently proposed by the applicant. Specifically:
- (a) Wai (Water): PPC48 does not give effect to Te Mana o te Wai and risks damaging the mauri of wai within the project area. This includes through PPC48's proposed treatment of waterways and its proposed stormwater and wastewater solutions. 21.6
21.7
21.8
21.9
 - (b) Sustainable Management: The Submitter considers that PPC48 should in some, if not most ways, be self reliant and self sustainable. Sustainable management has not been adequately given effect to in PPC48. 21.12
 - (c) Native Trees and Plants: The Submitter supports whakapapa sourced trees and plants within the PPC48 site. 21.10
 - (d) Te Aranga Design Principles: These principles have been developed by Auckland Council and Tamaki Makaurau iwi over a number of projects. The principles include mana (treaty based relationships), whakapapa (naming), tohu (acknowledgement of wider cultural landscape), taiao (bringing natural landscape elements into urban environments), mauri tu (environmental health of the site including wai and whenua), mahi toi (inscribing Maori narratives into architecture and design), and ahi ka (living presences for iwi and hapu to undertake their kaitiaki roles). Te Aranga Design Principles have not been incorporated into PPC48. 21.3
 - (e) Landscapes: The Submitter seeks that PPC48 identifies and preserves landscapes, including view shafts, hilltops, tuff rings and ridge lines. 21.5

RELIEF

11. The Submitter requests a decision on PPC48 that confirms, at a minimum, the following:
- | | | |
|-----|---|-------|
| (a) | Ongoing participation, consultation and engagement in the project; | 21.1 |
| (b) | Acknowledgement within the project design of the history of Mana Whenua in the PPC48 area; | 21.2 |
| (c) | Te Aranga Principles incorporated in design concepts; | 21.3 |
| (d) | Iwi monitoring; | 21.4 |
| (e) | Natural and cultural landscaping accounted for in the project design; | 21.5 |
| (f) | A minimum of 20 metre riparian margin for all waterways especially those to contain walkways / cycleways; | 21.6 |
| (g) | A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway; | 21.7 |
| (h) | Roof capture for reuse and groundwater recharge; | 21.8 |
| (i) | Park edge design adjacent to all waterways; | 21.9 |
| (j) | Native trees and plants only within the precinct; | 21.10 |
| (k) | Ridgelines hilltops and wetlands protected; and | 21.11 |
| (l) | Sustainable development reflected in the design and outcomes. | 21.12 |
12. The Submitter seeks the following decision from Auckland Council:
- (a) **Reject** the Application unless the issues addressed in this submission can be adequately addressed.
13. The Submitter wishes to be heard in support of its submission.
14. The Submitter would consider presenting a joint case if others make similar submissions.

22 October 2020



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

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Contact person: Bill Loutit, Simpson Grierson

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

A N D

IN THE MATTER of a submission under clause
6 of the First Schedule to the
RMA on Plan Change 48 –
Drury Centre Precinct

SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 48 – DRURY CENTRE PRECINCT (PC 48)

To: Auckland Council

Name of Submitter: **Auckland Council**

Address: 35 Albert Street
Private Bag 92300
Auckland 1142

INTRODUCTION

1. This is a submission on the following proposed private plan change by Kiwi Property No.2 Limited ("**KPL**"):

Plan Change 48 – Drury Centre Precinct ("**PC 48**")
2. Auckland Council could not gain an advantage in trade competition through this submission.
3. This submission relates to PC 48 in its entirety and all provisions of PC 48 including:
 - a. the IX Drury Centre Precinct
 - b. the Auckland Unitary Plan Maps.
4. PC 48 has been notified contemporaneously with three other proposed private plan changes, Plan Change 49 (Drury East Precinct) by Fulton Hogan Land Development Limited, Plan Change 50 (Waihoehoe Precinct) by Oyster Capital Limited, and Plan Change 51 (Drury 2 Precinct) by Karaka and Drury Limited (together with PC 48, "**the Drury Plan Changes**"). Auckland Council has also made submissions on these plan changes.

GENERAL REASONS FOR THE SUBMISSION

5. Future urban areas, such as the PC 48 land, play a critical role in Auckland's future growth. Auckland Council supports the future urbanisation of the land subject to the Drury Plan Changes, acknowledges the commitment made by the Government to the Drury area through the New Zealand Upgrade Programme, and is working with the Drury Plan Change applicants,

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

6. However, at this point in time, Auckland Council has significant concerns with PC 48 in its entirety as it:
 - a. Does not promote sustainable management of resources, will not achieve the purpose of the RMA, and is therefore inconsistent with Part 2 of the RMA;
 - b. Does not manage or enable the efficient and integrated use, development and protection of natural and physical resources;
 - c. Does not avoid, remedy or mitigate adverse effects;
 - d. Is inconsistent with, or fails to give effect to, provisions of relevant planning instruments;
 - e. Does not meet the requirements of section 32 of the RMA; and
 - f. Does not meet the requirements of section 75 of the RMA.

SPECIFIC REASONS FOR THE SUBMISSION

7. In particular, but without limiting the generality of the above, Auckland Council has significant concerns with PC 48 in its entirety for the reasons stated below.

PC 48 fails to integrate infrastructure planning / funding with land use

8. A key concern for the Auckland Council is that PC 48 does not provide for the strategic integration of infrastructure (transport, three waters, and community infrastructure), and the planning and funding of such infrastructure, with land use. The provision of such infrastructure works – which are of course physical resources in terms of the RMA – will not be achieved at a rate with which the council (representing the community) can physically and economically cope. This concern is exacerbated by the combined infrastructure requirements of the Drury Plan Changes.
9. The council acknowledges the funding for Drury transport infrastructure made available by the Government through the New Zealand Upgrade Programme. However, there remains a significant infrastructure funding shortfall (both capital and operating cost). In short, PC 48 is reliant on major infrastructure projects to service development which are not financed or funded (both capital and operating cost). At this point in time, there is no certainty as to the timing of delivery of these projects. PC 48 would thus enable urban development which will not be serviced by adequate infrastructure and would fail to ensure a quality built and transit-orientated environment.
10. Matters concerning the funding and timing of infrastructure are directly relevant to decisions on zoning, and it is poor resource management practice and contrary to the purpose of the RMA to zone land for an activity when the infrastructure necessary to allow that activity to occur without adverse effects on the environment does not exist, or there is a high degree of uncertainty as to whether that infrastructure will be provided in a timely and efficient way.¹ Discussions between the council, the applicant, other landowners in the Drury area and the Government on this fundamental issue are ongoing, and the council is hopeful that a solution to the infrastructure funding and financing issues can be found. However, at this stage such a solution is not in place.

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

PC 48 is inconsistent with relevant planning instruments

11. Until an infrastructure funding and financing solution is found, PC 48 is inconsistent with, and fails to give effect to, relevant RMA and council strategic planning instruments, including:
- a. the National Policy Statement on Urban Development 2020 (**NPS-UD**);
 - b. Regional Policy Statement (**RPS**) provisions of the Auckland Unitary Plan (**AUP**);
 - c. the Auckland Plan 2050 (**Auckland Plan**);
 - d. the Long-Term Plan 2018-2028 (**LTP**); and
 - e. the Regional Land Transport Plan 2018-2028 (**RLTP**).

NPS-UD

12. PC 48 is inconsistent with, and fails to give effect to, Objective 6 of the NPS-UD which requires local authority decisions on urban development that affect urban environments to be *“Integrated with infrastructure planning and funding decisions”*.

AUP RPS

13. PC 48 is inconsistent with, and fails to give effect to, relevant provisions of the AUP RPS. This includes the following provisions of Chapter B2 – Urban Growth and Form, which require the integration of infrastructure provision with urbanisation on a timely and efficient basis:
- a. B2.2.1 Objective (1)(c): *“A quality compact urban form that enables ... (c) better use of existing infrastructure and efficient provision of new infrastructure”*;
 - b. B2.2.1 Objective (5): *“The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure”*;
 - c. B2.2.2. Policy 7(c), which requires rezoning of land within the Rural Urban Boundary to: *“integrate with the provision of infrastructure”*;
 - d. B2.4.2 Policy (6) in relation to urban intensification: *“Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification”*;
 - e. B2.9. Explanation and Principal Reasons for Adoption, states:

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

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

[Emphasis added]

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

Auckland Plan

16. PC 48 is inconsistent with relevant provisions of the Auckland Plan, such as Our Development Strategy - Auckland’s Infrastructure, Coordinating investment and planning to enable growth:²

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

17. The Auckland Plan 2050: Development Strategy details the sequencing and timing of future urban land for development readiness. This recognises that sound resource management practice requires advanced planning and sequencing to ensure co-ordination between infrastructure providers and land release. The Opāheke Drury area is sequenced for development in 2028 – 2032. PC 48 is therefore 8 years early and out of step with the Development Strategy sequencing. It is therefore critical that a comprehensive infrastructure funding and financing solution is found before the PC 48 land is rezoned.

LTP

18. PC 48 is inconsistent with Council’s LTP. The LTP budgets for Council expenditure, including infrastructure investment, for the next 10 years through to 2028. The infrastructure required to service the development proposed by PC 48 is not budgeted for in the LTP.

RLTP

19. The RLTP is a 10-year investment programme for transport in Auckland, developed by Auckland Transport (AT) together with Waka Kotahi New Zealand Transport Agency (NZTA) and KiwiRail to respond to growth and challenges facing Auckland over the next decade. The infrastructure required to service the development proposed by PC 48 is not included in the RLTP.

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

Effects of failure to integrate infrastructure and land use

20. The effects of the failure of PC 48 (and the Drury Plan Changes) to integrate with infrastructure provision are a strategic and whole of Auckland issue. Unless the infrastructure funding shortfall is resolved, supporting PC 48 would require infrastructure funding to be removed / re-allocated from other parts of Auckland.
21. Auckland is highly constrained in its ability to finance and fund infrastructure across the region to support growth. With limited funding ability, scarce funding must be utilised in the most efficient way to enable region wide growth. Strategically, there is a need to open up land for development in a co-ordinated and joined up fashion when capacity is needed across Auckland, and where infrastructure delivery and funding is integrated.
22. At this point in time, PC 48 and the Drury Plan Changes are not consistent with the coordinated and integrated approach to infrastructure provision to support urban growth set out in the Auckland Plan, LTP and RLTP. As such, they will have major funding implications for infrastructure providers, will affect their ability to co-ordinate delivery and are likely to have major implications for the ability to service other areas. This in turn will undermine the ability to deliver infrastructure to support development capacity in other growth areas of Auckland.

Further specific reasons

23. Without derogating from the generality of the above and the submitter's opposition to PC 48, further specific reasons for this submission (and alternative relief) are set out in the **Schedule** to this submission.

RELIEF SOUGHT

24. Auckland Council seeks the following relief:
 - a. Auckland Council is engaged in discussions with KPL and the other Drury Plan Change developers in a concerted effort to find a solution to its concerns. However, at this point in time, the fundamental issues raised in this submission remain unresolved. Accordingly, as matters stand, the primary relief sought by Auckland Council is to decline PC 48 in its entirety until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region; or
 - b. In the alternative to the primary relief of declining PC 48, amend PC 48 and retain provisions as set out in the **Schedule** to this submission; and
 - c. Such further, other, or consequential relief, including in relation to PC 48's objectives, policies, rules, methods, and maps, that reflects or responds to the reasons for this submission.

Conclusion

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

DATED 22nd October 2020

On behalf of Auckland Council:

Councillor Chris Darby, Chairperson of the Planning Committee



Councillor Josephine Bartley, Deputy Chairperson of the Planning Committee



Councillor Desley Simpson, Chairperson of the Finance and Performance Committee



Tau Henare, Independent Māori Statutory Board member



Signatures of persons authorised to sign on behalf of submitter

SCHEDULE – FURTHER SPECIFIC REASONS FOR THE SUBMISSION AND ALTERNATIVE RELIEF

Infrastructure funding and timing

Row	Specific Reasons for the Submission	Relief Sought
1.	<p>PC 48 is reliant on major infrastructure projects to ensure the area can be developed. However, there is no clear indication of how the infrastructure would be financed and funded.</p> <p>There is a substantive amount of unfunded infrastructure required to service the anticipated development in the Drury Future Urban Zone land. A lack of council funding for infrastructure means that it is unlikely that the infrastructure (except for Government NZUP funded projects) required to support the development will be available when required. In the short term there is not adequate infrastructure to support the development and in the medium term the necessary infrastructure to support the development is not funded through the LTP or RLTP. Council is reviewing the Long-Term Plan which includes the 10-year budget. It is too early to predict any change to infrastructure funding.</p> <p>Sections of the existing transport network are heavily congested and cannot convey more traffic until upgraded, without causing high travel time delay, costs and safety risks.</p> <p>Even where proposed infrastructure is funded, it will take years to permit, design and construct.</p> <p>The location of some key transport infrastructure is still to be determined and is subject to notice of requirement processes that are still to be initiated. This affects the ability to determine appropriate land uses and zoning.</p>	<p>Ensure that the council's concerns about infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <ol style="list-style-type: none"> Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include: <ul style="list-style-type: none"> Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). Threshold rules are not used for works to be funded privately but there is no funding agreement in place. Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place.

22.1

	<p>The proposed infrastructure threshold and staging rules are not adequate to address the issue.</p> <p>There is no co-ordinated plan to stage development and infrastructure.</p>	<ul style="list-style-type: none">• Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems).• Threshold rules are not used in circumstances where the extent and location of works have not been determined yet.• Use of prohibited activity status for infringement could be considered. <p>d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.</p>	22.1
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Stormwater, water quality, streams, flooding and biodiversity

Row	Specific Reasons for the Submission	Relief Sought	
2.	The precinct is not fully consistent with the objectives and policies of the National Policy Statement for Freshwater Management 2020 (NPSFM).	Include more policies and rules to give full effect to the direction in the NPS-FM, including but not limited to Te mana o te wai.	22.2
3.	<p>Stormwater Management Plans (SMP(s)) identify effects of stormwater and how effects should be managed both to achieve the RPS, NPSFM and regional plan and to be in accordance with the region-wide Network Discharge Consent (NDC) granted by the Environment Court on 30 October 2019. Without an SMP approved by the Network Utility Operator there is uncertainty if the SMP adequately manages effects and if there are sufficient provisions to enact the direction that the SMP would provide.</p> <p>Policy and matters of discretion/assessment criteria are required to ensure that consenting of subdivision and land uses is consistent with the SMP in its final adopted form which may be included in the council's NDC.</p>	<p>Amend the precinct to include additional policies and rules to manage the effects of stormwater as described in an approved SMP.</p> <p>This includes:</p> <ul style="list-style-type: none"> • New policy: <u>Require subdivision and development to be assessed for consistency with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.</u> • Additional matters of discretion/assessment criteria that would apply to any restricted discretionary activity in the area of the precinct to ensure that new development and subdivision can be assessed for consistency with the NDC and SMP. • Any other rules necessary to give specific effect to the SMP during development. 	22.3
4.	Stormwater management area flow 1 (SMAF 1), as proposed in PC 48, is a control which provides a framework for hydrology mitigation where there will be discharges into a stream environment. SMAF 1 has both a retention and detention volume and the combination of these is intended to reduce erosive flows in streams, maintain stream baseflow and support the recharge of aquifers. It is the default minimum required under the	Retain application of SMAF 1 to the plan change area.	22.4

	region wide NDC and based on current knowledge is the most practicable option.		
5.	A new policy relating to the treatment of impervious surfaces is requested to give effect to the SMP and protect the receiving environment of the Te-Manukanuka-O-Hoturoa (Manukau Harbour).	Insert a new policy to the following effect: <u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u>	22.5
6.	A new policy is required to ensure that flood attenuation is provided until such time that infrastructure is upgraded to provide sufficient flood conveyance capacity and there is no downstream effect.	Insert a new policy to the following effect: <u>Provide sufficient floodplain storage within the Drury Centre precinct to avoid increasing flood risk upstream and downstream and manage increased flood risk within the precinct unless downstream infrastructure capacity means this is not required. This is subject to the upgrade of the downstream culvert upgrade.</u> Insert rules to give effect to this.	22.6
7.	Policy IX.3 (19) is unnecessary. It is better to rely on the existing AUP E3 framework and the Resource Management (National Environmental Standards for Freshwater) Regulations 2020. Policy E3.3(13) provides an adequate policy framework for where reclamation may be sought for development of infrastructure.	Delete policy IX.3 (19).	22.7
8.	Proposed standard IX6.6 (1) Stormwater Quality is supported in principle but cross references to the activity rules and standards in E9, including the parent rule 9.6.1.4 which has additional, and in some cases, confusing exemptions. These undermine its effectiveness because many roads, private roads and carparks may not be required to have stormwater treatment. Consequently,	Retain and amend standard IX6.6 (1) Stormwater Quality but amend it to read as follows: The activity rules and standards in E9 apply to development in the Drury Centre precinct as if the reference to 'high use roads', was <u>were</u> a reference to 'all <u>existing, new, upgraded or redeveloped</u> roads <u>accessways and carparks</u> ', or other amendments that would achieve the same environmental outcome.	22.8

	<p>they are not sufficient to protect the upper Te-Manukanuka-O-Hoturoa (Manukau Harbour) from contaminant accumulation from the combined contaminant discharges from all the new, existing or upgraded roads, access ways and parking areas. The requested amendment includes all these areas in the precinct rules to provide for treatment of these areas. Alternative methods of achieving the same outcome could be considered. This gives effect to the RPS B7.3 objectives and policies relating to freshwater systems, RPS B7.4 objectives and policies relating to coastal water and freshwater, the NPS-FM, and the New Zealand Coastal Policy Statement 2010.</p> <p>Additional matters of control or discretion are proposed to ensure that stormwater treatment assets are collectively constructed to be efficient and have low long term operating costs.</p>	<p>Insert new matters of control and discretion, in addition to those in E9, to the effect of:</p> <ul style="list-style-type: none"> • <u>How the location and design of stormwater treatment assets reduces their operating costs.</u> • <u>The consolidation and community scale of stormwater treatment assets.</u> • <u>The location of stormwater treatment assets where they will be most effective in reducing contaminants.</u> 	22.8
9.	<p>The receiving environments downstream of the plan change sites are highly sensitive to additional contaminants and are Significant Ecological Areas (SEAs). The NPS-FM requires that the health of freshwater receiving environments is prioritised above other uses and needs. This and other existing AUP objectives and policies direct that freshwater quality is maintained where it is good and enhanced where degraded. The existing provisions do not go far enough to achieve this.</p> <p>The SMP notes a mix of methods will be used including treatment of roads and use of inert building materials. A new standard relating to the exterior materials on buildings is requested.</p>	<p>Include a new standard to the effect that:</p> <p><u>Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.</u></p>	22.9
10.	<p>Riparian planting is important to maintain and enhance the life-supporting capacity of freshwater systems and restore biodiversity. Cross-referencing in standard IX.6.4(1) to</p>	<p>Retain and amend IX.6.4(1) by including a cross reference to the matters in Appendix 15.6(3)(b-f) and (4) of the Auckland Unitary Plan.</p>	22.10

	Appendix 15 of the AUP will assist in ensuring good outcomes.			
11.	<p>Extended 20m riparian building setbacks are appropriate on permanent streams for the following reasons:</p> <ul style="list-style-type: none">○ 20m riparian margins are recommended in the Drury-Opāheke Stormwater Management Plan 2019○ it is important to maintain and enhance freshwater quality, systems and processes○ to allow stream meander paths and floodplains to evolve with less risk to property or intervention to protect property○ it provides space for flood conveyance management and higher stream flows due to increased rainfall○ it provides space for stormwater infrastructure and potential future instream works to stabilise banks so that instream erosion and sediment loss is managed:○ to protect the Manukau Harbour○ to maintain mana whenua cultural values○ many streams will not qualify for esplanade reserves○ much of the original biodiversity of the area has been lost and this creates an opportunity for restoration and ecological linkages between the Manukau Harbour and natural areas within the Hunua Ranges○ it provides space for mature trees in the future surrounding high to medium density urban environment. <p>10m setbacks are required from all intermittent streams.</p>	<p>Replace standard IX.6.4(2) with a new standard and consequential amendments to effect that the riparian yards set for buildings in tables H13.6.5.1 Yards and H9.6.6.1 Yards read as follows:</p> <table><tr><td>Riparian</td><td>4020m from the edge of all permanent streams and <u>10m from the edge of all</u> intermittent streams</td></tr></table> <p>Other yards in these tables are not amended.</p>	Riparian	40 20m from the edge of all permanent streams and <u>10m from the edge of all</u> intermittent streams
Riparian	40 20m from the edge of all permanent streams and <u>10m from the edge of all</u> intermittent streams			
12.	Additional matters of discretion are requested for assessing infringements of standard IX.6.4 referred to above.	Add the following matters of discretion to IX.8.1(7):		

22.11

22.12

		<p><u>...(b) Effects on floodplain management taking into account maximum probable development, climate change and the roughness coefficient of existing and planned planting.</u></p> <p><u>(c) Effects on stream bank stability taking into account the cohesiveness of the soil and steepness of the bank angle.</u></p> <p><u>(d) Effects on the ability to provide for any proposed paths, cycleways, infrastructure and facilities outside the 10m wide strip of riparian planting.</u></p> <p>Add related assessment criteria at IX.8.2(6).</p>	22.12
13.	The council has found that maintenance and enhancement of permanent and intermittent streams is more likely to be achieved on development if indicative permanent and intermittent streams are shown on precinct plans. The Drury 1 precinct is an example of this practice. This helps to implement the RPS B7.3 and 7.4 and other regional provisions of the AUP. These streams can easily be mapped from the information in the applicant's technical reports, or alternatively, the water assessment technical reports prepared for the Drury – Opāheke Structure Plan.	Include indicative permanent and intermittent streams and wetlands on the precinct plan.	22.13
14.	Including the blue-green linkages from urban concept planning can help reinforce the importance of connections.	Include the indicative blue-green corridor within the precinct plan based on the urban concept in the Urban Design Assessment.	22.14
15.	Proposed policy IX.3(18) recognises that urban development fundamentally alters stream health including significant changes to hydrology and interventions other than hydrology mitigation may be needed to manage effects and protect the functioning of the stream.	Retain policy IX.3(18).	22.15
16.	It is important to focus on improving biodiversity as distinct from just planting.	Provide for improved biodiversity and ecological corridors (blue-green network) by amending policy IX.3(20) and adding a new	22.16

	<p>It is also important to provide for ecological corridors.</p> <p>A new policy and amendments to proposed policy IX.3(20) are proposed to address these matters.</p>	<p>policy as follows, together with any other amendments that may be required to give effect to these matters:</p> <p>Support<u>Ensure</u> improvements to water quality, and habitat and biodiversity, including by providing planting on the riparian margins of permanent and intermittent streams.</p> <p><u>Enable a network of open space, riparian corridors and park edge roads that provides for:</u></p> <ul style="list-style-type: none"> • <u>potential ecological corridors along streams between Te-Manukanuka-O-Hoturoa (Manukau Harbour) and the Hunua;</u> • <u>improvement of freshwater and coastal water systems; and</u> • <u>a safe and attractive walking and cycling network.</u>
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22.16

Open Space

Row	Specific Reasons for the Submission	Relief Sought	
17.	Auckland Council has criteria for purchase or other acquisition of land for public open space. These are set out in policy documents. It is important that these criteria are considered early during planning of public open space if public ownership of the land is intended. The council will not necessarily agree to purchase or receive proposed open space that does not meet these criteria.	Amend policy IX.3(14) to read as follows: In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contributes to a sense of place for the Drury Centre, including by: (a) incorporating distinctive site features; (b) reinforcing legibility within the centre; and (c) integrating with the stream network; <u>and</u> (d) <u>if Auckland Council ownership is proposed, the open spaces must be consistent with the council's open space and parks acquisition and provision policies.</u>	22.17
18.	<p>The proposed open space along the margins of the Hingaia Stream exceeds the standard 20m esplanade reserve width. It also extends over additional land that is either floodplain or Transpower's transmission corridor or both.</p> <p>The Auckland Unitary Plan zoning principles are that both floodplains and the transmission corridor take the adjoining urban or rural zoning (Business – Metropolitan Centre in this case), while the risk is managed by the provisions of: E36 and D26. Therefore, this area should be zoned Business – Metropolitan Centre Zone, although a rural zoning would also be acceptable to the council in this instance.</p> <p>Neither the floodplain land or the transmission corridor land beyond the standard 20m esplanade width meet the council's open space acquisition criteria and the council does not intend to purchase them for reserve.</p>	Reduce the open space zoning along Hingaia Stream to a 20m wide strip adjoining the stream.	22.18

	More broadly, there is about 460ha of floodplain in the Drury Future Urban Zone. It is not feasible in terms of either capital or operating cost for the council to assume ownership of all this area of land for flood management or other purposes.		
19.	To provide a transparent starting point for discussion between the council and landowners/developers it is recommended that indicative public open spaces are shown on the precinct plan. The plan attached to this submission (Attachment 1) indicates the approximate location, type and quantum of public open space for civic, neighbourhood and suburb scale parks consistent with Auckland Council open space policies and supportable for acquisition by the council (subject to political approval).	Include indicative open spaces in the precinct plan as shown in Attachment 1 to this submission.	22.19

Rules general

Row	Specific Reasons for the Submission	Relief Sought	
20.	The activities referenced in IX.5 Notification rules (1) to (3), which require non-notification of certain activities, may have significant adverse effects and it is more appropriate to rely on the standard notification provisions in the Resource Management Act 1991 (RMA).	Amend the IX.5 Notification rules (1) to (3) which require non-notification to apply the normal tests for notification under the relevant sections of the RMA.	22.20
21.	The various categories of consent activity status and matters of discretion/assessment criteria should be reviewed to ensure that they are the most appropriate to give effect to objectives and policies and decision making on submissions.	Ensure that the consent categories in IX.4.1 Activity table, matters of discretion in IX.8.1, and assessment criteria in IX.8.2 are the most appropriate to give effect to: matters raised in this submission, the objectives and policies of the precinct, the RPS and any national policy statement.	22.21

Land use

Row	Specific Reasons for the Submission	Relief Sought
22.	<p>The National Policy Statement on Urban Development 2020 (NPS-UD), the RPS and the Drury – Opāheke Structure Plan August 2019 aim to achieve high densities within walkable catchments of proposed rapid transit network (RTN) stations.</p> <p>Walkable distances are not defined in the RMA or RMA documents. However, this matter was investigated in preparation of Drury – Opāheke Structure Plan August 2019 in relation to RTN train stations.</p> <p>The local road network does not exist yet in these greenfield locations so actual walking distances along road footpaths cannot be measured yet. Instead it is appropriate to use a walkable radius from the proposed train station as a proxy for median actual walkable distances. This is expressed as an ‘extended walkable’ distance in the requested provisions to enable further discussion of an appropriate distance, as this is not an exact science.</p> <p>It is also appropriate to consider an additional shorter radius as being an area where a much higher (above median) level of walkability can potentially be achieved. This is expressed as a ‘short walkable’ radius in the requested provisions to enable further discussion of the appropriate distance. The council will be able to contribute information on specific distances at the hearing.</p> <p>The actual position of the Drury east station (and any plaza) has not been confirmed at the time of writing and may be in a different position to that shown in the precinct plan. It is more appropriate for the location of the station to be confirmed by the separate notice of requirement</p>	<p>Add a policy and standards to provide for increased density near RTN stations including:</p> <ul style="list-style-type: none"> a. A policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u> b. Building height standards enabling at least the Metropolitan Centre equivalent 22-23 storey building height in all zones within a short walkable radius of the RTN train station, and 7-8 storey building height within an extended walkable radius of the proposed RTN station; c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone; d. Any alterations to other building standards to respond to increased building height; e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.

22.22

	<p>process and ensuring that precinct provisions respond generally to the station wherever it is located.</p> <p>However, it is likely that a significant proportion of the PC 48 area will be within the walkable catchment. Therefore, increased density should be enabled throughout the walkable catchment in all zones.</p> <p>The NPS-UD prioritises increased densities within a walkable distance of RTN stations with a focus on use of tall buildings to achieve this. At least six storeys are to be enabled but more is preferred by the NPS-UD Policy 3.</p> <p>It is considered that there is not a large difference in potential adverse effects of height between 6, 7, or 8 storeys. Therefore, it is recommended that a building height control that provides for 7 to 8 storeys be applied within an extended walkable radius of the proposed RTN station This can be given effect to by applying the AUP 27m height variation control within an extended walkable radius of the station and routes. Some adjustment beyond this distance may be appropriate to better align with property boundaries.</p> <p>At still higher building heights, adverse effects can become more significant and a different range of standards are appropriate to address that. Overall, it is considered that within a short walkable radius of a RTN station, where high walkability is possible, taller buildings should be provided to enable higher density. This is subject to additional or amended standards that address the effects of towers. The building height standard of 72.5m (about 23 storeys) as used in the Metropolitan Centre Zone is considered an appropriate standard for land within a short walkable</p>	
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	<p>radius close to a RTN Station to give effect to the NPS-UD.</p> <p>The requested information standard would ensure that resource consent applications provide sufficient information to assess whether the development is consistent with the policy.</p> <p>The requested amendments provide for a new policy and new / amended standards to enable increased density and walkability near the RTN stations.</p>		
23.	A review is needed to enable full consideration of the potential for effects on other centres and so that the centre zoning and scale is appropriate to service the needs for future and existing populations.	Review the full extent and type of centre zoning to be applied to the Drury Centre taking into account the total business capacity available in all proposed and existing centres and business zones and the expected population demand for this capacity.	22.23
24.	Extending the Business – Metropolitan Zone north to Waihoehoe Road provides for the centre to be co-located with the full extent of the RTN station thus giving effect to the RPS, the NPS-UD and the Drury – Opāheke Structure Plan.	Extend the Business – Metropolitan Centre Zoning west along Flanagan Road as far as Waihoehoe Road.	22.24
25.	Land west of the railway under proposed sub-precinct D already has an operative urban zoning (it is not Future Urban). There is no practical value in extending the precinct or plan change to cover this area including the railway corridor.	Delete parts of sub-precinct D and the outer precinct boundary that that apply west and on top of the railway.	22.25
26.	It is more appropriate for the location of the railway station to be determined through the up-coming notice of requirement process.	Delete the indicative railway station shown on the precinct plan and make any other consequential changes to the precinct provisions.	22.26
27.	Department stores are an appropriate activity within the catchment of a RTN station and in the Business – Mixed Use Zone. They can potentially attain a good urban	Delete the non-complying status of department stores in sub-precincts C and E and replace with discretionary status.	22.27

	design standard and discretionary activity status is satisfactory to achieve that. It is also important to avoid provisions that inhibit trade competition.		
28.	The proposed building setback IX.6.5 is to protect the future corridor for widening of Waihoehoe Road. However, if a notice of requirement has been lodged for the road upgrade, the proposed rule is not necessary.	Review the need for IX.6.5 if a notice of requirement has been lodged for the upgrade of Waihoehoe Road.	22.28
29.	<p>The proposed Daylight and Outdoor Living Space standards are an appropriate addition to the Business – Mixed Use Zone standards because:</p> <ul style="list-style-type: none"> • They fill a known gap in the zone provisions relating to residential activity. • In this case the Business – Mixed Use Zone is likely to be used mainly for residential activity. • They will provide for a better-quality environment for future residents. 	Retain standards IX.6.7 Daylight and IX.6.8 Outdoor Living Space for the Business – Mixed Use Zone.	22.29
30.	<p>Standard H13.6.9 Outlook Space is one of only two standards in the Business – Mixed Use Zone that applies specifically to residential activity. Its purpose is to provide visual privacy and ensure rooms have outlook and a sense of space from windows. It works by setting minimal dimensions between buildings where there are windows on dwellings. The dimensions are measured outwards from the face of the window.</p> <p>Auckland Council’s monitoring of the AUP under s.35 of the RMA has found that there is a significant unintended defect with this standard that arises when apartment buildings have inset balconies which is increasingly common. The dimension is measured from the window</p>	Include amendments to standard H13.6.9(4) (Business – Mixed Use Zone Outlook Space) to the effect that the depth is measured from the external wall of the building where the window to which it applies is inset from the wall within an inset balcony.	22.30

	<p>inside the balcony, not the outer face of the building. When this happens, the outlook space is not achieved as intended even though technical compliance is attained. This can cause significant adverse effects for residents on the quality of the built environment.</p> <p>The council intends to rectify this problem at the first review of the AUP (post 2026). However, in the interim it would be appropriate for the precinct to include an amendment to the effect that the dimension is to be measured from the exterior face of buildings where the window is in an inset balcony on an apartment building. The equivalent Business – Metropolitan Centre Zone rule H9.6.10 is a potential model replacement rule where the dimension is measured from the exterior face of the building.</p>	
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Mana whenua

Row	Specific Reasons for the Submission	Relief Sought	
31.	Mana whenua values and traditions should be reflected in the new development with their participation.	Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development taking into account the recommendations in the cultural values assessments. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.	22.31
32.	It is important to ensure that Māori can benefit from the potential opportunities for housing and social services provided by the proposed developments. This gives effect to Directions 1-4 and Focus Area 7 of the Māori Identity and Wellbeing Section of the Auckland Plan.	Enable and provide for accessible and affordable social housing for Māori.	22.32

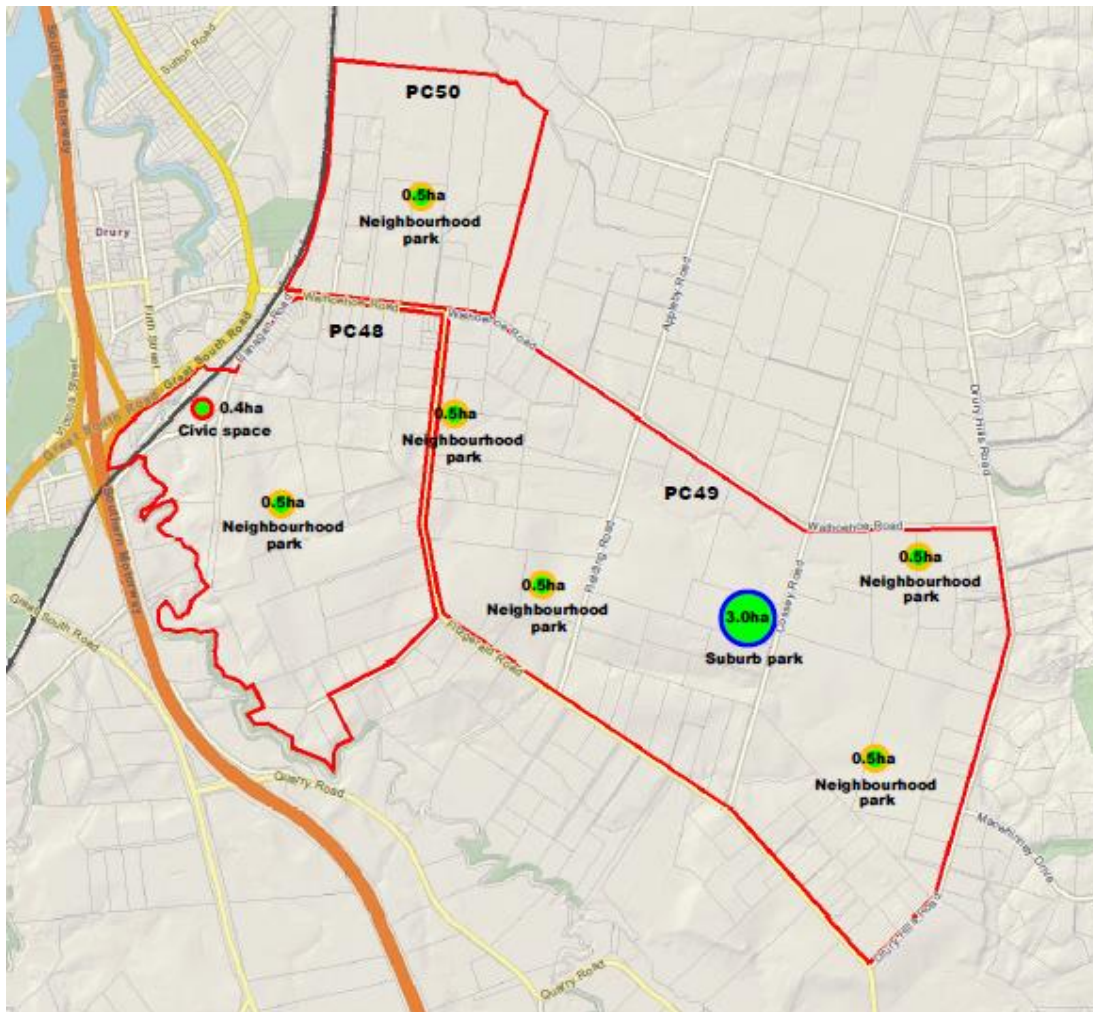
Natural heritage

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

22.33

Attachment 1

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





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FORM 5

Submission on a notified proposal for Private Plan Change 48 – Drury Centre under Clause 6 of Schedule 1 Resource Management Act 1991

22 October 2020

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

Email: unitaryplan@aucklandcouncil.govt.nz

CC: rebeccas@barker.co.nz

Name of submitter: The New Zealand Transport Agency

This is a submission on Private Plan Change 48 Drury Centre Precinct (**Plan Change**) to the Auckland Unitary Plan (Operative in Part).

