

AUCKLAND UNITARY PLAN OPERATIVE IN PART

PROPOSED PLAN CHANGE 49 (Private):

Drury East 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 49 - Drury East Precinct					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
1	1.1	Andrew Wildman	wild_andrew@outlook.com	Support the plan change	Approve PC49's overall subdivision goals but provide clarification on the location of Mill Road Extension.
2	2.1	Steve Airey	airey@xtra.co.nz	Support the plan change	Remove good horticultural growing land from the plan change area and replace it with other land nearby.
3	3.1	Danielle Haerewa	dhaerewa@gmail.com	Support the plan change	Approve the plan change.
4	4.1	Warwick Hill-Rennie	265 Cossey Road, Drury, 2577	Support the plan change with amendments	Approve the plan change conditional on it rezoning the whole of Cossey Road from Future Urban to Residential, not part only.
5	5.1	Ian and Sue Gunthorp	gun@xtra.co.nz	Support the plan change	Approve the plan change.
6	6.1	Doug Signal	wiseolddog@hotmail.com	Decline the plan change	Reject PC49 on the basis that all roads and intersections in the area need to be upgraded before zoning is granted, otherwise public local residents would be impacted with years of traffic problems.
7	7.1	Cathrine Reid	cathrinereid1971@gmail.com	Decline the plan change, but if approved make amendments	Delay rezoning until Mill Road route is designated, so that submitter can make an informed decision in regards to the preferred zoning of their property.
8	8.1	Ian David Cathcart	idcath1973@gmail.com	Decline the plan change, but if approved make amendments	No specific amendments sought, but seeks confirmation that flooding on 60 Fitzgerald Road will not be worsened and that the property will not end up as a stormwater management pond.
9	9.1	Graham Reid	drurylaw9@gmail.com	Support the plan change with amendments	Approve the rezoning subject to infrastructure placement.
10	10.1	Fire and Emergency New Zealand	eloise.taylforth@beca.com	Support the plan change	Approve the plan change, in particular proposed Policy 6 as currently worded.
11	11.1	Dickenson Family Trust	stsltd@xtra.co.nz	Neither supports nor opposes the Plan Change	Amend the categorisation of a permanent waterway to the rear of 320 Fitzgerald Road.
12	12.1	Lisa Rose Leask	lisa.leask@rentokil.initial.com	Support the plan change with amendments	Include properties on the southern side of Drury Hills Road and Fitzgerald Road within the plan change area, as this land will rely on the PC49 area for its future stormwater and wastewater provision.
13	13.1	Bruce Lloyd Leask	sandwick@xtra.co.nz	Support the plan change with amendments	Include properties on the southern side of Drury Hills Road and Fitzgerald Road within the plan change area, as this land will rely on the PC49 area for its future stormwater and wastewater provision.
14	14.1	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 PC49 area).
15	15.1	Rachel and Michael Gilmore	mikejamesgilmore@gmail.com	Support the plan change	Approve the plan change.
16	16.1	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).
17	17.1	Dean Hancock	jackdean@xtra.co.nz	Decline the plan change	Reject the plan change on the basis of not wanting to lose submitter's greenhouse cucumber growing business at 215 Waihoehoe Road.
18	18.1	Oyster Capital	jeremy@brabant.co.nz	Support the plan change	Approve the plan change.
19	19.1	Brookfield Road Ltd	ant.frith@g4group.co.nz	Support the plan change	Approve the plan change.
20	20.1	Jie's Holding Limited	Michael.savage@parkchambers.co.nz	Support the plan change with amendments	Include 497 Fitzgerald Road within the plan change area and zone it Business: Mixed Use, or Residential: Townhouse and Apartment Building Zone, or other suitable operative urban zones. Further, apply the same or similar appropriate operative urban zonings to all that land west of the PC49 site on the southern side of Fitzgerald Road currently zoned Future Urban.
21	21.1	Neville Tapp	hotbarrels@hotmail.com	Decline the plan change	Reject plan change, or as a minimum exclude the area east of Cossey Road from the plan change and rezoning, and move Mill Road alignment to follow Cossey Road.
22	22.1	First Gas Limited	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make amendments	Enable the Gas Transmission Network to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed (i.e. recognised and provided for) through an enabling activity status.

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22	22.2	First Gas Limited	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make amendments	Recognise the Gas Transmission Network as having functional and operational requirements and constraints, including in respect of its location.
22	22.3	First Gas Limited	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make amendments	Manage the adverse effects of third-party development or activities in close proximity to the Gas Transmission Network to the extent that adverse effects on the network are avoided or appropriately mitigated.
22	22.4	First Gas Limited	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make amendments	Identify Firstgas as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by Firstgas especially land use changes and subdivision, or alternatively the matters of discretion or assessment criteria include technical advice from Firstgas.
22	22.5	First Gas Limited	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make amendments	Identify the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users.
22	22.6	First Gas Limited	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make amendments	Add new objective as follows: <u>The Drury East Precinct recognises the importance of the existing pipeline infrastructure as assets which are regionally and nationally significant and will ensure that they are protected and enabled.</u>
22	22.7	First Gas Limited	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make amendments	Add new policy as follows: <u>The Drury East Precinct is planned, designed and constructed so that adverse effects on existing infrastructure are avoided or mitigated.</u>
22	22.8	First Gas Limited	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make amendments	Add new provision to IX.4-6 Activity Table, Notification and Standards requiring that 'Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner'.
23	23.1	GM and AA Jones Family Trust	littlejohn@quaychambers.co.nz	Support the plan change with amendments	Amend the plan change to remove any requirement for riparian margin and planting along the indicative stream shown in the Ecological Assessment (Appendix 9 to the plan change documentation) traversing the property at 230 Drury Hills Road.
24	24.1	Manzi Chen	karyn@purposeplanning.co.nz	Support the plan change	Approve the plan change.
25	25.1	Tony Chien	tchien2007@gmail.com	Support the plan change	Approve the plan change.
26	26.1	Kiwi Property Holdings No.2 Limited	dallan@ellisgould.co.nz	Support the plan change	Approve the plan change.
27	27.1	Fulton Hogan Land Development Ltd	sue@berrysimons.co.nz	Support the plan change with amendments	Add a new policy as follows: <u>(10) 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>
27	27.2	Fulton Hogan Land Development Ltd	sue@berrysimons.co.nz	Support the plan change with amendments	Amend Standard IX6.5 Stormwater Quality as follows: (1) The activity rules and standards in E9 apply to development in the Drury Centre precinct as if the reference to 'high use roads', was a reference to 'all roads'. (2) For all other impervious surfaces inert building materials should be used.
28	28.1	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with amendments	Consult Spark and the other telecommunication network providers throughout the plan change process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD.
28	28.2	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with amendments	Consult Spark and the other telecommunication network providers to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development proposed.
28	28.3	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with amendments	Consult Spark and the other telecommunication network providers to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development.
28	28.4	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with amendments	Consult with Spark and the other telecommunication network providers to ensure funding is available through the infrastructure funding agreements.
28	28.5	Spark New Zealand Trading Limited	fiona.matthews@spark.co.nz	Support the plan change with amendments	Include telecommunications infrastructure within the triggers for the staged release of development.

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29	29.1	Fletcher Residential Limited	mtweedie@frl.co.nz	Support the plan change	Approve the plan change.
30	30.1	Lomai Properties Limited	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Decline PPC49, unless the matters relating to alternative staging of development, provision of all required infrastructure and traffic are adequately resolved.
31	31.1	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.
31	31.2	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 into the PC49 area through zoning.
31	31.3	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	Replace the Business - Mixed Use zoned area with Business - Neighbourhood Centre Zone.
32	32.1	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.
32	32.2	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 PPC49 area.
32	32.3	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Incorporate Te Aranga Principles in design concepts.
32	32.4	Ngāti Te Ata Waiohua	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make amendments	Confirm iwi monitoring of the project.
32	32.5	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.
32	32.6	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.
32	32.7	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.
32	32.8	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.
32	32.9	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.

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32	32.10	Ngāti Te Ata Waiohua	bill.loutit@simpsongrrierson.com	Decline the plan change, but if approved make amendments	Use native trees and plants only within the precinct.
32	32.11	Ngāti Te Ata Waiohua	bill.loutit@simpsongrrierson.com	Decline the plan change, but if approved make amendments	Protect ridgelines, hilltops and wetlands.
32	32.12	Ngāti Te Ata Waiohua	bill.loutit@simpsongrrierson.com	Decline the plan change, but if approved make amendments	Reflect sustainable development in the design and outcomes.
33	33.1	George and Agnes Neate	adam@neate.co.nz	Support the plan change with amendments	Amend the plan change boundary to extend further south, to include the properties indicated on the map attached to the submission (south west of Fitzgerald Road and south east of Brookfields Road).
34	34.1	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> <ul style="list-style-type: none"> a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded. b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects. c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include: <ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. • Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). • Threshold rules are not used in circumstances where the extent and location of works have not been determined yet. d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.
34	34.2	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	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.
34	34.3	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	<p>Amend precinct to include additional policies and rules to manage the effects of stormwater as described in the SMP.</p> <p>This includes:</p> <ul style="list-style-type: none"> a. New policy: <u>Require subdivision and development to be assessed for consistency with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.</u> b. Additional matters of discretion/assessment criteria that would apply to any restricted discretionary activity in the area of the precinct to ensure that new development and subdivision can be assessed for consistency with the NDC and SMP. c. Any other rules necessary to give specific effect to the SMP during development.

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34	34.4	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Retain application of SMAF 1 to the plan change area.
34	34.5	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Retain policy IX.3(6).
34	34.6	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 East 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.
34	34.7	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>
34	34.8	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend standard IX6.5 (1) Stormwater Quality as follows (including a correction to the precinct reference): "The activity rules and standards in E9 apply to development in the DruryCentre East precinct as if the reference to 'high use roads', <u>was were a reference to 'all existing, new, upgraded or redeveloped roads, accessways and carparks'</u> , 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: • <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>
34	34.9	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>
34	34.10	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Replace standard IX.6.3(2) with a new standard and consequential amendments to effect that the riparian yards set for buildings in tables H13.6.5.1 Yards, H6.6.9.1 Yards, H5.6.8.1 Yards and H4.6.7.1 Yards read as follows: "Riparian - <u>4020m</u> from the edge of all permanent streams and <u>10m</u> from the edge of all intermittent streams" Other yards in these tables are not amended.
34	34.11	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Add the following matters of discretion to IX.8.1(3): <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(3).
34	34.12	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Include indicative permanent and intermittent streams and wetlands on the precinct plan.
34	34.13	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.

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34	34.14	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Retain policy IX.3(8).
34	34.15	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Provide for improved biodiversity and ecological corridors (blue-green network) by amending IX.3(9), adding a new policy as follows, and relocating the cross-reference to all relevant overlay, Auckland-wide and zone policies, together with any other amendments that may be required to give effect to these matters: (X) 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. All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above. <u>Enable a network of open space, riparian corridors and park edge roads that provides for:</u> • <u>potential ecological corridors along streams between Te-Manukanuka-O-Hoturoa (Manukau Harbour) and the Hunua;</u> • <u>improvement of freshwater and coastal water systems; and</u> • <u>a safe and attractive walking and cycling network.</u> <u>All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.</u>
34	34.16	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend Standard IX.6.3 (1) by including a cross reference to the matters in Appendix 15.6(3)(b-f) and (4) of the Auckland Unitary Plan.
34	34.17	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Amend policy IX.3(4) to read: In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contribute to a sense of place for Drury East, by incorporating any distinctive site features and integrating with the stream network. Also, if Auckland Council ownership is proposed, the open spaces must be consistent with the council's open space and parks acquisition and provision policies.
34	34.18	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.
34	34.19	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.
34	34.20	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.
34	34.21	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Add a policy and standards to provide for increased density near RTN stations including: a. Adding a policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u> b. Building height standards enabling 7-8 storey building height within an extended walkable radius of the proposed RTN station. c. Any alterations to other building standards to respond to increased building height. d. 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.
34	34.22	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Review the need for Standard IX.6.4 if a notice of requirement has been lodged for the upgrade of Waihoehoe Road.

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34	34.23	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Replace the Business - Mixed Use Zoning with Local Centre Zone and reevaluate whether this is the best location for a centre once the position of the Mill Road Corridor and points of access off that corridor have been confirmed. If the Business - Mixed Use zoning is retained, then provide standards for daylight and living space (as set out in PC 48).
34	34.24	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Provide for Light Industry Zoning on any land in the precinct that lies east of the Mill Road Corridor as determined by the future notice of requirement.
34	34.25	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.
34	34.26	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.
34	34.27	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Provide a notable tree assessment and scheduling of any notable trees identified in that assessment.
34	34.28	Auckland Council	Christopher.Turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make amendments	Decline PC 49 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
35	35.1	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Decline plan change unless the reasons for the submission, 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.
35	35.2	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Decline the plan change unless the submitter's transport infrastructure funding and provision concerns, including its concerns about reliance on development triggers to stage transport infrastructure provision, are appropriately addressed and resolved. In the alternative: (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 in the submission.
35	35.3	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 2 will be progressively upgraded over time to support development in the wider area. The precinct includes provisions to ensure that the subdivision and development of land for 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.
35	35.4	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Objective IX.2(2) as follows: (2) Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network. A transport network that facilitates the safe and efficient movement of people, goods and services and manages effects on the safe and efficient operation of the surrounding and wider transport network.
35	35.5	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Objective IX.2(3) as follows: (3) Development is supported by appropriate infrastructure. Subdivision and development are supported by the timely and coordinated provision of robust and sustainable transport, stormwater, water, wastewater, energy and communications infrastructure networks.

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35	35.6	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3 (5) as follows: (5) Ensure that the timing of <u>subdivision and development in the wider Drury East Precinct area as defined on Precinct Plan 2</u> is coordinated with the <u>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.</u>
35	35.7	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new Infrastructure and Staging policy as follows: (x) <u>Avoid any subdivision and development in the wider Drury area as defined on Precinct Plan 2 until the required transport infrastructure is in place.</u>
35	35.8	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Rules IX.4.1 (A2), (A3), (A5) and (A6) to introduce more onerous activity status for any development and/or subdivision not complying with Standards IX6.1 Staging of Development and IX6.2 Trip Generation Limit (such as non-complying activity status). In the alternative, amend Rules IX.4.1 (A2) and (A3) as follows: (A2) Development and/or subdivision that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades but complies with Standard IX6.3 Trip Generation Limit as confirmed in the Transport Assessment submitted with application for consent - RD (A3) Development and/or subdivision that does not comply with Standard IX6.2 Staging of Development with Transport Upgrades and or Standard IX6.3 Trip Generation Limit as confirmed in the Transport Assessment submitted with application for consent - <u>NC-D</u> As a consequential amendment, delete Rules IX.4.1 (A5) and (A6).
35	35.9	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.
35	35.10	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Standard IX.6 (2) as follows: (2) <u>The following zone standards do not apply to activities listed in Activity Table IX.4.1 above:</u> <u>E27.6.1 Trip generation</u>
35	35.11	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Standards IX.6.1 (1) and (2) and delete Standard IX.6.1 (3) and the note as follows: IX.6.1 Staging of Development with Transport Upgrades (1) Development and subdivision within the area shown on IX.10.2 Drury East: Precinct Plan 2 must not exceed the thresholds in Table IX.6.1.1 and <u>Table IX.6.1.2</u> 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 <u>have are subject to a valid land use and/or building consent or subdivision that is subject to a subdivision consent.</u> <u>that has a 224c certificate for vacant lots less than 1200m².</u> (3) <u>Table IX.6.1.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Drury East: Precinct Plan 2. Table IX.6.1.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Drury East: Precinct Plan 2.</u> 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
35	35.12	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Table IX.6.1.1 as set out in full in the submission, including to specify additional transport infrastructure upgrades and network improvements required to be completed
35	35.13	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Table IX.6.1.2.