The New Zealand Transport Agency (**Waka Kotahi**) could not gain an advantage in trade competition through this submission.

Waka Kotahi role and responsibilities

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (**LTMA**). Waka Kotahi's objective is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Waka Kotahi's roles and responsibilities include:

- Managing the State Highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

The Plan Change relates to areas that are close to and potentially affect State Highway 1 and the future Mill Road corridor (proposed state highway). Waka Kotahi's interest in this proposed Plan Change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.

- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.
- The manager of the State Highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.

Government Policy Statement on Land Transport.

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (GPS). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. Likewise, changes in transport can affect land use.

Waka Kotahi gives effect to the GPS through a number of strategic plans including:

- Arataki – our ten-year view of the step changes and actions needed to deliver on the government's current priorities and long-term outcomes for the land transport system;
- Toitu Te Taiao – Our sustainability action plan. This notes two big challenges around reducing greenhouse gases and improving public health;
- Keeping Cities Moving – our national mode shift plan based around shaping urban form, making shared and active modes more attractive and influencing travel demand and transport choices.

Wider Context

In making this submission, Waka Kotahi is cognisant of the context of the Plan Change and ongoing planning processes and projects. These include:

- The recent funding of the Mill Road corridor which is planned to traverse the southern Drury area and the Papakura to Drury South project as part of the New Zealand Upgrade Programme;
- Te Tupu Ngātahi's planning work on the Drury transport network which includes a number of new and upgraded arterial roads in the wider Drury area;
- Other private development proposals in the area including other plan changes;
- The National Policy Statement on Urban Development;
- The Council adopted Drury–Opaheke Structure Plan.

A high level of care is required to ensure integration between the projects in the area and the planning outcomes being sought, all of which have differing timeframes.

Decision sought

Waka Kotahi supports the plan change but seeks amendments and / or further information to provide greater certainty around the provision and funding of transport infrastructure and to ensure the outcomes in the plan change are achieved.

Decisions that Waka Kotahi seeks on the Plan Change are set out in its submissions contained in **Table 1**. Waka Kotahi also seeks any consequential changes to the Plan Change required to give effect to the relief described in **Table 1**.

Hearings

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

Signature of person authorised to sign on behalf of Submitter:



Kim Harris-Cottle

Team Lead, Consents and Approvals Waka Kotahi

Address for Service of person making submission:

NZ Transport Agency

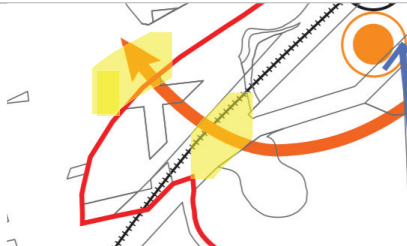
Contact Person: Evan Keating

Email: Evan.Keating@nzta.govt.nz

Table 1: NZ Transport Agency Submission on Auckland Unitary Plan (OIP) Plan Change 48 (Private) Drury Centre Precinct

Sub #	Provision Number	Reason for Submission	Relief Sought Base text is PC48 as notified New text <u>underline</u> Deleted text striketrough	
1	Whole of plan change	Waka Kotahi seeks to ensure that transport effects across the land transport system are appropriately managed and that sufficient infrastructure is provided to service the proposed development. At present, future local level transport networks (i.e. those provided and/or operated by Auckland Transport) for the Drury area are not identified in the Regional Land Transport Plan. The delivery of such infrastructure needs to be aligned with the release of land for development in order to manage adverse effects on the transport network.	Provide information and suitable provisions to resolve the transport infrastructure issue.	23.1
2	Whole Plan Change (including Precinct Plans)	The terms <i>active transport</i> and <i>public transport</i> are utilised within the National Policy Statement Urban Development 2020 (NPSUD). It is requested that references referring to <i>pedestrians and cyclists</i> is replaced with <i>active transport</i> to ensure consistency and clarity. For clarity, where the individual term pedestrian or cyclist is used, these should remain.	Support with amendment. Replace references to <i>pedestrians and cyclists</i> is with <i>active transport</i> (as defined within the National Policy Statement on Urban Development 2020).	23.2
3	Whole Plan Change (including Precinct Plans)	Waka Kotahi understands that the location of the 'future train station' on Precinct Plan 2 does not align with the preferred location of the station (acknowledging that a notice	Support with amendment. Ensure the plan change reflects the final location of the train station and achieves Objective 1 by providing a <i>transit-orientated development that supports high density</i>	23.3

		of requirement for this station has yet to be lodged).	<i>residential, employment-generating and retail activities close to rapid transit and prioritises public and active modes of transport to and within the centre.</i>	23.3
4	Precinct plans	In accordance with Policy 3 of the NPSUD and the potential location of the future train station, the zoning and building height allowances should be amended to increase the development capacity of the north of the plan change.	Relief sought: Extend the Metropolitan Centre zoning and sub-precinct A to incorporate sub-precinct E. Consequential amendments to Precinct Plan 2 will need to be made in line with the NPSUD along with the deletion of provisions relating to sub-precinct E. Waka Kotahi would like to work with the applicant on the detail of these changes in line with the requirements of the NPSUD.	23.4
5	Precinct plans	Sub-precinct B would provide for large format retail, an activity which is not compatible with the applicant's aspiration for a Transit Orientated Development (TOD) focused on a rail station and town centre. The general location of sub-precinct B at the southern end of the plan change is supported (if bulk retail is to be provided) but its scale and proximity to the rail station and town centre represent an inefficient use of land and would not give effect to the proposed objectives and policies.	Relief sought: Reduce the spatial extent of sub-precinct B by 50%. The Sub-precinct B boundary should be moved in a southerly direction.	23.5
6	Precinct plans	The optimal access for the town centre in terms of creating a high-quality TOD as proposed in the plan change is not clear in the submitted assessments and further joint working between the applicant, Waka Kotahi and Auckland Transport is required to consider this issue. Access A and the associated east-west collector which would cut through the town centre is not supported in its current alignment.	Relief sought: Delete 'Access A' from Precinct Plan 3. On Precinct Plan 2, replace 'Access A' between the two yellow lines with a dashed orange line. Update Precinct Plan 2 Legend to say Potential connection to Drury West <u>and possible Access A to State Highway 1.</u> Re-orientate the collector road which is currently shown to extend from Access A from an eastern alignment to a southerly one (i.e. so that it turns south to sub-precinct B).	23.6

		Modifications (deletion) to references to Access A are also requested consequential to other parts of the submission.	
7	IX Precinct description	Subject to other submission points, the Precinct Description is generally supported as it proposes a transit orientated metropolitan centre which includes high density development (with high employment generating activities) at its centre. A range of sub-precincts within the proposed Metropolitan Centre and Mixed Use zones are proposed to implement the transit orientated outcomes. Focus on transit orientated outcomes, active and public transport with complimentary zonings/sub-precincts is generally supported. Recognitions that upgrades to the transport network will also be necessary is also supported. Some minor amendments are proposed to refine the Precinct Description.	<p>Retain with amendments:</p> <p>The purpose of the Drury Centre Precinct is to provide for the development of a new, comprehensively planned and transit-orientated <u>high-density</u> centre at Drury that supports a quality compact urban form.....</p> <p>Relief sought:</p> <p>Sub-precinct B is zoned Business – Metropolitan Centre Zone and is intended to be the primary <u>only</u> location for large format retail, while also providing for other commercial and residential activities allowed in the zone. Development in this sub-precinct should ensure that a quality street environment is achieved;</p>
8	IX.2 Objective 1	The objectives refer to high density development being 'close to' rapid transit but this should be expanded to all land within walking distance to ensure consistency with the NPSUD.	<p>Retain with amendments:</p> <p>(1) Drury Centre is a transit-orientated development that supports high density residential, employment-generating and retail activities close to <u>within walking distance of</u> rapid transit and prioritises public and active modes of transport to and within the centre.</p>
9	IX.2 Objective 3	The objectives are generally supported as they provide for transit orientated outcomes, active and public transport, appropriate infrastructure and the safe and efficient operation of the transport	<p>Retain with amendments:</p> <p>(3) Development of the Drury Centre creates a distinctive sense of place <u>through delivery of high density activities and a mix of uses</u>, including by incorporating distinctive natural and built site features, responding to landform and respecting Mana Whenua values.</p>

23.7

23.8

23.9

		network. However, they should be expanded to include recognition of the need to implement the development envisioned in the plan change documents.		
10	IX.3 Policies 1, 2, 3 and 9	Policies 1 and 3 are supported as they seek to focus high density retail, commercial, community and residential activities within sub-precinct A and other high density and intensive residential and employment opportunities to support sub-precinct A and the Drury Rail Station. Policy 2 needs to be amended to clarify that it is the only location for large format retail.	Retain with amendments: (2) Recognise that sub-precinct B will be the primary <u>only</u> location for large format retail activities.	23.10 23.11 23.12 23.13
11	IX.3 Policy 4	Policy 4 is generally supported as it will encourage active and public transport outcomes but it needs to be amended to ensure that connections are provided in tandem with development.	Retain with amendments Provide for attractively designed, safe and direct access to the Drury Central train station, with a particular focus on pedestrians and cyclists <u>at the same time as land use development.</u>	23.14
12	IX.3 Policies 5, 6 and 7.	These policies are supported as they will promote street and built form which supports provision of active and public transport and an integrated transport network.	Retain as notified.	23.15 23.16 23.17
13	IX.3 Policy 15	The timely provision of infrastructure is supported.	Retain as notified.	23.18
14	IX.3 Policy 17	Policy 17 is generally supported as it will encourage active and public transport outcomes. An amendment is proposed to ensure that connections are provided in tandem with development.	Retain with amendment: (17) Provide for the staging of pedestrian and cycling connections to the Drury Central train station to encourage the use of public and active modes of transport <u>at the same time as land use development.</u>	23.19
15	IX.4.1 (A1)	Support requirement for resource consent for new public and private roads as this will enable a suitable assessment be made.	Retain as notified.	23.20
16	IX.4.1 (A5), (A6), (A8) and (A9)	The provisions are opposed for the following reasons.	Consequential amendments and deletions which respond to Waka Kotahi's submission in its entirety.	23.21

		<p>a. Monitoring the thresholds would be extremely difficult and it would be onerous to keep up to date and convey when and what threshold had been reached.</p> <p>b. The thresholds are standard across PC 48, 49 and 50, which adds further confusion determining when these thresholds are reached (or close to being reached).</p> <p>c. The thresholds centre on general vehicle performance, and deficient of public transport or active mode performance criteria. Alternative mode uptake is considered necessary to achieve the overarching trip generation as identified in the ITA</p> <p>d. The threshold criteria assume, the safety upgrades to be undertaken before any new dwellings, retail or commercial development, at the Waihoehoe / Great South Road intersection, will be adequate until to cater for significant development (for example, 62,430m² of retail GFA).</p>	
17	IX.4.1 New provision.	In line with the proposed amendments to the description and policies, large format retail needs to be confined to sub precinct B and listed as a non-complying activity in all other parts of the Precinct.	<p>Retain with amendment:</p> <p>Amend Activity Table to make large format retail a non-complying activity in all sub-precincts except sub-precinct B.</p>
18	IX.5(3) Notification	The provision is opposed as it precludes notification / affected persons approvals for activities within Table E11.4.1. Table	<p>Opposed notified provision; relief sought:</p> <p>Either:</p> <p>Delete IX.5(3); or</p>

23.22

23.23

		E11.4.1 includes public and private roads (A1) and non-compliance with standards IX6.2 and 6.3 (transport upgrades and trip generation limits). Waka Kotahi opposes this provision as it would preclude its consideration as an affected party for activities which may affect the provision or operation of transport infrastructure.	Modify IX.5(3) to ensure that Activity E11.4.1(A1) (new public or private roads) and infringements to standards IX6.2 and 6.3 (transport upgrades and trip generation limits) are subject to normal notification tests.	23.23
19	IX.6 Standard (2)(b)	The provision recognises E27.6.1(2)(d) which provides an 'exemption' from further assessment where there are requirements to consider transport, traffic or trip-generation effects within zone or precinct rules. The provision is supported on basis that transport, traffic or trip-generation provisions are retained in the precinct and that no permitted activities are enabled.	Retain as notified on basis that transport, traffic or trip-generation provisions are retained in the precinct and that no permitted activities are enabled.	23.24
20	IX.6.2(2) Staging of Development with Transport Upgrades	The definition of dwelling and retail/commercial floorspace is supported as it provides a clear description of GFA to be included within application of Table IX.6.2.1.	Retain as notified.	23.25
21	IX.6.2 <i>Note</i> following (3) Staging of Development with Transport Upgrades	The purpose of the italicised <i>Note</i> following provision IX.6.2(3) is uncertain.	Delete provision.	23.26
22	IX.6.2(3) Staging of Development with Transport Upgrades	The design and directional flow of Access A is currently uncertain therefore it is difficult to make assumptions as to its effects as identified in Table IX.6.2.2.	Delete provision and consequential deletion of Table IX.6.2.2.	23.27
23	IX.6.2.1 Table for Development with 'Access A' not constructed	The transport upgrades described in the right-hand column (<i>Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds</i>) of the	Retain with amendment: Provide more specificity as to the details of works required in the right hand column by including upgrade details listed in Table 8.1 ¹ , column headed <i>Revised (2020) Modelling – Infrastructure Upgrades Required</i> .	23.28

¹ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

		Table require more specificity to ensure that the proposed outcomes are clear for future plan uses and able to be delivered.	
24	IX.6.2.2 Table for Development with 'Access A' constructed	The transport upgrades described in the right hand column (<i>Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds</i>) of the Table require more specificity to ensure that the proposed outcomes are clear for future plan uses and able to be delivered.	Retain with amendment: Provide more specificity as to the details of works required by including upgrade details listed in Table 8.1 ² , column headed <i>Revised (2020) Modelling – Infrastructure Upgrades Required</i> .
25	IX.6.3 Trip Generation Limit including Tables IX.6.3.1 and IX.6.3.2	<p>The provisions intention is supported, however the ability to implement these (particularly calculating trip generation thresholds) across multiple landowners, development stages and three plan changes (PC48, 49, 50) is highly uncertain and would result in significant and ongoing compliance requirements.</p> <p>An alternative approach is proposed to ensure the operation of the transport network and timely provision of transport infrastructure relative to subdivision and development. However, these methods are not the only potential solutions to this issue and Waka Kotahi will work with all parties to agree the most appropriate method. Amendments are sought which include:</p> <p>(a) a provision which ensures a Level of Service of no less than LOS E at the Great South Road/ Waihoehoe Road Intersection; and</p>	<p>Delete IX.6.3 Trip Generation Limit including Tables IX.6.3.1 and IX.6.3.2.</p> <p>Replace with provisions which provide for operational requirements and more specific transport network responses. Potential wording could include a new permitted activity standard with non-compliance being a restricted discretionary activity (consequential changes to Activity Table IX.4 would be required).</p> <p>Restricted discretionary activity assessment criteria/matters of discretion could include transport network improvements.</p> <p>An alternative compliance pathway would be for an applicant to propose and undertake transport network improvements to maintain LOS E i.e. comply (noting that all development requires consent so compliance could be considered as part of this process).</p> <p><u>IX.6.3 Transport Infrastructure Development and subdivision to comply with the following:</u></p> <p>(a) <u>Great South Road/ Waihoehoe Road Intersection Operation:</u></p> <p>(i) <u>Where the baseline intersection operation is at Level of Service E (LOS E) or better at the time of application, no subdivision or development shall generate traffic movements which result in:</u></p> <p>1) <u>a Level of Service of less than LOS E; or</u></p> <p>2) <u>have a degree of saturation higher than 95%.</u></p>

23.29

23.30

² Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

		(b) provides a range of improvements which may be required to ensure LOS E. The proposed range of transport network improvements would reflect those from Table 8.1 ³ .	(ii) <u>Where the baseline intersection operation is at Level of Service F (LOS F) at the time of application, no subdivision or development shall generate traffic movements which results in:</u> 1) <u>degrees of saturation of more than the base line scenario, or</u> 2) <u>delays of more than 10% greater than the baseline scenario.</u> Other relief would include additional provisions which outline transport upgrades to be considered (as listed in Table 8.1 ⁴). Waka Kotahi would like to work with the applicant on this proposal.	23.30
26	IX.6.3.1 Table for Development with 'Access A' not constructed and IX.6.3.2 Table for Development with 'Access A' is constructed	If the relief in point 25 is not accepted; for both Tables, the transport upgrades described in the right-hand column (<i>Transport Upgrades Required to Exceed the Trip Generation Thresholds</i>) require more specificity to ensure that the proposed outcomes are clear for future plan uses and able to be delivered.	Retain with amendment if submission point 25 not accepted: Provide more specificity as to the details of works required in the right hand columns of both Tables by including upgrade details listed in Table 8.1 ⁵ , column headed <i>Revised (2020) Modelling – Infrastructure Upgrades Required</i> .	23.31
27	IX.6.3 Note following provision (2)	The purpose of the italicised <i>Note</i> following provision IX.6.3 (2) is uncertain.	Delete provision.	23.32
28	IX.8.1 Matters of discretion (1)	The matters of discretion are supported and one further additional matters proposed to ensure that the relevant road controlling authority outcomes are considered.	Support with amendment. <i>(1) Development of public and private roads:</i> <i>(a)....</i> <i>(d)...</i> <i>(e) the outcome of engagement with the relevant road controlling authority.</i>	23.33
29	IX.8.1 Matters of discretion (5)	The matters of discretion are supported and one further additional matters proposed to ensure that the relevant road controlling authority outcomes are considered.	Support with amendment. <i>(5) Development or subdivision that does not comply with Standard IX.6.2 Staging of Development with Transport Upgrades but complies with Standard IX.6.3 Trip Generation Limit:</i>	23.34

³ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

⁴ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

⁵ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

			<p>(a)...</p> <p>(b)...</p> <p>(c)...</p> <p><u>(d) the outcome of engagement with the relevant road controlling authority.</u></p> <p><u>(e) the utilisation of the development potential of the site (including its mix of uses) and its correlation with the public transport accessibility of the site.</u></p>	23.34
30	IX.8.2(1) Assessment criteria	The assessment criteria are supported and one further additional matters proposed to ensure that the relevant road controlling authority outcomes are considered.	<p>Support with amendment.</p> <p>(1) Development of public and private roads: Location of roads</p> <p>(a) ...</p> <p>(e)(iii) Development in Sub-Precincts C and E provides for a direct and legible connection to the Drury Central train station via Drury Boulevard and any connecting local or collector roads and/or open spaces.</p> <p><u>Road Controlling Authority</u></p> <p><u>(f) how the outcome of engagement with the relevant road controlling authority has been responded to.</u></p>	23.35
31	IX.8.2(5) Assessment criteria	The assessment criteria are supported and one further additional matters proposed to ensure that the relevant road controlling authority outcomes are considered.	<p>Support with amendment:</p> <p>(5) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit:</p> <p>(a)...</p> <p>(d)...</p> <p><u>(e) how the outcome of engagement with the relevant road controlling authority has been responded to.</u></p>	23.36

22 October 2020

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

By email to: unitaryplan@aucklandcouncil.govt.nz

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PLAN, CHANGE OR VARIATION (FORM 5)
Plan Changes 48 and 50

NAME OF SUBMITTER:
KiwiRail Holdings Limited (KiwiRail)

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KiwiRail Submission on Auckland Unitary Plan Operative in Part Plan Changes 48 and 50

KiwiRail is the State-Owned Enterprise responsible for the management and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services within New Zealand. KiwiRail is also the requiring authority for land designated "Railway Purposes" (or similar) in district plans throughout New Zealand.

KiwiRail is interested in Plan Changes 48 and 50 (Plan Changes) for several reasons;

1. Both Plan Change areas lie adjacent to the one of New Zealand's key main railway lines, the North Island Main Trunk line (**NIMT**), which carries both rail freight traffic and Metro passenger services and which forms part of the golden triangle network for rail freight between Auckland, Tauranga and Hamilton. KiwiRail seeks to protect the railway corridor to enable its ongoing use for operational purposes.
2. KiwiRail has commenced planning and design work for the Papakura to Pukekohe electrification (P2P) project as well as the platforms, signals and electric structures for three new Drury stations. The investment will extend the electrified rail network from Papakura to Pukekohe, and include a range of supporting network upgrades:
 - Electrification of 19km of track, including installation of overhead equipment (OLE), new traction power feed and signalling upgrades.
 - Potential lowering of tracks at a number of road overbridges (including SH1 Drury Interchange) to provide sufficient clearance for the OLE.



- Provision of two additional platform faces and stabling for twelve 3-car Electric Multiple Units at Pukekohe.
 - Passive provision for future construction of three new Drury stations and additional tracks.
 - Safety enhancements at level crossings.
3. The NZUP programme allocated \$247m to KiwiRail to build new Drury stations including station structures, access and parking, by 2024. KiwiRail is working closely with the Te Tupu Ngatahi Supporting Growth Programme in planning designations to enable the transport system to be protected and delivered over both the short and longer term. In particular, the Drury Central railway station is included in the New Zealand Upgrade Programme (NZUP), with work expected to start in 2023.
4. The scope of KiwiRail's submissions relate to the protection of the NIMT and efficiency of the railway works and stations to operate. KiwiRail shares the objectives of ensuring that the railway corridor and station facilities are fully integrated into both the urban landscape and local road, public transport, walking and cycling networks, and that appropriately located, well designed and multi-mode transport opportunities are enabled and encouraged.

KiwiRail's specific submissions on the Plan Changes are covered in the following submission sheets:

- Plan Change 48 (Private) Drury Centre Precinct: Applicant Kiwi Property
- Plan Change 50 (Private) Waihoehoe Precinct: Applicant: Oyster Capital

KiwiRail supports the Plan Changes, subject to the matters raised in this submission being appropriately addressed to ensure that any adverse effects of the proposal on the transport network can be adequately avoided or mitigated.

KiwiRail has coordinated its submissions with those of other local and government agencies.

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

KiwiRail wishes to speak to our submission and will consider presenting a joint case at the hearing with other parties who have a similar submission.

If you have any queries, please don't hesitate to contact me.

Yours faithfully,



Pam Butler
Senior RMA Advisor
KiwiRail

22 October 2020



Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 48 Drury	Relief Sought (as stated or similar to achieve the requested relief)	
Plan Change 48 (Private) Drury Centre Precinct				
IX.1 Project description	Seek amendment	<p>Does not allow for appropriate precinct specific controls to address adverse effects on the North Island Main Trunk railway line (NIMT)</p> <p>The Plan Change seeks to bring forward both a metropolitan centre zone, business mixed use and open space zones. The use of precincts in the AUP OP is to "enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling". This has not been achieved.</p> <p>While all the relevant overlay, Auckland-wide and zone policies apply to the precinct the lack of any specific controls are an inadequate response to the intrinsic qualities and physical characteristics of the site and area, including the location of the existing NIMT, which runs through the north western portion of the Plan Change area</p> <p>The NIMT is one of New Zealand's key railway lines. This line is operated and maintained 24/7. There are no provisions, including objectives, seeking to ensure that development within the precinct addresses the operational effects of the adjacent railway corridor on receivers or reverse sensitivity effects on the NIMT. The railway can generate noise effects above what might be usually anticipated by residential receivers.</p> <p>It is noted that the Drury South Industrial and Mixed Use Precinct in Plan Change 46 included measures to manage the effects of quarrying activities on the precincts more sensitive receivers with policies and standards (I410.6.4 Sub-Precinct C (Noise and Ventilation) which sought to protect activities sensitive to noise from unreasonable levels of land transport noise. This provides an example of precinct controls that provide provisions to address constraints for new development within their boundaries. It is not unreasonable that provisions be made to address potential adverse effects experienced in neighbouring land uses. Kiwirail has had recent success seeing a developer add similar controls with a development for residential activities in Te Kauwhata.</p> <p>Inconsistent with other objectives and policies of the AUP OP</p> <p>The Plan Change does not address the Plan Change area's development with reference to its effects on the NIMT. Accordingly, it is inconsistent with the direction of Plan Policy B2.3.2 of the AUP OP which seeks to;</p> <p>"(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following:"</p> <p>It is also inconsistent with the objective B2.4 Residential Growth B2.4.1. Objectives of the AUP OP:</p> <p>"(2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area"</p> <p>And B3.3 Transport B3.3.2 of the AUP OP which provides:</p> <p>"5 (f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure, and</p> <p>(6) Require activities sensitive to adverse effects from the operation of transport infrastructure to be located or designed to avoid, remedy or mitigate those potential adverse effects."</p> <p>Inconsistent with other provisions of the Plan Change</p> <p>Objective IX.2 of the Plan Change requires "Access to the precinct occurs in an effective, efficient, and safe manner and manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network:" This objective accordingly recognises the effects on the state highway network but there is no corresponding objective to recognise, and protect, the NIMT from adverse effects.</p>	<p>Amend IX.1 Precinct Description to add:</p> <p><u>The North Island Main Trunk railway line is protected from reverse sensitivity effects by ensuring that new buildings and activities will be designed and located to manage any adverse effects</u></p> <p>Add new Objective IX.2</p> <p><u>(8) The NIMT is protected from adverse effects, including reverse sensitivity effects, of subdivision, use and development by,</u></p> <p><u>1. setbacks within which incompatible activities will be managed;</u></p> <p><u>2. standards designed to protect noise sensitive receiver's health and amenity.</u></p> <p>Add new policy IX.3</p> <p><u>(XX) Adverse effects on the operation of the regionally significant NIMT and on the health and safety of adjacent development and noise sensitive receivers are managed through setbacks and performance standards.</u></p>	24.1
IX.2 Objectives				24.2
IX.3 Policies				24.3
IX.1 Precinct Description	Seek amendment	<p>The statement in the first paragraph that the "precinct also provides for the highest employment generating activities and retail and residential densities around the future Drury Central train station" does not recognise that the preferred location of the station is planned to be further to the north than that shown on Precinct Plan 2. The</p>	Delete "around" and replace with "in the vicinity of".	24.4

Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 48 Drury	Relief Sought (as stated or similar to achieve the requested relief)												
		<p>retail and residential development may not necessarily be "around" the future Drury Central train station but will be in its vicinity.</p> <p>Sub- Precinct D bullet point refers to the Sub-Precinct that "<i>provides for the establishment of the Drury Central Train Station and associated Park-and-Ride and transport interchange. A public plaza is provided for that will integrate the train station with the centre and will provide a high quality pedestrian experience.</i>" As above, the train station is likely to be in a location further north. In addition, the land proposed by the applicant to be included within Sub-Precinct D is third-party land outside the ownership of the applicants. Accordingly, it is not certain what could be developed within this area and it may be that this land does not form part of the Plan Change area.</p>	Delete the bullet point relating to Sub-Precinct D.	24.5											
Table IX.4.1 Activity	Seek amendment	The reasons for setbacks and noise and vibration criteria are set out below. Activities that do not meet those standards should be classified as restricted discretionary activities to allow the effects of such non-compliances to be assessed on an application by application basis.	Insert new activity (A8) as set out below and renumber existing (A8) to (A20) accordingly New activity (A8): <u>(A8) Development that does not comply with IX.6.9 Setback from NIMT and IX.6.10 Noise Sensitive Activities within 100m of a Rail Network Boundary RD</u>	24.6											
IX.6	Seek amendment	A key concern for KiwiRail is to ensure the safe and efficient operation of the rail network, in particular where neighbouring activities may come into conflict with adjacent land uses. Providing a physical setback for buildings adjoining the railway corridor boundary is a safety control which manages the interface between operations within the railway corridor and activities near the railway corridor i.e. it ensures that site occupants are able to carry out normal residential or business activities, including building maintenance with a reduced risk of coming into contact with the operational railway. A building setback is appropriate to reduce the potential conflict between the safe enjoyment and maintenance of buildings on adjacent properties and activities within the operational rail corridor.	Add to IX.6 Standards a new standard IX.6.9: <u>IX.6.9 Setback from NIMT</u> <u>Buildings must be setback at least 5 metres from any boundary which adjoins the NIMT railway line.</u>	24.7											
IX.6	Seek amendment	<p>The Plan Change does not adequately address noise and vibration effects from the railway corridor. KiwiRail acknowledges that developing and intensifying land near transport corridors is good planning practice. Initiatives to create sustainable and liveable urban development in accordance with national policy documents are fully supported. However, this can bring new occupants close to existing noise and vibration effects areas.</p> <p>A key part of ensuring the safe and efficient operation of the Auckland railway network is ensuring that reverse sensitivity effects on the railway corridor are appropriately mitigated. These effects can arise from the impact of noise and vibration arising from railway operations on nearby residents. It is also widely accepted nationally and internationally that sound and vibration from road and rail networks has the potential to cause adverse health and amenity effects on people living nearby. Railways are generally an accepted part of the urban environment, but many do not appreciate the actual effects of living with rail sound and vibration when they choose to live near existing railway designations. Railway operations occur 24/7 and include maintenance activities.</p> <p>For new buildings being constructed near the railway it is relatively straight-forward to control internal sound and vibration through the building location, design and provision of adequate ventilation systems. Likewise, acoustic screening can be used to achieve reasonable external sound levels. With careful design, future occupants can be protected from the most significant adverse effects associated with railway noise. It is not possible nor appropriate to expect that the railway corridor can mitigate new development, especially at height.</p> <p>Rail noise effects will extend approximately 100m from the railway designation. The plan change process permits a full assessment of noise and vibration effects and given the future potential for rail within the region, it is reasonable that effects on this critical transport infrastructure are addressed under the plan change process in terms of effects on adjacent sites. The noise rules applying within the zone do not take into account railway noise specifically, rather the control is designed to address the noise from activities within the zone which tend to have different characteristics.</p> <p>Regional Policy Statement (RPS) objectives and policies seek to protect infrastructure by setting out issues of regional significance which include urban growth and form and infrastructure, transport and energy. For example, RPS objectives in B2.3.1 relating to 'quality-built environment' and 'infrastructure' and policies in B3.2.2 are relevant to any plan change.</p> <p>The Infrastructure and Noise chapters in the AUP OP build on the RPS with additional objectives:</p>	<p>Add to IX.6 Standards a new standard IX.6.10 to manage potential human health effects from rail noise and vibration where buildings containing noise sensitive activities are located adjacent to the railway corridor as follows:</p> <p> <u>IX.6.10 Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p><u>Indoor railway noise</u></p> <p><u>1. Any new building or alteration to an existing building that contains an activity sensitive to noise where the building or alteration:</u></p> <p><u>(a) Shall be designed, constructed and maintained to achieve indoor design noise levels resulting from the railway not exceeding the maximum values in the following table; or</u></p> <table><tr><td><u>Building type</u></td><td><u>Occupancy/activity</u></td><td><u>Maximum railway noise level LAeq(1h)</u></td></tr><tr><td rowspan="2"><u>Residential</u></td><td><u>Sleeping spaces</u></td><td><u>35 dB</u></td></tr><tr><td><u>All other habitable rooms</u></td><td><u>40 dB</u></td></tr><tr><td><u>Education</u></td><td><u>Lecture rooms/theatres, music studios, assembly halls</u></td><td><u>35 dB</u></td></tr></table>	<u>Building type</u>	<u>Occupancy/activity</u>	<u>Maximum railway noise level LAeq(1h)</u>	<u>Residential</u>	<u>Sleeping spaces</u>	<u>35 dB</u>	<u>All other habitable rooms</u>	<u>40 dB</u>	<u>Education</u>	<u>Lecture rooms/theatres, music studios, assembly halls</u>	<u>35 dB</u>	24.8
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Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 48 Drury	Relief Sought (as stated or similar to achieve the requested relief)															
		<p>"E26.2.1. Objectives</p> <p>(6) Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.</p> <p>E26.2.2. Policies</p> <p>(2) Avoid where practicable, or otherwise remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.</p> <p>E25.3 Noise policies</p> <p>(7) Require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse sensitivity effects on;existing or authorised infrastructure....."</p> <p>The inadequate assessment of onsite amenity (health and therefore of the well-being of people and communities) and reverse sensitivity effects is inconsistent with these objectives and policies. This issue is created by the proposed zone change in close proximity to the operational railway corridor.</p>	<table><tr><td></td><td><u>Teaching areas, conference rooms, drama studios, sleeping areas</u></td><td><u>40 dB</u></td></tr><tr><td></td><td><u>Libraries</u></td><td><u>45 dB</u></td></tr><tr><td><u>Health</u></td><td><u>Overnight medical care, wards</u></td><td><u>40 dB</u></td></tr><tr><td></td><td><u>Clinics, consulting rooms, theatres, nurses' stations</u></td><td><u>45 dB</u></td></tr><tr><td><u>Cultural</u></td><td><u>Places of worship, marae</u></td><td><u>35 dB</u></td></tr></table> <p><u>(b) is at least 50 metres from any railway network, and is designed so that a noise barrier completely blocks line-of-sight from all parts of doors and windows, to all points 3.8 metres above railway tracks</u></p> <p><u>Mechanical ventilation</u></p> <p><u>2. if windows must be closed to achieve the design noise levels in clause 1(a), the building is designed, constructed and maintained with a mechanical ventilation system that</u></p> <p><u>(a) For habitable rooms for a residential activity, achieves the following requirements:</u></p> <p><u>i. provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and</u></p> <p><u>ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</u></p> <p><u>iii. provides relief for equivalent volumes of spill air;</u></p> <p><u>iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and</u></p> <p><u>v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.</u></p> <p><u>(b) For other spaces, is as determined by a suitably qualified and experienced person.</u></p> <p><u>Indoor railway vibration</u></p> <p><u>3. Any new buildings or alterations to existing buildings containing an activity sensitive to noise, closer than 60 metres from the boundary of a railway network:</u></p> <p><u>(a) is designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s vw.95 or</u></p> <p><u>(b) is a single-storey framed residential building with:</u></p> <p><u>i. a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and</u></p> <p><u>ii. vibration isolation separating the sides of the floor slab from the ground; and</u></p> <p><u>iii. no rigid connections between the building and the ground.</u></p>		<u>Teaching areas, conference rooms, drama studios, sleeping areas</u>	<u>40 dB</u>		<u>Libraries</u>	<u>45 dB</u>	<u>Health</u>	<u>Overnight medical care, wards</u>	<u>40 dB</u>		<u>Clinics, consulting rooms, theatres, nurses' stations</u>	<u>45 dB</u>	<u>Cultural</u>	<u>Places of worship, marae</u>	<u>35 dB</u>
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24.8

Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 48 Drury	Relief Sought (as stated or similar to achieve the requested relief)	
			<p>4. <u>A report is submitted to the council demonstrating compliance with clauses (1) to (3) above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise. In the design:</u></p> <p>(a) <u>railway noise is assumed to be 70 LAeq(1h) at a distance of 12 metres from the track, and must be deemed to reduce at a rate of 3 dB per doubling of distance up to 40 metres and 6 dB per doubling of distance beyond 40 metres.</u></p>	24.8
IX.8.1	Seek amendment	Consequential change to accommodate restricted discretionary status if the development does not meet IX6.9 Setback from NIMT and IX6.10 Noise Sensitive Activities within 100m of a Rail Network Boundary	<p>Insert new matters of discretion in IX.8.1 as follows:</p> <p><u>(12) Setback from NIMT and Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p><u>Effects from non-compliance with Standards IX.6.9 and IX.6.10</u></p>	24.9
IX.8.2	Seek amendment	Consequential change to accommodate restricted discretionary status if the development does not meet IX6.9 Setback from NIMT and IX6.10 Noise Sensitive Activities within 100m of a Rail Network Boundary. There are no specific assessment criteria included relating to the railway corridor. The assessment criteria proposed by KiwiRail reflects criteria developed by a Network Utilities industry working group. These include considerations for required mitigation based on how far removed from the rail corridor a building is. The ability to consider applications and the effects arising from reduced mitigation, along with the ability to require written approval from KiwiRail will enable specific circumstances to be taken into account as necessary for each application.	<p>Insert new assessment criteria in IX.8.2 as follows:</p> <p><u>(11) Setback from NIMT</u></p> <p>(a) <u>The size, nature and location of the buildings on the site.</u></p> <p>(b) <u>The extent to which the safety and efficiency of railway operations will be adversely affected.</u></p> <p>(c) <u>The outcome of any consultation with KiwiRail.</u></p> <p>(d) <u>Any characteristics of the proposed use that will make compliance unnecessary.</u></p> <p><u>(12) Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p>(a) <u>Whether the activity sensitive to noise could be located further from the railway corridor</u></p> <p>(b) <u>The extent to which the noise and vibration criteria are achieved and the effects of any non-compliance</u></p> <p>(c) <u>The character of and degree of amenity provided by the existing environment and proposed activity.</u></p> <p>(d) <u>The reverse sensitivity effects on the railway corridor and the extent to which mitigation measures can enable their ongoing operation, maintenance and upgrade.</u></p> <p>(e) <u>Special topographical, building features or ground conditions which will mitigate vibration impacts.</u></p> <p>(f) <u>The outcome of any consultation with KiwiRail.</u></p>	24.10
Drury Centre Zoning Plan Drury Centre Precinct Plan Drury Centre Precinct Plan 1 - Building Height Drury Centre Precinct Plan 3 – Transport	Seek amendment	The land proposed by the applicant to be included within Sub-precinct D is third-party land outside the ownership of the applicants. Accordingly, it is not certain what could be developed within this area and it may be that this land does not form part of the Plan Change area. In that case the listed maps would need to be amended to remove this land from the Plan Change area.	<p>Remove the land within Sub-precinct D from the listed plans.</p> <p>In addition, remove the reference to Sub-precinct D from the legend in Precinct Plan 1.</p>	24.11

Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 48 Drury	Relief Sought (as stated or similar to achieve the requested relief)
Staging Boundary			
Precinct Plan 2 - Spatial features	Seek amendment	<p>The location and/or design of the train station should be determined by the designation process to be undertaken by KiwiRail. The 'train station' and 'Station Plaza' locations do not recognise that the preferred location of the station is further to the north.</p> <p>In addition, the land proposed by the applicant to be included within Sub-Precinct D is third-party land (outside the ownership of the applicants). Accordingly, it is not certain what could be developed within this area and it may be that this land does not form part of the Plan Change area.</p>	<p>Move the 'future train station' and 'Station Plaza' symbols to the preferred location further north.</p> <p>In addition, annotate Precinct Plan 2 to make it clear that the 'future train station' and 'Station Plaza' are shown as indicative only. For ease of readership it would be preferable to have two legends, one for indicative features and one for confirmed features on Precinct Plan 2.</p> <p>Remove the land within Sub-Precinct D from the Plan Change area.</p>
Plan Change provisions	Seek amendment	The land proposed by the applicant to be included within Sub-precinct D is third-party land outside the ownership of the applicants. Accordingly, it is not certain what could be developed within this area and it may be that this land does not form part of the Plan Change area.	Any consequential changes to the Plan Change provisions to give effect to the relief sought above.

24.12



Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 50 (Private) Waihoehoe	Relief Sought (as stated or similar to achieve the requested relief)
Plan Change 50 (Private) Waihoehoe Precinct			
IX.1 Precinct description IX.2 Objectives IX.3 Policies	Seek amendment	<p>Does not allow for appropriate precinct specific controls to address adverse effects on the North Island Main Trunk railway line (NIMT)</p> <p>The Plan Change seeks to add a new Waihoehoe Precinct, with two sub precincts A and B within it to be zoned THAB. The use of precincts in the AUP OP is to "enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling". This has not been achieved.</p> <p>While all the relevant overlay, Auckland-wide and zone policies apply to the precinct the lack of any specific controls are an inadequate response to the intrinsic qualities and physical characteristics of the site and area, including the location of the existing NIMT, which runs the entire length of the Precinct's western boundary. The NIMT is one of New Zealand's key railway lines. This line is used 24/7. There are no provisions, including objectives, seeking to ensure that development within the Precinct addresses the operational effects of the adjacent railway corridor on receivers or reverse sensitivity effects on the NIMT. The railway can generate noise effects above what might be usually anticipated by residential receivers.</p> <p>It is noted that the Drury South Industrial and Mixed Use Precinct in Plan Change 46¹ included measures to manage the effects of quarrying activities on the precinct's more sensitive receivers through policies and standards (I410.6.4 Sub-Precinct C (Noise and Ventilation)) which sought to protect activities sensitive to noise from unreasonable levels of land transport noise. This provides an example of precinct controls that provide bespoke provisions to address constraints and adverse effects for new development within their boundaries. Kiwirail has had recent success seeing a developer add similar controls with a development for residential activities in Te Kauwhata (Waikato District).</p> <p>Inconsistent with other objectives and policies of the AUP OP</p> <p>The Plan Change does not address the Plan Change area's development with reference to its effects on the NIMT. Accordingly, it is inconsistent with the direction of Plan Policy B2.3.2 of the AUP OP which seeks to:</p> <p>"(2) Encourage subdivision, use and development to be designed to promote the health, safety and well-being of people and communities by all of the following: ..."</p> <p>It is also inconsistent with the objective B2.4 Residential Growth B2.4.1. Objectives of the AUP OP:</p> <p>"(2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area"</p> <p>And B3.3 Transport B3.3.2 of the AUP OP which provides:</p> <p>"5 (f) requiring activities adjacent to transport infrastructure to avoid, remedy or mitigate effects which may compromise the efficient and safe operation of such infrastructure, and</p> <p>(6) Require activities sensitive to adverse effects from the operation of transport infrastructure to be located or designed to avoid, remedy or mitigate those potential adverse effects."</p> <p>Inconsistent with other provisions of the Plan Change</p> <p>Objective IX.2 of the Plan Change requires "Access to the precinct occurs in an effective, efficient, and safe manner and manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network." This objective accordingly recognises the effects on the state highway network but there is no corresponding objective to recognise, and protect, the NIMT from adverse effects.</p>	<p>Amend IX.1 Precinct Description to add:</p> <p><u>The North Island Main Trunk railway line, which runs the entire length of the Precinct's western boundary is protected from reverse sensitivity effects by ensuring new buildings and activities will be designed and located to manage any adverse effects</u></p> <p>Add new Objective IX.2</p> <p><u>(5) The NIMT is protected from adverse effects, including reverse sensitivity effects, of subdivision, use and development by:</u></p> <p><u>1. setbacks within which incompatible activities will be managed;</u></p> <p><u>2. standards designed to protect noise sensitive receiver's health and amenity</u></p> <p>Add new Policy IX.3</p> <p><u>(12) Adverse effects on the operation of the regionally significant NIMT and on the health and safety of adjacent development and noise sensitive receivers are managed through setbacks and performance standards.</u></p>
Table IX.4.1 Activity	Seek amendment	<p>The reasons for setbacks and noise and vibration criteria are set out below. Activities that do not meet those standards should be classified as restricted discretionary activities to allow the effects of such non-compliances to be assessed on an application by application basis.</p>	<p>Insert new activity (A5) as set out below and renumber current (A5) and (A6) to (A6) and (A7).</p> <p>New activity (A5):</p>

¹ Submissions closed on 27 August 2020, FS 25/09/2020

Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 50 (Private) Waihoehoe	Relief Sought (as stated or similar to achieve the requested relief)																							
			<u>(A5) Development that does not comply with IX6.7 Setback from NIMT and IX6.8 Noise Sensitive Activities within 100m of a Rail Network Boundary RD</u>																							
IX.6	Seek amendment	<p>A key concern for KiwiRail is to ensure the safe and efficient operation of the rail network, in particular where neighbouring activities may come into conflict with adjacent land uses. Providing a physical setback for buildings adjoining the railway corridor boundary is a safety control which manages the interface between operations within the railway corridor and activities near the railway corridor i.e. it ensures that site occupants are able to carry out normal residential or business activities, including building maintenance with a reduced risk of coming into contact with the operational railway. A building setback is appropriate to reduce the potential conflict between the safe enjoyment and maintenance of buildings on adjacent properties and activities within the operational rail corridor.</p>	<p>Add to IX.6 Standards a new standard IX.6.7:</p> <p><u>IX.6.7 Setback from NIMT</u></p> <p><u>Buildings must be setback at least 5 metres from any boundary which adjoins the NIMT railway line.</u></p>																							
IX.6	Seek amendment	<p>The Plan Change does not adequately address noise and vibration effects from the railway corridor. KiwiRail acknowledges that developing and intensifying land near transport corridors is good planning practice. Initiatives to create sustainable and liveable urban development in accordance with national policy documents are fully supported. However, this can bring new occupants close to existing noise and vibration effects areas.</p> <p>A key part of ensuring the safe and efficient operation of the Auckland railway network is ensuring that reverse sensitivity effects on the railway corridor are appropriately mitigated. These effects can arise from the impact of noise and vibration arising from railway operations on nearby residents. It is also widely accepted nationally and internationally that sound and vibration from road and rail networks has the potential to cause adverse health and amenity effects on people living nearby. Railways are generally an accepted part of the urban environment, but many do not appreciate the actual effects of living with rail sound and vibration when they choose to live near existing railway designations. Railway operations occur 24/7 and include maintenance activities.</p> <p>For new buildings being constructed near the railway it is relatively straight-forward to control internal sound and vibration through the building location, design and provision of adequate ventilation systems. Likewise, acoustic screening can be used to achieve reasonable external sound levels. With careful design, future occupants can be protected from the most significant adverse effects associated with railway noise. It is not possible nor appropriate to expect that the railway corridor can mitigate new development, especially at height.</p> <p>Rail noise effects will extend approximately 100m from the railway designation. The plan change process permits a full assessment of noise and vibration effects and given the future potential for rail within the region, it is reasonable that effects on this critical transport infrastructure are addressed under the plan change process in terms of effects on adjacent sites. The noise rules applying within the zone do not take into account railway noise specifically, rather the control is designed to address the noise from activities within the zone which tend to have different characteristics.</p> <p>Regional Policy Statement (RPS) objectives and policies seek to protect infrastructure by setting out issues of regional significance which include urban growth and form and infrastructure, transport and energy. For example, RPS objectives in B2.3.1 relating to 'quality-built environment' and 'infrastructure' and policies in B3.2.2 are relevant to any plan change.</p> <p>The Infrastructure and Noise chapters in the AUP OP build on the RPS with additional objectives:</p> <p><i>"E26.2.1. Objectives</i></p> <p><i>(6) Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.</i></p> <p><i>E26.2.2. Policies</i></p> <p><i>(2) Avoid where practicable, or otherwise remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.</i></p> <p><i>E25.3 Noise policies</i></p> <p><i>(7) Require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse sensitivity effects on;existing or authorised infrastructure....."</i></p>	<p>Add to I.X.6 Standards a new standard IX.6.8 to manage potential human health effects from rail noise and vibration where buildings containing noise sensitive activities are located adjacent to the railway corridor, as follows:</p> <p><u>IX.6.8 Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p><u>Indoor railway noise</u></p> <p><u>1. Any new building or alteration to an existing building that contains an activity sensitive to noise where the building or alteration:</u></p> <p><u>(a) Shall be designed, constructed and maintained to achieve indoor design noise levels resulting from the railway not exceeding the maximum values in the following table; or</u></p> <table><tr><th><u>Building type</u></th><th><u>Occupancy/activity</u></th><th><u>Maximum railway noise level LAeq(1h)</u></th></tr><tr><td rowspan="2"><u>Residential</u></td><td><u>Sleeping spaces</u></td><td><u>35 dB</u></td></tr><tr><td><u>All other habitable rooms</u></td><td><u>40 dB</u></td></tr><tr><td rowspan="3"><u>Education</u></td><td><u>Lecture rooms/theatres, music studios, assembly halls</u></td><td><u>35 dB</u></td></tr><tr><td><u>Teaching areas, conference rooms, drama studios, sleeping areas</u></td><td><u>40 dB</u></td></tr><tr><td><u>Libraries</u></td><td><u>45 dB</u></td></tr><tr><td rowspan="2"><u>Health</u></td><td><u>Overnight medical care, wards</u></td><td><u>40 dB</u></td></tr><tr><td><u>Clinics, consulting rooms, theatres, nurses' stations</u></td><td><u>45 dB</u></td></tr><tr><td><u>Cultural</u></td><td><u>Places of worship, marae</u></td><td><u>35 dB</u></td></tr></table>	<u>Building type</u>	<u>Occupancy/activity</u>	<u>Maximum railway noise level LAeq(1h)</u>	<u>Residential</u>	<u>Sleeping spaces</u>	<u>35 dB</u>	<u>All other habitable rooms</u>	<u>40 dB</u>	<u>Education</u>	<u>Lecture rooms/theatres, music studios, assembly halls</u>	<u>35 dB</u>	<u>Teaching areas, conference rooms, drama studios, sleeping areas</u>	<u>40 dB</u>	<u>Libraries</u>	<u>45 dB</u>	<u>Health</u>	<u>Overnight medical care, wards</u>	<u>40 dB</u>	<u>Clinics, consulting rooms, theatres, nurses' stations</u>	<u>45 dB</u>	<u>Cultural</u>	<u>Places of worship, marae</u>	<u>35 dB</u>
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Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 50 (Private) Waihoehoe	Relief Sought (as stated or similar to achieve the requested relief)
		The inadequate assessment of onsite amenity (health and therefore of the well-being of people and communities) and reverse sensitivity effects is inconsistent with these objectives and policies. This issue is created by the proposed zone change in close proximity to the operational railway corridor.	<p><u>(b) is at least 50 metres from any railway network, and is designed so that a noise barrier completely blocks line-of-sight from all parts of doors and windows, to all points 3.8 metres above railway tracks</u></p> <p><u>Mechanical ventilation</u></p> <p><u>2. If windows must be closed to achieve the design noise levels in clause 1(a), the building is designed, constructed and maintained with a mechanical ventilation system that</u></p> <p><u>(a) For habitable rooms for a residential activity, achieves the following requirements:</u></p> <p><u>i. provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and</u></p> <p><u>ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and</u></p> <p><u>iii. provides relief for equivalent volumes of spill air;</u></p> <p><u>iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C; and</u></p> <p><u>v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.</u></p> <p><u>(b) For other spaces, is as determined by a suitably qualified and experienced person.</u></p> <p><u>Indoor railway vibration</u></p> <p><u>3. Any new buildings or alterations to existing buildings containing an activity sensitive to noise, closer than 60 metres from the boundary of a railway network:</u></p> <p><u>(a) is designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s vw.95 or</u></p> <p><u>(b) is a single-storey framed residential building with:</u></p> <p><u>i. a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and</u></p> <p><u>ii. vibration isolation separating the sides of the floor slab from the ground; and</u></p> <p><u>iii. no rigid connections between the building and the ground.</u></p> <p><u>4. A report is submitted to the council demonstrating compliance with clauses (1) to (3) above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise. In the design:</u></p> <p><u>(a) railway noise is assumed to be 70 LAeq(1h) at a distance of 12 metres from the track, and must be deemed to reduce at a rate of 3 dB per doubling of distance up to 40 metres and 6 dB per doubling of distance beyond 40 metres.</u></p>
IX.8.1	Seek amendment	Consequential change to accommodate restricted discretionary status if the development does not meet IX.6.7 Setback from NIMT and IX.6.8 Noise Sensitive Activities within 100m of a Rail Network Boundary	<p>Insert new matters of discretion in IX.8.1 as follows:</p> <p><u>(4) Setback from NIMT and Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p><u>Effects from non-compliance with Standards IX.6.7 and IX.6.8</u></p>
IX.8.2	Seek amendment	Consequential change to accommodate restricted discretionary status if the development does not meet IX.6.7 Setback from NIMT and IX.6.8 Noise Sensitive Activities within 100m of a Rail Network Boundary. There are no specific assessment criteria included relating to the railway corridor. The assessment criteria proposed in the	<p>Insert new assessment criteria in IX.8.2 as follows:</p>

Proposed Amendment	Support/Oppose/ Seek Amendment	Submission/Comments/Reasons Plan Change 50 (Private) Waihoehoe	Relief Sought (as stated or similar to achieve the requested relief)
		<p>relief sought reflect criteria developed by a Network Utilities industry working group. These include considerations for required mitigation based on how far removed from the rail corridor a building is. The ability to consider applications and the effects arising as a result of an application providing reduced mitigation, along with the ability to require written approval from KiwiRail will enable specific circumstances to be taken into account as necessary for each application.</p>	<p><u>(4) Setback from NIMT</u></p> <p><u>(a) The size, nature and location of the buildings on the site.</u></p> <p><u>(b) The extent to which the safety and efficiency of railway operations will be adversely affected.</u></p> <p><u>(c) The outcome of any consultation with KiwiRail.</u></p> <p><u>(d) Any characteristics of the proposed use that will make compliance unnecessary.</u></p> <p><u>(5) Noise Sensitive Activities within 100m of a Rail Network Boundary</u></p> <p><u>(a) Whether the activity sensitive to noise could be located further from the railway corridor</u></p> <p><u>(b) The extent to which the noise and vibration criteria are achieved and the effects of any non-compliance</u></p> <p><u>(c) The character of and degree of amenity provided by the existing environment and proposed activity.</u></p> <p><u>(d) The reverse sensitivity effects on the railway corridor and the extent to which mitigation measures can enable their ongoing operation, maintenance and upgrade.</u></p> <p><u>(e) Special topographical, building features or ground conditions which will mitigate vibration impacts;</u></p> <p><u>(f) The outcome of any consultation with KiwiRail.</u></p>



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

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



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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Kendyl Sullivan

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

Pukekohe Business Association

Address for service of Submitter

PO Box 1240, Pukekohe 2340

Telephone:

09 910 0137

Fax/Email:

kendyl@pukekohe.org.nz

Contact Person: (Name and designation, if applicable)

Kendyl Sullivan, Pukekohe Business Association Manager

Scope of submission

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

Plan Change/Variation Number

PC 48

Plan Change/Variation Name

Drury Centre Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

Please see attached submission

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

I **support** the specific provisions identified above ☐

I **oppose** the specific provisions identified above ☐

I wish to have the provisions identified above amended

Yes ☒

No ☐

The reasons for my views are:

Please see attached submission

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

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

Decline the proposed plan change / variation ☐

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

Please see attached submission

I wish to be heard in support of my submission ☐

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

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

K7G

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

22/10/2020

Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

Submission on Plan Change 48 – Drury Centre Precinct

Introduction

This submission relates to the group of four plan changes, PC48, 49, 50 and 51, which together seek to rezone land to the east of the existing Drury village. Specifically, our submission relates to PC48 - Drury Centre Precinct, which amongst other things seeks the rezoning of 35ha of land to Business - Metropolitan Centre on the south western edge of the area covered by the plan changes.

We would like to begin by commending the developers on their proactive approach to ensuring future land needs will be met. We are not opposing this approach as such however our concerns are as follows;

1. Our main concern is that the rezoning of the land to Metropolitan Centre will have an adverse impact on Pukekohe's form and function as a satellite town.
2. Secondly, we would question the timing and staging of this proposal. For instance, should this plan change go ahead we would argue that there needs to be a catchment to serve before progressing on a development that will have detrimental impacts to other centres in the surrounding area. At this time the surrounding catchment areas are adequately serviced by surrounding centres; however, we can certainly understand that this centre may be required once residential development begins. 25.1
3. We would also query the necessity of the size and scope of the development. 25.2

The Pukekohe Business Association (PBA) is registered as an Auckland Council BID (Business Improvement District) since 2011, with a formal constitution. Prior to this it was organised as a Business Association.

We operate with a team of three full time staff members including a Town Centre Manager, Events and Promotions coordinator and admin support. We work closely with the Franklin Local Board, for the good of Pukekohe. Over the last 9 years the PBA have advocated strongly on behalf of businesses in Pukekohe to support their continued growth and success whilst also advocating on the need to free up more commercial land for the development of Pukekohe.

Pukekohe is the heart of Franklin and the local service centre for the surrounding area which includes a large catchment area. As such it provides a wide range of services and facilities, including the Council Service Centre, Local Board Office, Police Station, Court, many churches, a library, pools, banks, post office, solicitors, accountants, real estate agencies, budgeting services, recreation centres, theatre/cinema, community theatre, RSA, all within the town. Pukekohe is in many ways operating at a higher level than its satellite town status.

Pukekohe as a satellite town and its role in the future of Auckland

The following vision has been developed for the Pukekohe-Paerata Structure Plan 2019.

New growth areas will enhance Pukekohe as a focal point and place to further support the surrounding rural economy. These areas will offer a range of housing choice and employment opportunities for people at all stages of life. It will be well connected to the wider Auckland and Waikato regions, while protecting and enhancing the natural, physical and cultural values that contribute to Pukekohe's unique character and identity.

To contribute to this vision, we will need to;

- Ensure a high-quality urban environment that people want to live and work in.
- **Provide for local employment opportunities.**

As a satellite town Pukekohe is anticipated to have significant future growth in employment as well as residential growth. A key part of the Pukekohe-Paerata Structure Plan 2019 is to identify a sufficient amount of land for employment opportunities. Feedback received during the preparation of the structure plan also identified that providing sufficient local employment opportunities and reducing the need to commute to work outside the area was very important.

The existing Pukekohe town centre will remain the primary commercial centre and focal point for Pukekohe. **Because of this, and the live zoned future local centre at Paerata Rise, no new additional large centres are required to service the structure plan area.** To service the future population anticipated throughout the structure plan area, the business land demand analysis estimates an additional two centres (approximately 2 to 2.5ha each) will be needed, potentially in north-western and south-eastern Pukekohe.

Local centres mainly provide for local retail, commercial services, offices, food and beverage and appropriately scaled supermarkets. Neighbourhood centres generally provide residents and passers-by with frequent retail and commercial service needs and will usually include activities such as a dairy, chemist, takeaways and small offices.

Impact of a New Metropolitan Centre at Drury

We note that in their report prepared for Kiwi Property, the advocates of PC48, Market Economics state that;

The land use survey has found Pukekohe to be a large centre with a wide and varied range of household sector activity. This includes activity that is likely to serve more localised demand across the surrounding Pukekohe urban area and adjacent rural households, as well as a strong comparison goods core that serves a wider demand across a much more expansive geographic area – oriented towards the south. In addition, it is likely that the geographically expansive draw also meets a substantial portion of non-local demand beyond the comparison goods sector. This is partly due to the absence of major supermarkets and other household core services/infrastructure in many of the surrounding centres across the wider rural area and small urban settlements.

Within this catchment area there are a number of other centres that are likely to concurrently serve shares of demand from the catchment. Pukekohe is the major retail destination within the lower southern part of Auckland and the northern part of the Waikato Region. Most other centres in the area are smaller town, local or neighbourhood centres that primarily serve limited localised demand, with only minor core retail offering.

As a consequence, Pukekohe is currently fulfilling a more Metropolitan Centre retail function within the centres hierarchy. It is likely to be drawing spending from across large geographic distances to meet demand from southern rural fringe Auckland households. This has important implications for the economic efficiency and sustainability of Auckland's retail household travel as consumers are drawn from across extensive geographic areas.

We agree with the basis of most of the above, it is clear Pukekohe is operating at a higher level than its satellite town status and this is due in part to its positioning within the surrounding areas. We have a difference of opinion regarding the economic sustainability of household travel however. Is travel dictated by distance travelled or by time taken to travel? You could argue that someone living in flat bush has a range of options when considering their household needs; Manukau, Botany, Takanini (alongside their neighbourhood centres), but wherever they choose to shop it is likely to taken them at least 15 minutes to get to one of these centres (depending on traffic). Likewise, across Franklin, it takes most people that choose to shop in Pukekohe 15-20 minutes to arrive. We do not consider this to be any less efficient than anywhere else in metropolitan Auckland. Furthermore, by encouraging people in the Franklin and North Waikato region to utilise Pukekohe as their centre we are reducing the congestion on Auckland's motorways and encouraging people to either travel south or remain in the south.

We would also strongly advocate that this makes it even more important to rezone / live zone land in Pukekohe as a priority for business (in the right areas), under the Pukekohe-Paerata structure plan, to retain people working locally and reduce traffic congestion heading north who will shortly have to content with this major development at Drury (with or without a metropolitan centre).

Pukekohe is ideally placed with good access to the golden triangle of Hamilton, Tauranga and Auckland.

Market Economics goes on to state;

*In addition to recognising the need for a centre to support the wider Drury development, Council need to ensure that any adverse impacts on the existing centre network in terms of their ability to provide for people and communities – **in particular impacts on higher order centres are avoided or mitigated.***

We disagree that priority should be based on a hierarchy of centres and should be more focussed on what the centres are providing in terms of services. It is clear that the development at Paerata (expecting to comprise of up to 4500 new homes) feels well sustained with Pukekohe located 5 minutes drive away and with a local neighbourhood centre so we would query the necessity of mitigating impacts on higher order centres when the development at Drury will also impact 'smaller centres' adversely by encroaching on existing catchment areas which are already well provided for.

Market Economics puts forward the following caveats and assumptions when assessing the impact on Pukekohe if the Drury development goes ahead;

In the original estimates of GFA able to be sustained in the Drury Metropolitan Centre, no demand was drawn from the Pukekohe catchment. This assumption is made because currently Pukekohe offers a wide range of comparison retail and hospitality options, these would be replicated at Drury Metropolitan Centre but the main categories of retail would not necessarily be increased. Other than 'newness' and diversity, Drury Metropolitan Centre may not offer significant additions to Pukekohe.

We fail to see how no demand would be drawn from the Pukekohe catchment. As per current spend data, a large proportion of our 'local spenders' come from across the Franklin area. Those located north of Pukekohe will now have the choice to go either south to Pukekohe or east to Drury so there will undoubtedly be an impact and demand on our catchment. In addition to this, replication of the retail and hospitality options may have an adverse impact on the offerings in Pukekohe. Studies

have shown that in the 15-25 year old demographic, that this demographic spends more money on experiences and food. Should Drury have an impact on our local hospitality providers and we suffer loss of tenants, the whole town suffers, as a town centre is not sustained without retail and hospitality. A good example of this is Downtown Tauranga who have suffered substantially with the developments at Bethlehem and Mount Maunganui (all within a 15 minute drive).

Drury Metropolitan Centre draws approximately 16% of the core retail and hospitality spend arising in the Franklin catchment, 3% of the Papakura catchment, 29% of the Drury West and Drury West additional catchment, and almost 50% of the demand from the Drury East catchment.

All of the areas stated above fall within Pukekohe's catchment area according to spend data we receive so we would argue the demand would be higher than anticipated.

Impacts are felt most strongly in the year a competing centre opens. Over time catchment growth often compensates for the retail diversions. In a high growth environment, such as in and around Pukekohe, growth is expected to offset any diverted trade in a very short time frame (1- 2 years at most).

We would be interested in the studies that prove the above statement. We would also argue that Covid has likely had an impact upon this modelling. Furthermore, we have a large number of people that live in Pukekohe but commute out of the area to work. People tend to shop where they work so whilst catchment growth may rise there is no guarantee that this translates into an offset of diverted trade.

Market Economics possibilities;

If Drury Metropolitan Centre is not developed and there is no major centre developed in the Drury FUZ – in other words the local centres in Drury West and the neighbourhood centres are the only ones meeting household needs, demand captured by the Drury Metropolitan Centre (defined in the bullet point above) is distributed across other centres.

In that scenario, Pukekohe Town Centre is expected to capture 60% of the demand that arises out of the Franklin catchment that was attracted to Drury Metropolitan Centre, 50% of demand that arises in Drury West and Drury West additional captured by Drury Metropolitan centre is diverted to Pukekohe, 20% of the Drury East demand, 10% of the Drury South demand and 5% of the captured Papakura demand would be spent at Pukekohe.

The future without Drury Metropolitan Centre is made up from Pukekohe performing its normal role with respect to its catchments and capturing demand that would otherwise have been met at Drury Metropolitan Centre. This is then compared to the 'with Drury Metropolitan Centre' situation.

We would argue another way to view this is to actively encourage the live zoning of land around Pukekohe to provide for this growth as encouraged by the Pukekohe – Paerata structure plan, not encourage a new competing Metropolitan Centre only 15km to the northeast.



Pukekohe Business Association
 PO Box 1240, Pukekohe 2340
 E: info@pukekohe.org.nz P: 09 910 0137


Concluding Comments

It is difficult to see how a competing metropolitan centre would not adversely affect Pukekohe. Whilst we are not diametrically opposed to this plan change, we would argue that the development be in a staged approach as required by residential growth to support and sustain all town centres within its vicinity.

25.1

We would also argue that development and business live zoning at Pukekohe should not be delayed due to this development and there should be no particular priority for centre's based on their classification, it should be on a case by case and impact-based assessment.

25.3

IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of an submission to the
AUCKLAND COUNCIL by
KARAKA AND DRURY LIMITED
in respect of **PRIVATE PLAN**
CHANGE 48 (Drury Centre
Precinct), to the Auckland Unitary
Plan

**SUBMISSION OF KARAKA AND DRURY LIMITED ON
PRIVATE PLAN CHANGE 48 (DRURY CENTRE PRECINCT)**

TO: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
Unitaryplan@auckland.govt.nz

Introduction

1. This submission is made by Karaka and Drury Limited ("KDL" or "the Submitter") on Private Plan Change 48 Drury Centre Precinct ("PPC 48") to the partly operative Auckland Unitary Plan ("AUP").
2. Identical submissions have been lodged by KDL in respect of
 - (a) Private Plan Change 49 Drury East Precinct; and
 - (b) Private Plan Change 50 Waihoehoe Precinct.
3. KDL's position in relation to all three plan changes are the same to the extent that:
 - (a) KDL is neutral, i.e., neither supports nor opposes PPCs 48, 49 and 50; and
 - (b) KDL requests that all plan changes be approved as notified.
4. KDL's only concern in relation to PPC 48 is to ensure that the PPC does not in any way impact on, impede or preclude:
 - (a) The quality of planning outcomes that KDL seeks to achieve for Drury West; or
 - (b) The timing in which those outcomes are delivered.
5. KDL is not a trade competitor for the purposes of PPC 48 and could not gain an advantage in trade competition through this submission.