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35	35.14	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Standards IX.6.2 (1), delete Standard IX.6.2 (2) and (3), and add a new clause as follows: IX.6.2 Trip Generation Limit (1) Development <u>and subdivision</u> within the Drury area shown on IX.10.2 Drury East: Precinct Plan 2 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational. (2) Table IX.6.2.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Drury East: Precinct Plan 2. Table IX.6.2.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Drury East: Precinct Plan 2. (3) Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020— Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below (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.
35	35.15	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Table IX.6.2.1 as set out in full in the submission, including to specify additional transport infrastructure upgrades and network improvements required to be completed
35	35.16	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Delete Table IX.6.2.2.
35	35.17	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Correct number and amend IX.8.1 (2) as follows: (2) Subdivision <u>and/or</u> development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit: (a) Effects on the transport network consistent with the trips generated by development specified in Table IX.6.2.1 or Table IX.6.2.2 ; (b) The rate of public transport uptake and travel management measures; and (c) The rate of coordination of retail, commercial and residential development in the wider Drury East area shown on Precinct Plan 2; <u>and</u> (x) The degree of certainty around the provision of required infrastructure upgrades including confirmation of infrastructure funding or other such measures agreed; <u>and</u> (x) Any mitigation measures or review conditions required to address the effects from development occurring ahead of the required infrastructure upgrades.

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35	35.18	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend IX.8.2 (2) as follows: (2) Development <u>and/or</u> subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit: (a) Whether the effects of the proposal on the transport network are consistent with the trips generated by development specified in Table IX.6.3.1 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.10.2 Precinct Plan 2</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 shown on Precinct Plan 2 to minimise trips outside of the precinct providing additional capacity within the transport network; (d) The effect of the timing and development of any transport upgrades; (x) Where new, upgrades and/or extensions to transport infrastructure are required, whether <u>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) Whether the effects of development proceeding ahead of the required transport upgrades <u>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>
35	35.19	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.6.1 and IX.6.2. Remove 'Access A' from Precinct Plan 2.
35	35.20	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new policy as follows: (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.
35	35.21	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new policy as follows: (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.
35	35.22	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend the building line restrictions in Standard IX.6.4 to reflect the final alignment and width required and ensure any yard requirements that apply are considered in addition to the building setbacks. The need for IX.6.5 should be reviewed if a notice of requirement is lodged for the upgrade of Waihoehoe Road.
35	35.23	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.
35	35.24	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.
35	35.25	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Provide further assessment of the impacts of the proposal on accessibility between the Drury East plan change area and 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.

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35	35.26	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.
35	35.27	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Objective IX.2 (1) as follows: (1) Drury East Precinct is a comprehensively developed residential environment that integrates with the Drury Centre Precinct and the natural environment, supports public transport use, walking and cycling, and respects Mana Whenua values.
35	35.28	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3 (3) as follows: (3) Require streets to be attractively designed and appropriately provide for all transport modes by: a) providing a high standard of pedestrian amenity, safety and convenience; 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 public transport and private vehicles.
35	35.29	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3(7) as follows: (7) Provide for the staging of bus, pedestrian and cycling connections to the Drury Central train-rail station upon its completion to encourage the immediate use of public and active modes of transport as soon as practically possible.
35	35.30	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX.3(1) as follows: (1) Require the east to west collector roads to be generally in the locations shown in IX.10.1 Drury East: Precinct Plan 1, while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network.
35	35.31	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Policy IX3(2) as follows: (2) Ensure that subdivision and development provide 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.
35	35.32	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 new 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.
35	35.33	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>
35	35.34	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 new public and private roads: (a) Location and design of the collector roads streets, local roads streets and connections with neighbouring sites and to achieve an integrated street network; (b) Provision of safe and efficient public transport, cycling and pedestrian networks; (c) Location and design, and sequencing of connections to the Drury Central train rail station; and (d) Matters of discretion IX8.1 (1)(a) - (c) apply in addition to the matters of discretion in E38.12.1-; and (x) Location and design of intersections with existing roads.

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Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
35	35.35	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: (1) Development of <u>new</u> public and private roads: (a) Whether the collector roads are provided generally in the locations shown on IX.10.1 Drury East: Precinct Plan 1 to achieve a highly connected street layout that integrates with the surrounding transport network. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters: (i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads; (ii) The need to achieve a <u>permeable and efficient</u> 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.
35	35.36	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 and connectivity, and supports <u>public and active modes of transport</u> a walkable street network . Whether roads are aligned with the stream network, or whether pedestrian and/or cycle paths are provided along one or both sides of the stream network, where they would logically form part of an integrated open space network;
35	35.37	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Retain Assessment criteria IX.8.2 (1)(c) and (d) for location of roads.
35	35.38	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Amend Assessment criteria IX.8.2 (1) for design of roads as follows: (A) Whether the design of collector and local roads are <u>generally</u> in accordance with the <u>minimum road reserve widths and key design elements</u> road cross sections (B) Whether the layout of the street network provides a good degree of accessibility and connectivity, and supports the development of Drury East Precinct as a <u>walkable centre and community street network</u> . As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 500m; (C) Within the walkable catchment of the Drury Central train station in the Terrace Housing and Apartment Buildings zone, whether the street network provides safe and legible pedestrian and cycle connections to the Drury Central rail 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 provides for a direct, legible and safe pedestrian and cycle connection to the Drury Central train <u>rail</u> station via connections through the Drury Centre precinct, or via Fitzgerald Road, Waihoehoe Road and Flanagan Road Drury Boulevard.
35	35.39	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add new assessment criteria to IX.8.2(1) as follows: (x) Whether the layout of the street network supports the provision of a <u>safe and efficient bus network</u> ; (x) Whether the design of collector and local roads includes <u>safe and efficient intersection treatments with existing roads</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 (x) Where development is adjacent to a rural road, whether the road is to be upgraded to an <u>urban standard</u> .

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35	35.40	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: <ul style="list-style-type: none"> • 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.
35	35.41	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.
35	35.42	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.
35	35.43	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Make any necessary amendments to PPC 49 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.
35	35.44	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new policy as follows: 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.
35	35.45	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: (X) Development that does not comply with IX.6.X Noise Mitigation - RD.
35	35.46	Auckland Transport	Josephine.Tam@at.govt.nz	Decline the plan change, but if approved make amendments	Add a new assessment criterion to IX.8.2 as follows: The extent to which noise sensitive activities in proximity to arterial roads are managed.
36	36.1	Counties Power Limited	jmichalakakis@align.net.nz	Support the plan change with amendments	Retain IX.2 Objective 2.
36	36.2	Counties Power Limited	jmichalakakis@align.net.nz	Support the plan change with amendments	Retain IX.2 Objective 3.
36	36.3	Counties Power Limited	jmichalakakis@align.net.nz	Support the plan change with amendments	Retain IX.3 Policy 1.
36	36.4	Counties Power Limited	jmichalakakis@align.net.nz	Support the plan change with amendments	Amend IX3 Policy 3 so that electrical infrastructure is taken into consideration when planning landscaping and planting of street trees; require consultation with Counties Power regarding species in the vicinity of overhead lines; and apply a typical road cross section for arterial roads to ensure that the berm is an acceptable width for the installation of underground electrical reticulation.
36	36.5	Counties Power Limited	jmichalakakis@align.net.nz	Support the plan change with amendments	Retain Policy 5.
36	36.6	Counties Power Limited	jmichalakakis@align.net.nz	Support the plan change with amendments	Amend Policy 6 to include reference to electrical, telecommunications and other infrastructure.
36	36.7	Counties Power Limited	jmichalakakis@align.net.nz	Support the plan change with amendments	Retain Policy 7.

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36	36.8	Counties Power Limited	jmicchalakis@align.net.nz	Support the plan change with amendments	Add new policy IX.3.(5)(e) as follows: Require subdivision and development to: ... (e) Enable the reduction of CO2 emissions by promoting the use of renewable energy.
36	36.9	Counties Power Limited	jmicchalakis@align.net.nz	Support the plan change with amendments	Add new policy IX.3(5)(f) as follows: Require subdivision and development to: ... (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.
36	36.10	Counties Power Limited	jmicchalakis@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.
36	36.11	Counties Power Limited	jmicchalakis@align.net.nz	Support the plan change with amendments	Amend matter of discretion IX.8.1(1)(d) as follows, if this is what was intended: (d) Matters of discretion IX.8.1 (1)(a) - (b) apply in addition to the matters of discretion in E38.12.1.
36	36.12	Counties Power Limited	jmicchalakis@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.
36	36.13	Counties Power Limited	jmicchalakis@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 arterial roads to ensure that the berm is an acceptable width for installation of underground electrical reticulation.
37	37.1	Ministry of Education	jess.rose@beca.com	Support the plan change with amendments	Amend Objective IX.2 (3) as follows: Development is supported by appropriate infrastructure (including education infrastructure).
37	37.2	Ministry of Education	jess.rose@beca.com	Support the plan change with amendments	Amend Policy IX.3 (6) as follows: Ensure that development in Drury East Precinct is coordinated with supporting education infrastructure, stormwater, wastewater and water supply infrastructure, having particular regard to the capacity of the Fitzgerald culvert and culverts under Great South Road.
37	37.3	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 (including schools) to achieve an integrated street network.
37	37.4	Ministry of Education	jess.rose@beca.com	Support the plan change with amendments	Amend IX.8.2 Assessment criteria 1)(a)(ii) for Location of roads as follows: ii. The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities (including provision of schools); and
37	37.5	Ministry of Education	jess.rose@beca.com	Support the plan change with amendments	Amend IX.8.2 Assessment criteria 1)(d) for Location of roads as follows: d) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network. Whether subdivision and development provides for collector roads and local roads to the site boundaries to coordinate with neighbouring sites (including potential future school sites) and support the integrated completion of the network within the precinct over time;
37	37.6	Ministry of Education	jess.rose@beca.com	Support the plan change with amendments	Amend IX.8.2 Assessment criteria 1)(b) for Design of Roads as follows: (b) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network, including to existing schools or sites designated for this purpose. As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 600m;
37	37.7	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.

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37	37.8	Ministry of Education	jess.rose@beca.com	Support the plan change with amendments	Retain Standard IX.6.1 Staging of Development with Transport Upgrades.
37	37.9	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.
38	38.1	Leith McFadden	leith@playgrounds.co.nz	Support the plan change with amendments	Zone areas for parks and public space.
38	38.2	Leith McFadden	leith@playgrounds.co.nz	Support the plan change with amendments	Ensure infrastructure upgrades are tied to staging through precinct provisions.
39	39.1	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the plan change with amendments	Include provisions within the precinct plan to require that archaeological assessments of the area are undertaken by a suitable qualified professional during the subdivision or resource consent stage of proposed developments.
39	39.2	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the plan change with amendments	Include provisions for the interpretation of the Drury Tramway/Mineral Railway R12/1122 that crosses the precinct diagonally running northwest to southeast.
39	39.3	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the plan change with amendments	Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to exclude archaeological site extents as assessed by a professionally qualified archaeologist and require the preparation of an archaeological assessment by a suitably qualified person to inform the planting plan.
39	39.4	Heritage New Zealand Pouhere Taonga	sandrews@heritage.org.nz	Support the plan change with amendments	Include appropriate provisions within the precinct plan to address any Māori cultural values identified.
39	39.5	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.
40	40.1	Matthew Royston Kerr	Royston.Kerr@Hirepool.co.nz	Decline the plan change	Decline the plan change on the basis of reverse sensitivity effects of the THAB zone on adjacent FUZ land; increased traffic effects along Waihoehoe Road with insufficient provisions for the upgrade of the corridor; increased traffic safety issues at the intersection of Waihoehoe Road and Appleby Road associated with the insufficient provisions for the upgrade of the intersection; inefficiency and uncertainty with regard to the rezoning and urban development of the remaining FUZ land in the Opaheke Drury area.
41	41.1	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 PC49 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 PC49 area to avoid increasing flood risk upstream and downstream, and manage increased flood risk within the precinct, to habitable rooms for all flood events.
41	41.2	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with amendments	Consider amending trip generation rule framework (Activity table IX.4.1(A2), (A3), (A5) and (A6) and standard IX.6.2) to replace with a simplified approach using GFA triggers alone, given the potential challenges in monitoring trip generation levels for a development of this scale.
41	41.3	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.6.5 (Stormwater Quality and Flooding); and (b) Subdivision that does not comply with Standard IX.6.5 (Stormwater Quality and Flooding).
41	41.4	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with amendments	Delete notification provision IX.5(2) 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.
41	41.5	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 E11.6.2 and Table E12.6.2 will be subject to the normal tests for notification under the RMA.
41	41.6	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with amendments	Amend IX.6(2) so that any exemption is clear as to the activities that it applies to, and that the effects of those activities have been assessed through an ITA.

Plan Change 49 - Drury East Precinct					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
41	41.7	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with amendments	Amend Tables IX6.1.1 and IX6.1.2 and plan change to ensure that: (a) adequate upgrading of the surrounding road network (for example Waihoehoe Road, Appleby Road, Cossey Road, Fitzgerald Road and the proposed connections between the PC49 area and Drury South Industrial Precinct Road shown on Precinct Plan 1) is undertaken; and (b) any non-compliance with this standard is a discretionary activity.
41	41.8	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with amendments	Remove Mill Road from Precinct Plan 1 – Road Network.
41	41.09	Drury South Limited	lauren.eaton@russellmcveagh.com	Support the plan change with amendments	Amend Standard IX6.5 by adding the words “and Flooding” to the heading and adding the following clause (2): (2) any stormwater management plan or earthworks proposed as part of subdivision or development must: (i) comply with any approved discharge consent; (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; (iii) be effective in containing all the natural and diverted streams and their margins, wetlands, and other off-site stormwater management devices; (iv) provide for overland flowpaths; (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.
42	42.1	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.
42	42.2	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Amend the whole Plan Change to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).
42	42.3	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Review the proposed zoning and associated provisions in light of the NPSUD requirements.
42	42.4	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Include provision for the Mill Road Corridor within the plan change. Waka Kotahi will work collaboratively with the applicant and Auckland Council on this outcome.
42	42.5	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Delete 'Access A' from Precinct Plan 2.
42	42.6	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Retain IX Precinct description.
42	42.7	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Add new objective as follows: <u>Protect sensitive activities from potential health and amenity effects that may arise from noise and vibration associated the operation of the transport network.</u>
42	42.8	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Amend Objective 1 as follows: (1) Drury East is a comprehensively developed residential environment that integrates with the Drury Centre Precinct and the natural environment, supports <u>active and public</u> transport use, and respects Mana Whenua values.
42	42.9	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Retain Objective 2.

Plan Change 49 - Drury East Precinct					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
42	42.10	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Retain Objective 3.
42	42.11	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Add new policy as follows: <u>Locate and design new and altered buildings, and activities sensitive to noise to minimise potential effects of the transport network.</u>
42	42.12	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Add new policy as follows: <u>Manage the location of sensitive activities (including subdivision) through set-backs, physical barriers and design controls.</u>
42	42.13	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Retain IX.3 Policy 1.
42	42.14	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Retain IX.3 Policy 2.
42	42.15	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Retain IX.3 Policy 3.
42	42.16	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Retain IX.3 Policy 5.
42	42.17	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Amend Policy 7 as follows: (7) Provide for the staging of pedestrian and cycling connections to the Drury Central train station and Drury Centre to encourage the use of public and active modes of transport.
42	42.18	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Retain Activity IX.4.1 (A1).
42	42.19	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) and (A6) in a manner which responds to Waka Kotahi's submission in its entirety.
42	42.20	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.
42	42.21	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Retain IX.6 Standard (2) as notified on the basis that transport, traffic or trip-generation provisions are retained in the precinct and that no permitted activities are enabled.
42	42.22	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Delete Standard IX.6.1(3) Staging of Development with Transport Upgrades.
42	42.23	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Delete italicised Note IX.6.1 (4).
42	42.24	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Amend title of Table IX.6.1.1 as follows: Table IX.6.1.1 Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 not constructed.
42	42.25	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Amend Table IX.6.1.1 Threshold for Development to provide more specificity as to the details of works required in the right hand column by including upgrade details listed in Table 8.1 of the Integrated Transport Assessment supporting the proposal, column headed "Revised (2020) Modelling – Infrastructure Upgrades Required".
42	42.26	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Delete Table IX.6.1.2 Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 constructed.