Context - KDL and MADE - the Auranga development in Drury West

6. KDL is a subsidiary of MADE Group Limited ("MADE") that has put in place the policy and planning framework that has (and will) enable the staged development of a

significant urban community, Auranga, in Drury West. The first two stages of the Auranga development have been authorised as follows:

- (a) Drury Precinct 1 (Auranga A) via PAUP Plan Variation 15 ("PV15) which rezoned an area of approximately 84.6ha in Bremner Road, Drury, from Future Urban to a mix of Mixed Housing Suburban, Mixed Housing Urban, Terraced Housing and Apartment Building and Local Centre zones to facilitate residential development.
 - (b) Drury Precinct Expansion (Auranga B1) via AUP Plan Change 6 ("PC6") re-zoned approximately 83ha of land in Drury West to the immediate west of "Auranga A", known as Auranga B1, from Future Urban to a mix of Mixed Housing Suburban and Mixed Housing Urban to facilitate and support residential development on that land, including providing a precinct plan for the PC6 land within the Drury 1 Precinct.
7. Significant progress has already been made on the first two stages of the Auranga development. The roads have been formed, all other infrastructure is in place, houses have been built and people are living there.

Planning for Drury

8. Over the last five years, significant structure planning and master planning of the Drury West area has been undertaken to ensure that a vibrant, cohesive and compact urban outcome can be achieved for that area. As a result and in accordance with PV15 and PC6, the planning and development of Drury West has largely been completed and is actively underway.
9. Further, KDL has:
- (a) Participated extensively in the development of the Council's adopted Drury Opaheke Structure Plan ("DOSP"); and
 - (b) Worked with the PPC 48, 49 and 50 applicants as part of the Drury Developers Group to test and agree a shared masterplan for the wider Drury-Opaheke area (for both Drury East and Drury West).

Reasons for KDL submission

10. KDL seeks that PPC 48 is approved as notified. That is on the basis that as currently drafted, PPC 48:
- (a) Appropriately gives effect to or has regard to all applicable higher order planning instruments, including the Regional Policy Statement provisions of the AUP.
 - (b) Promotes the sustainable management of natural and physical resources and is not contrary to Part 2 of the Resource Management Act 1991 ("RMA"), to the extent that it would:
 - (i) Ensure that any potential adverse effects are appropriately addressed;
 - (ii) Enable the social, economic and cultural well-being of the community in the Auckland region; and
 - (iii) Meet the reasonably foreseeable needs of future generations.
 - (c) Accords with and would assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 48 provisions relative to other means.

- (d) Would enable quality planning outcomes to be achieved for Drury-Opaheke and Drury West in particular, which are consistent with the DOSP and can be delivered in a timely manner.

Relief sought

11. For the foregoing reasons, KDL seeks the following outcome in relation to PPC 48:

(a) That PPC 48 be approved as notified.

26.1

(b) In particular, that no amendments be made to PPC 48 that would in any way impact on, impede or preclude:

(i) The quality of planning outcomes that KDL seeks to achieve for Drury West; or

26.2

(ii) The timing in which those outcomes are delivered.

12. KDL wishes to be heard in support of its submission.

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

KARAKA AND DRURY LIMITED by its solicitors
and duly authorised agents, Berry Simons



S J Berry

Date: 22 October 2020

Address for service:

Karaka and Drury Limited's address for service in respect of this submission is as follows:

Karaka and Drury Limited
C/- Berry Simons
PO Box 3144
Auckland 1140

T: (09) 909 7316
E: helen@berrysimons.co.nz

22 October 2020

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

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Proposed Private Plan Change 48 – Drury Centre Precinct

Please find attached Auckland Transport's submission on the Proposed Private Plan Change 48 from Kiwi Property No. 2 Ltd.

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

Yours sincerely



Josephine Tam

Principal Planner, Land Use Policy and Planning Central/South

cc:

Barker and Associates Ltd
PO Box 1986
Shortland Street
Auckland 1140

Attention: Rebecca Sanders

Via email: RebeccaS@barker.co.nz

Encl: Auckland Transport's submission on Proposed Private Plan Change 48 – Drury Centre Precinct





**FORM 5 – SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 48
DRURY CENTRE PRECINCT UNDER CLAUSE 6 OF SCHEDULE 1, RESOURCE
MANAGEMENT ACT 1991**

To Auckland Council
Private Bag 92300
Auckland 1142

From Auckland Transport
Private Bag 92250
Auckland 1142

1.0 Introduction

1.1 Kiwi Property No. 2 Ltd (**the applicant**) has lodged a private plan change (**PPC 48 or the plan change**) to the Auckland Unitary Plan: Operative in Part (**AUPOP**) to rezone 95 hectares of land in Drury from Future Urban zone to a mix of Business and Open Space zones. PPC 48 also seeks to introduce a new Drury Centre Precinct for the plan change area.

1.2 Auckland Transport is a Council Controlled Organisation of Auckland Council (**the Council**) and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to contribute to an 'effective, efficient and safe Auckland land transport system in the public interest'¹. In fulfilling this role, Auckland Transport is responsible for:

- a. The planning and funding of most public transport;
- b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle);
- c. Operating the roading network; and
- d. Developing and enhancing the local road, public transport, walking and cycling networks.

1.3 Auckland Transport is part of Te Tupu Ngātahi Supporting Growth (**SG**) which is a collaboration between Auckland Transport and Waka Kotahi NZ Transport Agency (**Waka Kotahi**) to plan and route protect the preferred transport network in future growth areas such as Drury. In reviewing this plan change, Auckland Transport has had regard to the draft Integrated Transport Assessment dated April 2019, which complemented the Drury – Opāheke Structure Plan. The Drury – Opāheke Structure Plan was prepared by the Council and went through a robust process, including three phases of consultation, before being adopted by Auckland Council's Planning Committee in August 2019. The structure plan sets out a pattern of land uses and the supporting infrastructure network for approximately 1921 hectares of Future Urban zoned land around Drury and Opāheke.

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



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

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

2.0 Auckland Transport's submission is:

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

Auckland Plan 2050

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

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

Managing Auckland-wide growth and rezoning

2.4 The high-level spatial pattern of future regional development is represented in the Auckland Plan by the Future Urban zone in the AUPOP and further defined through sub-regional level planning including the Drury – Opāheke Structure Plan, to then be enabled through appropriate plan change processes. At the regional level, PPC 48 and the proposed Drury Centre precinct is one of the major greenfield areas



contributing to the overall growth in transport demands in parallel with the on-going smaller scale incremental growth that is enabled through the AUPOP.

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

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

- 2.6 Guidance on the sequencing and timing of future urban land identified in the Auckland Plan (i.e. “unzoned” greenfield areas of development) was discussed in the Future Urban Land Supply Strategy 2017 (**FULSS**), subsequently incorporated into the updated Auckland Plan in 2018. This document sets out the anticipated timeframes for “development ready” areas over a 30-year period. The FULSS helps to inform infrastructure asset planning and funding priorities, and in turn supporting development capacity to ideally be provided in a coordinated and cost-efficient way via the release of “development ready” land.
- 2.7 The urbanisation of future urban land enabled through plan changes (such as PPC 48) that precedes the wider staging and delivery of planned infrastructure and services requires careful consideration of the transport needs. This includes the requirement for applicants/developers to mitigate the transport effects associated with their developments and to provide transport infrastructure needed to service their developments. In addition, there is the need to provide for strategic transport infrastructure to service the whole growth area identified in FULSS or Supporting Growth network that needs to be brought forward because of their development. Any misalignment between the timing to provide infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is “development ready”.
- 2.8 Addressing the effects arising from development occurring ahead of the provision of the required transport network improvements and services is dependent on funding to support the planning, design, consenting and construction of the transport infrastructure, services and improvements. There is a need to assess and clearly define the responsibilities relating to the required infrastructure and the potential range of funding and delivery mechanisms including the role of applicants/developers, and the financially constrained environment that Auckland



Council and Auckland Transport are operating within. Discussions between the Council, the applicant, other landowners in the Drury area and the Government on this fundamental issue are ongoing, and Auckland Council and Auckland Transport are hopeful that a solution to the infrastructure funding and financing issues can be found. However, at this stage such a solution is not in place.

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

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

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

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

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

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



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

Supporting transport and land use integration opportunities

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

Cumulative effects

- 2.14 Cumulative adverse effects on the transport network can result from multiple developments that may individually have minor effects but in combination with others result in significant effects. In this case, the transport effects of PPC 48 should be considered in conjunction with the potential effects from PPC 49 (Drury East Precinct), PPC 50 (Waihoehoe Precinct), and PPC51 (Drury 2 Precinct). These plan changes have been notified concurrently with PPC 48 and also seek to rezone Future Urban zoned land within the Drury – Opāheke Structure Plan area for urban developments that will potentially start at around the same time. Therefore, these plan changes should be read and considered together. PPC 46 (Drury South) to rezone land in the wider Drury area for urban developments or higher development yields

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



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

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

Assessment and identification of effects and mitigation

- 2.16 In the context of PPC 48, the extent, scale and intensity of potential transport effects and the methods for mitigating these effects will require a combination of both wider strategic transport network connections, upgrades and facilities that are programmed in the Drury – Opāheke Structure Plan area and developer mitigation.
- 2.17 The capacity to address the transport effects of PPC 48 is reliant and dependent on a suite of wider strategic transport network connections, upgrades and facilities that are programmed to support the Drury – Opāheke Structure Plan area. The identification and programming of these transport network improvements is being undertaken as part of the Supporting Growth Programme and is subject to a separate investigation, planning and delivery process. Ideally, these transport network improvements would be in place before the land use development is implemented. The scale of the Supporting Growth Programme means that there will be a lag time relating to the planning, design, consenting and construction of the strategic transport network connections, upgrades and facilities.
- 2.18 Given this inter-dependency on a separate process where there is no certainty around funding for all the identified network improvements, there is a need to consider a range of mitigation methods including the potential deferral of development or a review of land development staging to ensure co-ordination and alignment with the required transport network mitigation.
- 2.19 The above overarching considerations have informed the following specific submission points addressed in Auckland Transport's submission.

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

- 3.1 Auckland Transport's submission seeks to ensure that PPC 48 appropriately manages the effects of the proposal (i.e. the amended provisions and the resulting



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

- Lack of infrastructure funding to support 'out of sequence' development;
- Development triggers / provision of transport upgrades and mitigation;
- State Highway 1 Drury Interchange direct access ('Access A');
- Land use integration with public transport networks;
- Drury Boulevard / Flanagan Road closure / Waihoehoe Road route protection and upgrade;
- Location of Drury Centre rail station and associated Park-and-Ride / station plaza;
- Development of new roads / road cross section / arterial road control;
- Transport effects of large format retail; and
- Noise mitigation.

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

3.3 Although all four plan changes (PPCs 48, 49, 50 and 51) have been notified by the Council at the same time, they are being processed separately. Good planning outcomes, particularly those in relation to the transport network, rely on the need to consider effects of all four private plan changes in an integrated manner to ensure sound and integrated planning and decision making. For this purpose, Auckland Transport's submissions on these four private plan changes should be read and considered along with each other. Copies of Auckland Transport's submissions on PPC 49, PPC 50 and PPC51 are included in **Attachment 2**.

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

4.0 Decisions sought from the Council

4.1 Auckland Transport's primary position at this time is that the Council should decline PPC 48, unless the concerns raised in this submission including the main body and **Attachment 1** are appropriately addressed and resolved.

4.2 **Attachment 1** provides further detail of the decisions sought from the Council, including alternative relief in the event that Auckland Transport's primary relief (that PPC 48 be declined) is not accepted.



4.3 In all cases where amendments to the plan change are proposed, Auckland Transport would consider alternative wording or amendments to the objectives, policies, rules, methods and maps which address the reason for Auckland Transport's submission. Auckland Transport also seeks any further, other or consequential relief required to respond to the reasons for this submission and/or give effect to the decisions requested.

4.4 Auckland Transport is available and willing to work through the matters raised in this submission with the applicant.

5.0 Appearance at the hearing

5.1 Auckland Transport wishes to be heard in support of this submission.

5.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.

Name: Auckland Transport

Signature:

A handwritten signature in black ink, appearing to read 'CR.', is positioned below the 'Signature:' label.

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

Date: 22 October 2020

Contact person: Josephine Tam
Principal Planner

Address for service: Auckland Transport
Private Bag 92250
Auckland 1142

Telephone: 09 448 7271

Email: Josephine.Tam@at.govt.nz



Attachment 1

The following table sets out where amendments are sought to the PPC 48 Drury Centre Precinct provisions and also identifies those provisions which Auckland Transport supports.

Italics = *PPC 48 notified text*

Strikethrough = ~~proposed deletions~~

Bold and underline = **proposed additions**

Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
Lack of infrastructure funding to support 'out of sequence' development	Entire plan change	Oppose	<p>Auckland Transport is concerned that PPC 48 provides no clear indication of how transport infrastructure required to support the plan change proposal would be financed and funded. PPC 48 is reliant on major transport infrastructure projects (i.e. both bulk infrastructure as well as upgrades to existing infrastructure that are not currently built to urban standard or upgrades to operation services) to be provided by third parties, in order to service and support the rezoning of the precinct area from Future Urban zone to a mix of Business and Open Space zones.</p> <p>As outlined in the submission above, the Future Urban zone land in the precinct area is not planned for urbanisation until 2028 and beyond. While a number of the NZUP projects and other wider transport infrastructure improvements have been planned, the Regional Land Transport Plan 2018-2028 has not identified or allocated funding for major transport infrastructure to support the urbanisation in Drury area before 2028.</p> <p>Developments happening ahead of any supporting transport infrastructure being in place is not sound resource management practice and is contrary to, and does not give effect to, the NPS-UD which supports out of sequence only when the funding and delivery of transport</p>	Auckland Transport's primary position at this time is that PPC 48 should be declined unless the reasons for this submission, as outlined in the main body of the submission above and in this table, including Auckland Transport's concerns about the funding, financing and delivery of required transport infrastructure and network improvements and services to support the 'out of sequence' development proposed by this plan change, are appropriately addressed and resolved.

27.1



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>infrastructures/upgrades are available and being provided to support the development. Moreover, uncoordinated transport infrastructure provision will not result in well-functioning urban environments as anticipated by the NPS-UD and will lead to poor land use-transport integration outcomes.</p> <p>Given that there is no certainty around funding and delivery for required infrastructure improvements, if PPC 48 is not declined, there is a need to consider a range of mitigation methods including the potential deferral of development or a review and implementation of land development staging to ensure co-ordination and alignment with the required transport network mitigation.</p>	
Development triggers / provision of transport upgrades and mitigation	Entire Plan Change	Oppose	<p>The aim of the proposed infrastructure threshold and staging rules in PPC 48 is to enable transport infrastructure to be provided in a staged manner to support the rezoning. However, Auckland Transport is of the opinion that the proposed rules are not adequate to address the transport infrastructure funding and provision issues as outlined in the submission above.</p> <p>Auckland Transport believes that pure reliance on development triggers to stage transport infrastructure provision in the absence of a development staging plan will result in piecemeal and uncoordinated development and will not achieve the transit-oriented development outcome this plan change seeks to achieve.</p> <p>More specifically, private vehicle dependencies are likely to occur when large areas of residential land uses are being developed prior to the development of any commercial and employment land uses in the same area. With limited employment land uses in the local area more people will be required to commute to work using private vehicles as</p>	<p>Auckland Transport's primary position at this time is that PPC 48 should be declined unless the transport infrastructure funding and provision concerns identified in the main body of this submission and in this table, including its concerns about reliance on development triggers to stage transport infrastructure provision, are appropriately addressed and resolved.</p> <p>In the alternative:</p> <ul style="list-style-type: none"> (a) Amend the plan change to include alternative mechanisms/provisions (including alternative objectives, policies, rules, methods or maps) to address Auckland Transport's concerns; and/or (b) Include amendments to relevant plan change provisions as required by Auckland Transport and outlined below.



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>opposed to alternative modes of transport (i.e. public transport, walking and cycling). This will in turn undermine the goal of Drury Centre to be developed as a transit-oriented development and that Objective IX.2 (1) as proposed by the applicant is unlikely to be achieved.</p> <p>It is also important to note that the applicant's Integrated Transport Assessment has relied upon a modal shift at around 14% when assessing the overall trip generation potential from the onset. If this is not achieved, then the impacts of the proposal (i.e. the plan change provisions and the resulting anticipated development enabled by these amendments) will be greater than assessed and the timing of the recommended development triggers as stated under the proposed Standards IX.6.2 and IX.6.3 would also be incorrect.</p> <p>Moreover, Auckland Transport is concerned that the proposed rezoning will bring about adverse effects on the existing transport network that will not be fully mitigated through the proposed plan change provisions.</p>	
	IX.1 Precinct Description	Oppose	<p>The proposed precinct description, objectives and policies do not recognise the need for both subdivision and development to be coordinated with the provision (including funding and delivery) of the transport infrastructure and services that are required to support the precinct and connecting it to the wider network. In this respect, these provisions do not give effect to higher order NPS-UD and RPS provisions. Importantly, coordination is required to avoid, remedy and mitigate adverse effects on the transport network and to achieve integration of land use and transportation. Therefore, wording</p>	<p>Amend the Precinct Description as follows:</p> <p><i>The transport network in the wider Drury East area as defined on Precinct Plan 3 will be progressively upgraded over time to support development in the wider area. The precinct includes provisions to ensure that <u>any subdivision and the development of land for business and housing is coordinated with the funding and construction of the transport network upgrades in order to avoid, remedy and mitigate adverse effects on the local and wider transport network necessary to support it.</u></i></p>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought	
	IX.2 Objectives (5) and (6)	Oppose	supporting the above should be explicitly stated in the objectives and policy.	Amend Objectives IX.2 (5) and (6) as follows: (5) Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network. <u>A transport network that facilitates the safe and efficient movement of people, goods and services and manages effects on the safe and efficient operation of the surrounding and wider transport network.</u> (6) Development is supported by appropriate infrastructure. Subdivision and development are supported by the timely and coordinated provision of robust and sustainable transport, stormwater, water, wastewater, energy and communications infrastructure networks.	27.4
	IX.3 Policy (15)	Oppose		Amend Policy IX.3 (15) and add a new policy as follows: (15) Ensure that the timing of <u>subdivision and</u> development in <u>the wider Drury Centre Precinct area as defined on Precinct Plan 3</u> is coordinated with the <u>funding and delivery of</u> transport infrastructure upgrades necessary to <u>avoid, remedy and</u> mitigate the adverse effects of <u>urbanisation development</u> on the <u>safe and efficient operation effectiveness and safety of the immediately surrounding and wider</u> transport network. <u>(x) Avoid any subdivision and development in the wider Drury area as defined on Precinct Plan 3 until the required transport infrastructure is in place.</u>	27.5 27.6
	IX.4.1 Activity table All Sub-Precincts	Oppose		Amend Rules IX.4.1 (A5), (A6), (A8) and (A9) to introduce more onerous activity status for any development and/or subdivision not complying with Standards IX.6.2 Staging of Development and IX.6.3 Trip Generation Limit (such as non-complying activity status).	27.7 27.8



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought						
			<p>required to exceed specified development and trip generation thresholds.</p> <p>Auckland Transport acknowledges the intention of the proposed rules is to manage and mitigate adverse effects of subdivision and development on the transport network, and hence Auckland Transport considers that failure to comply with both standards (i.e. allowing subdivision and development to advance before the required transport upgrades are implemented) will have the potential to result in significant adverse effects on the transport network.</p> <p>Auckland Transport therefore seeks a non-complying activity status for development and subdivision which fail to comply with both Standards IX.6.2 and IX.6.3. This will make sure that such consents can only be granted if the adverse effects will be minor or if the activity will not be contrary to the relevant objectives and policies.</p> <p>Auckland Transport also seeks the combination of Rules IX.4.1 (A8) with (A5), and (A9) with (A6) to avoid duplication.</p>	<p>In the alternative, amend Rules IX.4.1 (A5) and (A6) as follows:</p> <table><tr><td>(A5)</td><td>Development <u>and/or subdivision</u> that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades but complies with Standard IX6.3 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent.</u></td><td>RD</td></tr><tr><td>(A6)</td><td>Development <u>and/or subdivision</u> that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades <u>and</u> or Standard IX6.3 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent.</u></td><td><u>NC</u> D</td></tr></table> <p>As a consequential amendment, delete Rules IX.4.1 (A8) and (A9).</p>	(A5)	Development <u>and/or subdivision</u> that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades but complies with Standard IX6.3 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent.</u>	RD	(A6)	Development <u>and/or subdivision</u> that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades <u>and</u> or Standard IX6.3 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent.</u>	<u>NC</u> D
	(A5)	Development <u>and/or subdivision</u> that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades but complies with Standard IX6.3 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent.</u>	RD							
	(A6)	Development <u>and/or subdivision</u> that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades <u>and</u> or Standard IX6.3 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent.</u>	<u>NC</u> D							
IX.5 Notification	Oppose	IX.5 Notification rules (1) to (3) require non-notification of certain activities. The activities referenced in these rules may have significant adverse effects and it is more appropriate to rely on the standard notification provisions in the Resource Management Act 1991 (RMA).	Amend the IX.5 Notification rules (1) to (3) which require non-notification to require the normal tests for notification under the relevant sections of the RMA.							
IX.6 Standards	Oppose	Standard IX.6 (2)(b) is not required because it is explicitly stated under Rule E27.6.1 (2)(b) that Standard E27.6.1(1) does not apply where development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the	<p>Delete Standard IX.6 (2)(b) as follows:</p> <p>(2) The following zone standards do not apply to activities listed in Activity Table IX.4.1 above:</p> <p>(a) H9.6.1 Building Height</p>							

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			same or similar in character, intensity and scale to those identified in the previous assessment.	(b) E27.6.1 Trip generation
	IX.6.2 Standard	Oppose	<p>Amendment is sought to Standard IX.6.2 (1) to ensure that both subdivision and development are covered.</p> <p>Standard IX.6.2 (2) proposed by the applicant implies that subdivision of vacant lots of 1200m² or greater will not have any impacts on the transport network. However, it is Auckland Transport's view that all subdivision (including vacant lots) and any development of land which precedes a subdivision (e.g. earthworks) will generate construction traffic which can in turn affect both the network capacity and road conditions (e.g. provision of a safe pavement condition). Auckland Transport therefore seeks to amend Standard IX.6.2 (2) to ensure that the requirements under this standard will apply to all subdivision.</p> <p>Auckland Transport seeks to delete Standard IX.6.2 (3). As outlined below, the need for Access A has not been adequately justified, and hence there is no basis for the required transport upgrades to be different with or without Access A. The reference to Table IX.6.2.2 in Standard IX.6.2 (1) will also need to be deleted.</p> <p>Auckland Transport also seeks to delete the note under Standard IX.6.2. This is a consequential amendment which relates to changes sought to Table IX.6.2.1 as outlined below.</p>	<p>Amend Standards IX.6.2 (1) and (2) and delete Standard IX.6.2 (3) and the note as follows:</p> <p><i>IX.6.2 Staging of Development with Transport Upgrades</i></p> <p>(1) Development <u>and subdivision</u> within the area shown on IX.10.3 Precinct Plan 3 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational.</p> <p>(2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for those activities that have <u>are subject to</u> a valid land use <u>and/or building</u> consent or subdivision that <u>is subject to a subdivision consent</u>. that has a 224c certificate for vacant lots less than 1200m².</p> <p>(3) Table IX.6.2.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.3 Drury Centre: Precinct Plan 3. Table IX.6.2.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.3 Drury Centre: Precinct Plan 3.</p> <p><i>Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020 – Transport prepared by the New Zealand Transport</i></p>

27.11



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought								
				<i>Agency are not included in the development thresholds below</i>								
	Table IX.6.2.1	Oppose	<p>Amend Table IX.6.2.1 as follows, <u>including to specify additional transport infrastructure upgrades and network improvements required to be completed (NB: the upgrades / network improvements required for PPC 48 is a matter of ongoing discussion and review – the upgrades / network improvements specified below are those which Auckland Transport has identified to date as needing to be completed, as a minimum, noting also that triggers may change as a result of negotiations with developers and/or additional assessment):</u></p> <p><i>Table IX.6.2.1 Threshold for Development and Subdivision with ‘Access A’ as shown on IX.10.3 Drury Centre: Precinct Plan 3 not constructed</i></p> <table><tr><td>New/ Additional Dwelling Threshold</td><td>New/ Additional Retail GFA Threshold</td><td>New/ Additional Commercial GFA Threshold</td><td>Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds. <u>For the purpose of this Rule, transport upgrades are triggered if any one of these thresholds is not complied with.</u></td></tr><tr><td colspan="3">Prior to any subdivision, new dwellings, retail or commercial development</td><td><ul style="list-style-type: none">Interim safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for pedestrians and cyclists on all approaches.<u>Interim road upgrade of Waihoehoe Road (Great South Road to Fitzgerald Road) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards.</u><u>Full road upgrade of Fitzgerald Road (Waihoehoe Road to Drury Hills Road intersection) meeting a two lane Mixed Collector design standard in accordance with Auckland Transport’s current design standards.</u><u>Interim road upgrade of Waihoehoe Road (Fitzgerald Road to Drury Hills Road intersection) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards.</u><u>Interim reconstruction of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South intersections to dual lane roundabout treatments.</u><u>Construction of the northern end of Drury Boulevard as the primary multi-modal station access.</u></td></tr></table>	New/ Additional Dwelling Threshold	New/ Additional Retail GFA Threshold	New/ Additional Commercial GFA Threshold	Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds. <u>For the purpose of this Rule, transport upgrades are triggered if any one of these thresholds is not complied with.</u>	Prior to any subdivision , new dwellings, retail or commercial development			<ul style="list-style-type: none">Interim safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for pedestrians and cyclists on all approaches.<u>Interim road upgrade of Waihoehoe Road (Great South Road to Fitzgerald Road) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards.</u><u>Full road upgrade of Fitzgerald Road (Waihoehoe Road to Drury Hills Road intersection) meeting a two lane Mixed Collector design standard in accordance with Auckland Transport’s current design standards.</u><u>Interim road upgrade of Waihoehoe Road (Fitzgerald Road to Drury Hills Road intersection) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards.</u><u>Interim reconstruction of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South intersections to dual lane roundabout treatments.</u><u>Construction of the northern end of Drury Boulevard as the primary multi-modal station access.</u>	
New/ Additional Dwelling Threshold	New/ Additional Retail GFA Threshold	New/ Additional Commercial GFA Threshold	Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds. <u>For the purpose of this Rule, transport upgrades are triggered if any one of these thresholds is not complied with.</u>									
Prior to any subdivision , new dwellings, retail or commercial development			<ul style="list-style-type: none">Interim safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for pedestrians and cyclists on all approaches.<u>Interim road upgrade of Waihoehoe Road (Great South Road to Fitzgerald Road) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards.</u><u>Full road upgrade of Fitzgerald Road (Waihoehoe Road to Drury Hills Road intersection) meeting a two lane Mixed Collector design standard in accordance with Auckland Transport’s current design standards.</u><u>Interim road upgrade of Waihoehoe Road (Fitzgerald Road to Drury Hills Road intersection) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards.</u><u>Interim reconstruction of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South intersections to dual lane roundabout treatments.</u><u>Construction of the northern end of Drury Boulevard as the primary multi-modal station access.</u>									

27.11

27.12



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission			Decision Sought
			<u>2,172</u>	<u>39,830m²</u>	<u>22,200m²</u>	<ul style="list-style-type: none"> • <u>Upgrade Waihoehoe Road from two lanes to four lane Arterial (Great South Road to Fitzgerald Road).</u> • <u>Closure of the northern end of Flanagan Road.</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> • <u>State Highway 1 three-laning to Drury.</u> • <u>State Highway 22 widening to Karaka.</u> • <u>Rail Electrification Papakura to Pukekohe.</u> • <u>New Drury Central and West Rail Stations.</u>
			3,406	62,430m ²	34,800m ²	<ul style="list-style-type: none"> • Upgrade of the Waihoehoe / Great South Road intersection to signals. • <u>Upgrade Great South Road to four traffic lanes (Drury Interchange to at least 400m north of Great South Road / Waihoehoe Road intersection).</u> • <u>Upgrade of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South intersections to signals with capacity (on all approaches).</u> • <u>Upgrade Waihoehoe Road from two lanes to four lane Arterial (Great South Road to Fitzgerald Road) in accordance with Auckland Transport's current design standards.</u> • <u>Upgrade State Highway 1 Drury Interchange to double north on-ramp and south bound off-ramps.</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> • <u>State Highway 1 Drury South Interchange.</u> • <u>Mill Road Upgrade (Drury South Interchange to Fitzgerald Road).</u>
			4,640	83,960m ²	46,800m ²	<ul style="list-style-type: none"> • Capacity upgrade of the Waihoehoe / Great South road intersection (western arm only).

27.12



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission			Decision Sought
						<ul style="list-style-type: none"> <u>Additional capacity upgrade of the Waihoehoe / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South signalised interections (on all approaches).</u> <u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u> <u>State Highway 1 three laning Drury to Bombay.</u> <u>Mill Road Full Route.</u> <u>Pukekohe Expressway Full Route.</u> <u>North-South Opāheke Road Full Route.</u>
			6,428	107,650m ²	60,000m ²	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South road interection (on all approaches). <u>Additional capacity upgrade of the Waihoehoe / Great South road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South signalised interections (on all approaches).</u> <u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u> <u>Provision for a third and fourth rail line.</u>
<p>Table IX.6.2.1 sets out the transport upgrades required to enable specified development thresholds to be exceeded (i.e. the number of dwellings and gross floor areas of retail and commercial development), each applying to successively higher development yields. It appears that Table IX.6.2.1 was formulated based on the applicant's modelling outcomes, and Table 8-2 of the applicant's Integrated Transport Assessment and Attachment 3 of the Request for Information Response: Transport. It is concluded in the applicant's Integrated Transport Assessment that the developments are unlikely to have a significant adverse effect on the traffic network, provided that the transport infrastructure required to support the developments is implemented.</p> <p>However, Table IX.6.2.1 as currently drafted is of concern to Auckland Transport for the following reasons:</p> <ul style="list-style-type: none"> It is unclear as to how the proposed development thresholds (by way of number of dwellings and gross floor areas) will be able to capture subdivision. As discussed above, it is Auckland Transport's view that all subdivision (including vacant lots) and any development of land which precedes a subdivision (e.g. earthworks) will generate construction 						

27.12



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>traffic which can in turn affect both the network capacity and road conditions (e.g. provision of a safe pavement condition). Therefore, the transport upgrade requirements should apply to subdivision.</p> <ul style="list-style-type: none"> As proposed by the applicant under Table IX.6.2.1, no transport upgrade except for interim safety upgrades (i.e. safe crossing facilities for pedestrians and cyclists) to the Waihoehoe / Great South Road intersection is required until 3,406 dwellings, 62,430m² of retail GFA or 34,800m² of commercial GFA are developed. This is different to Table 8-2 of the applicant's Integrated Transport Assessment and Attachment 3 of the Request for Information Response: Transport which includes additional transport upgrade requirements at lower development threshold levels. There is lack of mitigation proposed to address construction traffic effects on both the capacity and condition of roads. The pavement condition of both Fitzgerald Road and Waihoehoe Road will require pavement rehabilitation upgrade from the outset in order to safely and effectively accommodate the increased construction related traffic from the development to be enabled through this plan change. Any pavement upgrade should take into account the future requirements of the road and other underground / above ground service renewals. The existing roundabouts at the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road intersections will also require upgrades to support increased traffic volumes and construction related movements. The requirements in relation to Drury Boulevard and closure of Flanagan Road are discussed in detail below. The wider network improvements required to enable each threshold level were not included in Table IX.6.2.1. While the funding and/or programme of a number of these wider works have already been planned, the plan change proposals including the Drury Centre, Drury East, Waihoehoe and Drury 2 Precincts are effectively bringing forward the need for a proportion of the proposed works. To give certainty as to when and what transport upgrades are required to mitigate the associated traffic effects, NZUP projects and other wider network improvements should be included in Table IX6.2.1. This aligns with Table 8-2 of the applicant's Integrated Transport Assessment. <p>Auckland Transport therefore considers that the proposal (i.e. the amended provisions and the resulting anticipated development enabled by these amendments) will have the potential to result in significant adverse effects on the local and wider transport network, unless the above issues are appropriately addressed.</p>	
	Table IX.6.2.2	Oppose	Refer to discussion in relation to Access A below.	Delete Table IX.6.2.2.

27.12

27.13



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
	IX.6.3 Standard	Oppose	<p>The reasons for the amendment sought to Standards IX.6.3 (1) and the deletion of Standards IX.6.3 (2) and the note have been discussed above (refer to submission point in relation to Standard IX.6.2 above).</p> <p>Auckland Transport seeks to include a new clause to provide clear guidance on how compliance with the standard should be determined i.e. by a traffic assessment prepared by a suitably qualified expert.</p>	<p>Amend Standards IX.6.3 (1), delete Standard IX.6.3 (2) and the note, and add a new clause as follows:</p> <p><i>IX.6.3 Trip Generation Limit</i></p> <p>(1) Development <u>and subdivision</u> within the Drury area shown on IX.10.3 Precinct Plan 3 must not exceed the thresholds in Table IX.6.3.1 and Table IX.6.3.2 until such time that the identified infrastructure upgrades are constructed and are operational.</p> <p>(2) Table IX.6.3.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.3 Drury Centre: Precinct Plan 3. Table IX.6.3.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.3 Drury Centre: Precinct Plan 3.</p> <p>Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020 Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below</p> <p><u>(x) A Transport Assessment corresponding to the scale and significance of the proposed activity prepared by a suitably qualified expert must be provided in order to confirm compliance with this standard.</u></p>
	Table IX.6.3.1	Oppose	Amend Table IX.6.3.1 as follows, <u>including to specify additional transport infrastructure upgrades and network improvements required to be completed</u> (NB: the upgrades / network improvements required for PPC 48 is a matter of ongoing discussion)	

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27.15



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought										
			<p><u>and review – the upgrades / network improvements specified below are those which Auckland Transport has identified to date as needing to be completed, as a minimum, noting also that triggers may change as a result of negotiations with developers and/or additional assessment):</u></p> <p><u>Table IX.6.3.1 Trip Generation Limits Threshold for Development with ‘Access A’ as shown on IX.10.3 Drury Centre: Precinct Plan 3 not constructed</u></p> <table><tr><th>Inbound Trip Generation in vehicles per hour (vph)</th><th>Outbound Trip Generation in vehicles per hour (vph)</th><th>Transport Upgrades Required to Exceed the Trip Generation Thresholds</th></tr><tr><td>Prior to any <u>subdivision</u>, new dwellings, retail or commercial development</td><td></td><td><ul style="list-style-type: none">Interim safety upgrade to the Waihoehoe / Great South Road intersection to provide safe crossing facilities for pedestrians and cyclists on all approaches.<u>Interim road upgrade of Waihoehoe Road (Great South Road to Fitzgerald Road) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards.</u><u>Full road upgrade of Fitzgerald Road (Waihoehoe Road to Drury Hills Road intersection) meeting a two lane Mixed Collector design standard in accordance with Auckland Transport’s current design standards.</u><u>Interim road upgrade of Waihoehoe Road (Fitzgerald Road to Drury Hills Road intersection) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards .</u><u>Interim reconstruction of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South intersections to dual lane roundabout treatments.</u><u>Construction of the northern end of Drury Boulevard as the primary multi-modal station access.</u></td></tr><tr><td><u>AM Peak: 1,550</u> <u>PM Peak: 2,390</u></td><td><u>AM Peak: 1,990</u> <u>PM Peak: 1,990</u></td><td><ul style="list-style-type: none"><u>Upgrade Waihoehoe Road from two lanes to four lane Arterial (Great South Road to Fitzgerald Road).</u><u>Closure of the northern end of Flanagan Road.</u><p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p></td></tr></table>		Inbound Trip Generation in vehicles per hour (vph)	Outbound Trip Generation in vehicles per hour (vph)	Transport Upgrades Required to Exceed the Trip Generation Thresholds	Prior to any <u>subdivision</u> , new dwellings, retail or commercial development		<ul style="list-style-type: none">Interim safety upgrade to the Waihoehoe / Great South Road intersection to provide safe crossing facilities for pedestrians and cyclists on all approaches.<u>Interim road upgrade of Waihoehoe Road (Great South Road to Fitzgerald Road) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards.</u><u>Full road upgrade of Fitzgerald Road (Waihoehoe Road to Drury Hills Road intersection) meeting a two lane Mixed Collector design standard in accordance with Auckland Transport’s current design standards.</u><u>Interim road upgrade of Waihoehoe Road (Fitzgerald Road to Drury Hills Road intersection) meeting a two lane Arterial design standard in accordance with Auckland Transport’s current design standards .</u><u>Interim reconstruction of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South intersections to dual lane roundabout treatments.</u><u>Construction of the northern end of Drury Boulevard as the primary multi-modal station access.</u>	<u>AM Peak: 1,550</u> <u>PM Peak: 2,390</u>	<u>AM Peak: 1,990</u> <u>PM Peak: 1,990</u>	<ul style="list-style-type: none"><u>Upgrade Waihoehoe Road from two lanes to four lane Arterial (Great South Road to Fitzgerald Road).</u><u>Closure of the northern end of Flanagan Road.</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p>	
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27.15



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

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission		Decision Sought
					<ul style="list-style-type: none"> • <u>State Highway 1 Drury South Interchange.</u> • <u>Mill Road Full Route.</u> • <u>Pukekohe Expressway Full Route.</u> • <u>Proposed North-South Opāheke Road.</u>
			AM Peak: 3,510 PM Peak: 4,910	AM Peak: 4,020 PM Peak: 4,560	<ul style="list-style-type: none"> • Capacity upgrade of the Waihoehoe / Great South Road intersection (on all approaches). • <u>Additional capacity upgrade of the Waihoehoe / Great South road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South signalised interections (on all approaches).</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> • <u>Third Main Rail Line (Pukekohe to Papakura).</u>
<p>Table IX.6.3.1 sets out the transport upgrades required once specified trip generation limits are met, each applying to successively higher limits. It appears that Table IX.6.3.1 was formulated based on the applicant's modelling outcomes, and Table 8-2 of the applicant's Integrated Transport Assessment and Attachment 3 of the Request for Information Response: Transport. It is concluded in the applicant's Integrated Transport Assessment that the developments are unlikely to have a significant adverse effect on the traffic network, provided that the transport infrastructure required to support the developments is implemented.</p> <p>However, Table IX.6.3.1 as currently drafted is of concern to Auckland Transport for the following reasons:</p> <ul style="list-style-type: none"> • It is unclear as to how the proposed development thresholds (by way of number of dwellings and gross floor areas) will be able to capture subdivision. As discussed above, it is Auckland Transport's view that all subdivision (including vacant lots) and any development of land which precedes a subdivision (e.g. earthworks) will generate construction traffic which can in turn affect both the network capacity and road conditions (e.g. pavement condition). Therefore, the transport upgrade requirements should apply to subdivision. • The applicant has proposed in Table IX.6.3.1 that no transport upgrade except for interim safety upgrade (i.e. safe crossing facilities for pedestrians and cyclists) to the Waihoehoe / Great South Road intersection is required until the inbound trip of 1,890 vph during AM peak and 2,860 vph during PM peak or the outbound trip of 2,340 vph during AM peak and 2,470 vph during PM peak are reached. This is different to Table 8-2 of the applicant's Integrated 					

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>Transport Assessment and Attachment 3 of the Request for Information Response: Transport which includes additional transport upgrade requirements at trip generation limits.</p> <ul style="list-style-type: none"> There is lack of mitigation proposed to address construction traffic effects on both the capacity and condition of roads. The pavement condition of both Fitzgerald Road and Waihoehoe Road will require pavement rehabilitation upgrade from the outset in order to safely and effectively accommodate the increased construction related traffic from the development to be enabled through this plan change. Any pavement upgrade should take into account the future requirements of the road and other underground / above ground service renewals. The existing roundabouts at the Waihoehoe Road / Great South Road and prioritised intersection at Waihoehoe Road / Fitzgerald Road will also require upgrades to support increased traffic volumes and construction related movements. The requirements in relation to Drury Boulevard and closure of Flanagan Road are discussed in detail below. The wider network improvements required to enable each threshold level were not included in Table IX.6.3.1. While the funding and/or programme of a number of these works have already been planned, the plan change proposals (including the Drury Centre, Drury East and Waihoehoe Precincts) are effectively bringing forward the need for such works. To give certainty as to when and what transport upgrades are required to mitigate the associated traffic effects, the NZUP projects and other wider network improvements should be included in Table IX.6.3.1. This aligns with Table 8-2 of the applicant's Integrated Transport Assessment. <p>Auckland Transport therefore considers that the proposal (i.e. the amended provisions and the resulting anticipated development enabled by these amendments) will have the potential to result in significant adverse effects on the local and wider transport network, unless the above issues are appropriately addressed.</p>	
	Table IX.6.3.2	Oppose	Refer to discussion in relation to Access A below.	Delete Table IX.6.3.2.
	IX.8.1 (5) Matters of discretion	Support in principle	Auckland Transport acknowledges that a number of transport upgrade requirements as stated in Tables IX.6.2.1 and IX.6.3.1 fall on third-party land outside the ownership of the applicant but is concerned that this fragmented land ownership will pose risks to the successful delivery of the necessary transport	<p>Amend IX.8.1 (5) as follows:</p> <p>(5) <i>Development and/or subdivision that does not comply with Standard IX.6.2 Staging of Development with Transport Upgrades but complies with Standard IX.6.3 Trip Generation Limit:</i></p>

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>infrastructure to support the proposal. To address this, Auckland Transport seeks to add a new matter of discretion and assessment criteria to require the preparation of a funding agreement.</p> <p>In addition, amendment is sought to ensure that both subdivision and development are covered by these provisions and that Drury East is clearly defined as the area shown on IX.10.3 Precinct Plan 3.</p>	<p>(a) <i>Effects on the transport network consistent with the trips generated by development specified in Table IX.6.3.1 or Table IX.6.3.2;</i></p> <p>(b) <i>The rate of public transport uptake and travel management measures; and</i></p> <p>(c) <i>The coordination of retail, commercial and residential development in <u>within the wider Drury area shown on IX.10.3 Precinct Plan 3; Drury East.</u></i></p> <p><u>(x) The degree of certainty around the provision of required infrastructure upgrades including confirmation of infrastructure funding or other such measures agreed; and</u></p> <p><u>(x) Any mitigation measures or review conditions required to address the effects from development occurring ahead of the required infrastructure upgrades.</u></p>
	IX.8.2 (5) Assessment criteria	Support in principle		<p>Amend IX.8.2 (5) as follows:</p> <p>(5) Development <u>and/or</u> subdivision that does not comply with IX.6.12 Staging of Development with Transport Upgrades but complies with IX.6.23 Trip Generation Limit:</p> <p>(a) <i>Whether the effects of the proposal on the transport network are consistent with the trips generated by development specified in Table IX.6.3.1 or Table IX.6.3.2;</i></p> <p>(b) <i>Whether increased use of public transport provides additional capacity within the <u>local</u> transport network <u>included within the Drury area shown on</u></i></p>

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
				<p>IX.10.3 Precinct Plan 3; including by implementing travel demand management measures.</p> <p>(c) <i>Whether residential development is coordinated with retail and commercial development within the wider Drury East—area identified on Precinct shown on IX.10.3 Precinct Plan 3 to minimise trips outside of the precinct providing additional capacity within the transport network;</i></p> <p>(d) <i>The effect of the timing and development of any transport upgrades;</i></p> <p>(x) <u>Where new, upgrades and/or extensions to transport infrastructure are required, whether infrastructure funding agreements or other agreements exist to ensure that the new, upgraded or extended infrastructure required to service the subdivision and/or development can be funded and delivered; and</u></p> <p>(x) <u>Whether the effects of development proceeding ahead of the required transport upgrades are mitigated by any conditions of consent including those relating to the scale, staging or operation of an activity, review conditions or interim network improvements proposed by the applicant.</u></p>
State Highway 1 Drury Interchange direct access ('Access A')	IX.6.2 and IX.6.3 Standard, Precinct Plans 3	Oppose in part	The proposed Standards IX.6.2 and IX.6.3 set out the transport upgrades required to exceed specified development and trip generation thresholds. The level at which the thresholds are set differs according to whether a direct access to the Drury Centre Precinct from the State Highway 1 Drury Interchange is assumed to be provided (referred to as 'Access A' in Precinct Plan 3).	<p>Delete all reference to 'Access A' under Standards IX.6.2 and IX.6.3.</p> <p>Remove 'Access A' from Precinct Plan 2 and Precinct Plan 3.</p>

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



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>result in the centre being more directly accessible to vehicular traffic, with a less attractive street environment given the need for elevated structures and potentially high traffic volumes traversing the proposed Key Retail Street. This would be contrary to the proposed precinct objectives and policies.</p> <p>Notwithstanding the above construction concerns (and although the Applicant has confirmed that Access A may not necessarily be required to support the transport needs of Drury Centre Precinct), Auckland Transport acknowledges the benefits of providing additional access provisions to enable greater integration, site permeability and network resilience for Drury Centre Precinct and its immediate surrounds. Accordingly, alternative access arrangements would be considered on their individual and collective merit. Any direct/alternative arrangements should include the provisions for public transport and walking and cycling in order to ensure that the precinct's goal of a transit-oriented development can be achieved.</p>	
Land Use Integration with Public Transport Networks	Entire Plan Change	Oppose	<p>Auckland Transport supports transit-oriented developments where these are appropriately located, well designed and multi-modal transport opportunities are enabled and encouraged. In particular, opportunities should be provided for people who live and work within an area so as to reduce the length and/or number of private vehicle trips through the availability of public transport and/or other active modes such as cycling and walking.</p> <p>Auckland Transport believes that transport-land use integration outcomes are a prerequisite to mitigate the effects of urban development. In recognition that rapid transit network stations, such as the Drury Central rail station, are a</p>	<p>The precinct provisions should be amended to better address the following related matters:</p> <ul style="list-style-type: none"> • Define the key transit-oriented development principles, characteristics and outcomes as they apply to the plan change area. • Ensure there is consistency through the suite of precinct provisions in regard to giving effect to the transit- oriented development related outcomes. • Applying appropriate mechanisms in the precinct provisions to support transit-oriented development related outcomes e.g. managing the provision of parking as part of the wider suite of travel demand



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought	
			<p>scarce physical resource, managing and optimising the use of the station through spatial, physical and operational integration of the land use development (enabled by this plan change) is critical. The principles of a transit-oriented development model should therefore underpin the spatial location of infrastructure, prioritisation of transport modes, patterns of land use development and associated development potential/intensity within the plan change.</p> <p>Transit-oriented development is a well understood concept that is characterised by compact developments with moderate to high densities, located within walking distance of a transit station or stop, generally with a mix of residential and non-residential opportunities, designed for pedestrians, that does not exclude vehicles.^[1]</p> <p>The main principles underpinning the transit-oriented development concept can be summarised in terms of the following:</p> <p><u>Urban Structure and Accessibility</u></p> <p>Development is anchored around a transit station or node that ideally provides opportunities for public transport uptake. The barriers to accessibility (e.g. busy roads, areas with safety risks) should be avoided or appropriately mitigated to maximise safety, permeability and connectivity.^[2]</p> <p><u>Density</u></p> <p>Modal shift to public transport is most likely to occur within the walkable catchment of a public transport station or stop</p>	<p>management measures that are applied to transit-oriented development scenarios.</p> <p>In addition:</p> <ul style="list-style-type: none"> • Provide further assessment of the impacts of the proposal on accessibility to and from the Drury Central rail station for all modes including public transport and pedestrian access, focusing on safety, permeability and connectivity to and from the station. • Extend the Business – Metropolitan Centre Zoning west along Flanagan Road. • Include provisions in the plan change to ensure that funding for public transport services (i.e. bus services) is available to support and provide public transport connections between the developments and the Drury Central rail station upon its completion. • Possible amendments to the plan change provisions in order to achieve transit-oriented development related outcomes are outlined below. 	<p>27.20</p> <p>27.21</p> <p>27.22</p> <p>27.23</p>
	IX.1 Precinct Description	Support in principle		<p>Amend the Precinct Description as follows:</p> <p><i>There are five Sub-precincts in the Drury Centre Precinct:</i></p> <ul style="list-style-type: none"> • <i>Sub-precinct A is zoned Business - Metropolitan Centre Zone and contains the primary retail area, Key Retail Main Street and civic and green open spaces. The sub-precinct is the focal point for intensive retail, commercial and civic development, with safe and convenient active transport access to and from the</i> 	27.24



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>and increased density of land use within this catchment supports increased public transport patronage.</p> <p><u>Diversity</u></p> <p>The diversity or range of land use activities located within a defined catchment has the potential to reduce travel distances and vehicle trips with origins/destinations (e.g. housing, offices and institutional activities) being in close proximity and providing opportunities for multi-purpose walking and/or public transport trips as an alternative to private vehicle trips.</p> <p><u>Design</u></p> <p>The functional and amenity-based design of the physical built-form elements within a transit-oriented development (e.g. streets, public transport facilities, buildings and public spaces) can influence and encourage the realisation of transit-oriented development benefits, such as increasing the levels of walking between local destinations and transit stations / stops.</p> <p><u>Parking</u></p> <p>Car parking is discouraged and provided in lower numbers compared to surrounding development (non-transit oriented developments).^[2]</p>	<p><u>Drury Central rail station being enabled and prioritised and pedestrian activity;</u></p> <ul style="list-style-type: none"> Sub-precinct B is zoned Business – Metropolitan Centre Zone and is intended to be the primary location for large format retail, while also providing for other commercial and residential activities allowed in the zone. Development in this sub-precinct should ensure that a quality street environment is achieved <u>with the provision of safe and convenient active transport access to and from the Drury Central rail station being enabled and prioritised;</u> <p>...</p> <ul style="list-style-type: none"> Sub-precinct E is zoned Business – Mixed Use Zone and provides for high density residential and a range of commercial activities that will complement the core centre and maximise the efficient use of land close to the rapid transport network. Eight to ten storey buildings are enabled, and flexible ground floor designs are encouraged in the sub-precinct <u>with the provision of safe and convenient active transport access to and from the rail station being enabled and prioritised,</u> reflecting its close proximity to the Drury Central train <u>rail station;</u>
	IX.2 Objectives (1) and (4)	Support in principle	<p>These transit-oriented development attributes are consistent with transport and land use outcomes sought by Auckland Transport, when implemented in an integrated and appropriate manner in terms of optimising investment in public transport, providing for transport alternatives and managing network impacts and effects.</p>	<p>Amend Objectives IX.2 (1) and (4) and add a new objective as follows:</p> <p>(1) <i>Drury Centre is a transit-orientated development <u>which consists of that supports</u> high density residential, employment-generating and retail activities close to rapid transit and prioritises public and active modes of transport to and within the centre.</i></p>

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought	
			<p>It is important to note that the applicant's Integrated Transport Assessment has relied upon a modal shift (at around 14%) when assessing the overall trip generation potential. This is higher than the 11% modal shift adopted by the Integrated Transport Assessment completed for the Drury – Opāheke Structure Plan. If this is not achieved, then the impacts of the proposal (i.e. the plan change provisions and the resulting anticipated development enabled by these amendments) will be greater than assessed and the timing of the recommended development triggers as stated under Standards IX6.2 and IX.6.3 would also be incorrect (refer to submission points in relation to Standards IX6.2 and IX.6.3).</p> <p>Auckland Transport therefore seeks a more directive approach on how the precinct as a whole will enable and encourage the realisation of a Transit Oriented Development. Amendments are sought to a number of precinct provisions to support this.</p> <p>[1] Refer to GB Arrington, 2007. Transit Oriented Development: Understanding the Fundamentals of TOD</p> <p>[2] Falconer, R and Richardson, E, Rethinking urban land use and transport planning – opportunities for transit-oriented development in Australian cities, Australian Planner, Vol 47, No 1, March 2010.</p>	<p>(4) Drury Centre is <u>a walkable centre, with a street-based environment that provides a high standard of pedestrian amenity, safety and convenience quality pedestrian experience, with a particular emphasis on the Key Retail Street.</u></p> <p><u>(x) The Drury Centre precinct develops and functions in a way which promotes:</u></p> <ul style="list-style-type: none"> <u>travel mode shifts to public and active modes of transport; and</u> <u>a well-connected and legible network of pedestrian and cycling linkages throughout and connecting the precinct to the Drury Central rail station.</u> 	27.26
	IX.3 Policies (4), (7) and (17)	Support in principle		<p>Amend Policies IX.3 (4), (7) and (17) as follows:</p> <p>(4) Provide for attractively designed, safe and direct access to <u>and from</u> the Drury Central train <u>rail</u> station, with <u>the provision of active transport access being prioritised</u> a particular focus on pedestrians and cyclists.</p> <p>(7) Require streets to be attractively designed to appropriately provide for all modes of transport by:</p> <ol style="list-style-type: none"> providing a high standard of <u>pedestrian amenity, safety and convenience</u> for pedestrians in areas where high volumes of pedestrians are expected; and providing for safe separated access for cyclists on arterial and collector roads that link key destinations; and providing a level of landscaping that is appropriate for the function of the street; <u>and</u> 	27.27
					27.28
					27.29



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought				
				<p>d) <i>providing for the safe and efficient movement of public transport and private vehicles.</i></p> <p>(17) Provide for bus, pedestrian and cyclingthe staging of pedestrian and cycling connections to the Drury Central train rail station upon its completion to encourage the immediate use of public and active modes of transport as soon as practically possible.</p>	27.29 27.30			
	IX.4.1 Activity table All Sub-Precincts	Oppose in part		<p>Add a new rule as follows:</p> <table><tr><td><u>(X)</u></td><td><u>Long-term non-accessory parking facilities</u></td><td><u>NC</u></td></tr></table>	<u>(X)</u>	<u>Long-term non-accessory parking facilities</u>	<u>NC</u>	27.31
<u>(X)</u>	<u>Long-term non-accessory parking facilities</u>	<u>NC</u>						
Drury Boulevard / Flanagan Road closure	IX.3 Policies	Oppose in part	<p><u>Drury Boulevard</u></p> <p>The proposed precinct provisions do not adequately recognise and provide for Drury Boulevard as the primary multi-modal access between the precinct and the future Drury Central rail station.</p> <p>The proposed alignment of Drury Boulevard is shown in the Drury Centre Precinct Plan 3. The proposed function of Drury Boulevard is specified in Assessment Criteria at IX.8.2 (1)(e). It appears that the intention of Drury Boulevard is to serve as a primary walking and cycling connection between the precinct and the future Drury Central rail station. This is generally supported by Auckland Transport.</p>	<p>Add two new policies as follows:</p> <p><u>(x) Recognise and provide for Drury Boulevard as the primary multi-modal access between the Precinct and the Drury Central train station.</u></p> <p><u>(x) Require the closure of the northern end of Flanagan Road to provide for the Waihoehoe Road rail bridge replacement, while ensuring safe and efficient access to the Precinct.</u></p>	27.32 27.33			
	Tables IX.6.2.1 and IX.6.3.1	Oppose in part	<p>However, there is no specific requirement on when Drury Boulevard and its access to and from Waihoehoe Road will need to be constructed. It is Auckland Transport’s view that the northern end of Drury Boulevard must be constructed as a prerequisite for any subdivision and/or development in order to ensure the Precinct is accessible and well connected to the</p>	<p>Add the following transport upgrade requirements into Tables IX.6.2.1 and IX.6.3.1 as a prerequisite for any development and/or subdivision:</p> <ul style="list-style-type: none"><u>Construction of the northern end of Drury Boulevard as the primary multi-modal station access;</u> <p>And the following requirement to provide for the Waihoehoe Road rail bridge replacement:</p>	27.34 27.35			



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought	
			future Drury Central rail station. Moreover, Drury Boulevard should be clearly recognised in the precinct policy as a multi-modal access which provides for walking and cycling as well as public transport connections.	<ul style="list-style-type: none"> <u>Closure of the northern end of Flanagan Road.</u> 	27.35
	IX.8.1 (1) Matters of discretion	Oppose in part	<p>Amendments are therefore sought to a number of precinct provisions to support the above.</p> <p><u>Flanagan Road closure</u></p>	<p>Amend IX.8.1 (1)(c) and add a new clause as follows:</p> <p>(c) <u>Location and design, and sequencing of connections to the Drury Central train rail station, in particular the provision of the northern end of Drury Boulevard;</u></p> <p><u>(x) Closure of the northern end of Flanagan Road.</u></p>	27.36
	IX.8.2 (1) Assessment criteria	Oppose in part	<p>The precinct provisions do not identify the need to close Flanagan Road and provide for the planned Waihoehoe Road rail bridge replacement. Instead, the precinct boundary specifically excludes Flanagan Road.</p> <p>The required height, span and widening of the Waihoehoe Road rail bridge will dictate that the northern end of Flanagan Road can no longer connect to Waihoehoe Road.</p> <p>Moreover, from a road safety point of view, the Waihoehoe Road/Flanagan Road intersection is an uncontrolled intersection and its current design is not sufficient to accommodate the construction traffic demands as the precincts develop. From a network planning point of view, the applicant and subsequent developers should be made aware of the required closure of Flanagan Rd early on to ensure that any network planning are well thought out from the outset. Amendments are sought to a number of precinct provisions to support this.</p>	<p>Add two new assessment criteria under IX.8.2(1) as follows:</p> <p><u>(x) Whether the northern end of Drury Boulevard is proposed as the primary multi-modal station access concurrently with the Drury Central rail station; and</u></p> <p><u>(x) Whether the closure of the northern end of Flanagan Road is provided for the Waihoehoe Road rail bridge replacement, while ensuring safe and efficient access to the Precinct.</u></p>	27.37
	IX.10.2 Precinct Plan 2	Oppose in part		<p>Amend IX.10.2 Precinct Plan 2 as follows:</p> <ul style="list-style-type: none"> Include a notation for the northern end of Drury Boulevard as “primary multi-modal station access road”; and Include a notation to close the northern end of Flanagan Road to provide for the Waihoehoe Road rail bridge replacement. 	27.38
Waihoehoe Road route protection	IX.3 Policies	Oppose	The proposed policies do not recognise the importance of Waihoehoe Road as a future arterial road and its function as a multi-modal connection. Auckland Transport considers that two new policies are needed to:	<p>Add two new policies as follows:</p> <p><u>(x) Recognise and protect the route for Waihoehoe Road as a multi-modal arterial which provides for the east-west</u></p>	27.39



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought	
			<ul style="list-style-type: none"> Recognise and protect the route for Waihoehoe Road as a four-lane arterial road (Great South Road to Fitzgerald Road) and two-lane arterial road (Fitzgerald Road to Drury Hills Road intersection) in order to service growth in Drury; and Support the safe and efficient use of Waihoehoe Road for walking, cycling and public transport by restricting direct vehicle access from adjoining properties. 	<p><u>movements between Great South Road and Drury Hills Road intersection.</u></p> <p><u>(x) Restrict direct vehicle access onto Waihoehoe Road to support the safe and efficient operation of the transport network for walking, cycling and public transport.</u></p>	27.39 27.40
	IX.6.5 Standard	Support in principle	<p>Ultimate building setbacks need to reflect the final alignment and width including construction areas of the proposed arterials. Yard requirements need to be applied in addition to the building setback.</p> <p>The proposed building setback standard IX.6.5 is to protect the future corridor for widening of Waihoehoe Road. However, the proposed rule would not be necessary after a notice of requirement has been lodged for the road upgrade.</p>	Amend the building line restrictions to reflect the final alignment and width required and ensure any yard requirements that apply are considered in addition to the building setbacks. The need for IX.6.5 should be reviewed if a notice of requirement is lodged for the upgrade of Waihoehoe Road.	27.41
	IX.11 Appendix 1: Road Cross Section Details	Support in part	<p>Auckland Transport supports the vehicle access restriction proposed on Waihoehoe Road for the reasons as discussed above.</p> <p>Refer below for further discussion of IX.11 Appendix 1.</p>	Retain the vehicle access restriction on Waihoehoe Road as per Rule E27.6.4.1 (3)(c) of the AUPOP.	27.42
Location of Drury Central rail station / station plaza	IX.10.2 Precinct Plan 2	Oppose	IX.10.2 Precinct Plan 2 shows an indicative location of the future rail station and Station Plaza is located adjacent to the rail station. It is noted that the indicative location of both the rail station and Station Plaza as proposed by the applicant is located on third-party land (i.e. a site owned by Watercare) outside the ownership of the applicants. Moreover, the indicative rail station location as proposed by the applicant is	Amend IX.10.2 Precinct Plan 2 as follows: <ul style="list-style-type: none"> Delete the notation of the future rail station; and Delete the notation of Station Plaza. 	27.43
	IX.1 Precinct Description	Oppose		Remove Sub-Precinct D from the plan change area and delete provisions relating to Sub-Precinct D. and provides for the establishment of the Drury Central Train Station and	27.44



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought	
			different to the location indicated in the Drury – Opāheke Structure Plan. It is unclear how this indicative rail station location was determined.	associated Park and Ride and transport interchange. A public plaza is provided for that will integrate the train station with the centre and will provide a high quality pedestrian experience.	27.44
	IX.8.2 (2) Assessment Criteria	Oppose	<p>Auckland Transport acknowledges that the rail station location as shown on Precinct Plan 2 is indicative only. Auckland Transport also acknowledges that flexibility is provided for under the corresponding assessment criteria which seek general accordance with the location shown on Precinct Plan 2. However, it is Auckland Transport's view that the rail station location (and its design) should not be dictated to any extent by the precinct provisions. The location and/or design of the rail station should be determined by the designation process and is subject to a future pending Notice of Requirement.</p> <p>Furthermore, the indicative rail station location and corresponding provisions present some ambiguity:</p> <ul style="list-style-type: none"> The objective of Sub-Precinct D will change substantially if the rail station, park and ride facility and transport interchange were not located where identified in the precinct. The precinct provisions as currently drafted do not include an alternative scenario for Sub-Precinct D. It is unclear how Sub-Precinct D would be developed otherwise and whether any associated effects including those on the transport network have been assessed and considered; 	<p>Amend Assessment Criteria IX.8.2 (2)(a) and delete IX.8.2 (2)(d) and (e) as follows:</p> <p><i>Whether Homestead Park and Station Plaza are is provided in a locations generally consistent with their indicative locations shown on IX.10.2 Drury Centre Precinct Plan 2 and have adequate street frontage to ensure the open spaces are visually prominent and safe;</i></p> <p>...</p> <p>(d) Whether Station Plaza is designed as an open space which will act as a major entrance way to Drury Centre, integrating the train station with the Drury Centre;</p> <p>(e) Whether any buildings or kiosks which locate in the Station Plaza are designed to ensure they do not compromise or dominate the use of the space for public recreational use.</p>	27.45
	IX.8.2 (3)(j) to (m) Assessment Criteria	Oppose	<ul style="list-style-type: none"> Station Plaza is located on third-party land (i.e. a site owned by Watercare) outside the ownership of the applicant. It is unclear whose responsibility it would be to fund and develop the plaza. Auckland Transport acknowledges that the intention of Station Plaza is to act as a major entrance way which integrates the rail station with the precincts (refer to IX.8.2 (2)(d)). However, 	Delete Assessment Criteria IX.8.2 (3)(j) to (m).	27.46



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought		
			Auckland Transport considers it is more important to ensure that the rail station, wherever it is located, is appropriately integrated with the supporting transport network (including active modes, public transport and private vehicle connections). A plaza may or may not be required to achieve this.			
Development of new roads	IX.3 Policies (5) and (6)	Support	Auckland Transport generally supports Policies IX.3 (5) and (6). In particular, Auckland Transport seeks to retain the reference in Policy IX.3 (5) where variation to the location of collector roads is allowed to achieve land use and transport integration but seeks amendments to Policy IX.3 (6) to ensure that subdivision is covered.	Retain Policy IX.3 (5) and retain Policy IX.3 (6) with the amendment noted below: <i>(5) Require collector roads to be generally in the locations shown in IX.10.1 Drury Centre: Precinct Plan 2, while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network.</i> <i>(6) Ensure that development <u>and subdivision</u> provides a local road network that achieves a highly connected street layout and integrates with the collector road network within the precinct, and the surrounding transport network, and supports the safety and amenity of the open space and stream network.</i>		
	IX.4.1 Activity table All Sub-Precincts	Oppose in part	Rule IX.4.1 (A1) as proposed requires the development of public or private road as a restricted discretionary activity. The associated assessment criteria under IX.8.1(1) relate to matters on how and where the roads should be developed as part of the sub-precinct establishments. It appears that the intention of this rule is to capture the development of new roads only. To avoid confusion, Auckland Transport seeks to amend Rule IX.4.1 (A1) by adding the word ‘new’ before public or private road with a note which explicitly states that this rule does not	Amend Rule IX.4.1 (A1) as follows: <table border="1"><tr><td>(A1)</td><td>Development of <u>new</u> public or private road <u>(this rule does not apply to Auckland Transport)</u></td><td>RD</td></tr></table> As a consequential amendment, the same changes are sought to the heading of IX.8.1 (1) matters of discretion and IX.8.2 (1) assessment criteria.	(A1)	Development of <u>new</u> public or private road <u>(this rule does not apply to Auckland Transport)</u>
(A1)	Development of <u>new</u> public or private road <u>(this rule does not apply to Auckland Transport)</u>	RD				

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought			
			apply to Auckland Transport. The requirements of activities within roads and unformed roads by Auckland Transport are covered under E26 the Infrastructure Chapter of the AUPOP.				
	IX.6 Standards and IX.4.1 Activity table All Sub-Precincts	Oppose	The proposed rules and standards do not include any requirements in relation to road vesting. To provide clear direction, Auckland Transport seeks to include a new standard and rule about the requirement of road vesting.	<p>Add a new standard to require the vesting of proposed public roads in all sub-precincts as follows:</p> <p><u>IX.6.X Road Vesting</u></p> <p><u>Proposed public roads (including separated pedestrian and bicycle routes) must be constructed and vested in Council upon subdivision or development of the relevant area at no cost to the Council.</u></p> <p><u>As a consequential amendment, add a new rule as follows:</u></p> <table><tr><td><u>(X)</u></td><td><u>Development and/or subdivision that does not comply with IX.6.X Road Vesting.</u></td><td><u>NC</u></td></tr></table>	<u>(X)</u>	<u>Development and/or subdivision that does not comply with IX.6.X Road Vesting.</u>	<u>NC</u>
<u>(X)</u>	<u>Development and/or subdivision that does not comply with IX.6.X Road Vesting.</u>	<u>NC</u>					
	IX.8.1 (1) Matters of discretion	Support in principle	<p>The proposed matters of discretion do not address the matters of public transport and the location and design of intersections with existing roads. Auckland Transport therefore seeks amendments to IX.8.1 (1)(b) and requests a new clause to ensure that these matters are included.</p> <p>The reasons for seeking amendments to IX.8.1 (1)(c) and addition of a new clause in relation to Flanagan Road closure have been discussed in detail above.</p>	<p>Amend IX.8.1 (1) as follows:</p> <p>(1) Development of <u>new</u> public and private roads:</p> <p>(a) Location and design of the collector <u>roads</u> streets, local <u>roads</u> streets and connections with neighbouring sites and to achieve an integrated street network;</p> <p>(b) Provision of <u>safe and efficient public transport</u>, cycling and pedestrian networks;</p> <p>(c) Location and design, <u>and sequencing</u> of connections to the Drury Central train <u>rail</u> station, <u>in particular the provision of the northern end of Drury Boulevard; and</u></p>			

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
				<p>(d) Matters of discretion IX8.1 (1)(a) - (c) apply in addition to the matters of discretion in E38.12.1.1;</p> <p><u>(x) Location and design of intersections with existing roads; and</u></p> <p><u>(x) Closure of the northern end of Flanagan Road.</u></p>
	IX.8.2 (1) Assessment criteria	Support in principle	<p>The proposed assessment criteria do not include the matters of public transport and the location and design of intersections with existing roads. Auckland Transport therefore seeks to add two new assessment criteria under IX.8.2 (1) to ensure that these matters are included for assessing consent applications for the development of new roads.</p> <p>Auckland Transport seeks to delete Assessment Criterion IX.8.2 (1)(a)(iii) as proposed by the applicant. The constructability of any new roads is already covered by Auckland Transport's TDM and that the requirement for new roads to be delivered by a single landowner is not warranted in terms of managing effects. Therefore, this assessment criterion is not considered necessary and should be deleted.</p> <p>Amendments are sought to Assessment Criteria IX.8.2 (1)(b) and (d) to ensure that the road network is accessible and also well connected.</p> <p>Amendments sought to Assessment Criterion IX.8.2 (1) (c) relates to the amendments sought to IX.11 Appendix 1. Refer below for further discussion of IX.11 Appendix 1.</p> <p>Amendments are sought to the Assessment Criterion at IX.8.2 (1)(e) to remove any ambiguity around when pedestrian and cycle connections to the rail station should be provided. It is Auckland Transport's view that safe and legible pedestrian and</p>	<p>Amend IX.8.2 (1) as follows:</p> <p>(1) Development of new public and private roads:</p> <p>Location of roads</p> <p>(a) The extent to which the collector road network and the Key Retail Street are provided generally in the locations shown on IX.10.X Drury Centre: Precinct Plan 2 to achieve a highly connected street layout that integrates with the surrounding transport network and responds to landform. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:</p> <p>(i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads;</p> <p>(ii) The need to achieve a permeable an efficient block structure and layout within the precinct suitable to the proposed activities; and</p> <p>(iii) The constructability of roads and the ability for it to be delivered by a single landowner.</p>