Plan Change 49 - Drury East Precinct					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
42	42.27	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	<p>Delete IX.6.2 Trip Generation Limit including Tables IX.6.2.1 and IX.6.2.2, and replace with provisions which provide for operational requirements and more specific transport network responses. Potential wording is set out below, and could include a new permitted activity standard with non-compliance being a restricted discretionary activity (consequential changes to Activity Table IX.4 would be required).</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.6.2 Transport Infrastructure</u></p> <p><u>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 8.1 of the Integrated Transport Assessment supporting the proposal).</p>
42	42.28	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	<p>Amend Tables IX.6.2.1 and IX.6.2.2, if submission point 42.25 is not accepted, to provide more specificity as to the details of works required in the right hand columns of both Tables by including upgrade details listed in Table 8.1 of the Integrated Transport Assessment supporting the proposal, column headed Revised (2020) Modelling – Infrastructure Upgrades Required.</p>
42	42.29	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	<p>Delete italicised Note IX.6.2 (3).</p>
42	42.30	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:</p> <p>(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>
42	42.31	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	<p>Add new matters of discretion to IX.8.1 as included in Attachment 1 to the submission, relating to the suite of controls sought for limiting effects on sensitive activities from noise and vibration associated with the transport network:</p> <p><u>Discretion is restricted to:</u></p> <p><u>(a) Location of the building;</u></p> <p><u>(b) The effects of the non-compliance on the health and amenity of occupants;</u></p> <p><u>(c) Topographical, ground conditions or building design features that will mitigate noise or vibration effects; and</u></p> <p><u>(d) The outcome of any consultation with the NZ Transport Agency.</u></p>

Plan Change 49 - Drury East Precinct					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
42	42.32	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Amend IX.8.1 Matters of discretion (2) as follows: (2) Development or subdivision that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit: Effects on the transport network consistent with the trips generated by development specified in Table IX.6.2.1 or Table IX.6.2.2; (b).... (d) <u>the outcome of engagement with the relevant road controlling authority.</u>
42	42.33	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) ... (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 <u>an integrated active transport walkable street network.</u> [...] walkable street network. [...] (c) ... (d) ... Design of roads (a) ... (b) Whether the layout of the street network provides a good degree of accessibility and supports <u>an integrated active transport walkable street network.</u> [...] walkable street network. [...] (c)(i) ... <u>Road Controlling Authority</u> (f) <u>how the outcome of engagement with the relevant road controlling authority has been responded to.</u>
42	42.34	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Amend assessment criteria IX.8.2(2) as follows: (2) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit: (a)... (b) Whether increased use of public <u>and active</u> transport provides additional capacity within the transport network including by implementing travel demand management measures. (d)... (e) <u>how the outcome of engagement with the relevant road controlling authority has been responded to.</u>
42	42.35	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Add new assessment criteria to IX.8.2 as included in Attachment 1 to the submission, relating to the suite of controls sought for limiting effects on sensitive activities from noise and vibration associated with the transport network: Discretion is restricted to: (a) <u>Whether the location of the building minimises effects;</u> (b) <u>Alternative mitigation which manages the effects of the non-compliance on the health and amenity of occupants;</u> (c) <u>Any identified topographical, ground conditions or building design features that will mitigate noise and vibration effects or; and</u> (d) <u>The outcome of any consultation with the NZ Transport Agency.</u>
42	42.36	The New Zealand Transport Agency	evan.keating@nzta.govt.nz	Support the plan change with amendments	Add new permitted activity standards to IX.6 applying to activities within 100m of the edge of a state highway carriageway or the proposed Mill Road corridor, relating to the suite of controls sought for limiting effects on sensitive activities from noise and vibration associated with the transport network. See Attachment 1 to the submission for full proposed wording.
43	43.1	Karaka and Drury Limited	helen@berrysimons.co.nz	Neither supports nor opposes the Plan Change	Approve plan change

Plan Change 49 - Drury East Precinct					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
43	43.2	Karaka and Drury Limited	helen@berrysimons.co.nz	Neither supports nor opposes the Plan Change	Do not amend PPC 49 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.
44	44.1	Kāinga Ora	michael@campbellbrown.co.nz	Support the plan change with amendments	Approve the plan change, subject to amending the proposed Business – Mixed Use zone to Business – Neighbourhood Centre Zone (see Attachment Two to the submission).
44	44.2	Kāinga Ora	michael@campbellbrown.co.nz	Support the plan change with amendments	Approve the plan change, subject to: •application of a 22.5m Height Variation Control across the proposed THAB zone (see Attachment Three to submission); •identification of future open space / park on the precinct plan (or alternatively Open Space – Informal Recreation zoning); •amendment of precinct plans to reflect overall submission.
44	44.3	Kāinga Ora	michael@campbellbrown.co.nz	Support the plan change with amendments	Retain the Drury East Precinct description (with any consequential amendments to reflect Kāinga Ora's submission).
44	44.4	Kāinga Ora	michael@campbellbrown.co.nz	Support the plan change with amendments	Retain Objective (1) 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.
44	44.5	Kāinga Ora	michael@campbellbrown.co.nz	Support the plan change with amendments	Retain Objective (4).
44	44.6	Kāinga Ora	michael@campbellbrown.co.nz	Support the plan change with amendments	Amend Policy (1) as follows: "Require the east to west collector road to be generally in the location shown in IX.10.1 Drury East: Precinct Plan 1 while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network and planned neighbourhood centre".
44	44.7	Kāinga Ora	michael@campbellbrown.co.nz	Support the plan change with amendments	Retain Policy (5), (6) and (7) subject to clarification and / or amendment of policies and associated provisions to account for public infrastructure upgrades.
44	44.8	Kāinga Ora	michael@campbellbrown.co.nz	Support the plan change with amendments	Retain Standard IX.6.1 subject to clarification and / or amendment of policies and associated provisions and thresholds to account for public infrastructure upgrades.
44	44.9	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.
44	44.10	Kāinga Ora	michael@campbellbrown.co.nz	Support the plan change with amendments	Amend Criteria IX.8.2 (1)(a) as follows: Whether the east to west collector road is provided generally in the location shown on IX.10.1 Drury East: Precinct Plan 1 to achieve a highly connected street layout that integrates with the surrounding transport network and planned neighbourhood centre. 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; and iv. The need to ensure that any alternative layout integrates with and provide frontage to the planned neighbourhood centre.
45	45.1	Watercare	Ilze.Gotelli@water.co.nz	Neither supports nor opposes the Plan Change	Amend Policy 6 as follows: (6) Ensure that development in Drury East Precinct is coordinated with, and does not precede, supporting stormwater, wastewater and water supply infrastructure, having particular regard to the capacity of the Fitzgerald culvert and culverts under Great South Road.

Plan Change 49 - Drury East Precinct					
Summary of Decisions Requested					
Sub #	Sub Point	Submitter Name	Address for Service	Theme	Summary
45	45.2	Watercare	Ilze.Gotelli@water.co.nz	Neither supports nor opposes the Plan Change	Add new Policy 6A as follows: (6A) <u>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>
46	46.1	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.
46	46.2	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 PPC49 area.
46	46.3	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Incorporate Te Aranga Principles in design concepts.
46	46.4	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Confirm iwi monitoring of the project.
46	46.5	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.
46	46.6	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Apply a minimum of 20 metre riparian margin for all waterways especially those to contain walkways / cycleways.
46	46.7	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.
46	46.8	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Require roof capture for reuse and groundwater recharge.
46	46.9	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Confirm park edge design adjacent to all waterways.
46	46.10	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Use native trees and plants only within the precinct.
46	46.11	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Protect ridgelines, hilltops and wetlands.
46	46.12	Ngāti Tamaoho	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make amendments	Reflect sustainable development in the design and outcomes.
47	47.1	Tim John Macwhinney	a.t.macwhinney@gmail.com	Support the plan change with amendments	Do not proceed with plan change until the Mill Road major arterial route has been finalised.
47	47.2	Tim John Macwhinney	a.t.macwhinney@gmail.com	Support the plan change with amendments	Amend plan change boundary to expand to an area to the south east including 2 Drury Hills Road, as shown on map attached to submission.
47	47.3	Tim John Macwhinney	a.t.macwhinney@gmail.com	Support the plan change with amendments	Provide a road directly linking Waihoehoe Road - Cossey Road intersection as shown on map attached to submission. Should the Mill Road - Drury South Rd route be moved to the east to parallel Drury Hills Road, provide some other direct link.

Submissions

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 49 (Private) - andrew wildman
Date: Thursday, 27 August 2020 5:30:19 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: andrew wildman

Organisation name:

Agent's full name: andrew wildman

Email address: wild_andrew@outlook.com

Contact phone number:

Postal address:

144 Drury Hills Road

Drury

Drury 2577

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

the future subdivision variation and location of Mill Road, road extension

Property address: 144 Drury Hills Road

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:

Satisfied with the overall subdivision goals but clarification needed on Mill Road Extension

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

1.1

Details of amendments:

Submission date: 27 August 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.

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)

Steve Airey

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

Address for service of Submitter

344 Drury Hills Rd

RD1 Drury

Telephone:

2949096

Fax/Email:

airey@xtra.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 49

Plan Change/Variation Name

Drury East 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 area bounded by Waihoehoe, Drury Hills, Fitzgerald and Cossey Roads

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 area of land bounded by Waihoehoe, Drury Hills, Fitzgerald and Cossey Roads has topsoil which I understand is of volcanic origin. This makes it very good horticultural land.

Given the shortage of good growing land around Auckland it would make more sense to develop other land in the area. (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. ☐

Remove good growing land from the plan change area and replace it with other land nearby. 2.1

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 ☐

Steve Airey

29/8/20

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

Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 49 (Private) - Dannielle Haerewa
Date: Sunday, 6 September 2020 6:30:20 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 49 (Private)

Plan change name: PC 49 (Private): Drury East 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

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 49 (Private) - Warwick Hill-Rennie
Date: Wednesday, 9 September 2020 4:30:56 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Warwick Hill-Rennie

Organisation name:

Agent's full name:

Email address:

Contact phone number:

Postal address:
 265 Cossey Road
 Drury
 Auckland 2577

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:
 Plan change from Future Urban zone to Residential

Property address: 265 Cossey Road, Drury

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:

We support the plan change conditional on the plan change rezoning the whole of Cossey Road from Future Urban to Residential and not part thereof as contemplated by the plan. If the plan change does not include the whole of Cossey Road we will object to the plan change as it is inconsistent to have part of a road re-zoned.

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

Details of amendments: We support the plan change conditional on the plan change rezoning the whole of Cossey Road from Future Urban to Residential and not part thereof as contemplated by the plan.

4.1

Submission date: 9 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 49 (Private) - Ian and Sue Gunthorp
Date: Tuesday, 29 September 2020 3:16:09 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Ian and Sue Gunthorp

Organisation name:

Agent's full name:

Email address: gun@xtra.co.nz

Contact phone number:

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

Rezoning land in the Drury East Precinct

Property address: 6 Fitzgerald Road, Drury.

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:

We consider that the objectives of amending the zoning to enable additional housing and associated transport and community facilities is necessary in this part of the Auckland region.

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

5.1

Details of amendments:

Submission date: 29 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.

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 49 (Private) - Doug Signal
Date: Tuesday, 29 September 2020 3:16:11 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
 dury
 auckland 2577

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

Property address: Dury

Map or maps:

Other provisions:
 Waihoehoe rd to great south rd intersection

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.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 49 (Private) - Cathrine Reid
Date: Wednesday, 30 September 2020 5:01:20 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Cathrine Reid
 Organisation name:
 Agent's full name:
 Email address: cathrinereid1971@gmail.com
 Contact phone number: 0211353661
 Postal address:
 132 Drury Hills Rd
 Drury
 Drury 2577

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)
 Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

Property address: 132 Drury Hills rd

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I would like to see the rezoning delayed until the Mill Rd route is designated. At the current time it is still indicative with the preferred route affecting our property. I feel unable to make an informed decision re rezoning of our property until the route is decided. If Mill Rd was to move further West we have a valuable piece of land with multiple potential buyers. If we lose part of our property would a different zone be preferable eg light industry. Would we have access to infrastructure if the rezoning goes ahead?? I would like it noted that I have contacted Fulton Hogan land acquisitions twice to see if there was any interest in purchasing our block and they were not interested. Perhaps they know something I don't?? I would like to be heard at a hearing. What is the effect on our rates once rezoned?

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Delay until Mill Rd route designated

Submission date: 30 September 2020

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 49 (Private) - Ian David Cathcart
Date: Wednesday, 7 October 2020 10:00:47 AM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Ian David Cathcart

Organisation name:

Agent's full name: Ian David Cathcart

Email address: idcath1973@gmail.com

Contact phone number:

Postal address:

7 Thornton Green

Karaka

Auckland 2113

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

Stormwater management and potential flooding of property getting worse

Property address: 60 Fitzgerald Road, Drury

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

I support the plan provided that my property at 60 Fitzgerald Road sits next to the Fitzgerald Stream and the culvert which is a choke point is not adversely affected.

8.2.6.1 of the Appendix 10 Stormwater Management Plan provides:

"Any changes to the landform in the 100 year ARI floodplain will be designed with appropriate mitigation to ensure there is no worsening of flooding to dwellings and/or adverse impacts to the amenity of property at the upstream and downstream ends of the PCA

· Not worsen flooding on land inside the PCA without property owner agreement"

Adherence to this point is critical to my section as the 100 year ARI runs through my land (limiting a prior house extension on the site) and any worsening of the situation will not be considered reasonable. Until such time I can confirm no worsening of the situation on flooding I am not in

support of the change.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: No specific amendments. I just want to know and confirm that my section will not end up as a stormwater management pond or like and that it will not be adversely affected if I chose to develop it to fit with the proposed plan.

8.1

Submission date: 7 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.

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 49 (Private) - Graham Reid
Date: Saturday, 10 October 2020 2:31:05 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Graham Reid

Organisation name:

Agent's full name: Graham Reid

Email address: drurylaw9@gmail.com

Contact phone number: 021 2961001

Postal address:

Drury Law
 PO Box 157
 Drury 2247
 South Auckland
 South Auckland 2247

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

N/A

Property address: 132 Drury Hills Road, Drury

Map or maps:

Other provisions:

Specific zoning needs to be subject to infrastructure placement. Where is Mill Road going? For non
 Fulton Hogan property.. in developing our land, will we be able/given fair access to utilities?
 Designation/use will be subject to placement of infrasture.

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:

The area has been identified in the proposed unitary plan as an urban area, this is consistant with the unitary plan and will provide badly needed housing and supporting infrasture for the area.

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

9.1

Details of amendments: Designation subject to infrasture placement.

Submission date: 10 October 2020

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

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

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

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

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

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

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

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



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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

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

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

Fire and Emergency New Zealand

Address for service of Submitter

PO Box 10000, Victoria Street West, Auckland, 1142

Telephone:

0900000000

Fax/Email:

eloise.taylforth@beca.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 49

Plan Change/Variation Name

Drury East Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

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

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

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

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

I wish to have the provisions identified above amended

Yes ☐

No ☐

The reasons for my views are:

Please refer to letter attached

(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 letter attached

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

12.10.2020

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

Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

Form 13

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

To: Auckland Council

Submission on: Private Plan Change 49

Name of submitter: Fire and Emergency New Zealand

Address for service: c/o Beca Ltd

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

This is a submission on the proposed private plan change 49 (PPC 49) at Drury East, Auckland by Barker and Associates on behalf of Fulton Hogan Land Development (the Applicant) to Auckland Council. The applicant requests to change the zoning of the plan change area (approximately 184 hectares) from Future Urban to Business – Mixed Use and Residential – Urban, Suburban and Terrace Housing and Apartment zones. This submission is written on behalf of Fire and Emergency New Zealand (FENZ).

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

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

Background:

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

The Fire and Emergency submission is:

The plan change area is contained by the Papakura urban area to the north, the Hunua foothills to the east, the Drury South Business area to the south, and State Highway 1 to the west. The plan change area is currently zoned as Future Urban under the Auckland Unitary Plan: Operative in Part (AUP: OP). The Applicant seeks to rezone the plan change area in accordance with the Drury-Opāheke Structure Plan to accommodate for residential housing as follows:

- 22 ha Residential – Terrace Housing and Apartment Building zone;
- 64 ha Residential – Mixed Housing Urban zone;
- 95 ha Residential – Mixed Housing Suburban zone; and
- 2 ha Business – Mixed Use zone.

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 is along nearby Flanagan Road 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 PPC 49 to service development.

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

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

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

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

Fire and Emergency is not a trade competitor.

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



Eloise Taylforth
Planner
Beca

Date: 12/10/2020

10.1



Dickenson Family Trust

320 Fitzgerald Road RD 1 Drury 2577

Phone 0274 933347 or 294 7795

email stsltd@xtra.co.nz

Re Drury East Zoning Plan;

14th October 2020

To Auckland Council

Planning Technician

Plans & Places.

I am writing in regards to the Fulton Hogan zoning plan. Unlike Kiwi Property, it is disappointing that Fulton Hogan developments have never consulted with us being the other affected property owners as to what they are planning. I am thankful that Fulton Hogan development are also putting the plan forward on our behalf, but that has raised some concerns as to water ways walking tracks and cycle tracks. Fulton Hogan developments do not know the history of the land and have only owned the land for a short time so I put forward this letter to help inform the council and any others of concern to the zone change.

Our property is only 1 hectare and to lose the full use and our control of 10 or 20 meters x 50 meters from the back of our property is a real cause for concern because of a so called fake water way.

The Water Way

The only reason there is some water there is because of a man made dam which was dug at the property next door to me 30 years ago to water stock and to prevent stock from entering each other's properties. Also it prevented the effluent from the milking shed on Cossey Road from polluting too many other farms pass the dam. About 10 years ago before the milking shed closed to prevent further pollution a catchment pond was dug on the farm at Cossey Road to retain their cow's effluent when they hosed down the milking shed.

That so called water way is not from a natural stream it is not spring feed and is only water from the runoff from the land contour when it rains. Last summer there was no water there for over 4 months and it would have been a lot longer if the dam had been removed which is only containing the water at present.

Now that there are no cows or milking sheds in the area and I now have use of that land next door and to keep it tidy by running my sheep on the land, so I will remove the dam this summer and that water will be gone and not there, except only when it rains, once the rain stops the water will be gone. It will be no difference than a gutter at the side of any road and should only be regarded as such, and with having no cultural or long term historical significant at all.

Please can you take this letter and the factual reasoning into consideration for the any future zone change? | 11.1

Kind regards

Steve A Dickenson Director

Dickenson Family Trust.

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)

LISA ROSE LEASK (KOOPMAN)

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

Address for service of Submitter

524 FITZGERALD ROAD
ROD DRURY

Telephone:

027-406-5527

Fax/Email:

lisa.leask@rentokil-initial.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 49

Plan Change/Variation Name

Drury East 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

524 FITZGERALD ROAD, DRURY

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above ☐

I oppose the specific provisions identified above ☐

I wish to have the provisions identified above amended

Yes ☒

No ☐

The reasons for my views are:

See attached sheet.

101 524 FITZGERALD RD, DRURY

(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. ☐

Change the plan to include the area that has been excluded, ie. the Southern corner surrounded by Drury Hills Rd & Fitzgerald road intersection 12.1

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 ☐

Lisa Leach

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

16 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.

LISA LEASK
524 FITZGERALD ROAD, DRURY

The present plan change proposed leaves a significant block of properties on the Southern side of Drury Hills Rd and Fitzgerald Rd out on a limb i.e... it would retain its Future Urban designation.

Why has this not been included in the proposed plan change

The lay of the land is such that all stormwater and future wastewater from this area would flow onto the area coming under the proposed plan.

Provision for this would need to be made, and how could this be done without this area being included.

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)

BRUCE LLOYD LEASK

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

Address for service of Submitter

80 DRURY HILLS RD
RD.1 DRURY

Telephone:

0272912175

Fax/Email:

sandwick@xtra.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 49

Plan Change/Variation Name

Drury East 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

80 DRURY HILLS RD, DRURY

Or

Map

Or

Other (specify)

Submission

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

I support the specific provisions identified above ☐

I oppose the specific provisions identified above ☐

I wish to have the provisions identified above amended

Yes ☒

No ☐

The reasons for my views are:

See attached sheet.

(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. ☐

Change the plan to include the area that has been excluded, i.e. the Southern corner surrounded by Drury Hills Rd & Fitzgerald road intersection

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 ☒

R. J. Leask

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

16 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 for P.C. 49

From: B.L. Leask
80 Drury Hills Rd.

The present plan change proposed leaves a significant block of properties on the Southern side of Drury Hills Rd and Fitzgerald Rd out on a limb i.e. it would retain its Future Urban designation.

Why has this not been included in the proposed plan change

The lay of the land is such that all stormwater and future wastewater from this area would flow onto the area coming under the proposed plan.

Provision for this would need to be made, and how could this be done without this area being included.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 49 (Private) - Wendy Hannah
Date: Monday, 19 October 2020 6:15:53 PM
Attachments: [228 Flanagan Road Map.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 2014

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East 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

14.1

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

Submission date: 19 October 2020

Supporting documents
228 Flanagan Road Map.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

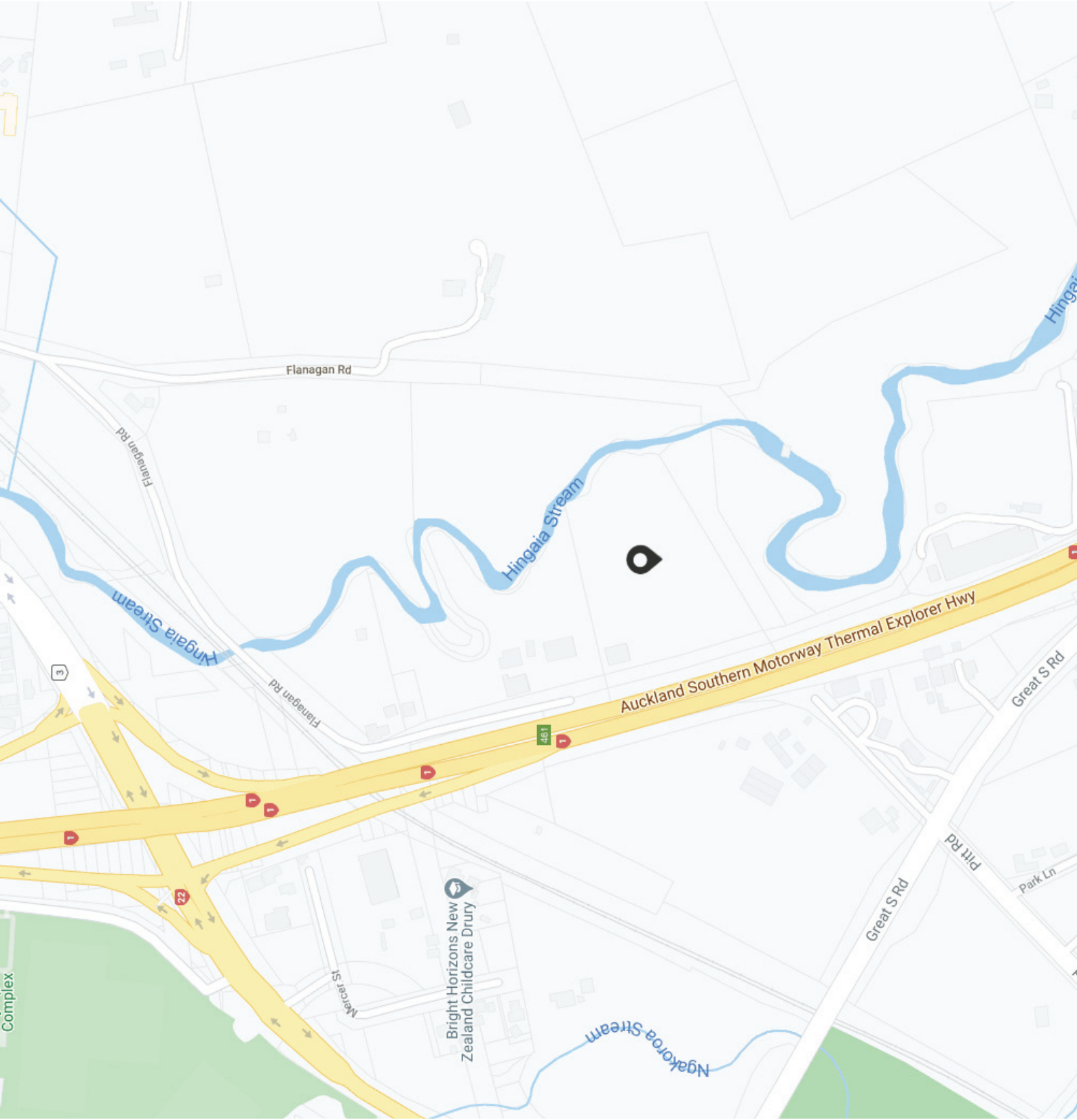
Could you gain an advantage in trade competition through this submission? No

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 49 (Private) - Rachel and Michael Gilmore
Date: Monday, 19 October 2020 8:30:45 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Rachel and Michael 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 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

Property address:

Map or maps: Drury east zoning 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:

We support the use of mixed zoning with lower density towards drury hills, the extensive use of cycling/walking paths throughout the development and neighbourhood parks. We urge the developer to include quality playground equipment at these parks

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

15.1

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 49 (Private) - Geoff Yu and Rebecca Mao
Date: Tuesday, 20 October 2020 12:31:02 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 49 (Private)

Plan change name: PC 49 (Private): Drury East 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 PC48 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 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.

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 49 (Private) - Dean Hancock
Date: Tuesday, 20 October 2020 5:15:49 PM

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Dean Hancock

Organisation name: Karaka Park Produce LTD

Agent's full name: Jackie Hancock

Email address: jackdean@xtra.co.nz

Contact phone number: 0274766203

Postal address:
 59 Eggleton Road
 Patumahoe
 RD4
 Pukekohe
 Auckland
 Auckland 2679

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

Property address: 215 Waihoehoe rd ,98 Fitzgerald rd

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Do not wish to lose my business of greenhouse cucumber growing including a packhouse at 215 Waihoehoe rd .Do not want to lay off staff etc , which will happen if planned changes occur

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

| 17.1

Submission date: 20 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.

Submission on Proposed Private Plan Change 49 – Drury East 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 49 (PC49) 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 49 as a whole.

4. SUBMISSION

Oyster Capital supports PC49 in its notified form.

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

- a) The proposed zoning pattern is consistent with the Drury-Opāheke Structure Plan and the three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East;
- b) A variety of residential typologies and densities are proposed and respond to locational attributes. The proposed zoning pattern focuses the Residential Terrace Housing and Apartment Building zone close to public transport and Kiwi's proposed Metropolitan Centre. The Residential-Mixed Housing Suburban zone has been applied to provide a transition between the Mixed Housing Urban zone and the Countryside Living zone to the east;
- c) The adverse effects of urban development on the natural environment, including the Fitzgerald Stream and its tributaries can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced;

- d) The zoning pattern and proposed Precinct enables a connected and high-quality road network to be established that provides appropriately for all transportation modes; and
- e) The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

5. Decision Sought

Oyster Capital seeks the following relief from Auckland Council on PC49:

- a) That PC49 be retained and approved, as notified.

18.1

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.

BROOKFIELD ROAD LIMITED

PO Box 37680

Parnell

Auckland 1151

Submission on Proposed Private Plan Change 49 – Drury East 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 49 (PC49) to the Auckland Unitary Plan – Operative in Part (AUP).

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

2. BACKGROUND

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

3. SCOPE OF SUBMISSION

The submission relates to PC 49 as a whole.

4. SUBMISSION

Brookfield Road Limited supports PC49 in its notified form.

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

- 1) The proposed plan change is consistent with the Drury-Opāheke Structure Plan that was supported by Brookfield Road Limited. This plan change is part of a wider strategy prepared in conjunction with PC 48 and PC 50 which will enable an integrated vision for Drury East to be developed in a coordinated manner;
- 2) A range of residential typologies have been proposed which respond to proximity to transport, local services and amenities. The proposed zoning pattern focuses the Residential Terrace Housing and Apartment Building zone close to public transport and the Metropolitan Centre proposed to be enabled through Plan Change 48. The Residential-Mixed Housing Suburban zone has been applied to provide a transition between the Mixed Housing Urban zone and the Countryside Living zone to the east;

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

5. Decision Sought

Brookfield Road Limited seeks the following relief from Auckland Council on PC49:

- a) That PC49 be approved, as notified.

19.1

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

Submission on Publicly Notified Proposal for Proposed Plan Change 49 (Private): Drury East Precinct

To: Auckland Council

Name of Submitter: Jie's Holding Limited

This is a submission on the following proposed plan change:

1. Proposed Plan Change 49 (Private): Drury East Precinct – to rezone 184 hectares of Future Urban zone to Business: Mixed Use, Residential: Terraced Housing and Apartment Buildings, Residential: Mixed Housing Urban, and Residential: Mixed Housing Suburban (“the proposed plan change”).
2. The submitter could not gain an advantage in trade competition through this submission.
3. This submission relates to are the whole of the plan change and with particular reference to the boundary selected for the proposed plan change which excludes (but should include) the submitter’s property at 497 Fitzgerald Road, Drury.
4. The submission is:
 - (a) The submitter owns the property at 497 Fitzgerald Road (“the site”). The site is located on the southern side of Fitzgerald Road, diagonally opposite the land the subject of the proposed plan change.
 - (b) At present 497 Fitzgerald Road has a split zoning with the southern approximately two thirds of the property included the Business-Light Industrial zone, with the northern portion of the property fronting Fitzgerald Road zoned Future Urban.
 - (c) The land to the east of the site is also included in the Business-Light Industry zone, as is land to the west and south of the site.
 - (d) There is a small area of land on the southern side of Fitzgerald Road to the west of the site and opposite the area the subject of the proposed plan change, that currently retains a Future Urban zoning. At present and in the event that the proposed plan change is confirmed, the northern portion of the submitter’s site and the pocket of Future Urban zoned land to the west will be substantially surrounded by operative urban zonings.
 - (e) The proposed plan change seeks a mix of residential zonings and a small area of Business – Mixed Use zone.
 - (f) It is unsatisfactory and there is no sound planning reason to leave the submitter’s site zoned part Business-Light Industrial Zone and part Future Urban Zone, particularly in light of the extensive changes contemplated in the immediate vicinity by the proposed plan change and associated plan changes. The same may be said for the pocket of Future

Urban zoned land to the west of the submitter's site on the southern side of Fitzgerald Road.

- (g) The Section 32 report identifies that the proposed plan change has been prepared following preparation of a Structure Plan that accords with the Structure Plan Guidelines at Appendix 1 of the AUP. In turn, reference is made to the Council's Drury - Opaheke Structure Plan for the wider area and to the public consultation that has taken place in formulating that document.
 - (h) The Section 32 Report states that from 2017 a group of developers, including FHLD, prepared a Structure Plan for Drury – Opaheke and that this was developed in tandem with the Council's Structure Plan for the wider area.
 - (i) The Auckland Council Drury – Opaheke Structure Plan (included at Figure 6 of the Section 32 Report) shows the entirety of the submitter's site as zoned Business – Light Industrial. The same zoning is also identified for the land immediately west of the submitter's site, currently zoned Future Urban.
 - (j) Later in the Council's planning and consultation exercise for the Drury-Opaheke Structure Plan, the submitter's site and those surrounding it on both sides of Fitzgerald road were identified as suited for a range medium density housing. A third phase of public engagement identified the site and neighbouring land as Light Industrial Business in the Draft Structure Plan.
 - (k) It is clear as a result of the extensive work behind the Drury-Opaheke Structure Plan, that the submitter's site and the adjacent land on Fitzgerald Road currently zoned Future Urban, is now appropriately given an operative urban zoning.
 - (l) Infrastructure is prioritised in the Council's Long Term Plan and the site is able to be serviced at the same time as the land the subject of the proposed plan change. There are no infrastructure or environmental reasons to delay an operative urban zoning of the site, or indeed the adjacent land.
 - (m) The detailed structure planning undertaken to date supports an operative urban zoning for the site for residential or business activities.
5. The submitter seeks the following decision from the local authority:

That 497 Fitzgerald road, Drury be included within the boundary of the proposed plan change and receive an operative urban zoning of Business: Mixed Use, or Residential: Townhouse and Apartment Building Zone, or other suitable operative urban zones.