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought	
			<p>cycle connections to the Drury Central rail station should be incorporated into the overall road network of the Drury Centre Precinct from the outset, regardless of the rail station being operational or not.</p> <p>The reasons for seeking the addition of the new assessment criteria in relation to Drury Boulevard and Flanagan Road closure have been discussed in detail above.</p> <p>Auckland Transport also considers it appropriate that when development is undertaken next to a rural road, the road should be upgraded by developers/applicants to the appropriate urban standard.</p>	<p>(b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility <u>and connectivity</u>, and supports <u>public and active modes of transport</u> and walkable street network. Whether subdivision and development provide for collector roads and local roads to the site boundaries to coordinate with neighbouring sites and support the integrated completion of the network within the precinct over time;</p> <p><i>Design of roads</i></p> <p>(c) Whether the design of collector and local roads are generally in accordance with the <u>minimum road reserve widths and key design elements</u> road cross sections provided in IX.11 Drury Centre: Appendix 1;</p> <p>(d) Whether the layout of the street network provides a good degree of accessibility <u>and connectivity</u>, and supports <u>the development of Drury Centre Precinct as a walkable centre and community street network</u>. As a general principle, the length of a block should be no greater than 180m, and the perimeter of the block should be no greater than 500m;</p> <p>(e) Whether the street network provides safe and legible pedestrian and cycle connections to the operational Drury Central train <u>rail</u> station as development occurs over time. In particular, whether the following is provided, or an alternative is provided that achieves an equal or better degree of connectivity:</p> <p>(i) Development in Sub-Precincts B and F provides for a direct, legible and safe pedestrian and cycle</p>	<p>27.53</p> <p>27.54</p> <p>27.55</p> <p>27.56</p>



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
				<p>connection to the Drury Central train rail station via Drury Boulevard or the Key Retail Street shown on Precinct Plan 12;</p> <p>(ii) Development in Sub-Precinct A provides for a direct, legible and safe pedestrian and cycle connection to the Drury Central train rail station via the Key Retail Street and/or any connecting local or collector roads and/or open spaces;</p> <p>(iii) Development in Sub-Precincts C and E provides for a direct and legible connection to the Drury Central train rail station via Drury Boulevard and any connecting local or collector roads and/or open spaces.</p> <p><u>(x) Whether the layout of the street network supports the provision of a safe and efficient bus network;</u></p> <p><u>(x) Whether the design of collector and local roads includes safe and efficient intersection treatments with existing roads;</u></p> <p><u>(x) Whether the northern end of Drury Boulevard is proposed as the primary multi-modal station access to and from the station;</u></p> <p><u>(x) Whether the closure of the northern end of Flanagan Road is provided for the Waihoehoe Road rail bridge replacement, while ensuring safe and efficient access to the Precinct; and</u></p> <p><u>(x) Where development is adjacent to a rural road, whether the road is to be upgraded to an urban standard.</u></p>

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
	IX.11 Appendix 1: Road Cross Section Details	Oppose in part	<p>Auckland Transport seeks a consistency of approach across private plan change precinct provisions in the use of cross sections which outline the standards to be applied to future road construction. This approach should balance the need for flexibility to respond to changing design standards over time and the need for certainty, particularly where roads have to be constructed over time by a number of developers.</p> <p>Auckland Transport seeks provisions within Precinct Plans which indicate appropriate overall minimum road reserve widths as well as the functional requirements and key design elements for street design. These should be supported by appropriate activity status, matters for discretion and assessment criteria to provide for instances where these provisions are not met.</p> <p>Auckland Transport seeks to replace the range proposed for the corridor and carriageway width with an appropriate minimum road corridor width requirement.</p> <p>The minimum road corridor width required to support the functional requirements and key design elements for each road or road typology should be defined. This width should be informed by the key design elements and functional requirements.</p> <p>Auckland Transport therefore seeks the deletion of the widths identified for carriageway, median, cycle path, street trees, parking, and footpath.</p> <p>Auckland Transport acknowledges the benefits of using rain gardens as a stormwater detention/treatment device. However, the blanket rule of requiring the establishment of rain garden on all roads is not practical and may not necessarily achieve the best environmental outcomes. For example, rain</p>	<p>Delete IX.11 Appendix 1: Road Cross Section Details.</p> <p>Introduce provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and roads which need to be upgraded to urban standards including but not limited to:</p> <ul style="list-style-type: none"> • Carriageway • Footpaths • Cycleways • Public Transport • Ancillary Zone (parking, street trees etc.) • Berm • Frontage • Building Setback • Design Speed <p>As part of new provisions, retain vehicle access restriction provisions, as addressed above.</p>

27.58



Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought
			<p>gardens are not suitable for areas with steep slopes, the volume of stormwater detention and/or runoff reduction can also be limited depending on the size of the rain gardens, and they are known to be expensive to maintain and/or service and hence may not be the most cost-effective solution.</p> <p>Auckland Transport therefore seeks to delete the reference to rain gardens in IX.11 Appendix 1. The relevant stormwater management requirements are covered in E8 and E9 the Stormwater Discharge and Diversion and the Stormwater Quality Chapters of the AUPOP.</p>	
Arterial road control	Entire plan change	Oppose	<p>The AUPOP maps in its controls layer depicts arterial roads. At present, Great South Road and the state highways are the only ones that are annotated in the Drury area.</p> <p>Under Standard E27.6.4.1 of the AUPOP, any vehicle crossings onto arterial roads will require resource consent as restricted discretionary activities and with matters of consideration including effects on the transport network, building frontage, pedestrian priority, pedestrian safety, street and pedestrian amenity.</p> <p>Whilst the precinct plans do indicate future arterials and often have access provisions this does not in itself carry through to the AUPOP maps. Auckland Transport therefore requests that these be added to the AUPOP map layer.</p> <p>There should also be a mechanism to apply them to future arterials as they are created.</p> <p>Retail frontage and commercial frontage controls are also usually mapped to an existing road. In this case if the proposed road ended up in a different location on development, then a plan change would be required to update the precinct plan. Some form of 'floating' control that achieves the same</p>	<p>Seek provisions to add layers to the AUPOP for:</p> <ul style="list-style-type: none"> • Arterial roads within the Precinct area, including Waihoehoe Road; • The purpose of all roads to be shown on the precinct plans. As notified, some existing roads do not have their future role annotated. The AUPOP maps need to specify the future intended classification of these roads; and • Key retail frontage provisions to AUPOP map notations and allow them to float with the indicative roads which may be located differently on development.

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought												
			outcome but moves with the actual location of the road could address this problem.													
Transport effects of large format retail	IX.4.1 Activity Table Sub-Precinct C and E	Oppose	<p>Rule IX.4.1 (A10) as proposed by the applicant provides for department stores with Sub-Precincts C and E as non-complying activities. As proposed under Rule IX.4.1, a number of other commercial and industrial activities that are likely to attract frequent private vehicle movements and large parking demands are also required to seek consent as discretionary or non-complying activities.</p> <p>Policy IX.3 (1) as proposed by the applicant recognises that Sub-Precinct B will be the primary location for large format retail activities. This aligns with the assumption used in the applicant’s Integrated Transport Assessment. As defined by the AUPOP, large format retail is any individual shop tenancy with a floor area greater than 450m² and includes (but not be limited to) department store and supermarket.</p> <p>As proposed by the applicant, department stores will require consent as non-complying activities, but no requirements are proposed on other types of large format retail e.g. supermarket. It is Auckland Transport’s view that all large format retail activities have the potential to generate adverse effects on the transport network and therefore the same effect management approach should apply.</p>	<p>Amend Rule IX.4.1 (A10) as follows:</p> <p><i>Sub-Precinct C and E – Mixed Use</i></p> <table><tr><th colspan="2">Activity</th><th>Activity Status</th></tr><tr><td colspan="3">Use</td></tr><tr><td colspan="3">Commerce</td></tr><tr><td>(A10)</td><td><u>Large Format Retail</u> Department Stores</td><td>NC</td></tr></table>	Activity		Activity Status	Use			Commerce			(A10)	<u>Large Format Retail</u> Department Stores	NC
Activity		Activity Status														
Use																
Commerce																
(A10)	<u>Large Format Retail</u> Department Stores	NC														
Consistency of approach and provisions across Drury private plan changes			Auckland Transport seeks a consistency of approach and drafting across the policies and other provisions contained within the Drury private plan changes provided that this exercise does not adversely affect the outcomes it is seeking.	Make any necessary amendments to PPC 48 as required to achieve a consistency in approach, including in relation to objectives, policies, rules, methods and maps, across the private plan changes within the Drury growth area												

27.62

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Issue	Relevant Precinct Provision	Support / Oppose	Reasons for Submission	Decision Sought				
Noise Mitigation	IX.3 Policies	Oppose in part	These additions seek to ensure that noise-sensitive activities in proximity to arterial roads are controlled to address potential health and reverse sensitivity effects.	Add a new policy as follows: <u>Ensure that new activities sensitive to noise adjacent to arterial roads are located, designed and constructed to mitigate adverse effects of road noise on occupants.</u>	27.64			
	IX.6 Standards and IX.4.1 Activity table All Sub-Precincts	Oppose in part		Add a new standard to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level). As a consequential amendment, add a new rule as follows: <table border="1"><tr><td>(X)</td><td>Development that does not comply with IX.6.X Noise Mitigation.</td><td>RD</td></tr></table>	(X)	Development that does not comply with IX.6.X Noise Mitigation.	RD	27.65
	(X)	Development that does not comply with IX.6.X Noise Mitigation.		RD				
IX.8.2 Assessment criteria	Oppose in part	Add a new assessment criterion as follows: <u>The extent to which noise sensitive activities in proximity to arterial roads are managed.</u>	27.66					

**Attachment 2**

See attached Auckland Transport submissions on:

- Proposed Private Plan Change 49 (Drury East Precinct)
- Proposed Private Plan Change 50 (Waihoehoe Precinct)
- Proposed Private Plan Change 51 (Drury 2 Precinct)

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Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:
Refer submission

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
Refer submission

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

Details of amendments: Refer to submission

Submission date: 22 October 2020

Supporting documents
PC48 Appendix 1.pdf
201021 1 JMi AC_Plan Change 48 submission final.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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

Auckland Unitary Plan
PC 48 (Private): Drury Centre Precinct
Submission



Quality Control Sheet

Submitter: Counties Power Limited

Asset: Counties Power Electricity Distribution Network

Plan: Auckland Unitary Plan - Proposed Plan Change 48 (Private) Drury Centre Precinct

Document: Submission

Counties Power Contact: Rachel Bilbe, Land Access Coordinator

Consultant Contact: Jo Michalakakis, Auckland Manager – Planning, Align Limited

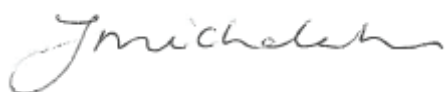
File Reference: COUNT038

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Issue 1.0	22 October 2020	For approval
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Distribution:

Rachel Bilbe	Counties Power	Email
AC Policy Team	Auckland Council	Online Submission



Produced by:

Jo Michalakakis



Review by:

Nick Williamson

Align Limited

Date: 22 October 2020

Limitations:

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1. Introduction

This document provides a submission on Plan Change 48 (Private): Drury Centre Precinct. The document contains a spreadsheet with submission points generally supporting the plan changes and proposing some clarifications or amendments to the proposed provisions.

Overall, Counties Power are strong in their support of the plan change and have the ability to supply power to enable this development. Counties Power are well positioned to support the developments from both a funding and forward planning perspective (i.e. have either purchased or identified land for future zone substations and a future option to create a new GXP at Transpower's Drury site in addition to the existing Transpower Bombay GXP). Counties Power is currently constructing a new zone substation at Bombay (at a lower voltage than the Bombay GXP), which combined with its existing Opaheke substation, can provide capacity to the development. In addition, once construction of the Quarry Road substation, which is located in Drury, is completed over 2025 - 2030, Counties Power will have additional capacity to supply power any future demands within the area covered by Plan Change Area 48. Counties Power are also working with KiwiRail to build a 25kV line from Quarry Rd, Drury to Burt Rd to support the Papakura to Pukekohe rail electrification programme which will support the proposed Railway Station in this precinct.

There are some suggested amendments to provisions. The submission references the following parts of the proposed plan change:

- Objectives 5 and 6;
- Policies 7, 15, 16, and 17;
- IX.8.1 Matters of discretion (1), (3) and (4);
- IX.8.2 Assessment criteria (1) and (3); and
- IX.11 Appendices – Appendix 1.
- New policies are also proposed

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

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

2. About Counties Power

Counties Power owns, manages, and operates an electricity distribution network in southern Auckland, northern Waikato and Hauraki District areas, collectively serving over 44,000 customers, with a system length of 3,200km covering an area of approximately 2,250km². The Auckland Council portion of their network covers 830km² and makes up 37% of the Counties Power network. In the Auckland Region, this includes urban centres such as Pukekohe, Waiuku

and Southern Papakura; rural residential areas like Hunua; and rural areas with very low customer density. It also includes Drury, the area subject to proposed Plan Change 48. The company also provides telecommunications and smart metering services.

Counties Power is 100% consumer owned. All shares are held by the Trustees of the Counties Power Consumer Trust ("the Trust") on behalf of all local power consumers. The Trust has a total of five Trustees, of which two are required to be elected every two years. Counties Power is managed for the benefit of its consumers and their communities. The Trust oversees the performance of Counties Power through the appointment of a Board of Directors (Board). The Board and Management of Counties Power consult the Trust on the strategic direction, business plans, and asset management measures and targets. Information about the Trust can be obtained from www.countiespowertrust.co.nz.

By length, 72% of the Counties Power network is rural overhead, however the urban networks supplying Pukekohe, Waiuku, Tuakau, Pokeno, Drury and parts of Papakura comprise a split of overhead and underground assets. Generally, the eastern part of the network is newer, higher in network connection densities and subject to high levels of growth in the areas adjacent to motorway and state highway corridors. The western side of the network is older, more remote, lower density and has less growth in terms of new connections and load requirements on the network. The Counties Power network is exposed to a range of environmental conditions, including weather – particularly the harsh coastal environment around the Awhitu peninsula, and vegetation – most notable in the areas around Hunua Ranges, but with effects across the entire network.

3. Counties Electricity Network Operation and Location

Counties Power has two points of supply from Transpower's National Grid via GXPs at Glenbrook and Bombay. From there, power is distributed to consumers via eight zone substations and an extensive network of lines, cables, transformers, and other equipment. The Glenbrook GXP supplies the western substations at 33kV whilst Bombay GXP supplies the eastern substations at 110kV and 22kV.

Counties Power's network is made up of both High Voltage (HV) and Low Voltage (LV) lines made up as follows:

HV network comprises:

- sub-transmission lines (33kV and 110kV) which carry electricity from the Grid Exit Point (GXP) to zone substations or between zone substations. Typically serving 500 to 12,000 customer connections.
- feeder lines (11kV and 22kV) which carry electricity from zone substations to transformers or in some cases direct to customers with a large demand (e.g. some industrial customers). These typically serve 80 to 2,500

customer connections.

LV Network (400V) comprises lines from transformers to individual connection points, typically serving 1 to 20 customer connections.

More than 20 years ago, Counties Power decided to provide for future growth by converting the backbone of its network from 33kV (for sub-transmission) and 11kV (for feeders) to 110kV and 22kV respectively. These voltages carry significant loads with a reasonably unobtrusive overhead line network and have provided the consumer-shareholders of Counties Power with a network that is cost effective to construct, flexible and resilient.

Approximately 8,500 customers (or 20% of Counties Powers total network load) are in the Hingaia, Drury, Papakura and Hunua areas. The customers in these areas rely on power from the Counties Power zone substation at Opaheke, which is supplied from the Transpower GXP at Bombay. Electricity is conveyed between these two points by means of two sub-transmission lines operating at 110kV, referred to as the Bombay-Opaheke (west) and Bombay-Opaheke (east) lines.

With regard to the Plan Change 48 area, 110kV overhead sub transmission lines are located on the western side of Fitzgerald Road and along the eastern section of Brookfield Road. There are low voltage lines and 22kV overhead lines on Flanagan Road and Waihoehoe Road. A diagram is included as Appendix 1 to show where Counties Power's assets are located.

Counties Power is also working with KiwiRail to build a 25kV line from Quarry Rd, Drury to Burt Rd to support the Papakura to Pukekohe electrification programme. The exact location for the future railway station is yet to be decided.

The 110kV and 22kV lines are both considered to be existing works under the Electricity Act 1992. They are protected by the terms of the Electricity Act 1992, the New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003. These lines are key assets in the Counties Power network architecture. The reliable and safe operation of these assets is paramount, as anything which jeopardises the integrity of either of these lines, creates an unacceptable risk to the Counties Power network and security of supply.

Counties Power will consult with the developer at the appropriate time with regard to undergrounding this infrastructure. There are existing 110kV overhead sub-transmission lines (west side of Fitzgerald Rd and along part of Brookfield Rd) adjacent to the Business: Mixed Use Zone.

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

This includes telecommunications lines (fibre). These lines support the operation of their electrical infrastructure. These lines (fibre) run through proposed Sub-precinct D and support the operation of their electrical infrastructure.

4. Low carbon development

The Government is targeting 100% renewable electricity generation. Non-renewable alternatives, such as the reticulation of natural gas, unnecessarily increase carbon dioxide emissions when alternative electricity solutions already exist. These solutions are locked in for the economic life of the equipment (e.g. gas boilers, home gas heaters). With this in mind, Counties Power requests that Auckland Council uses this opportunity to implement policies that will enable low carbon energy options within the development precinct that will reduce future carbon emissions for the Auckland and be cost effective for households and businesses.

- Enabling security of electricity supply (targeted to be 100% renewable) to provide for end-use electricity consumption activities where cost-effective.
- Reducing transport carbon dioxide emissions through encouraging the electrification of transport infrastructure, including rail. The development should consider the need for provision of charging stations for an increasing electric vehicle fleet, with numerous OECD countries now looking to stop the sale of petrol and diesel vehicles around 2035.

Chapter: Drury Centre Precinct

Objective/ Policy	Provision	Position	Reason for position	Relief Sought	
Chapter IX: Drury Centre Precinct					
Objective (5)	Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network.	Support	Counties Power relies on the effectiveness and efficiency of the State Highway to ensure access for vehicles to carry out timely construction, maintenance and repair to the network for the essential electricity service.	Include objective as drafted.	28.1
Objective (6)	Development is supported by appropriate infrastructure.	Support	Counties Power provides electricity infrastructure to enable and support development. Once construction of the Quarry Road substation is complete over 2025 - 2030, Counties Power will have the capacity to supply power to the area covered by Plan Change Area 48. The 110kV west line in Fitzgerald Road is an essential piece of infrastructure that ensures security of electricity supply to the Plan Change area and beyond. Electrical infrastructure and reticulation can be made available subject to negotiation and satisfactory financial contribution from the developer and suitable space being made available in a timely manner. If there is a requirement to relocate or underground existing overhead infrastructure, the developer will also be required to make a contribution toward the cost.	Include objective as drafted.	28.2
Policy (7)	Require streets to be attractively designed to appropriately provide for all modes of transport by: ... (c) providing a level of landscaping that is appropriate for the function of the street; ...	Support in part	Electrical infrastructure must be taken into consideration when planning landscaping and planting of street trees and should be carried out in consultation with Counties Power. This is of particular importance where existing overhead lines are to be retained. Trees, branches and windblown tree debris falling onto lines are a major cause of power outages in Auckland. The Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 require that trees must be kept clear of network power lines. The presence of trees can also impede access for maintenance purposes. It is also relevant in terms of access to, and the safe operation of existing and new underground cables. Planting of street trees may jeopardise the safe operation of the sub-transmission line	Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted. Counties Power seek consultation regarding the species of trees/shrubs proposed by any standard in the vicinity of overhead lines to ensure that due consideration is given to the height and spread of the tree and any potential hazards to the electricity network associated with the location and species of the tree. Counties Power seeks a typical road cross-section for arterial roads to ensure that the berm is an acceptable width for installation of underground electrical reticulation.	28.3

			and thereby the security of electricity supply.	Counties Power seeks that the provisions are amended to consider these factors.	28.3
Policy (15)	Ensure that the timing of development in Drury Centre Precinct is coordinated with the transport infrastructure upgrades necessary to mitigate the adverse effects of development on the effectiveness and safety of the immediately surrounding transport network.	Support	The timing of development should be coordinated with all infrastructure providers in order to be able to provide the Drury Centre Precinct with appropriate supporting infrastructure and avoid disruption caused by delayed installation of other (non-water) utilities.	Include the policy as drafted.	28.4
Policy (16)	Ensure that development in Drury Centre Precinct is coordinated with supporting stormwater, wastewater and water supply infrastructure.	Support in part	The timing of development should be coordinated with all infrastructure providers in order to be able to provide the Drury Centre Precinct with appropriate supporting infrastructure and avoid disruption caused by delayed installation of other (non-water) utilities.	Amend the provision to include reference to electrical, telecommunications and other infrastructure.	28.5
Policy (17)	Provide for the staging of pedestrian and cycling connections to the Drury Central train station to encourage the use of public and active modes of transport.	Support	Where access is required to existing, or new electrical infrastructure installed within the pedestrian or cycling routes, it is essential to maintain suitable vehicular access for electrical lines construction, upgrade or maintenance in these areas during and after the construction of these connections to the train station.	Include policy as drafted.	28.6
New Policy IX.3 (5)(e)	Require subdivision and development to: ... <u>(e) Enable the reduction of CO₂ emissions by promoting the use of renewable energy.</u>		Central government has set greenhouse gas emissions reductions targets for 2030 and with any new development area comes the ability to promote more sustainable energy types than those currently in wide use.	Include new policy as drafted.	28.7
New Policy IX.3 (5)(f)	Require subdivision and development to: ... <u>(f) Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.</u>		With electric vehicles becoming more the norm it is important that sufficient charging stations are provided for while also allowing for further charging stations without the need for significant upgrade when the demand inevitably increases.	Include new policy as drafted.	28.8
Rules/Standards	Provision	Position	Reason for position	Relief Sought	
IX.8.1 Matters of discretion	(1) Development of public and private roads: (a) Location and design of the collector streets, local streets and	Support in part	Each category of road (or service lane) must provide suitable space for installation of electrical infrastructure to meet the needs of the area or building, as well as adequate separation	Counties Power seeks that the provisions are amended to consider these factors. Counties Power seeks a typical road cross-section for arterial roads to ensure that the berm is an acceptable width for	28.9

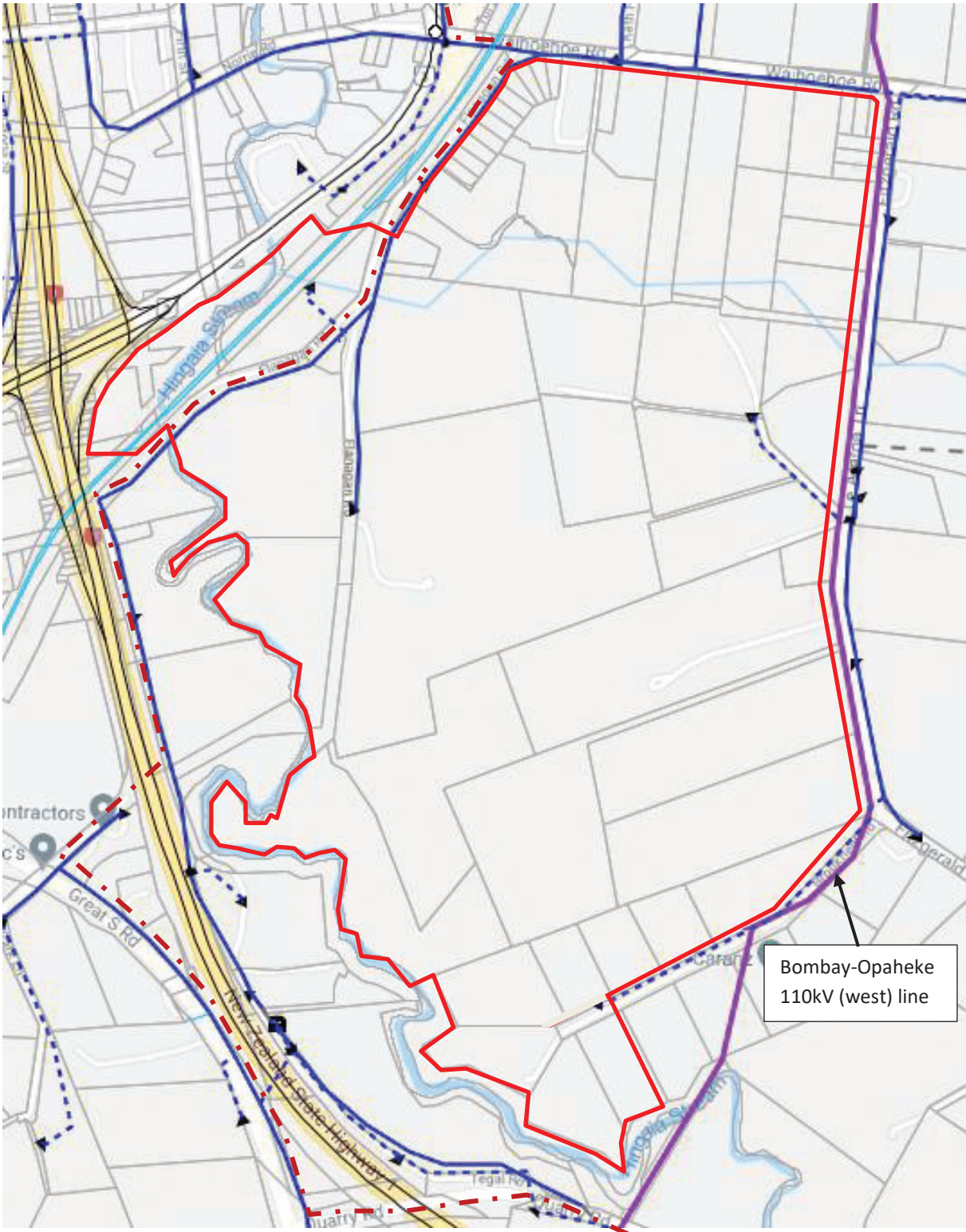
	<p>connections with neighbouring sites to achieve an integrated street network;</p> <p>(b) Provision of cycling and pedestrian networks;</p> <p>(c) Location and design of connections to the Drury Central train station; and</p> <p>(d) Matters of discretion IX8.1 (1)(a) - (c) apply in addition to the matters of discretion in E38.12.1.</p>		<p>between the different utilities, landscaping and other road users. Where electrical infrastructure is required, vehicular access of a suitable construction standard must be provided to allow access for maintenance of electrical infrastructure.</p> <p>Note: the indicative road layouts are supported by Counties Power.</p>	<p>installation of underground electrical reticulation.</p>	28.9
	<p>(3) New buildings, and alterations and additions to buildings not otherwise provided for in the underlying zone within Sub-Precincts A, B and D:</p> <p>(a) The design and appearance of buildings and development as it relates to all the matters set out in H9.9.8.1(2)(a)-(i) and the future amenity values of Drury</p> <p>(b) The design and layout of the train station and transport interchange;</p> <p>(c) Servicing; and</p> <p>(d) Matters of discretion IX8.1 (3)(a) - (C) apply in addition to the matters of discretion in H9.8.1 (2).</p>	Support	<p>If and where overhead lines are to be retained in sub precincts A and D, the design and location of any new buildings, or alteration or additions to buildings must be considered in light of NZECP34 as well as maintaining suitable vehicular access i.e. alterations and additions to buildings must not cause electrical infrastructure to become 'land-locked'.</p>	<p>Include provision as drafted.</p> <p>Clarify whether the intent of the word servicing includes provision of electrical infrastructure.</p>	28.10
	<p>(4) New buildings, alterations and additions to buildings not otherwise provided for in the underlying zone within Sub-Precincts C, E and F:</p> <p>(a) The design and layout of buildings and development insofar as it affects the existing and future residential amenity values and the amenity values of public streets and open spaces;</p> <p>(b) Servicing;</p> <p>(c) Matters of discretion IX8.1 (4)(a) - (b) apply in addition to the matters of discretion in H13.8.1 (3).</p>	Support	<p>If and where overhead lines are to be retained in sub precincts C, E and F, the design and location of any new buildings, or alteration or additions to buildings must be considered in light of NZECP34 as well as maintaining suitable vehicular access i.e. alterations and additions to buildings must not cause electrical infrastructure to become 'land locked'.</p>	<p>Include provision as drafted.</p> <p>Clarify whether the intent of the word 'servicing' includes provision of electrical infrastructure.</p>	28.11
IX.8.2 Assessment criteria	<p>(1) Development of public and private roads:</p> <p>Location of roads</p> <p>(a) The extent to which the collector road</p>	Support in part	<p>Counties Power support the road layout as indicated in IX.10.X Drury Centre: Precinct Plan 2, or an alternative which provides similar connectivity for the installation of the electrical distribution network.</p> <p>Counties Power support the functional matters (i) and (ii) in that these may also be matters which would otherwise</p>	<p>Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/ trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted.</p>	28.12

	<p>network and the Key Retail Street are provided generally in the locations shown on IX.10.X Drury Centre: Precinct Plan 2 to achieve a highly connected street layout that integrates with the surrounding transport network and responds to landform. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:</p> <p>(i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads;</p> <p>(ii) The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and</p> <p>(iii) The constructability of roads and the ability for it to be delivered by a single landowner.</p> <p>(b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network. Whether subdivision and development provides for collector roads and local roads to the site boundaries to coordinate with neighbouring sites and support the integrated completion of the network within the precinct over time;</p> <p>Design of roads</p> <p>(c) Whether the design of collector and local roads are generally in accordance with the road cross sections provided in IX.11 Drury Centre: Appendix 1; (d) Whether the layout of the</p>		<p>impact on their ability to install and maintain the electrical infrastructure.</p> <p>Counties Power support functional matter (iii) as this will enable a coordinated and sequential approach to the supply and installation of new electrical reticulation. This is of particular importance if existing overhead infrastructure is to be replaced with underground cables and where connectivity needs to be maintained across distinct areas within a specific Plan Change area or between the different Plan Change Areas (48-51).</p> <p>Electrical infrastructure must be taken into consideration when planning landscaping and planting of street trees and should be carried out in consultation with Counties Power. This is of particular importance where existing overhead lines are to be retained but is also relevant in terms of access to, and the safe operation of existing and new underground cables.</p> <p>Each category of road must provide suitable space for installation of electrical infrastructure as well as adequate separation between the different utilities, landscaping and other road users.</p>	<p>Counties Power seeks a typical road cross-section for arterial roads to ensure that the berm is an acceptable width for installation of underground electrical reticulation.</p> <p>Counties Power seeks that the provisions are amended to consider these factors.</p>
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	<p>street network provides a good degree of accessibility and supports a walkable street network. As a general principle, the length of a block should be no greater than 180m, and the perimeter of the block should be no greater than 500m;</p> <p>(e) Whether the street network provides safe and legible pedestrian and cycle connections to the operational Drury Central train station as development occurs over time. In particular, whether the following is provided, or an alternative is provided that achieves an equal or better degree of connectivity</p> <p>...</p>			
IX.8.2 Assessment criteria	<p>(3) The design and layout of the train station and transport interchange</p> <p>(j) Whether the location of the train station and transport interchange is generally in accordance with IX.10.2 Drury Centre: Precinct Plan 2;</p> <p>(k) Whether the bus interchange is designed and located to minimise conflict with the pedestrian focused Station Plaza;</p> <p>(i) Prioritising pedestrian amenity (active frontages, building entrances etc) on collector roads;</p> <p>(ii) Screening carparking areas from streets and open spaces; and</p> <p>(iii) Integrating landscaping with parking areas.</p> <p>(l) Whether the design of the railway station enables for users to access platforms on either side of the railway and in doing so creating connections between Drury Village and Drury</p>	Support in part	<p>In terms of items (ii) Screening carparking areas from streets and open spaces; and (iii) Integrating landscaping with parking areas, consideration must be given to the location of electrical infrastructure when planning landscaping, in terms of maintaining suitable access to the assets and also their ongoing safe operation. It is expected that the carparking/planting referred to will occur within public spaces and may conflict with electricity infrastructure.</p> <p>Electrical infrastructure must be taken into consideration when planning landscaping and planting of street trees and should be carried out in consultation with Counties Power. This is of particular importance where existing overhead lines are to be retained. Counties Power seek consultation regarding the species of trees/shrubs proposed required by any standard in the vicinity of overhead lines to ensure that due consideration is given to the height and spread of the tree and any potential hazards to the electricity network associated with the species of the tree. The presence of trees can also impede access for maintenance purposes.</p> <p>Trees and branches falling onto lines are a major cause of power outages in Auckland. The Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 require</p>	<p>Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted.</p> <p>Counties Power seeks a typical cross-section for planting in the vicinity of the train station to ensure that there will be no conflict with electrical infrastructure. Note: This may be more appropriate as an assessment criterion than an Appendix as the location of the train station is not yet known.</p> <p>Counties Power seeks that the provisions are amended to consider these factors.</p>

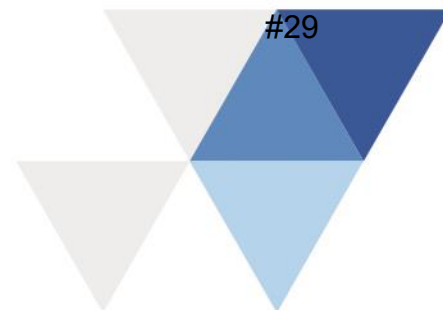
	Centre, by way of example this could be achieved through a pedestrian overbridge; and (m) Whether the design of the railway station integrates with the proposed Station plaza shown on IX.10.2 Drury Centre: Precinct Plan 2;		that trees must be kept clear of network power lines.	
Appendices	Provision	Position	Reason for position	Relief Sought
IX.11 Appendices	Appendix 1: Road Cross Section Details	Support in part	<p>Electrical infrastructure must be taken into consideration when planning landscaping and planting of street trees and should be carried out in consultation with Counties Power.</p> <p>This is of particular importance where existing overhead lines are to be retained – especially the 110kV sub-transmission line on the west side of Fitzgerald Road.</p> <p>Each category of road must provide suitable space for installation and safe operation of electrical infrastructure. Roots from trees and other plants can cause problems where there are underground cables in terms of access for maintenance of the cables and faults.</p>	<p>Counties Power seeks that the provisions are amended to consider these factors.</p> <p>Counties Power seeks a typical road cross-section for each roading type (including arterial roads) to identify the proposed location of the street trees and landscaping and to ensure that the berm is an acceptable width for installation of underground electrical reticulation.</p>

Appendix 1 – Counties Power Assets Diagram



Existing Counties Power Infrastructure

	110kV sub-transmission (overhead)	Plan area
	22kV distribution (overhead)	
	22kV distribution (underground)	
	Fibre – high criticality (overhead/underground)	



FORM 5

Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: C/- Beca Ltd
21 Pitt Street
Auckland 1010

Attention: Jess Rose

Phone: 09 308 4565

Email: jess.rose@beca.com

This is a submission on the Proposed Plan Change 48 to the Auckland Unitary Plan ('Plan Change 48').