20.1

Further, that the same or similar appropriate operative urban zonings be applied to all that land west of the site on the southern side of Fitzgerald Road currently zoned Future Urban.

The submitter does wish to be heard in support of its submission. If others are making a similar submission it would consider presenting a joint case with them at a hearing.

J M Savage
Counsel for Jie's Holding Limited

Address for service:

PO Box 5844, Victoria Street West, Auckland 1142

Level 3, 23 Victoria Street East, Auckland 1010

Ph: (09) 379 9780

E: Michael.savage@parkchambers.co.nz

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)

NEVILLE LESLIE TAPP

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

Address for service of Submitter

170 DRURY HILLS ROAD, RD1, DRURY

Telephone:

021 738 049

Fax/Email:

HOTBARRELS@HOTMAIL.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 49

Plan Change/Variation Name

Drury East 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 TO ATTACHED DOCUMENTS.

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: I AM OPPOSED TO THE DEVELOPMENT OF THE LAND AREA BETWEEN COSSEY ROAD AND DRURY HILLS ROAD INTO RESIDENTIAL.
THE RESIDENTIAL DEVELOPMENT + PROPOSED 4 LANE HIGHWAY PARALLEL TO DRURY HILLS ROAD WILL NEGATIVELY IMPACT EXISTING RESIDENCE WHO HAVE LIVED IN RURAL DRURY FOR A LARGE PORTION OF THEIR LIVES. (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. ☐

AS A MINIMUM, THE BOUNDARY OF THE PLAN CHANGE + THE PROPOSED ROUTE OF MILL ROAD DRURY SOUTH MUST BE MOVED TO COSSEY RD.

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


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

21/10/20.
 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.

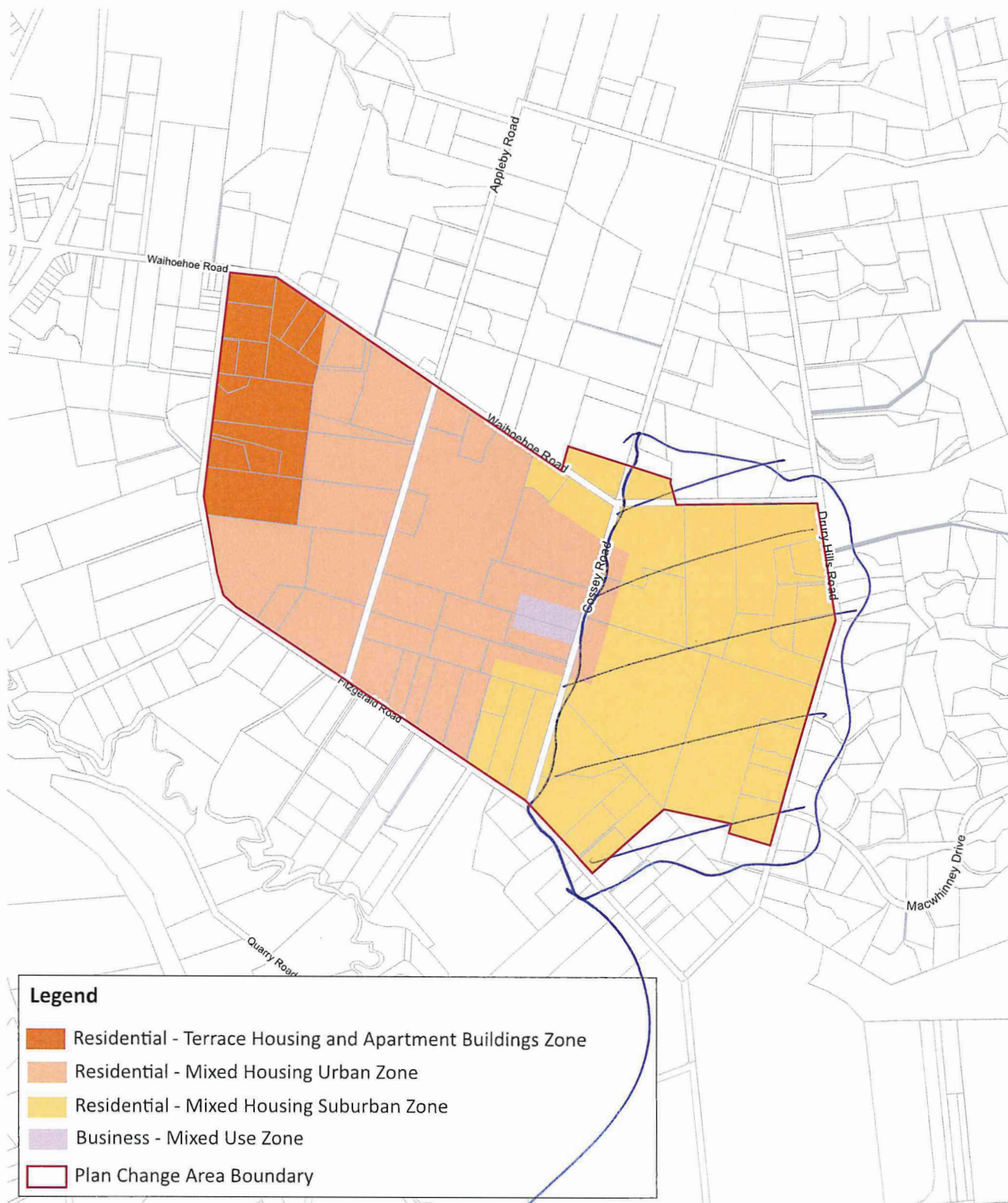
If you could gain an advantage in trade competition through this submission please complete the following:

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.

Drury East Precinct

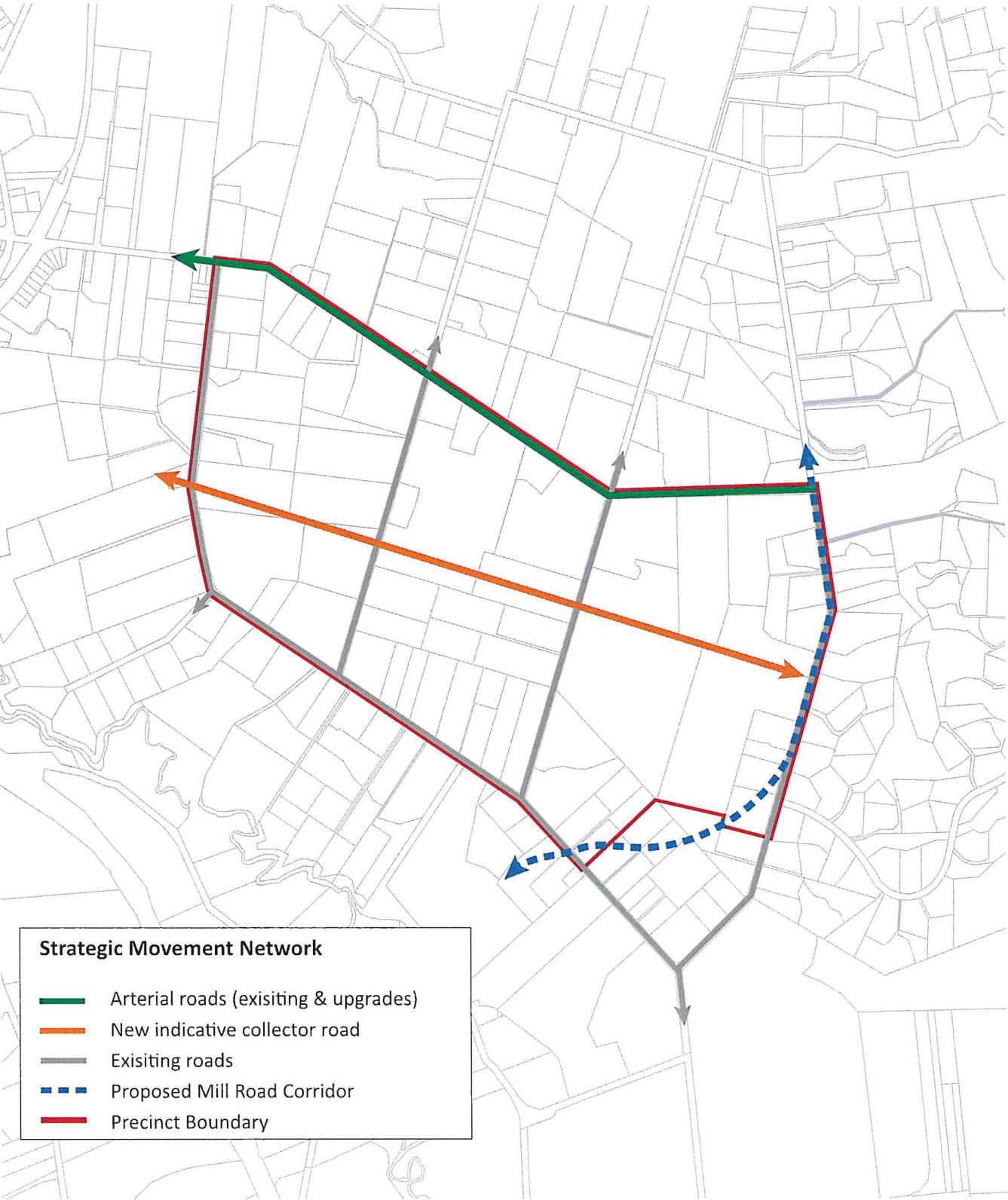
Drury East - Zoning Plan



I OPPOSE ALL REZONING + DEVELOPMENT OF LAND TO THE EAST OF LOSSEY ROAD.
MILL ROAD DRURY SOUTH HIGHWAY SHOULD FOLLOW LOSSEY ROAD ALIGNMENT.

Drury East Precinct

Drury East Precinct Plan 1 - Road Network



From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 49 (Private) - Zane Wood
Date: Wednesday, 21 October 2020 9:31:01 AM
Attachments: [Plan Change 49.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Zane Wood

Organisation name: First Gas Limited

Agent's full name:

Email address: zane.wood@firstgas.co.nz

Contact phone number: 027 287 7248

Postal address:
42 Connett Road
Bell Block
New Plymouth 4312

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

Property address: Multiple addresses

Map or maps:

Other provisions:

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

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

The reason for my or our views are:

Firstgas oppose the Private Plan Change (PPC) as it is currently drafted as it fails to adequately address our Regionally Significant Infrastructure being Firstgas's High Pressure Transmission Pipeline which dissects the PPC area. Consideration needed to be made in relation to the formation of the transport links and the proposed end land uses, which need to be reflected through the proposed planning framework.

Furthermore, as a requiring authority (Designation 9104 under the Unitary Plan) in the proposed PPC area I would have anticipated that the applicant to approach Firstgas to attain s.176 (RMA) approval prior to the lodgment of the schedule 1 process.

I or we seek the following decision by council: Decline the plan change, but if approved, make the amendments I requested

Details of amendments: Details of amendments sorts are identified in the attached submission.

Submission date: 21 October 2020

Supporting documents
Plan Change 49.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.

First Gas Limited

42 Connett Road West, Bell Block
Private Bag 2020, New Plymouth, 4342
New Zealand

P +64 6 755 0861

F +64 6 759 6509

Submission on Private Plan Change 49 Drury East Precinct to Auckland Council by First Gas Limited

1. Introduction to Submitter:

First Gas Limited (Firstgas) own and operate approximately 2,500 kilometres of high-pressure natural gas transmission pipelines through the North Island and are confirmed as a Requiring Authority.

The gas transmission pipelines, located below the ground, is supported by ancillary above-ground infrastructure, and delivers gas from production stations in Taranaki to various towns and cities throughout the North Island, including within Auckland and Whangarei, for commercial, industrial, and domestic use.

In the context of the Resource Management Act 1991, the Firstgas assets and operations deliver significant benefits to the wider North Island. The transmission (and distribution) of natural gas provides for economic growth, enables communities, business and industry to function and provides for people and communities' social well-being and their health and safety. The gas transmission network is recognised as both regionally and nationally significant infrastructure.

2. Understanding the Plan Change:

Fulton Hogan Land Development Limited are seeking a Private Plan change to include a new precinct within the Auckland Unitary Plan, being the Drury East Precinct. The Drury East Precinct would be identified on the planning maps and would fundamentally rezone 184 Hectares of land in Drury East resulting in 2 hectares of Business: Mixed Use zoned land; 22 hectares of Residential: Terrace Housing and Apartment Buildings zoned land; 65 hectares of Residential: Mixed Housing Urban zoned land and 95 hectares of Residential: Mixed Housing zoned land.

3. Firstgas assets within the Plan Change area:

Firstgas owns and operates the "Huntly OT to Westfield Gas Pipeline" which is located (in part) within the Precinct Boundary.

This pipeline is part of a network which conveys natural gas between New Plymouth and Auckland and is Auckland's commercial source of natural gas. The pipeline operates under high-pressure and is a transmission asset.

The pipeline is designated in the Auckland Unitary Plan, reference '9104 Pukekohe to East Tamaki Gas Pipeline' which provides for the 'operation, maintenance and repair, upgrade and renewal of the existing gas transmission pipeline and ancillary facilities as required for the transportation of gas'. The restrictions included within this designation specifically state that no person shall plant any tree or shrub, disturb the soil below a depth of 0.4 from the surface; or do anything on or to the land which would or could damage or endanger the pipeline within the designated corridor without first obtaining written consent of Firstgas.

4. Overview of Policy Framework Relating to Gas Infrastructure within Extent of Private Plan Change 49:

Matters for the Council to consider in respect of Private Plan Change 49, include consistency with the Auckland Unitary Plan's direction and framework and the Regional Policy Statement. In the context of existing gas infrastructure, the provisions of note within the Regional Policy Statement for Auckland contained within Chapter B3 of the Unitary plan are:

B3.2.1 Objectives

- (1) Infrastructure is resilient, efficient and effective.*
- (2) The benefits of infrastructure are recognised, including:*
 - (a) Providing essential services for the functioning of communities, businesses and industries within and beyond Auckland;*
 - (d) Providing for public health, safety and the well-being of people and communities;*
- (6) Infrastructure is protected from reverse sensitivity effects caused by incompatible subdivision, use and development*

B3.2.2 Policies

Provision of infrastructure

- (1) Enable the efficient development, operation, maintenance and upgrading of infrastructure.*
- (2) Recognise the value of investment in existing infrastructure.*

Reverse sensitivity

- (4) Avoid where practicable, or otherwise remedy or mitigate, adverse effects of subdivision, use and development on infrastructure.*
- (5) Ensure subdivision, use and development do not occur in a location or form that constrains the development, operation, maintenance and upgrading of existing and planned infrastructure.*

Further, Chapter E26 Infrastructure provides for Network Utilities objectives and policies, including:

E26.2.1. Objectives

- (4) Development, operation, maintenance, repair, replacement, renewal, upgrading and removal of infrastructure is enabled.*
- (6) Infrastructure is appropriately protected from incompatible subdivision, use and development, and reverse sensitivity effects.*

E26.2.2 Policies

Adverse effects on infrastructure

- (3) 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.*

5. Firstgas operating standards and codes:

Firstgas is required to ensure the protection and integrity of the pipeline is maintained, to ensure the safety of the public, property and environment. Pipelines are required to meet the safety and operational requirements of the Health and Safety in Employment (Pipelines) Regulations 1999, and the operating code Standard AS2885 Pipelines – Gas and Liquid Petroleum (AS2885).