Introduction

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, and ensuring that the educational needs of new communities are met through purchasing sites and constructing new schools to meet demand as it occurs. The Ministry has an interest in activities that may impact on educational facilities and assets in the Auckland region and on the timing and urban form of large scale that will generate demand for additional education facilities, including state schools, Māori medium and learning support requirements.

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

The Ministry of Education's interest in the Drury Area

In 2019, the Ministry of Education developed the National Education Growth Plan 2030 (NEGP) which provides a co-ordinated approach for addressing school-aged population growth across New Zealand. The NEGP identifies a number of catchments across the country and considers the anticipated demand and growth patterns so that the Ministry can ensure the school network is delivered in the right place at the right time.

Plan Change 48 is one of five recently notified plan change in the Drury area. The NEGP categorises the Papakura-Rosehill-Drury area as 'Blueprint for Growth', being an area where: *"local government planning includes intensive housing development and expansion into outer urban areas in response to, or causing, a large influx of people to move into a particular area. These areas provide opportunities to master plan education infrastructure collaboratively across agencies to integrate into new communities"*.

NEGP anticipates that the school network in the Papakura-Rosehill-Drury catchment will need to support approximately 11,500 to 12,600 students. With the potential need for 4 – 6 new primary schools and at least one new state secondary school in this area by 2030.

Position on this plan change

Plan Change 48 is seeking to rezone approximately 95ha of Future Urban zoned land in Drury East to a mix of Business – Metropolitan Centre, Business – Mixed Use and Open Space – Informal Recreation zones. Once the urban zonings are in place, the Drury East development (Plan Changes 48, 49, and 50) will enable approximately 7,000 new dwellings accommodating 19,000 new residents.

The Ministry broadly supports the proposed plan changes in Drury in so far as they will provide a framework for the development of much needed housing for the wider Auckland Region. This will, however, require additional capacity in the local school network to cater for this growth as the area develops. The section 32 Report supporting the plan change records that: *“New schools will be required to service urban growth in Drury and the Ministry of Education is currently undertaking a needs assessment. The Ministry of Education will designate the land for future schools as required.”*

The Ministry agrees that new schools will be required to service the urban growth enabled through the proposed plan changes. The Ministry has had a number of high-level discussions with developers in East Drury; however, it has not commenced a site acquisition process. These plan changes, if approved, will influence the site selection process and determine what level and type of educational facilities are required. The Ministry will still need to go through a formal notice of requirement processes before any designation is included in the Unitary Plan. The underlying District Plan provisions will be considered as part of any future the designation processes within the Plan Change areas. Currently the proposed plan change provisions do not recognise or acknowledge the need for a future school site to be enabled to support the social and educational needs of the East Drury community.

The Section 32 report states that 485 Burt Road, in West Drury has been rezoned Special Purpose School zone and a Notice of Requirement is currently processing to designate 41 Burberry Road, West Drury for a Primary School and Early Childhood Education Centre. The Ministry would like to clarify that:

- The school at 485 Burt Road will be a State Integrated School and the Ministry will not determine the timing for this school.
- The site at 41 Burberry Road, Drury has now been designated for a Primary School.
- Land at 401 and 281 Jesmond Road, Drury has been purchased for the establishment of a Secondary School; however the notice of requirement process has not been lodged to date.

The Ministry provides and plans for schools in response to demand created by residential development or intensification. It is important to ensure that other key infrastructure such as roading, wastewater and utilities are addressed up front as part of the Plan Change process to ensure wider infrastructure provision is timed appropriately to avoid access or service issues for education facilities (for example needing to establish appropriate road infrastructure to access a new school site).

The Ministry therefore has an interest in:

- How development is planned and sequenced, particularly in terms of infrastructure provision such as roading as this will impact where and when schools can be established.
- Ensuring the Precinct provisions specifically acknowledge and provide for schools. This is critical given schools are a critical piece of social and community infrastructure. An absence of

supportive provisions can place obstacles in the way of establishment of education facilities in future years.

- The urban form and amenity provided through connectivity and usable areas of public open space.

We note that the plan change reports were drafted prior to the publication of the National Policy Statement on Urban Development 2020 (NPS-UD) but that the Section 32 Report does include an assessment of the Proposed National Policy Statement on Urban Development. Of particular importance to the Ministry is Policy 10 of the NPS-UD, which states that local authorities should engage with providers of development infrastructure and additional infrastructure (schools are considered additional infrastructure) to achieve integrated land use and infrastructure planning. In addition to this, subpart 3.5 of the NPS-UD states that local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available. We have requested amendments to the precinct provisions below, which reflect the importance of providing for additional infrastructure in areas of growth.

The Ministry broadly supports provisions in the plan change that seek to put in place a framework that will deliver integrated communities with a street and block pattern that supports the concepts of liveable, walkable and connected neighbourhoods. This includes a transport network that is easy and safe to use for pedestrians and cyclists and is well connected to public transport, shops, schools, employment, open spaces and other amenities.

Decision sought

The Ministry requests the following decision:

- Amendments to the proposed IX. Drury Centre Precinct Chapter (requested changes are underlined):
- *Objective IX.2 (6) Development is supported by appropriate infrastructure (including education infrastructure).* | 29.1
- *Policy IX.3 (16) Ensure that development in Drury Centre Precinct is coordinated with supporting education, stormwater, wastewater and water supply infrastructure.* | 29.2
- *IX.8.1 Matters of discretion*

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

1) *Development of public and private roads:*

(a) Location and design of the collector streets, local streets and connections with neighbouring sites (including schools) to achieve an integrated street network;

(b) ...

(c) ...

(d) ...

| 29.3
- *IX.8.2 Assessment criteria*

1) *Development of public and private roads:*

Location of roads

(a)

i. ...

ii. *The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities (including provision of schools); and*

29.4

iii. ...

(b) *Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network. Whether subdivision and development provides for collector roads and local roads to the site boundaries to coordinate with neighbouring sites (including potential future school sites) and support the integrated completion of the network within the precinct over time;*

29.5

Design of Roads

(c)

(d) *Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network, including to existing schools or sites designated for this purpose. As a general principle, the length of a block should be no greater than 180m, and the perimeter of the block should be no greater than 500m;*

29.6

(e) ...

i.

ii. ...

iii.

- Amendments to ensure there is provision of appropriate public open space to support the surrounding community.

29.7

- The retention of:

- Standard IX.6.2 Staging of Development with Transport Upgrades. These standards will help ensure appropriate transport infrastructure is provided prior to significant development occurring in the area. It will also enable greater ability to stage the provision of education facilities as development progresses.

29.8

- Objectives and policies relating to the provision of safe and legible walking and cycling connections through communities as this will decrease reliance on private motor vehicle for travel to and from school and have health and safety benefits for communities.

29.9

Given the level of increase in housing provision in Drury as a result of this private plan change and the other plan changes in Drury, the Ministry requests regular engagement with Auckland Council and Kiwi

Property Holdings No. 2 Ltd to keep up to date with the housing typologies being proposed, staging and timing of this development so that the potential impact of the plan changes on the school network can be planned for.

Any consequential amendments required to give effect to the matters set out in this submission.

The Ministry wishes to be heard in support of its submission.



Jess Rose
Planner – Beca Ltd

(Consultant to the Ministry of Education)

Date: 22 October 2020

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

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



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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name) Leith McFadden

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

Address for service of Submitter

6 Sagra Way

Bombay 2675

Telephone: 021 752 987

Fax/Email: leith@playgrounds.co.nz

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number PC 48

Plan Change/Variation Name Drury Centre Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

The zoning and precinct provisions

Submission

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

I support the specific provisions identified above ☒

I oppose the specific provisions identified above ☐

I wish to have the provisions identified above amended Yes ☒ No ☐

The reasons for my views are:

Support in part. The overall development of the area is supported to support Auckland's Growth.

Increased commitment, by the way of open space zoning, is requested to ensure a positive community outcome.

Concerns regarding negative traffic, transport and infrastructure effects.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

☐
☒
☐
☐

30.1

Zone areas for parks and public space.

Ensure infrastructure upgrades are tied to staging through precinct provisions.

30.2

I wish to be heard in support of my submission

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

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

☐
☐
☐


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

22 October 2020

Date

Notes to person making submission:

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

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

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

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

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

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

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

Contact details

Full name of submitter: Susan Andrews

Organisation name: Heritage New Zealand Pouhere Taonga

Agent's full name:

Email address: sandrews@heritage.org.nz

Contact phone number: 09 307 9920

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 48 (Private)

Plan change name: PC 48 (Private): Drury Centre Precinct

My submission relates to

Rule or rules:

Please see attached submission.

Property address: Please see attached submission.

Map or maps: Please see attached submission.

Other provisions:

Please see attached submission.

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

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

The reason for my or our views are:

Please see attached submission.

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

Details of amendments: Please see attached submission.

Submission date: 22 October 2020

Supporting documents

HNZPT Submission PPC48 - Drury Centre.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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



HERITAGE NEW ZEALAND
POUHERE TAONGA

22nd October 2020

Attention: Planning Technician
Auckland Council
Level 24
135 Albert Street
Private Bag 92300
Auckland 1143

Dear Sir or Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

PROPOSED PLAN CHANGE 48 (PRIVATE): DRURY CENTRE PRECINCT

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. This is a submission on the following proposed private change to the Auckland Unitary Plan (Operative in Part) (the proposal):

PC 48 (Private): To rezone 95 hectares of land in the area generally bounded by Great South Road, Waihoehoe Road, Fitzgerald Road and the Hingaia Stream, from Future Urban to approximately 35 hectares of Business: Metropolitan Centre zone, approximately 51.5 ha of Business: Mixed Use zone surrounding the Metropolitan Centre and approximately 8.5ha Open Space: Informal Recreation zone adjoining the Hingaia Stream.

2. Heritage New Zealand could not gain an advantage in trade competition through this submission.

- Heritage New Zealand is an autonomous Crown Entity with statutory responsibilities under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage.

3. The specific provisions of the proposal that Heritage New Zealand's submission relates to are:

- The proposed plan change in its entirety.

4. Heritage New Zealand's submission is:

- Heritage New Zealand wishes to have the proposed plan change provisions amended.

5. The reasons for Heritage New Zealand's position are as follows:

- 5.1. The plan change encompasses an area with a number of notable 19th century historical associations, relating to European settlement, construction of the Great South Road, the New Zealand Wars, the former Drury Railway Station and Railyards, and the Drury Tram/Mineral Railway. The proposed plan change area encompasses the Flanagan Homestead and General Cameron's House. In addition, there are a number of known and potentially unknown archaeological sites within the proposed plan change area.

- 5.2. As outlined in the Assessment of Environmental Effects (AEE) and archaeological assessment, there is the potential for remnant undiscovered archaeology within the proposed plan change area. Ideally, Heritage New Zealand would seek a fulsome archaeological assessment prior to the plan change occurring. However, if the effects on archaeology are to be dealt with during the resource consenting or subdivision process, Heritage New Zealand seeks that conditions be included to that effect. If archaeological assessment is undertaken at the subdivision stage it ensures that archaeological remains in situ can be incorporated into the subdivision plans and informs green space locations, building platform locations and road layout.
- 5.3. Reliance on the Accidental Discovery Protocol provisions of the Auckland Unitary Plan is only appropriate in the instance where it has been established that the potential for archaeological remains is low.

31.1

Flanagan Homestead

- 5.4. Heritage New Zealand supports the proposed retention and adaptive re-use of Flanagan Homestead R12/1125 (CH122183) with the homestead having the scope to be easily adaptively re-used for any number of suitable purposes. However Heritage New Zealand considers that the homestead should remain in situ on its original site, and that the park should include an appropriate extent of its setting (including any plants and trees with a historical association to the homestead), to preserve the integrity of the historic heritage values associated with the building and the context within which it is located.
- 5.5. The Flanagan Homestead and surrounds have been evaluated in both the historic heritage assessment completed by Matthews and Matthews Architects Ltd and the heritage assessment completed by Clough & Associates Ltd. It has been found to have considerable local significance in relation to historical, social, knowledge, and physical attribute values, and in terms of the contribution it makes to the local historical context. Additionally the Flanagan Homestead has moderate local significance in terms of technological and aesthetic values.
- 5.6. Based on these assessments Heritage New Zealand submits that the homestead and surrounds meet the threshold for inclusion in Schedule 14.1 Schedule of Historic Heritage as a Category B Historic Heritage Place and should therefore be scheduled.
- 5.7. As an alternative, Heritage New Zealand seeks provisions included within the precinct which more accurately reflect the location of the Flanagan Homestead and its extent with suitable objectives, policies and rules for its ongoing protection.
- 5.8. Heritage New Zealand also seeks amendment the proposed provisions at IX.8.2(2)(c) to include any non-indigenous trees identified as having specific historic heritage association and values in relation to Flanagan Homestead.

31.2

31.3

31.4

General Cameron's House

- 5.9. Heritage New Zealand does not disagree with the assessment of the significance of the General Cameron's House (R12/755). Heritage New Zealand agrees with the recommendation in the archaeological assessment that if the building is to be affected by future development, that a heritage evaluation should be undertaken. Heritage New Zealand seeks that a condition be included in the precinct provisions to that effect.

31.5

- 5.10. The surrounds of the house are likely to contain remnant subsurface archaeology from the military camps that once surrounded it. If the precinct provisions do not have a general requirement for archaeological assessment prior to subdivision, Heritage New Zealand seeks that a provision to that effect is included in the precinct plan in relation to the area surrounding General Cameron's House.

31.6

Drury Tramway

- 5.11. The Archaeological Assessment and Assessment of Effects (AEE) both support further archaeological survey of the recorded Drury Tramway/Mineral Railway (R12/1122). Heritage New Zealand supports this but seeks that this intention be recorded in the precinct provisions. Heritage New Zealand also supports the recommendation contained within the archaeological assessment that once future development plans have been determined and appropriate mitigation measures recommended, if feasible that some form of reference to the tramway/mineral railway through a heritage trail or something similar be incorporated.

31.7

Open Space Area

- 5.12. Heritage New Zealand supports the provision of open space zoning along the edge of Hingaia Stream. Riparian margins often contain archaeological sites. Heritage New Zealand seeks that provision is included within the precinct for archaeological assessment of the riparian boundaries to inform plans, including planting, takes place.

31.8

- 5.13. This proposed plan change does not include the Future Urban zoned land on the eastern side of Hingaia Stream. It is not possible to know what that land may be zoned for in the future and we cannot assume that it may become open space zoned land as suggested in the Assessment of Environmental Effects¹. The provision of open space within this proposed plan change therefore must be appropriate to the scale and nature of the current proposal.

- 5.14. Sub-Precinct A which abuts the Hingaia Stream is being enabled for the greatest level of development. Heritage New Zealand has no issue with the nature of intensive development proposed but does wish to ensure that it sits at the appropriate distance from the Hingaia Stream.

- 5.15. Therefore, Heritage New Zealand would seek that the open space zoning be slightly extended east in the northern part of the precinct where the Mixed Use Zoning is closest to the Hingaia Stream. The rationale for the current proposed Mixed Use Zoning boundary being consistent with the transmission line corridor is understood from a reverse sensitivity perspective but it is proposed that a slightly wider zoning provides the opportunity for a more contiguous and flowing open space area alongside the entirety of the Hingaia Stream within the proposed plan change area.

31.9

- 5.16. Heritage New Zealand supports the recommendation in the archaeological assessment that the reported site of a mill associated with the Flanagan family (R12/967) should have a buffer zone and any works in the reserve should avoid this area and seek that provisions are included to that effect.

31.10

¹ Barkers and Associates *Drury s32 Assessment Report August 2020*, pg. 11.

Māori Cultural and Historic values

5.17. Heritage New Zealand supports mana whenua in exercising of kaitiakitanga over the project area and to suggest such relief as is appropriate to them. Therefore Heritage New Zealand would ask that appropriate conditions are incorporated in the precinct provisions to address any Māori cultural heritage values that may have been identified or as requested by iwi.

31.11

Interpretation

5.18. While potentially outside of the scope of this process, Heritage New Zealand also believes that Auckland Council and the applicants should explore the potential of commissioning a heritage interpretation plan for the wider Drury area subject to the four separate plan changes, including ideas for place-shaping, place-naming, colour schemes, design references, public artworks and other heritage interpretation. With the proposed esplanade reserves, riparian setbacks, and new road layouts it may be possible to develop a heritage trail to support local identity and enhance public understanding of Historic heritage places through improved public access, continuous esplanade reserves, presentation, interpretation and maintenance of significant historic heritage as suggested in the Structure Plan for the area.

31.12

6. Heritage New Zealand seeks the following decision from the local authority:

- Accept the proposed plan change with the amendments suggested above or any alternative relief as necessary to give effect to this submission.

7. Heritage New Zealand does wish to be heard in support of our submission.

Yours sincerely



Sherry Reynolds
Director Northern Region

Address for Service:
Susan Andrews
PO Box 105 291, Auckland
09 307 9920
sandrews@heritage.org.nz

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PRIVATE PLAN
CHANGE UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE
MANAGEMENT ACT 1991**

TO: Auckland Council

SUBMITTER: Drury South Limited

SUBMISSION ON: Proposed Plan Change 48 (Private): Drury Centre Precinct to the Auckland Unitary Plan ("**PC48**").

Introduction

1. Drury South Limited ("**DSL**") owns approximately 257ha of land within the Drury South Industrial Precinct, located to the south of the PC48 land. DSL is in the process of developing its land for largely industrial purposes.
2. DSL could not gain an advantage in trade competition through this submission.
3. DSL is directly affected by effects of PC48 that:
 - (a) adversely affect the environment; and
 - (b) do not relate to trade competition or the effects of trade competition.

Scope of submission

4. The submission relates to PC48 in its entirety, but is particularly focused on specific provisions of PC48 as set out in **Schedule 1**.

Nature of submission

5. DSL supports further urban development in the Drury area and is supportive of PC48, subject to appropriate provisions being included within PC48 to ensure that PC48 does not adversely affect others in the area.

Reasons for submission

6. PC48, if amended to address the issues DSL has identified:
 - (a) will promote sustainable management of resources, and therefore will achieve the purpose and principles of the Resource Management Act 1991 ("**RMA**");
 - (b) will meet the reasonably foreseeable needs of future generations;
 - (c) will enable social, economic and cultural wellbeing;
 - (d) will avoid, remedy or mitigate adverse effects on the environment; and

- (e) represents the most appropriate way to achieve the objectives of the Auckland Unitary Plan, in terms of section 32 of the RMA.

Specific reasons for submission

7. Without limiting the generality of paragraph 6 above, DSL is particularly concerned to ensure that the transport and flooding effects of PC48 are appropriately managed.
- (a) *Transport* - Transport was a key consideration through the development of the Drury South Industrial Precinct that has detailed transport provisions including various transport upgrades external to the Precinct to ensure that transport effects are appropriately managed. DSL seeks to ensure that a framework is established under PC48 that similarly and appropriately manages transport effects.
- (b) *Flooding* - The broader Hingaia Stream catchment has a history of flooding issues. Following detailed flood modelling, the Drury South Industrial Precinct includes detailed provisions to ensure that development does not change flooding risks upstream or downstream. DSL seeks to ensure a consistent approach is taken with PC48.

Decision sought

8. The following decision is sought from the local authority:
- (a) confirmation of PC48 subject to the inclusion of appropriate provisions to address the issues discussed above and identified in **Schedule 1**; and
- (b) such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.
9. DSL wishes to be heard in support of this submission.
10. If others make a similar submission consideration would be given to presenting a joint case with them at any hearing.

DRURY SOUTH LIMITED by its solicitors and authorised agents Russell McVeagh:



Signature:

Date:

Address for Service:

Daniel Minhinnick

22 October 2020

C/- Lauren Eaton

Russell McVeagh

Barristers and Solicitors

Level 30

Telephone:**Email:**

Vero Centre
48 Shortland Street
PO Box 8/DX CX10085
AUCKLAND 1140
+64 9 367 8000
lauren.eaton@russellmcveagh.com

SCHEDULE 1

Issue / Provision	Reasons for submission	Decision / relief sought	
IX.3 Policies (Infrastructure and Staging)	There is a lack of any policies addressing the issue of avoiding earthworks and development that will exacerbate the known risk of upstream and downstream flooding outside the PC48 area. This is contrasted with the Policies I410.3 (15) and (16) in the adjacent Drury South Industrial Precinct which address the need detain the 1% AEP event without adverse effects on the extent of flooding of upstream and downstream areas and provide sufficient floodplain storage to avoid increasing flood risk upstream and downstream.	Insert new policies to: (a). Make adequate provision within the PC48 area to detain the 1% AEP event without adverse effects on the extent of flooding of upstream and downstream areas; and (b). Provide sufficient floodplain storage within the PC48 area to avoid increasing flood risk upstream and downstream, and manage increased flood risk within the precinct, to habitable rooms for all flood events.	32.1
IX.4.1(A5), (A6), (A8) and (A9) IX.6.3	Activity Table IX.4.1 (A5), (A6), (A8) and (A9) together with Standard IX.6.3 provides an alternative mechanism (via trip generation thresholds) to meeting the GFA thresholds in Standard IX.6.2 that trigger transport upgrades. It is not clear how the trip generation thresholds and GFA mechanisms will be implemented given that there will be challenges that arise with monitoring trip generation levels across a complex arrangement of multiple development sites across an area with multiple access points.	Consideration should be given to whether a simplified approach using GFA triggers alone is a more effective approach, given the potential challenges in monitoring trip generation levels for a development of this scale.	32.2
IX.4.1	Activity Table IX.4.1 does not address the issue of non-compliance with Standard IX.6.6 (Stormwater Quality and Flooding).	Amend Table IX.4.1 by introducing two new discretionary activities: (a). <i>Development that does not comply with Standard IX.6.6 (Stormwater Quality and Flooding);</i> and (b). <i>Subdivision that does not comply with Standard IX.6.6 (Stormwater Quality and Flooding).</i>	32.3
IX.5(3)	The provision removes the normal tests for notification under the relevant sections of the Resource Management Act 1991 by stating that restricted discretionary applications for land disturbance under chapters E11 and E12 of the AUP <i>will be considered without public or limited notification or the need to obtain written approval from affected parties.</i> There is no justification provided for this removal of the rights of affected parties (including DSL) who may be adversely affected by earthworks within the PC48 area.	Delete the provision so that an application for resource consent for a restricted discretionary activity listed in Table E11.4.1, Table E11.4.2 and Table 12.4.1 will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.	32.4

IX.5(4)	<p>The provision removes the normal tests for notification under the relevant sections of the Resource Management Act 1991 by stating that restricted discretionary applications to infringe E11.6.2 and E12.6.2 (General standards for land disturbance) of the AUP <i>will be considered without public or limited notification or the need to obtain written approval from affected parties</i>. The standard E12.6.2 in particular includes the following designed to protect neighbouring property and assets (underlining added):</p> <p>(2). <i>Land disturbance must not result in any <u>instability of land or structures at or beyond the boundary of the property where the land disturbance occurs</u>.</i></p> <p>(3). <i>The land disturbance must not cause malfunction or result in damage to <u>network utilities, or change the cover over network utilities so as to create the potential for damage or malfunction</u>.</i></p> <p>(4). <i>Access to <u>public footpaths, berms, private properties, network utilities, or public reserves must not be obstructed unless that is necessary to undertake the works or prevent harm to the public</u>.</i></p> <p>(5). <i>Measures must be implemented to ensure that any <u>discharge of dust beyond the boundary of the site is avoided or limited such that it does not cause nuisance</u>.</i></p> <p>(11). <i>Earthworks (including filling) within a 100 year annual exceedance probability (AEP) flood plain:</i></p> <p>(a) <i>must not raise ground levels more than 300mm, to a total fill volume up to 10m³ which must not be exceeded through multiple filling operations; and</i></p> <p>(b) <i><u>must not result in any adverse changes in flood hazard beyond the site</u>.</i></p> <p>(12). <i>Earthworks (including filling) within overland flow paths must maintain the same entry and exit point at the boundaries of a site and <u>not result in any adverse changes in flood hazards beyond the site</u>, unless such a change is authorised by an existing resource consent.</i></p> <p>There is no justification provided for this removal of the participation rights of affected parties (including DSL) who may be adversely affected by non-</p>	<p>Delete the provision so that an application for resource consent for a restricted discretionary activity listed in Table E11.4.1, Table E11.4.2 and Table 12.4.1 will be subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.</p>
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	compliance with these standards within the PC48 area.		
IX.6(2)(b)	IX.6(2)(b) exempts activities within the PC48 area from complying with Trip Generation Rule E27.6.1. This might be acceptable if adequate provision was made for transportation infrastructure within the other PC48 rules, but it is not, as set out below.	Amend so that any exemption is clear as to the activities that it applies to, and that the effects of those activities have been assessed through an ITA.	32.6
IX6.2	Tables IX.6.2.1 and IX.6.2.2 set out the development GFA thresholds and upgrades to the Waihoehoe Road / Great South Road intersection both with and without direct access being provided to the Drury Centre from State Highway 1, as shown on IX.10.3 Drury Centre: Precinct Plan 3. The transportation upgrades proposed in both Tables IX.6.2.1 and IX.6.2.2 are inadequate in scope and nature to ensure that there are not adverse effects on the Drury South Industrial Precinct and the surrounding transport network. The transport assessment which supports PC48 places undue reliance on currently unfunded transportation upgrades being provided by other parties or through as yet unspecified developer funding agreements.	Amend PC48 to ensure that: (a). adequate upgrading of the surrounding road network (for example Waihoehoe Road, Great South Road, Fitzgerald Road and the proposed connections between the PC48 area and Quarry Road and Pitt Road / Great South Road shown on Precinct Plan 2) is undertaken; and (b). any non-compliance with this standard is a discretionary activity.	32.7
Precinct Plan 2 – Spatial Features	The Precinct Plan includes indicative and proposed connector roads but the transport assessment has not considered the effects of those connections. There are also no mechanisms specified in PC48 by which to assess the effects on these roads under subsequent consent processes.	The effects of the connections identified in the Precinct Plan are assessed in the ITA and / or through the PC48 provisions, and appropriate upgrades to mitigate any effects arising are included within PC48.	32.8
IX6.6 Stormwater Quality	The proposed standard is supported insofar as it deals with stormwater quality issues, but it does not address flooding issues in the catchment which affect upstream and downstream areas	Amend Standard IX6.6 by adding the words “ <i>and Flooding</i> ” to the heading and adding the following clause (2): <i>(2) any stormwater management plan or earthworks proposed as part of subdivision or development must:</i> <i>(i) comply with any approved discharge consent;</i> <i>(ii) be effective in avoiding, remedying or mitigating the potential adverse effects of stormwater discharge on water quality and flood hazards. In the case of stormwater management facilities within private land this assessment will include how the operation and maintenance of such facilities is to be secured by way of appropriate covenants or consent notices;</i> <i>(iii) be effective in containing all the natural and diverted streams and their margins, wetlands, and other off-site stormwater</i>	32.9

		<p><i>management devices;</i></p> <p><i>(iv) provide for overland flowpaths;</i></p> <p><i>(v) ensure that subdivision and development does not result in increased flood risk to land for all flood events from the 50% and up to 1% AEP flood event downstream and upstream of the precinct.</i></p>
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32.9

**SUBMISSION ON PLAN CHANGE 48 – DRURY CENTRE PRECINCT, DRURY SOUTH –
AUCKLAND UNITARY PLAN BY KĀINGA ORA HOMES AND COMMUNITIES**

TO: Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1010

Submission via email: unitaryplan@aucklandcouncil.govt.nz

KĀINGA ORA HOMES AND COMMUNITIES (“**Kāinga Ora**”) at the address for service set out below makes the following submission on Plan Change 48 – Drury centre Precinct, Drury (“**PC48**”) to the Auckland Unitary Plan Operative in Part (“**AUP:OP**”).

Background

1. Kāinga Ora was established in 2019 as a statutory entity established under the Kāinga Ora-Homes and Communities Act 2019. Kāinga Ora consolidates Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown entity and is required to give effect to Government policies.
2. Kāinga Ora is now the Government’s delivery entity for housing and urban development. Kāinga Ora will therefore work across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:
 - (a) being a world class public housing landlord; and
 - (b) leading and co-ordinating urban development projects.
3. Kāinga Ora’s statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
 - (a) provide people with good quality, affordable housing choices that meet diverse needs; and

- (b) support good access to jobs, amenities and services; and
 - (c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
4. Kāinga Ora is focused on delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures.
 5. The public housing portfolio managed by Kāinga Ora in Auckland comprises approximately 30,100 dwellings¹. Auckland is a priority to reconfigure and grow Kāinga Ora's housing stock to provide efficient and effective public and affordable housing that is aligned with current and future residential demand in the area, and the country as a whole.
 6. Kāinga Ora has a shared interest in the community as a key stakeholder, alongside local authorities. Kāinga Ora's interests lie in the provision of public housing to persons who are unable to be sustainably housed in private sector accommodation, and in leading and co-ordinating residential and urban development projects. Kāinga Ora works with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.
 7. In addition to its role as a public housing provider, Kāinga Ora also has a significant role as a landowner, landlord, rate payer and developer of residential housing. Strong relationships between local authorities and central government are key to delivering government's priorities on increasing housing supply.
 8. Policy decisions made at both central and local government level have impacts on housing affordability. The challenge of providing affordable housing will require close collaboration between central and local government to address planning and governance issues to reduce the cost of construction, land supply constraints, infrastructure provisions and capacity as well as an improved urban environment.
 9. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing. These include the provision of services and infrastructure and how this may

¹ As of 30 September 2020

impact on Kāinga Ora existing and planned housing, community development and Community Group Housing (“**CGH**”) suppliers.

10. In addition to the above, Kāinga Ora will play a greater role in urban development in New Zealand. The legislative functions of Kāinga Ora, as outlined in the Kāinga Ora Act, illustrate this broad mandate and outline two key roles of Kāinga Ora in that regard:
 - a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
 - b) providing a leadership or coordination role more generally.
11. Notably, Kāinga Ora’s statutory functions in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first time buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.

Scope of Submission

12. The submission relates to PC48 in its entirety.

The Submission is:

13. Kāinga Ora **supports** the plan change **in part**, which seeks to rezone land within the spatial extent of the Proposed Drury Centre Precinct (“**the Proposed Precinct**” or “**Precinct**”) from Future Urban Zone (“**FUZ**”) to a combination of Business – Metropolitan Centre Zone (“**MCZ**”), Business – Mixed Use Zone (“**MUZ**”) and Open Space – Informal Recreation Zone (“**OSIRZ**”). This is subject to Kāinga Ora’s relief being granted and matters raised in its submission being addressed. In particular, but without limiting the generality of the above:
14. Kāinga Ora generally supports the proposed zonings within the spatial extent of the Proposed Precinct, which are generally aligned with the zoning indicated on the Drury-Opāheke Structure Plan 2019. The proposed zoning and corresponding Precinct Provisions will promote and enable a compact urban form that is supported by the Precinct’s transportation connectivity in the form of State Highway One and the planned and funded Drury East Rail Station – consistent with Chapter B2 of the Regional Policy Statement (“**RPS**”) in the AUP:OP.

15. Kāinga Ora generally supports the Transit Orientated Development (“**TOD**”) approach that has been taken (as-referenced) throughout the master planning documentation in support of the proposed Plan Change and in particular under Objective (1) of the proposed Drury Centre Precinct. Kāinga Ora consider it critical to the success of the future development, that the aspirations of the master plan are realised within the precinct provisions themselves in order to avoid development that, due to its proximity to State Highway One, nevertheless becomes a car-driven urban area.
16. Kāinga Ora acknowledges that the rezoning of land may not be sequenced with the Future Urban Land Supply Strategy 2017 (“**FULSS**”) which is cross-referenced within the Drury-Opāheke Structure Plan 2019 to be rezoned during ‘2028 – 2032’. Kāinga Ora generally supports the planning assessment undertaken in support of PC48 because:
 - (a) The proposed rezoning under PC48 has taken place following the Drury-Opāheke Structure Plan 2019, and is therefore aligned with the sequence for urban land rezoning outlined within the RPS (as-assessed within the Planning Assessment supporting the PC48);
 - (b) The Proposed Precinct’s location, intensity and timing is consistent with the relevant objectives and policies of the National Policy Statement on Urban Development 2020 (“**NPS:UD**”) because in particular:
 - (i) Urbanisation of land at this time is responsive to the need to ensure sufficient development capacity for the wider Auckland Region and to deliver housing supply (Objective 1, 6 and Policy 8);
 - (ii) The Precinct enables buildings heights and intensity surrounding the proposed Metropolitan Centre Zone consistent with Policy 3; and
 - (iii) Provides for a range of land uses and housing types across the PC48, 49 and 50 spatial extents that that will be integrated through comprehensive land use planning and specific transportation-connectivity provisions that promote well-functioning environments that support a range of transportation choices (Policy 1).
 - (c) Timing and funding for key infrastructure upgrades necessary to support urbanisation are confirmed by Waka Kotahi – New Zealand Transport Agency (“**NZTA**”);

- (d) The Proposed Precinct provisions would ensure that the sequencing of development within the precinct is undertaken in a manner that mitigates actual and potential effects on the wider transportation network, and takes place in a staged manner to remain 'in step' with key public infrastructure delivery necessary to support the Drury Centre Precinct;
 - (e) There is a clear demand for developable land within the Auckland Region to facilitate an increase in housing supply and consequential positive effects on affordability; and
 - (f) The timing for completion of the statutory process to deliver live zoning, along with the planning, consenting and eventual delivery of development would put the actual infrastructure *demand* from enabled development within the Proposed Precinct close to the 2028 timeframe otherwise envisaged by the FULSS.
17. Kāinga Ora seeks a number of amendments to PC48 which are set out in detail in this submission below, and in **Attachment 1** which identifies the specific provisions of PC48 which Kāinga Ora either supports, seeks amendment to, or opposes. In particular, but without limiting the generality of the above:
 18. Kāinga Ora notes that the Master Plan associated with the Proposed Precinct, identifies a number of localised open spaces throughout the planned development of the Precinct, which provide linkages from the OSIRZ through to urban areas, along with a neighbourhood park bounded by roads within Sub-Precinct F (identified in Master Plan documentation). Despite this, there are few methods within the Proposed Precinct provisions to ensure these features are delivered, in addition to the identified 'Homestead Park' on Precinct Plan 2.
 19. Kāinga Ora is also of the view that the Open Space – Informal recreation zone located in locations subject to the National Grid power transmission network, locates these areas to the periphery of the Precinct, and the wider urbanised land sought to be enabled under PC48, 49 and 50.
 20. Consistent with its submission on PC49, Kāinga Ora is of the view that there is an under-provision of open space throughout the collective proposed Drury precincts (as sought from Plan Changes 48 to 51), which is necessary to support the intensity of land use proposed within the wider Drury East area and provide connections through to the zoned areas of Open Space. As with the identified 'Homestead Park' on Precinct

Plan 2 – Spatial Features, localised parks and green linkages identified within the Master Plan documents, should be incorporated into the precinct plans and provisions, to ensure that there is sufficient direction within future Resource Consent applications to include these features so as to provide meaningful connection to and integration of the OSIRZ zoning.