Third party interference is one of the main risks to the safety and integrity of underground pipelines. Activities which may affect the existing gas infrastructure need to take into account the location and protection requirements of the pipelines and associated infrastructure. Activities in the vicinity of the pipeline will also need to be carried out in a way which does not compromise the safe and efficient operation of the network, including the ability to legally and physically access the infrastructure with necessary machinery to undertake works.

6. Submission Statement:

Firstgas is opposed to the proposed plan change, due to the lack of consideration of Firstgas's asset within the plan change area. Through these processes, Firstgas seeks to ensure that an appropriate framework is proposed and appropriate end use locations are considered to protect the existing infrastructure within the extent of the Precinct and enable its ongoing operation, maintenance, and upgrading, which includes access to the gas infrastructure; while also protecting the asset from activities associated with the purpose of the Precinct. This framework also ensures that Firstgas are able to continue to comply with its industry standard for the operation and maintenance of gas and liquid petroleum pipeline assets – AS2885.

Ultimately, as a representative of Firstgas, I am unaware of any consultation requesting the written authority from Firstgas in respect of the Applicant's consent for Plan Change 49, as a requiring authority pursuant to Section 176 of the Resource Management Act 1991. Section 176 of the Act states that no person shall undertake any use of the land, and change the character, intensity, or scale of the use of the land, that would prevent or hinder work to which the designation relates, without the prior written consent of that requiring authority. Firstgas considers that the private plan change sought from Auckland Council can be considered as activities which would (or could, per the wording contained within Designation 9104) hinder work to which the designation relates. Having not been sought for written consent with regard to these applications, this highlights the risks associated with differences of interpretation in the application of section 176 of the Act to Firstgas.

Firstgas seeks that the content of this submission be factored into future decision-making deliberations, to the extent that the proposed Plan Change includes clear provisions which protect the existing infrastructure and does not restrict nor compromise its ongoing safe and effective operation, maintenance and upgrade abilities, including access. In summary, Firstgas seeks that:

- | | |
|---|------|
| • The Gas Transmission Network is enabled to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed (i.e. recognised and provided for) through an enabling activity status; | 22.1 |
| • The Gas Transmission Network is recognised as having functional and operational requirements and constraints, including in respect of its location; | 22.2 |
| • There may be some occasions where works undertaken by Firstgas generate adverse environmental effects; | |
| • That the adverse effects of third-party development or activities in close proximity to the Gas Transmission Network are managed to the extent that adverse effects on the network are avoided or appropriately mitigated; | 22.3 |
| • Firstgas is identified as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by Firstgas especially land use changes and subdivision, or alternatively the matters of discretion or assessment criteria include technical advice from Firstgas; and | 22.4 |
| • The identification of the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users. | 22.5 |

7. Specific Submission Points to Applicant's Proposed 'Drury East Precinct (IX)'

Proposed Objectives IX.2

Firstgas request the inclusion of a new objective which states 'The Drury East Precinct recognises the importance of the existing pipeline infrastructure as assets which are regionally and nationally significant and will ensure that they are protected and enabled'.

22.6

Firstgas consider that these changes will seek to ensure that the existing infrastructure is protected and enabled.

Proposed Policies IX.3

Firstgas requests the inclusion of a new policy which states 'The Drury East Precinct is planned, designed and constructed so that adverse effects on existing infrastructure are avoided or mitigated'.

Firstgas consider that this change will seek to ensure that the existing infrastructure is protected and enabled.

22.7

Proposed IX.4 - 6 (Activity Table, Notification and Standards)

Firstgas seek the following provision to be included within the applicant's proposed framework in relation to resource consent processes; 'Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner'.

22.8

Firstgas consider that the inclusion of this provision will enable and protect the existing infrastructure from possible impacts created by activities within the Precinct. For example, the proximity of sensitive actives to the Gas Transmission Pipeline, residential development and so on. The inclusion of an appropriate planning provision within the precinct's proposed framework will provide for assessment on such possible impacts by the infrastructure owner who has the technical and operational experience relating to the efficient and safe management of the infrastructure asset.

8. Conclusion

Firstgas welcomes the opportunity to discuss the content of this submission with the applicant, Fulton Hogan Land Development Limited with the aim of reaching an amicable solution whereby the consideration identified above are included in Plan Change 49.

From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 49 (Private) - GM and AA Jones Family Trust
Date: Wednesday, 21 October 2020 9:31:18 AM
Attachments: [PC 49 Submission - Jones FT.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: GM and AA Jones Family Trust

Organisation name:

Agent's full name: Kitt Littlejohn

Email address: littlejohn@quaychambers.co.nz

Contact phone number: 021 657 376

Postal address:

PO Box 106215

Auckland

Auckland 1143

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

The whole of the plan change.

Property address: 230 Drury Hills Road, Drury

Map or maps:

Other provisions:

See attached

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

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

The reason for my or our views are:

See attached

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

Details of amendments: Remove indicative stream notation on the Trust's property.

23..1

Submission date: 21 October 2020

Supporting documents

PC 49 Submission - Jones FT.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.

Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council
Private Bag 92-300
Auckland

Name of submitter: Jones Family Trust
230 Drury Hills Road
RD1 Drury 2577
Auckland

This is a submission on the following proposed plan change to the Auckland Unitary Plan:

Private Plan Change 49 – Drury East Precinct

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

The specific provisions of the proposal that this submission relates to are:

The whole of Private Plan Change 49

The Trust's submission is:

The Trust supports the whole of the proposed plan change for the reasons set out in support of it in the Section 32 Report and associated information.

In particular:

- (a) the Trust supports the rezoning of 230 Drury Hills Road to Residential – Mixed Housing Suburban Zone, or such other residential zone enabling greater residential development density than that zone;*
- (b) the Trust notes that by reference to Figure 5 in Appendix 9 to the plan change documentation (Ecological Assessment,) proposed standard IX.6.3 Riparian Margin would require a 10m planted riparian margin on each side of an indicative stream traversing the Trust's property. However, there is no stream within the Trust's property, merely a drain (see attached), and the Ecological Assessment is therefore wrong in this regard. The Trust opposes any provision in the proposed plan change that would require riparian margins and planting on either side of the drain within its property.*

23.1

The Trust seeks the following decision from the local authority:

Approve Plan Change 49 with amendment.

The Trust wishes to be heard in support of its submission.

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

Signature:

JONES FAMILY TRUST by its authorised agent:



K R M Littlejohn

Date:

21 October 2020

Address for service:

K R M Littlejohn
Quay Chambers
Level 7, 2 Commerce Street
P O Box 106215

AUCKLAND CITY 1143

Telephone:

(09) 374 1669 or 021 657 376

Email:

littlejohn@quaychambers.co.nz



From: [Unitary Plan](#)
To: [Unitary Plan](#)
Subject: Unitary Plan Publicly Notified Submission - Plan Change 49 (Private) - Manzi Chen
Date: Wednesday, 21 October 2020 10:16:05 AM
Attachments: [Submission on the PC49 Drury East Precinct.pdf](#)

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Manzi Chen

Organisation name:

Agent's full name: Karyn Kurzeja C/- Purpose Planning

Email address: karyn@purposeplanning.co.nz

Contact phone number: 029-930-6026

Postal address:

PO Box 9600

Newmarket

Auckland 1149

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

Support for the rezoning of the land at 360 Fitzgerald Road, Drury to be rezoned from Future Urban zone to Residential – Mixed Housing Urban in conjunction with PC49.

Support the entire Plan Change 49

Property address: 360 Fitzgerald Road, Drury

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:

Refer to attached submission

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

Details of amendments:

Submission date: 21 October 2020

Supporting documents

Submission on the PC49 Drury East Precinct.pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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



029-930-6026
Karyn@purposeplanning.co.nz
www.purposeplanning.co.nz

1/14 Viaduct Harbour Avenue,
Auckland Central 1010
PO Box 9600, Newmarket,
Auckland 1149

21st October 2020

To Whom it May Concern

This is a Submission on PC49 Drury East Precinct

I support the proposed rezoning of the land at 360 Fitzgerald Road, Drury to be rezoned from Future Urban zone to Residential – Mixed Housing Urban in conjunction with PC49.

The reasons for my views are:

1. The proposed rezoning is consistent with Auckland Council's Drury – Opāheke Structure Plan 2019;
2. It will increase the supply of quality housing in Southern Auckland, with a network of open space and the provision of a small-scale commercial centre to meet the day to day needs of the residents;
3. The proposed objectives of the Plan Change area are consistent with Section 5 of the Resource Management Act. Specifically:
 - The proposed urbanisation of the Plan Change area will provide opportunities for quality housing in an area close to public transport and amenities, enabling communities to meet their own social well-being;
 - The natural resources of the Plan Change area, including in particular, the Fitzgerald Stream and its tributaries will generally be maintained and enhanced, such that they will be sustained for future generations;
 - Where stream reclamation may be required to facilitate urban development in the future, the effects can be offset through enhancement of other sections of streams within the Plan Change area to ensure no net loss is achieved; and
 - The Auckland-wide provisions in relation to stormwater and stream management will ensure that the life supporting capacity of ecosystems will be protected while at the same time it will mitigate the adverse effects of the development on the environment.
4. The proposed Drury East Precinct provisions that will apply to the future development of the land under the AUP(OP) will ensure that a high quality built environment is achieved at the street, block and site scale.
5. The Plan Change will result in a quality built environment where subdivision, use and development respond to the intrinsic qualities and physical characteristics of the area, while reinforcing the hierarchy of centres and corridors, contributing to a diverse mix of choice and maximising resource and infrastructure efficiency.
6. The Plan Change will, within the Residential - Mixed Housing Urban zone, enable a range of housing types at a range of densities and in a manner that is in keeping with the planned urban built character of the zone;
7. The Plan Change will ensure that land is used efficiently in areas close to centres and public transport; and



029-930-6026
Karyn@purposeplanning.co.nz
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1/14 Viaduct Harbour Avenue,
Auckland Central 1010
PO Box 9600, Newmarket,
Auckland 1149

8. All necessary statutory requirements have been met.

I support the entire plan change provisions.

I seek the following decision by Council:

Accept the proposed plan change / variation

I 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.

24.1

Name of Submitter:

Manzi Chen
29 Arney Road, Remuera,
Auckland

Address for Service:

Purpose Planning Limited
PO Box 9600,
Newmarket
Auckland 1149
Attention: Karyn Kurzeja

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

October 20 2020

Auckland Council
 Plans and Places Team

By email: unitaryplan@aucklandcouncil.govt.nz

To Whom it May Concern,

Re: Private Plan Change 49 – Drury East Precinct

This letter provides feedback on Private Plan Change 49 (PC49) as it specifically affects our property (**Figure 1**). We are aware of the proposal from Fulton Hogan Land Development Ltd to develop a new residential development 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 some 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 PC49 be approved, as notified.

25.1

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 49 – Drury East 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 49 (PC49) to the Auckland Unitary Plan – Operative in Part (AUP) on behalf of Kiwi Property Holdings No.2 Limited (Kiwi Property).
- 1.2 Kiwi Property could not gain an advantage in trade competition through this submission.

2. BACKGROUND

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

3. SCOPE OF SUBMISSION

- 3.1 The submission relates to PC 49 as a whole.

4. SUBMISSION

- 4.1 Kiwi Property supports PC49 in its notified form.
- 4.2 Of particular relevance to Kiwi Property's submission, the following matters are noted:
 - a) The proposed zoning pattern is consistent with the Drury-Opāheke Structure Plan and the three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East;
 - b) A variety of residential typologies and densities are proposed and respond to locational attributes. The proposed zoning pattern focuses the Residential Terrace Housing and Apartment Building zone close to public transport and Kiwi's proposed Metropolitan Centre. The Residential-Mixed Housing Suburban zone has been applied to provide a transition between the Mixed Housing Urban zone and the Countryside Living zone to the east;
 - c) The adverse effects of urban development on the natural environment, including the Fitzgerald Stream and its tributaries can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced;
 - d) The zoning pattern and proposed Precinct enables a connected and high-quality road network to be established that provides appropriately for all transportation modes; and

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

5. Decision Sought

5.1 Kiwi Property seeks the following relief from Auckland Council on PC49:

- a) That PC49 be retained and approved, as notified.

26.1

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

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:

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 49

Plan Change/Variation Name

Drury East 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. ☐

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)

22/10/20

Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

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

AND

IN THE MATTER of a submission pursuant to Clause 6 of
 Schedule 1 of the Act in respect of
PLAN CHANGE 49 to the **AUCKLAND
 UNITARY PLAN**

SUBMISSION ON PLAN CHANGE 49 (DRURY EAST 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 49 ("PC 49") to the Auckland Unitary Plan ("AUP") which seeks to rezone 184 hectares of Future Urban Zone land at Drury East to enable urban development.
- 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 PC 49. FHLD has worked with Kiwi Property Limited (the proponent of Plan Change 48 (Drury Centre)) and Oyster Capital (the proponent of Plan Change 50 (Waihoehoe Precinct)) (together, the "Drury East Developers") 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.
- 1.4 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.

- 1.5 Consistent with other greenfield precincts in the AUP, PC 49 establishes the Drury East 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:
- (a) Achieving an appropriate urban layout;
 - (b) Providing an integrated and connected street network;
 - (c) Providing a network of open space which integrates with the natural features of the area;
 - (d) Enhancing riparian margins and freshwater quality; and
 - (e) Ensuring development integrates with public transport and that development coordinates with the required infrastructure upgrades.
- 1.6 The specific aspects of PC 49 that this submission relates to are:
- (a) Updates to the transport modelling which demonstrate that the development enabled by PC 49 does not rely on the transport upgrades identified within the Drury Transport Investment Programme.
 - (b) Amendments to the stormwater provisions to ensure consistency between the Drury East Precinct and the Stormwater Management Plan ("SMP") prepared in accordance with Auckland Council's network discharge consent.

2. ADDITIONAL TRANSPORT MODELLING

- 2.1 The transport modelling provided with the PC 49 request (attached to Appendix 8: Integrated Transport Assessment) was completed in 2019 and was based on the Strategic Growth Alliance decades and timing available at the time.
- 2.2 This modelling was therefore 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:
- (a) SH1 Papakura to Drury South Interchange (2025);
 - (b) Mill Road (2028);
 - (c) Drury Central and West Train Stations (2025);
 - (d) Papakura to Pukekohe Rail Electrification (2024).

- 2.3 The traffic modelling was also undertaken prior to the Drury Transport Investment Programme (DTIP) confirming the transport upgrades required to support the full build out of the Drury Opaheke Structure Plan area, including:
- (a) Jesmond Rd Extension;
 - (b) Waihoehoe Road WEST Upgrade;
 - (c) Paerata Rail Station & Southern connector;
 - (d) Jesmond Road Upgrade;
 - (e) East West Arterial - Bremner Road realignment and bridge upgrades;
 - (f) SH22 Improvements (4 laning);
 - (g) Waihoehoe Road EAST Upgrade;
 - (h) Rail 4 Tracking;
 - (i) Great South Road FTN upgrade to Papakura;
 - (j) Burt Rd - Pukekohe Expressway;
 - (k) Pukekohe Expressway Stage 1;
 - (l) Opaheke North South Arterial.
- 2.4 Revised transport modelling was subsequently undertaken by the Drury East Developers that incorporated the NZUP and DTIP upgrades. This was provided to Auckland Council by way of a response to a request for further information dated 24 March 2020 that was notified with the plan change request.
- 2.5 The revised transport modelling has informed proposed development standards included in the Drury East precinct which seek to stage development with the required transport infrastructure upgrades (IX6.1 Staging of Development with Transport Upgrades and Standard IX6.2 Trip Generation Limit).
- 2.6 Since the revised modelling was undertaken, the Drury East developers have undertaken additional transport modelling, attached as **Attachment A**. The purpose of this additional modelling is to understand whether the DTIP upgrades are necessary to support development in the PC 48-50 areas, and therefore to manage the effects of development on the effectiveness and safety of the transport network in accordance with the requirements of Objective 3 of the Drury East Precinct.

- 2.7 To understand this, Stantec undertook the following sensitivity tests:
- (a) Sensitivity Test 1 – Without DTIP Upgrades (NZUP Only);
 - (b) Sensitivity Test 2 – Without DTIP Upgrades, but including transport upgrades required in the Drury Centre, Drury East, Waihoehoe and Drury 2 precincts.
- 2.8 The results of Sensitivity Test 1 demonstrate that development enabled by the Drury Centre, Drury East and Waihoehoe Plan Changes does not rely on the DTIP transport upgrades until 2048.
- 2.9 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 PC 48, 49 and 50 areas does not result in any notable traffic delays until 2048.
- 2.10 Overall, the additional transport modelling demonstrates that the NZUP transport upgrades and the upgrades required for the Drury Centre, Drury East, Waihoehoe and Drury 2 precincts are sufficient to enable the development of the PC 48-50 areas.

3. PROPOSED AMENDMENTS TO STORMWATER PROVISIONS

- 3.1 The Auckland-wide stormwater quality and Stormwater Management Area Flow 1 (SMAF 1) provisions will apply in the PC 49 area which will manage sediment and contaminant runoff to the freshwater and coastal receiving environment.
- 3.2 In accordance with the Council's recently approved Network Discharge Consent, the SMP was prepared by Tonkin & Taylor, and is included at Appendix 10 to the PC 49 request. 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 PC 49 area.
- 3.3 Since the notification of PC 49 FHL has, based on feedback from the Auckland Council Healthy Waters team, identified two aspects of the proposed precinct provisions which need to be refined to provide for improved stormwater quality outcomes, as follows:
- (a) The need for an additional policy relating to stormwater quality; and
 - (b) Amendments to the inert building materials standard.
- 3.4 The proposed amendments are set out in **Attachment B** and addressed in more detail below.

New Policy IX.X – stormwater quality

- 3.5 FHLD proposes the addition of the following new policy:

Policy IX.X: 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.

27.1

- 3.6 The purpose of this new policy is to provide greater direction in terms of the approach to stormwater management in the Drury East Precinct.

- 3.7 The purpose of the proposed policy is to clarify the relationship between the SMP adopted under the Network Discharge Consent and the Drury East Precinct by recognising that subdivision and development will have to be in accordance with the SMP . This is consistent with the approach taken in respect of Plan Change 51 (Drury 2 Precinct).

Inert building materials standard

- 3.8 FHLD proposes the amendment of the stormwater quality standard as follows:

IX6.5 Stormwater Quality

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'.

For all other impervious surfaces inert building materials should be used.

27.2

- 3.9 The SMP aims to align the proposed stormwater management approach for the PC 49 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.
- 3.10 The 'Stormwater Management Toolbox' is proposing a higher standard of stormwater management than what is required for SMAF 1 areas and other areas by 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.

- 3.11 Standard IX6.5 Stormwater Quality is proposed to be included in the PC 49 area to recognise that a higher standard of stormwater treatment for roads will be provided than the baseline that is already required by Chapter E9 of the AUP
- 3.12 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. For consistency Standard IX6.5 Stormwater Quality should be amended to recognise that the requirement in the SMP relating to the use of inert building materials is also a higher standard of stormwater treatment than required under Chapter E9 of the AUP.

Decision Sought

- 3.13 FHLD seeks the following relief from Auckland Council:
- (a) Approve the Drury East Precinct with the amendments set out in **Attachment B.**
 - (b) Any further or alternative relief that may be required to address the matters raised in this submission.
4. **FHLD could not gain an advantage in trade competition as a result of this submission.**
5. **FHLD wishes to be heard in support of its submission.**

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

FULTON HOGAN LAND DEVELOPMENT LIMITED

by their solicitors and duly authorised agents
BERRY SIMONS



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ATTACHMENT A

**ADDITIONAL TRANSPORT MODELLING – MEMORANDUM FROM STANTEC DATED 15
OCTOBER 2020**

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.**

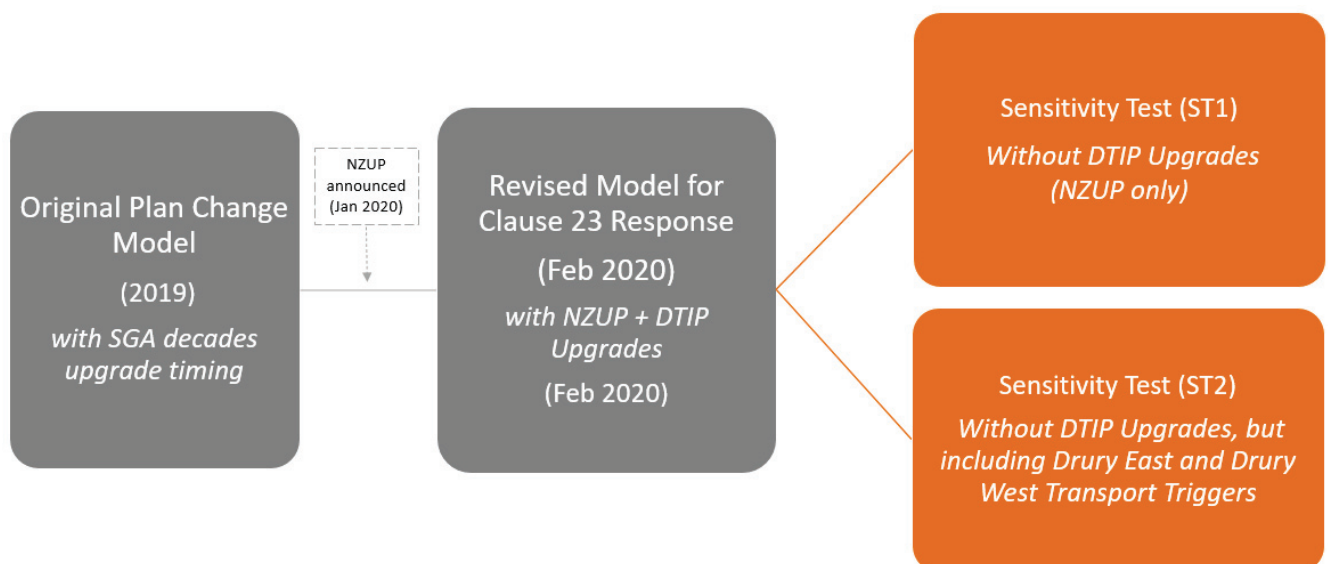


Figure 1: Transport Modelling Overview

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.

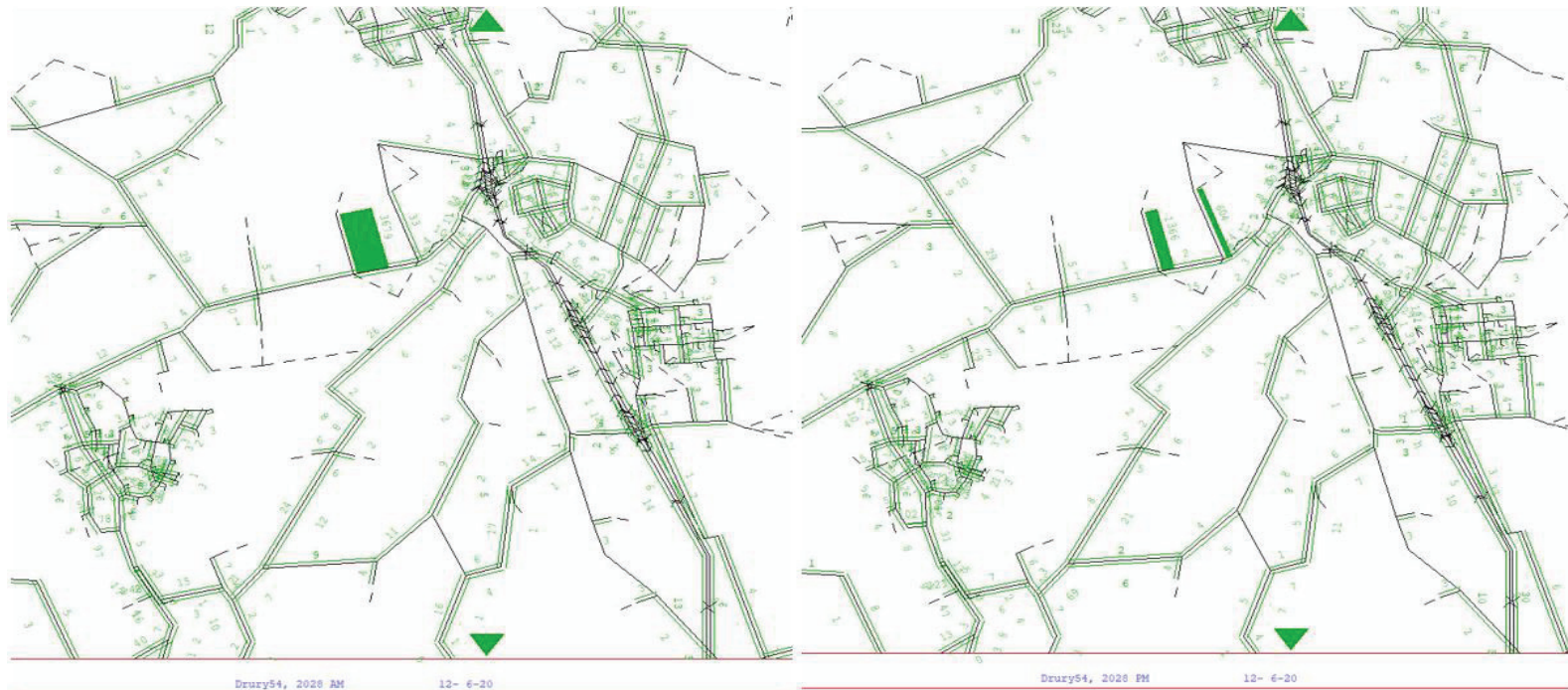


Figure 4: ST1Results – Delay in 2028 (AM and PM)

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.

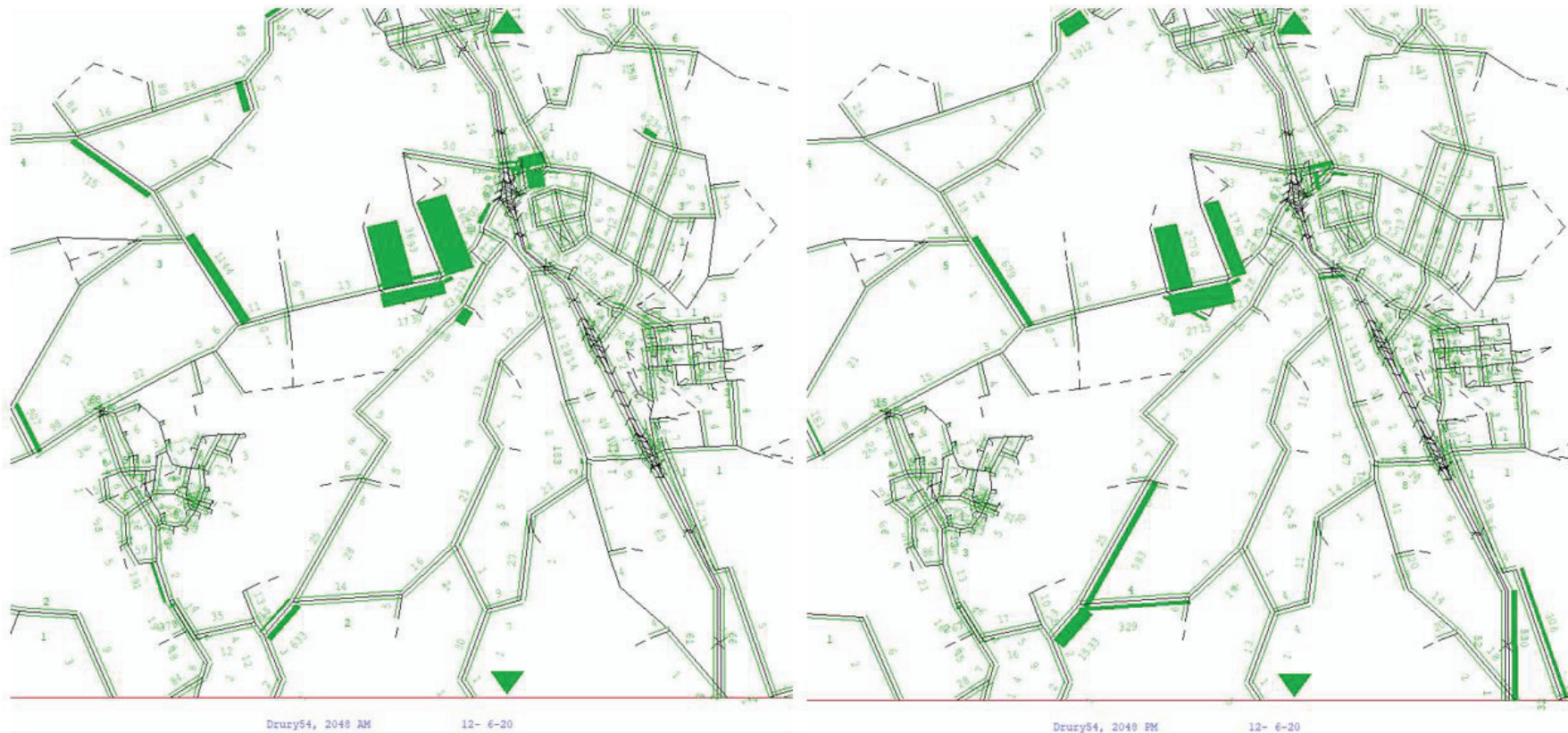


Figure 6: ST1 Results - Delay in 2048 (AM and PM)

SENSITIVITY TEST 2 RESULTS

ST2: 2028

- Drury East and Drury West work well.

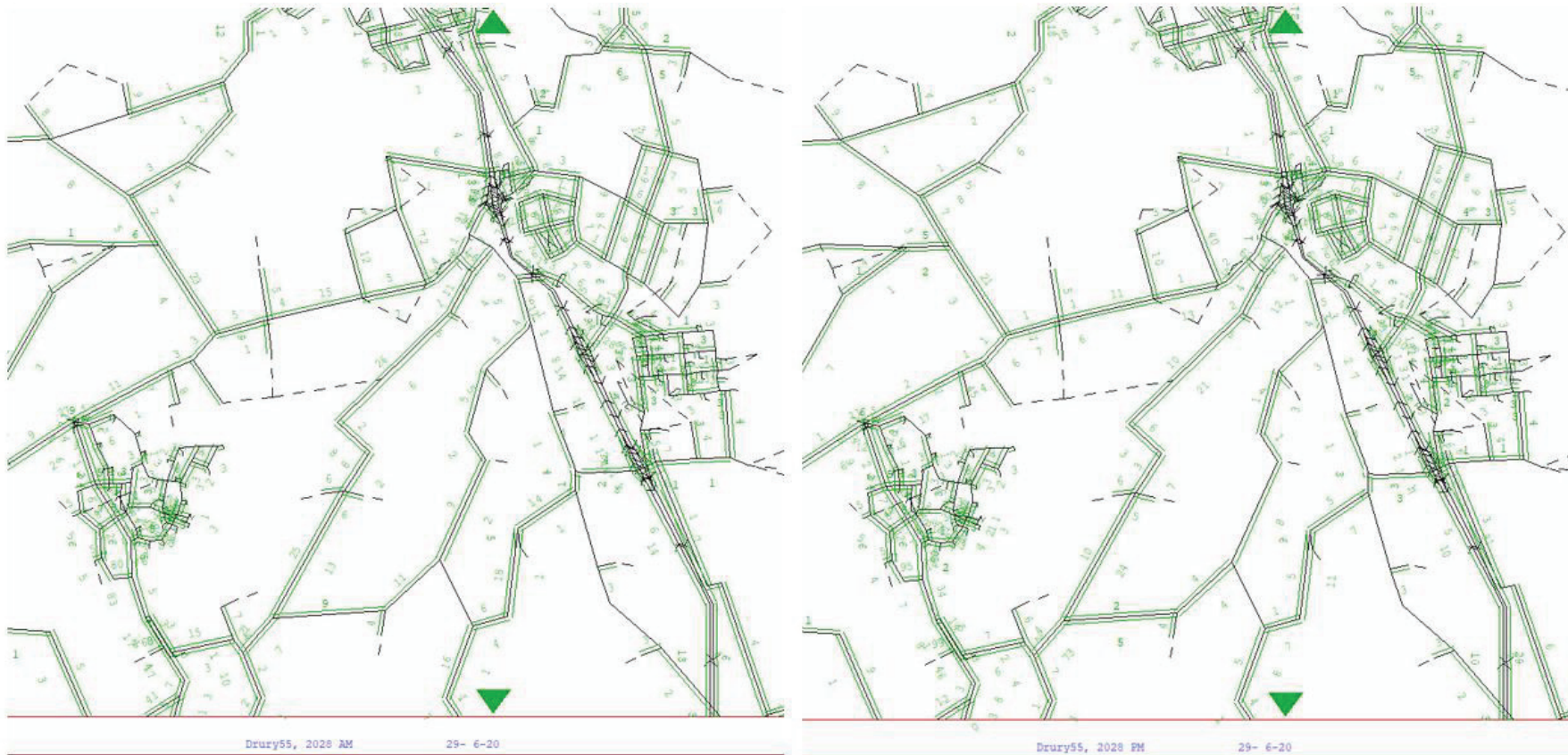


Figure 7: ST2 Results – Delay in 2028 (AM and PM)

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).