21. Kāinga Ora notes that the Plan Change documentation and Master Plan makes reference to the location of a potential future Hospital ‘sub-precinct’ and Tertiary Education Facility. Kāinga Ora is of the view that, across the combined extent of PC48, 49 and 50, such facilities (including all levels of education as well as social services) are essential to support to level of intensification and urbanisation proposed, and will ensure a sustainable and vibrant community. Kāinga Ora therefore seeks spatial zonings be included (i.e. Special Purpose Zone) and corresponding provisions to provide for and enable these services to meet the needs of the community enabled by the plan changes.
22. Kāinga Ora seeks that the Proposed Precinct Provisions and Plans indicate that such land uses are contemplated and provided for within the Precinct.

Relief Sought

23. Kāinga Ora seeks the following decision from Auckland Council on PC48:
 - (a) That the proposed provisions of the Proposed Precinct be deleted or amended, to address the matters raised in this submission and its attachments so as to provide for the sustainable management of the Region’s natural and physical resources and thereby achieve the purpose of the (“**the Act**” or “**RMA**”).
 - (b) Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.
 - (c) Any other alternative or consequential relief to give effect to this submission.
24. In the absence of the relief sought, PC48:
 - (a) is contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;

- (b) will compromise an integrated release of urbanised land and not sufficiently promote the establishment of open space to support the collective residential intensity enabled across the concurrent plan changes PC48, 49 and 50;
 - (c) will not sufficiently identify health and education land uses as being compatible with the Precinct; and
 - (d) will in those circumstances impact significantly and adversely on the ability of people and communities to provide for their social, economic and cultural wellbeing.
25. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.
26. Kāinga Ora wishes to be heard in support of this submission.
27. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at hearing.

Dated this 22 day of October 2020



Brendon Liggett
Manager – Development Planning
Kāinga Ora Homes and Communities

ADDRESSES FOR SERVICE:

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Auckland

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Attachment 1 –

Table 1: Identifies the specific provisions of PC48 which Kāinga Ora either supports, seeks amendment to, or opposes.

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:
	<i>Note: Kāinga Ora's submission relates to PC 48 in its entirety. Where provisions within the proposed Drury East Precinct are not included in this submission table, those provisions are supported in part, subject to the relief sought by Kāinga Ora.</i>			
1.	Spatial application of Zoning within the Drury Centre Precinct	Support in part	<p>Kāinga Ora generally supports the proposed zonings within the Drury Centre Precinct, which are generally aligned with the zoning indicated on the Drury-Opāheke Structure Plan 2019, and will promote and enable a compact urban form that is supported by transportation connectivity in the form of State Highway One and the planned and funded Drury East Rail Station.</p> <p>Kāinga Ora generally supports the Transit Orientated Development ("TOD") approach that has been taken (as-referenced) throughout the master planning documentation in support of the proposed Plan Change and in particular under Objective (1) of the proposed Drury Centre Precinct. Kāinga Ora consider it critical to the success of the future development, that the aspirations of the master plan are realised within the precinct provisions themselves in order to avoid development that, due to its proximity to State Highway One, nevertheless becomes a car-driven urban area.</p> <p>However, Kāinga Ora observes that the Open Space – Informal recreation zone located in locations subject to the National Grid power transmission network, locates these areas to the periphery of the precinct, and the wider urbanised land sought to be enabled under PC48, 49 and 50.</p> <p>The Master Plan associated with the Drury Centre Precinct, identifies a number of localised open spaces throughout the planned development of the Precinct, which provide linkages</p>	<p>Approve the plan change, subject to:</p> <ul style="list-style-type: none"> Identifying local open space areas within the Precinct and strengthening precinct provisions to provide an integrated and connected open space network; The inclusion of spatial zoning (i.e. Special Purpose Zone) and corresponding precinct provisions to enable the provision of identified future tertiary and hospital activities within the precinct provisions that are necessary to support the intensity of urbanisation sought; Consequential amendments as-required to give effect to the relief sought.

33.1

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:
			<p>from the Open Space – Informal Recreation zone through to urban areas, along with a neighbourhood park bounded by roads within Sub-Precinct F (identified in Master Plan documentation). Despite this, there are few methods within the precinct provisions to ensure features are delivered, in addition to the identified 'Homestead Park' on Precinct Plan 2.</p> <p>Consistent with its submission on PC49, Kāinga Ora is of the view that there is an under-provision of open space throughout the collective precincts, which is necessary to support the intensity of land use proposed within the wider Drury East area and provide connections through to the zoned areas of Open Space. As with the identified 'Homestead Park' on Precinct Plan 2 – Spatial Features, localised parks and green linkages identified within the Master Plan documents, should be incorporated into the precinct plans and provisions, to ensure that there is sufficient direction within future Resource Consent applications to include these features.</p> <p>Kāinga Ora notes that the Plan Change documentation and Master Plan makes reference to the location of a potential future Hospital 'sub-precinct' and Tertiary Education Facility. Kāinga Ora is of the view that, across the combined extent of PC48, 49 and 50, such facilities (including all levels of education as well as social services) are essential to support to level of intensification and urbanisation proposed, and will ensure a sustainable and vibrant community. It is also noted that such facilities have already been identified as-needed within the Plan Change documentation (based on the documented discussions with the Ministry of Education, District Health Boards and the Ministry for Business Innovation and Employment)². Kāinga Ora therefore seeks spatial zonings be included (i.e. Special Purpose Zone) and</p>	

² Page 32, 34 and 35 - Drury Metropolitan Centre 2048 Master Plan Report (28 June 2019)

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:	
			corresponding provisions to provide for and enable these services to meet the needs of the community enabled by the plan changes.		
2.	Drury Centre Precinct Plans	Support in part	<p>Kāinga Ora generally supports the Drury Centre Precinct Plans.</p> <p>Consistent with its submission on the spatial application of Zoning within the Drury Centre Precinct, localised parks and green linkages identified within the Master Plan documents, should be incorporated into the precinct plans and provisions, to ensure that there is sufficient direction within future Resource Consent applications to include these features.</p>	<p>Approve the plan change, subject to:</p> <ul style="list-style-type: none"> Identifying local open space areas within the Precinct and strengthening precinct provisions to provide an integrated and connected open space network; The inclusion of spatial zoning (i.e. Special Purpose Zone) and corresponding precinct provisions to enable the provision of identified future tertiary and hospital activities within the precinct provisions; Consequential amendments as-required to give effect to the relief sought. 	33.1
3.	IX.1 Drury Centre Precinct Description	Support in part	Kāinga Ora generally supports the description of the precinct.	Retain the Drury Centre Precinct description with consequential amendments to reflect Kāinga Ora's submission.	33.2
4.	IX.2 Objective (3)	Support in part	It is unclear what the phrase '...respects Mana Whenua values' means within the context of future assessment as part of resource consent application, and how this would be applied in any future assessment under Section 104 (1)(b) of the Resource Management Act 1991.	Retain Objective (3) subject to clarification and amendment.	33.3

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:	
			<p>It is also unclear whether, by implication, a Cultural Values Assessment ('CVA') would be required for all resource consent applications within the precinct to understand what those particular values are within the context of a development or the wider precinct.</p> <p>Kāinga Ora suggest that those values may be better-incorporated into the precinct provisions themselves to avoid administrative ambiguity. If this has been undertaken through particular standards and criteria relating to stormwater, Te Aranga Design Principles etc, then these should be acknowledged within the objectives and policies of the precinct.</p>		
5.	IX.2 Objective (4)	Support in part	<p>Kāinga Ora supports the objective in-part. However, the reference to the environment being "[...]street-based" could be misconstrued as encouraging an agglomeration of streets throughout the precinct. As vehicle access is likely to be a practical requirement to access and servicing of future development, Kāinga Ora requests that the 'street-based' reference is deleted, with wording added to clarify the objective:</p> <p><i>"Drury Centre is <u>an</u> street-based environment that provides a high-quality pedestrian <u>experience throughout the street network</u>, with a particular emphasis on the Key Retail Street.</i></p>	Retain Objective (4) subject to amendment.	33.4
6.	IX.2 Objective (7)	Support	Kāinga Ora supports the proposed objective which is aligned with the National Policy Statement on Fresh Water Management.	Retain Objective (7) as notified.	33.5
7.	IX.3 Policy (3)	Support in part	<p>Kāinga Ora generally supports the policy. However, the policy can be clarified as it appears to be two separate issues combined, as well as re-wording to plain English:</p> <p><i>(3) Provide for high density residential and supporting intensive employment activities compatible with residential amenity</i></p>	Retain Policy (3) with amendment.	33.6

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:	
			<p><i>values in Sub-Precinct C, E and F without undermining the role that recognise the primacy of Sub-Precinct A as the core centre. Provide for a greater range of intensive employment activities and greater heights in Sub-Precinct E responding to its close proximity to rapid transport, while recognising the primacy of Sub-Precinct A as the core centre.</i></p> <p><i><u>(4) Provide for a greater range of intensive employment activities and greater heights in Sub-Precinct E responding to its close proximity to rapid transport, while recognising the primacy of Sub-Precinct A as the core centre.</u></i></p>		
8.	IX.3 Policy (5)	Support in part	<p>Kāinga Ora generally supports the need to ensure development in accordance with the planned road layout and precinct plans.</p> <p>However, Kāinga Ora is opposed to wording of the policy and associated activities and development standards which allow for an alternative location without consideration of the implications that may arise from an alternative location that fragments the pattern of zoning and built character that would establish within the precinct – particularly the transition between the Metropolitan Centre and Mixed-Use zones.</p> <p>The policy should be reworded as follows:</p> <p><i>“Require collector roads to be generally in the locations shown in IX.10.1 Drury Centre: Precinct Plan 2, while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network <u>and is generally aligned with transitions in zoning</u>”.</i></p>	Retain Policy (5) with amendment.	33.7
9.	IX.3 Policy (15)	Support in part	<p>Kāinga Ora supports in part the need to manage the actual and potential effects that residential development may generate on the transportation network, where necessary upgrades to support such development may not have occurred.</p>	<p>Retain Policy (15) subject to:</p> <ul style="list-style-type: none"> Clarify and / or amend policies and associated provisions to account for public infrastructure upgrades. 	33.8

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:
			However, Kāinga Ora questions the extent to which the various publicly-funded infrastructure works (noted under IX.6.2 (3) and IX.6.3 (2) as “...not included in the development thresholds...” have influenced the setting of the development thresholds proposed, and whether the thresholds have assumed those upgrades have taken place. If those public works not taking place have a material influence on the threshold proposed, Kāinga Ora submit they should be included in the precinct.	
10.	IX.6 (2)(b) Standards	Oppose	<p>Kāinga Ora opposes the exclusion of the E27.6.1 Trip generation standard from within the Drury Centre Precinct.</p> <p>While it is acknowledged that trip generation assessments are otherwise excluded under E27.6.1 (2)(b); it is unclear what method the Drury Centre Precinct provisions employ to account for a situation where (as noted in the standard above) the land use and the associated trip generation and transport effects are <i>not</i> the same or similar in character, intensity and scale to those identified in the previous assessment, and upon which the precinct provisions and various thresholds have been based.</p> <p>Retaining the application of E27.6.1 provides a ‘back stop’ to ensure that unforeseen (however unlikely) changes in the surrounding environment and transportation assumptions do not affect the planned outcomes of the Drury Centre Precinct or the safety and efficient of the wider transportation network.</p>	Remove the exclusion of E27.6.1 Trip generation standard from within the Drury Centre Precinct.
	IX.6.2 Staging of Development with Transport Upgrades	Support in part	Kāinga Ora supports in part the need to manage the actual and potential effects that residential development may generate on the transportation network, where necessary upgrades to support such development may not have occurred.	<p>Retain Standard IX.6.2 subject to:</p> <ul style="list-style-type: none"> Clarify and / or amend policies and associated provisions and thresholds to account for public infrastructure upgrades.

33.9

33.10

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:	
			However, Kāinga Ora questions the extent to which the various publicly-funded infrastructure works (noted under IX.6.2 (3) and IX.6.3 (2) as “...not included in the development thresholds...” have influenced the setting of the development thresholds proposed, and whether the thresholds have assumed those upgrades have taken place. If those public works not taking place have a material influence on the threshold proposed, Kāinga Ora submit they should be included in the precinct.		
	IX.6.3 Trip Generation Limit	Support in part	<p>Kāinga Ora supports in part the need to manage the actual and potential effects that residential development may generate on the transportation network, where necessary upgrades to support such development may not have occurred.</p> <p>However, Kāinga Ora questions the extent to which the various publicly-funded infrastructure works (noted under IX.6.2 (3) and IX.6.3 (2) as “...not included in the development thresholds...” have influenced the setting of the development thresholds proposed, and whether the thresholds have assumed those upgrades have taken place. If those public works not taking place have a material influence on the threshold proposed, Kāinga Ora submit they should be included in the precinct.</p>	<p>Retain Standard IX.6.3 subject to:</p> <ul style="list-style-type: none"> Clarify and / or amend policies and associated provisions and thresholds to account for public infrastructure upgrades. 	33.11
	IX.8.2 (1) (a) Assessment Criteria	Support in part	<p>Consistent with its submission on IX.3 (5), Kāinga Ora generally supports the need to ensure development in accordance with the planned road layout and precinct plans.</p> <p>However, Kāinga Ora is opposed to wording of the policy and associated activities and development standards which allow for an alternative location without consideration of the implications that may arise from an alternative location that fragments the pattern of zoning and built character that would establish within the precinct – particularly the transition between the Metropolitan Centre and Mixed-Use zones.</p>	Retain Criteria IX.8.2 (1)(a) subject to amendment.	33.12

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought:
			<p>The criteria should be reworded as follows:</p> <ul style="list-style-type: none"> <i>i. The presence of natural features, natural hazards or contours and how this impacts the placement of roads;</i> <i>ii. The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and</i> <i>iii. The constructability of roads and the ability for it to be delivered by a single landowner; <u>and</u></i> <i>iv. <u>The need to ensure that any alternative Collector Road location is generally aligned with transitions in zoning.</u></i> 	

Auckland Council

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Private Bag 92300

Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Plan Change 48 (Private): Drury Centre Precinct

FROM: Watercare Services Limited

ADDRESS FOR SERVICE: ilze.gotelli@water.co.nz

DATE: 22 October 2020

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

1. INTRODUCTION

1.1. Watercare's purpose and mission

Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council ("**Council**").

Watercare provides integrated water and wastewater services to approximately 1.4 million people in Auckland. Watercare collects, treats and distributes drinking water from 11 dams, 26 bores and springs, and four river sources. A total of 330 million litres of water is treated each day at 15 water treatment plants and distributed via 89 reservoirs and 90 pump stations to 450,000 households, hospitals, schools, commercial and industrial properties.

Watercare's water distribution network includes more than 9,000 km of pipes. The wastewater network collects, treats and disposes of wastewater at 18 treatment plants and includes 7,900 km of sewers.

Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of the assets. Watercare must also give effect to relevant aspects of the Council's Long Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Urban Land Supply Strategy.¹

2. SUBMISSION

2.1. General

This is a submission on a change proposed by Kiwi Property No.2 Ltd to the Auckland Unitary Plan (Operative in Part) that was publicly notified on 27 August 2020 ("**Plan Change**").

The applicant proposes to rezone 95 hectares of Future Urban zoned land in the area generally bounded by Great South Road, Waihoehoe Road, Fitzgerald Road and the Hingaia Stream to approximately 35 hectares of Business: Metropolitan Centre zone, approximately 51.5 hectares of Business: Mixed Use zone surrounding the Metropolitan Centre, and approximately 8.5 hectares of Open Space: Informal Recreation zone adjoining the Hingaia Stream ("**Plan Change Area**"). The Plan Change also introduces the Drury Centre Precinct to the Auckland Unitary Plan (Operative in Part).

Watercare neither supports nor opposes the Plan Change.

The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing arrangement to ensure that the effects on Watercare's existing and planned water and wastewater network are appropriately considered and managed in accordance with the Resource Management Act 1991.

This submission also addresses specific issues related to land owned by Watercare at 103 Flanagan Road (the "**Watercare Land**") and seeks to ensure that critical existing and planned water and wastewater infrastructure located on the Watercare Land is not compromised by future works enabled or supported by the Plan Change.

2.2. Specific parts of the Plan Change

The specific parts of the Plan Change that this submission relates to are:

- (a) the proposed water and wastewater servicing arrangement; and
- (b) the effects of the Plan Change on Watercare's existing and planned water and wastewater network.

¹ Local Government (Auckland Council) Act 2009, s58.

Watercare has reviewed the Plan Change and considers that:

- (a) the proposed water and wastewater capacity and servicing requirements have been adequately assessed as part of the Plan Change;
- (b) subject to development occurring in accordance with the proposed staging and infrastructure upgrades described further below:
 - (i) the proposed servicing arrangement is technically feasible; and
 - (ii) any adverse effects of the Plan Change on Watercare's existing and planned water and wastewater infrastructure network will be appropriately managed.

2.2.1. Water supply servicing for the Plan Change Area

The Plan Change Area is not serviced by Watercare's water supply network.

Watercare has constructed a new bulk water supply point adjacent to Watercare's existing Waikato Water Pump Station. The bulk supply point has sufficient flows and pressure to service the Plan Change Area.

The developer will be required to provide and fund the local reticulation network within the Plan Change Area.

Design of all water supply infrastructure, including sizing for future reticulation, will be required to comply with Watercare's Code of Practice for Land Development and Subdivision.

Design and testing for firefighting pressure and provision for fire hydrants within the road reserve will be required to be addressed at resource consent stage.

2.2.2. Wastewater servicing for the Plan Change Area

The Plan Change Area is not serviced by Watercare's wastewater network.

2.2.2.1. Servicing the Wider Drury Area

Watercare is currently completing the installation of the Southern Wastewater Network. The Southern Wastewater Network includes:

- a) a gravity main from the intersection of Fitzgerald Road and Brookfield Road;
- b) a new wastewater pump station adjacent to the Waikato Water Pump Station on the Watercare Land at 103 Flanagan Road (the "**Drury South Pump Station**"); and
- c) a rising main connecting into the Drury West Branch Sewer in Bremner Road.

The Southern Wastewater Network was initially designed to cater for the Drury South Limited industrial development and Hunua Views residential development but, following agreements reached with the applicant and other developers, it was upsized to cater for the initial stages of the three currently proposed plan changes in Drury East. The Southern

Wastewater Network is now designed to cater for 10,000 Dwelling Unit Equivalents ("DUEs"). This project is due for completion in December 2020.

The Southern Wastewater Network connects to the new Bremner Road Pump Station, constructed by Karaka and Drury Consultant Limited (KDCL) as part of the Auranga development, which in turn connects to the Hingaia Pump Station. Wastewater from the Hingaia Pump Station is conveyed to the Mangere Wastewater Treatment Plant via the Southern Interceptor. The Bremner Road Pump Station is designed to cater for 6,000 DUEs.

Collectively, the Southern Wastewater Network and the Bremner Road Pump Station will cater for the initial growth in the wider Drury Development Area that will be enabled by proposed Plan Changes 46, 48, 49, 50 and 51 but will need to be upsized to cater for additional growth as the area develops.

Watercare is also currently undertaking a \$76 million project to upgrade the Hingaia Pump Station to cater for currently projected population growth in the Hingaia Peninsula, Drury and Opaheke Areas (refer Figure 1 attached at **Appendix A**) ("**Hingaia Project**"), as the Southern Interceptor was not originally designed to service projected growth in Drury and Opaheke. The Hingaia Project will upgrade the Hingaia Pump Station by adding an additional 450m³ of storage and constructing a new 630mm rising main to divert flows from the Southern Interceptor to the Manurewa South Wastewater Pump Station. This project is due for completion in 2024.

The longer-term upgrades that will be required to service the wider Drury Development Area include:

- upsizing of the Drury South Pump Station and rising main;
- upsizing of the Bremner Road Pump Station. The Bremner Road Pump Station has been designed to cater for 6,000 DUEs. The existing pump station will need to be upgraded in stages at certain levels of flows and then will need to be fully upgraded by Watercare when the upstream catchment flows reach 200 l/s; and
- further upsizing (or replacement) of the Hingaia Pump Station and installation of a second new rising main. It is anticipated that additional upsizing will be required by 2030 but the timing for upsizing or replacement works will reflect long-term growth.

2.2.2.2. Servicing the Plan Change Area

The applicant has entered into a commercial agreement to support the construction of the Southern Wastewater Network and the Bremner Road Pump Station. This agreement provides capacity to the applicant for up to 950 DUEs or 49 l/s.

The local wastewater reticulation required to connect the Plan Change Area to the Watercare network will be provided by the developer at its cost.

All wastewater infrastructure will be required to comply with Watercare's Code of Practice for Land Development and Subdivision.

2.3 Watercare Land

Watercare owns the land at 103 Flanagan Road. Watercare has critical water and wastewater assets located on the Watercare Land, including:

- a) The Waikato Water Pump Station that pumps water from the Waikato Water Transmission Pipeline. This is one of Auckland's most critical water supply assets.
- b) The Drury South Pump Station that Watercare is currently constructing adjacent to the Waikato Water Pump Station. As discussed above, this wastewater pump station has been sized to cater for 10,000 DUEs but will need to be upgraded in the future to cater for the longer-term growth of Drury East.

The applicant has discussed with Watercare its proposal to locate the proposed Drury Central Train Station and associated Park-and-Ride and transport interchange ("**Train Station**") adjacent to and partly on the Watercare Land. We understand that this is an alternative site to the one that has been proposed by the Supporting Growth Alliance. Watercare has no opinion on the location of the proposed Train Station, provided that the final location does not compromise the construction, operation or ongoing maintenance of Watercare's current and future infrastructure assets, including by way of any reverse sensitivity effects.

At the applicant's request, Watercare has agreed to work with the applicant to determine whether there is a design option at the applicant's proposed site that is compatible with Watercare's existing and planned infrastructure, including any ongoing construction, operational and maintenance requirements. Any final design would need to retain sufficient flexibility for Watercare to accommodate upgrades or additional infrastructure required to meet future demand.

Watercare has entered into a Memorandum of Understanding with the applicant confirming the willingness of both parties to consider design options that enable the proposed Train Station to be located at the site preferred by the applicant without jeopardising Watercare's current and future assets. At the time of this submission, there has only been limited information provided to Watercare in respect of potential design alternatives and no detailed assessment or final selection has occurred.

3. DECISION SOUGHT

Watercare seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Plan Change will be adequately met, such that the water and wastewater related effects are appropriately managed.

To enable that decision to be made, Watercare requests the following amendments to the proposed Drury Centre Precinct provisions:

- (a) Amend Policy 16 as follows:

(16) Ensure that development in Drury Centre Precinct is coordinated with, and does not precede, supporting stormwater, wastewater and water supply infrastructure.

34.1

- (b) Include new Policy 16A as follows:

(16A) Manage subdivision and development to avoid, remedy or mitigate adverse effects on infrastructure, including reverse sensitivity effects or those which may compromise the operation or capacity of existing or authorised infrastructure.

34.2

- (c) Such other alternative or consequential relief as required to give effect to the matters raised in this submission.

4. HEARING

Watercare wishes to be heard in support of its submission.

22 October 2020

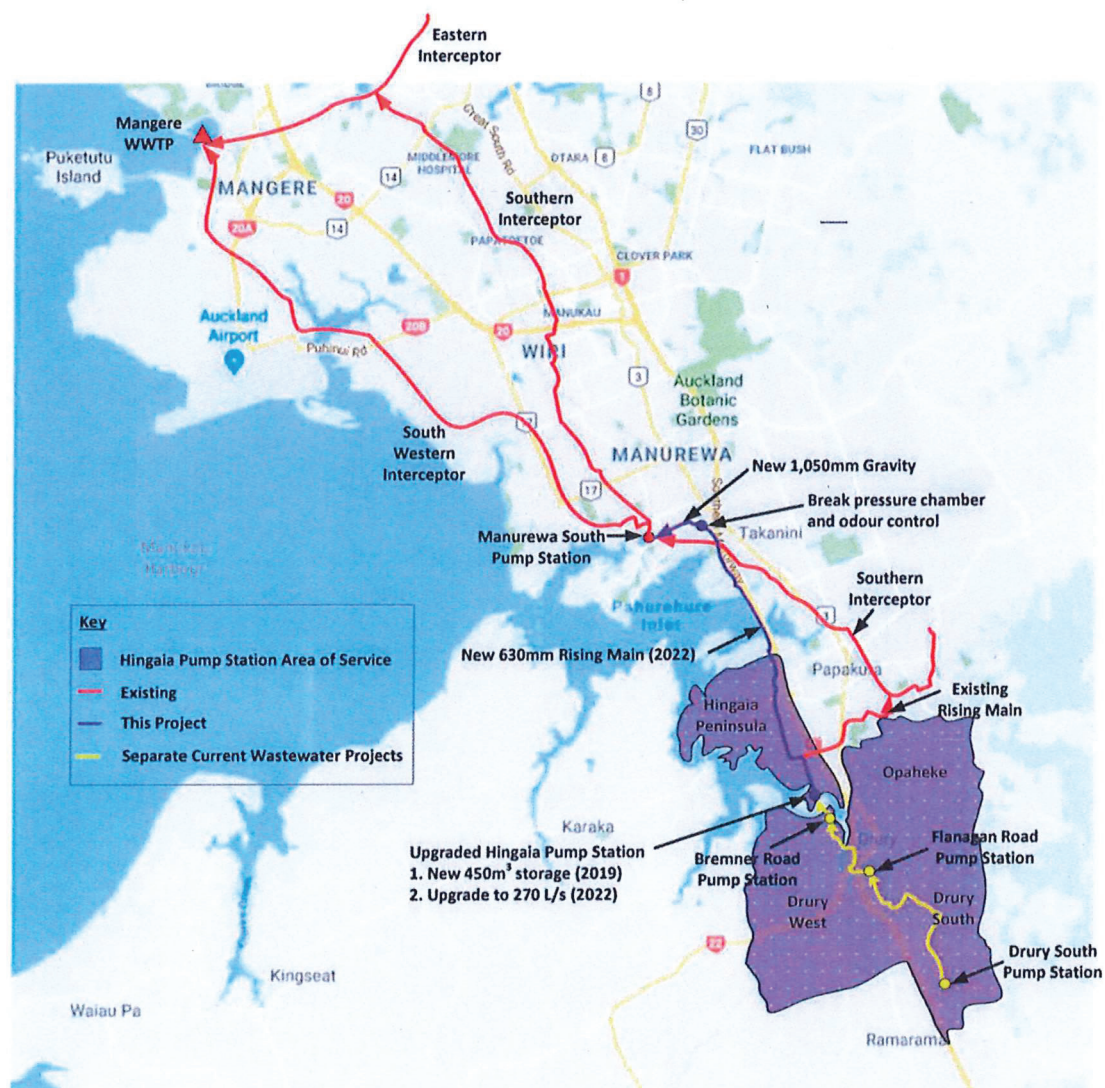


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Appendix A

Figure 1: The Hingaia Wastewater Pump Station Upgrade Project.





SUBMISSION ON PLAN CHANGE 48 (PRIVATE): DRURY CENTRE PRECINCT

To: Auckland Council

Name of Submitter: Ngāti Tamaoho (the **Submitter**)

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 48: Drury Centre Precinct (**PPC48**) by Kiwi Property Holdings No 2 Limited (**applicant**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. PPC48 seeks to rezone 95 hectares of land in the area generally bounded by Great South Road, Waihoehoe Road, Fitzgerald Road and the Hingaia Stream from Future Urban to a mixture of Business: Metropolitan Centre and Business: Mixed Use land. PPC48 also amends provisions of the Drury South Industrial Precinct at Maketu Road, Quarry Road and Fitzgerald Road in Drury South to create a new commercial centre.
3. PPC48 is one of three private plan change requests that have been prepared and lodged by three separate developers, but which are interrelated. The net result of the three plan change requests is a proposed large development constituting approximately 7,000 new dwellings, 19,000 new residents and 58,000m² GFA of new office space, among other outcomes. The Submitter has lodged separate submissions of each of the three plan change requests.
4. The Submitter could not gain an advantage in trade competition through this submission.
5. This submission relates to the entire PPC48.
6. The Submitter's key interests are to ensure the protection, preservation and appropriate management of natural and cultural resources in a manner that recognises and provides for Mana Whenua interests and values and enables positive environmental, social and economic outcomes.
7. As the proposal currently stands, the Submitter **opposes in part** PPC48 on the basis that:
 - (a) Mana Whenua have not had the opportunity to provide input into the design and detail of the proposal to ensure that their values are reflected in PPC50, and

that adverse environmental, social and cultural effects are avoided, remedied or mitigated.

8. Ngāti Tamaoho prepared a Cultural Values Assessments for the applicant which set out in detail the cultural connections Ngāti Tamaoho has with the PPC48 land and the surrounding Drury-Opaheke area. We do not repeat this detail provided in this CVA.

SUBMISSION

9. The Submitter considers that PPC51 is inconsistent with Part 2 of the RMA, including:
 - (a) The purpose of the RMA to promote the sustainable management of natural and physical resources, including by safeguarding the life-supporting capacity of air, water, soil and ecosystems;
 - (b) Section 6(a) the preservation of the natural character of the coastal environment, wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development;
 - (c) Section 6(e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other Taonga;
 - (d) Section 6(f) the protection of historic heritage from inappropriate subdivision, use and development;
 - (e) Section 6(g) the protection of protected customary rights;
 - (f) Section 7(a) which requires all persons exercising functions and powers under the RMA to have particular regard to kaitiakitanga; and
 - (g) Section 8 which requires all persons exercising functions and powers under the RMA to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
10. It is vital for the people of Ngāti Tamaoho that the mana of the land subject to PPC50 is upheld, acknowledged and respected and that their people have rangatiratanga (opportunity to participate and be involved in decision making) over their ancestral land and Taonga. In addition, the people of Ngāti Tamaoho (alongside other iwi holding Mana Whenua) have responsibility as kaitiaki to fulfil their obligation and responsibilities to the environment in accordance with customs passed down, and to be accountable to the people (current and future generations) in these roles as custodians.
11. The Submitter is concerned that PPC50 will result in adverse environmental and cultural effects, as it is currently proposed by the applicant. Specifically:

(a)	Wai (Water): PPC50 does not give effect to Te Mana o te Wai and risks damaging the mauri of wai within the project area. This includes through PPC48's proposed treatment of waterways and its proposed stormwater and wastewater solutions.	35.6 35.7 35.8 35.9
(b)	Sustainable Management: The Submitter considers that PPC50 should in some, if not most ways, be self-reliant and self-sustainable. Sustainable management has not been adequately given effect to in PPC50.	35.11
(c)	Native Trees and Plants: The Submitter supports whakapapa sourced trees and plants within the PPC50 site.	35.10

- | | | |
|-----|---|------|
| (d) | Te Aranga Design Principles: These principles have been developed by Auckland Council and Tamaki Makaurau iwi over a number of projects. The principles include mana (treaty based relationships), whakapapa (naming), tohu (acknowledgement of wider cultural landscape), taiao (bringing natural landscape elements into urban environments), mauri tu (environmental health of the site including wai and whenua), mahi toi (inscribing Maori narratives into architecture and design), and ahi ka (living presences for iwi and hapu to undertake their kaitiaki roles). Te Aranga Design Principles have not been incorporated into PPC50. | 35.3 |
| (e) | Landscapes: The Submitter seeks that PPC50 identifies and preserves landscapes, including view shafts, hilltops, tuff rings and ridge lines. | 35.5 |

RELIEF

12. The Submitter requests a decision on PPC50 that confirms, at a minimum, the following:
- | | | |
|-----|---|-------|
| (a) | Ongoing participation, consultation and engagement in the project; | 35.1 |
| (b) | Acknowledgement within the project design of the history of Mana Whenua in the PPC50 area; | 35.2 |
| (c) | Te Aranga Principles incorporated in design concepts; | 35.3 |
| (d) | Iwi monitoring; | 35.4 |
| (e) | Natural and cultural landscaping accounted for in the project design; | 35.5 |
| (f) | A minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways; | 35.6 |
| (g) | A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway; | 35.7 |
| (h) | Roof capture for reuse and groundwater recharge; | 35.8 |
| (i) | Park edge design adjacent to all waterways; | 35.9 |
| (j) | Native trees and plants only within the precinct; | 35.10 |
| (k) | Sustainable development reflected in the design and outcomes | 35.11 |
13. The Submitter seeks the following decision from Auckland Council:
- | | | |
|-----|---|--|
| (a) | <u>Reject</u> PPC50 unless the issues addressed in this submission can be adequately addressed | |
|-----|---|--|
14. The Submitter wishes to be heard in support of its submission.
15. The Submitter would consider presenting a joint case if others make similar submissions.

22 October 2020

Lucie Rutherford

R.M.A. Officer

Ngati Tamaoho

rmaofficer@tamaoho.maori.nz

A handwritten signature in dark ink, appearing to read 'L. Rutherford', with a stylized flourish at the end.