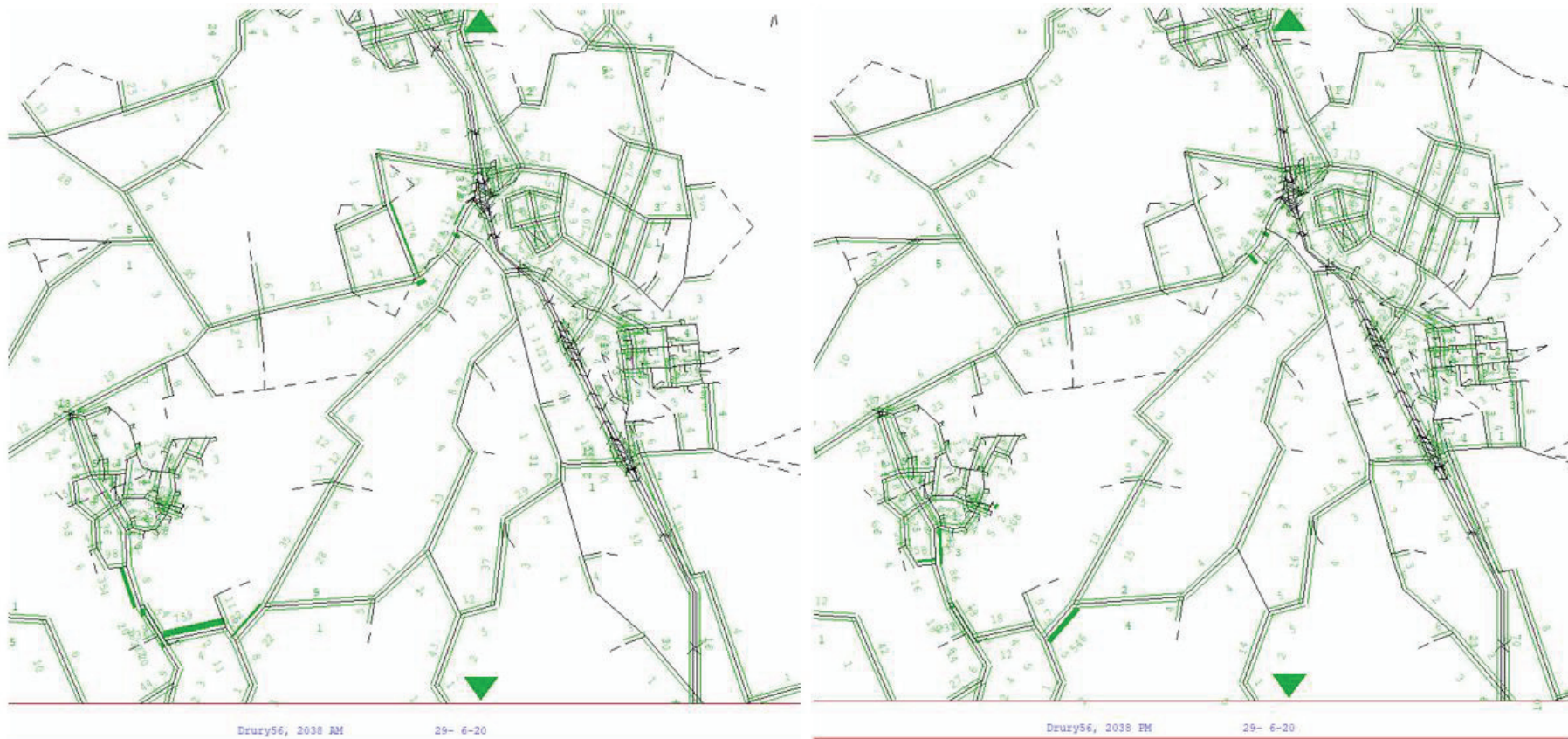


Figure 8: ST2 Results – Delay in 2038 (AM and PM)

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+

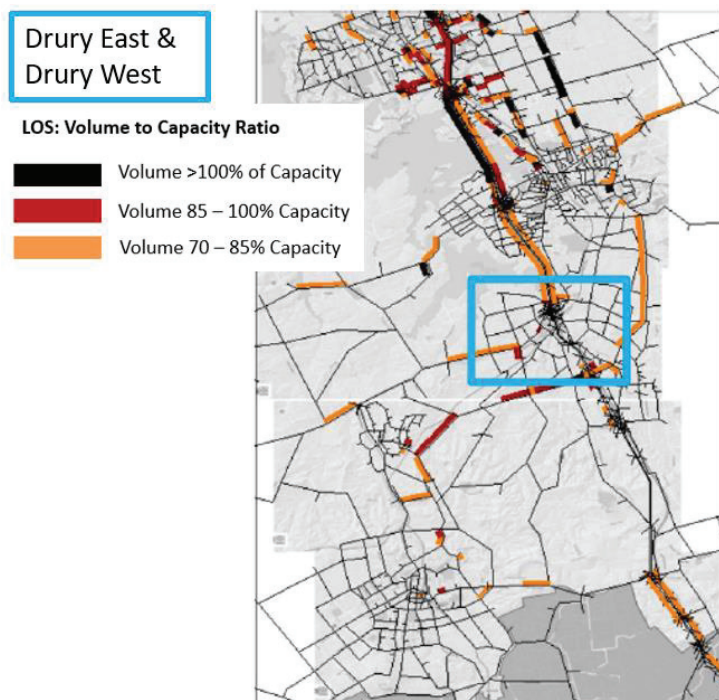


Figure 8-7 – 2048 AM Peak V/C

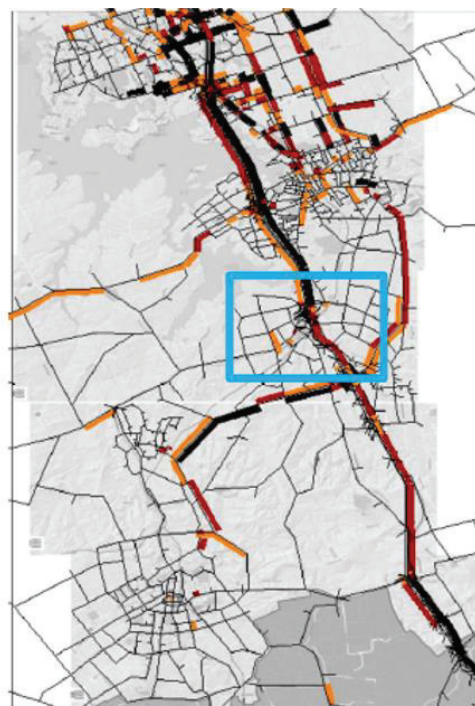


Figure 8-9 – 2048 PM Peak V/C

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:

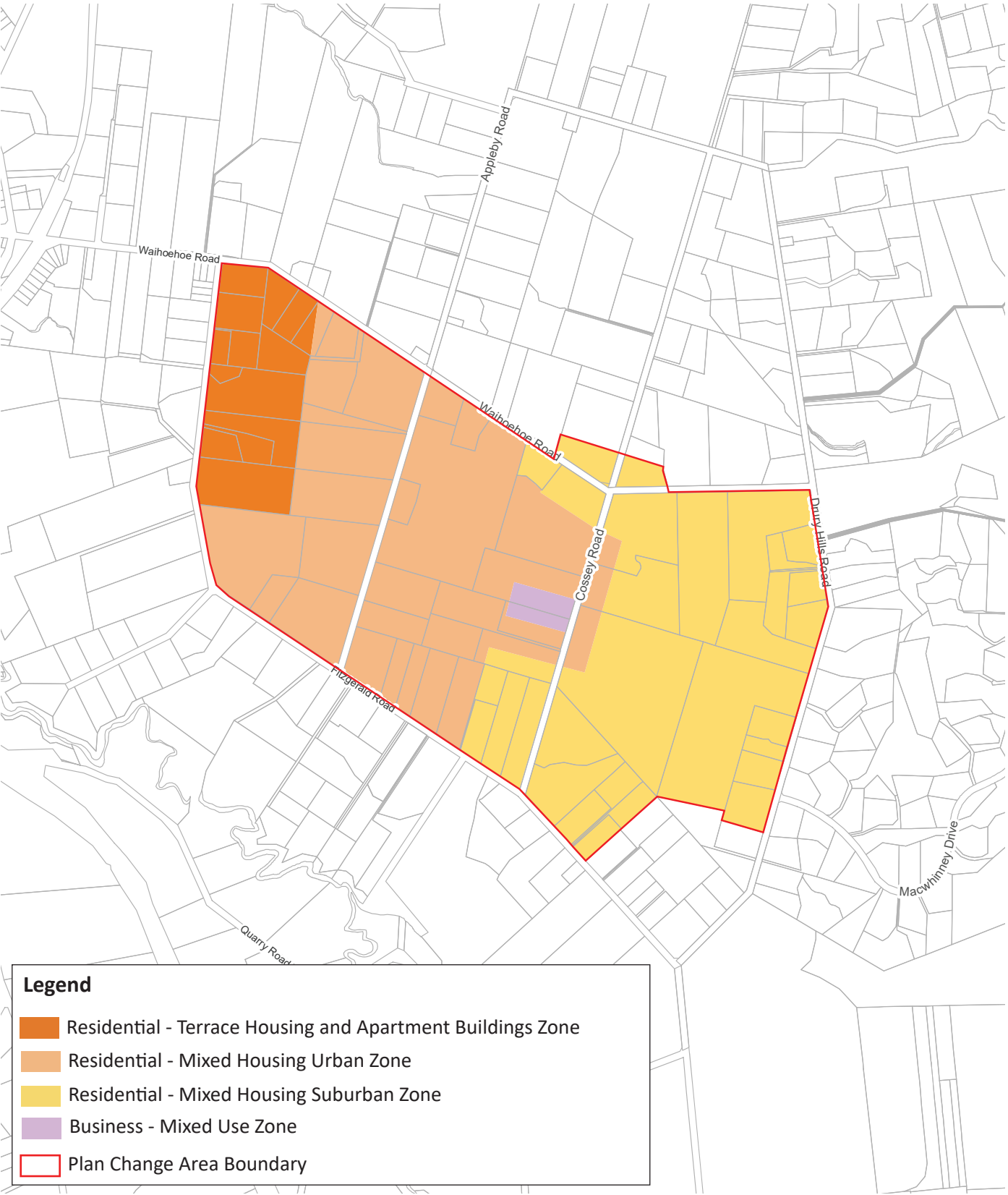
- The congestion profile on the Drury West and Drury East local network is broadly comparable between the two models
- Stantec's Sensitivity Test 2 Model shows more local links operating near capacity (as expected), however the delays are localised and not considered uncommon during the peak period, 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

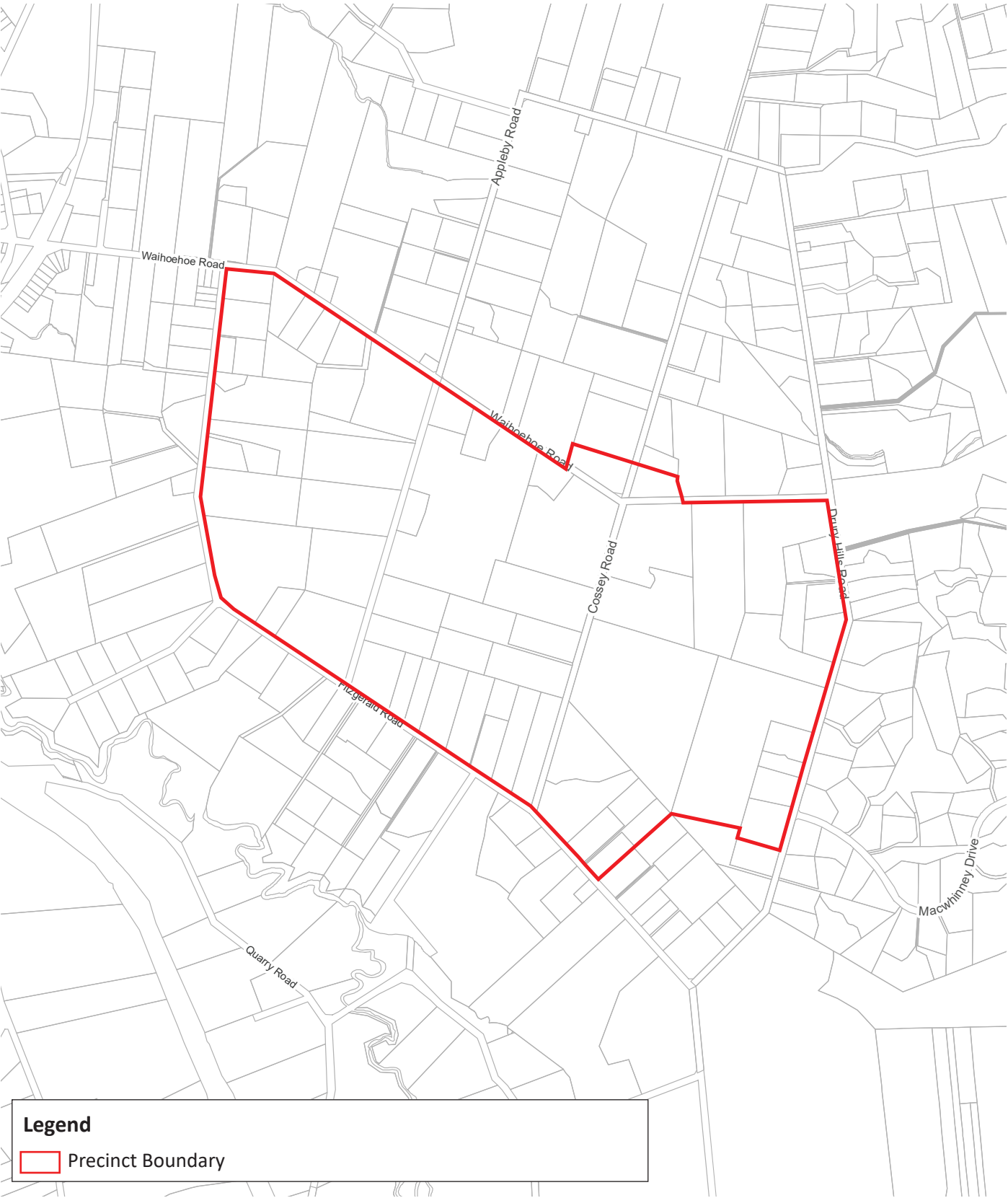
Daryl Hughes
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ATTACHMENT B
REVISED DRURY EAST PRECINCT PROVISIONS

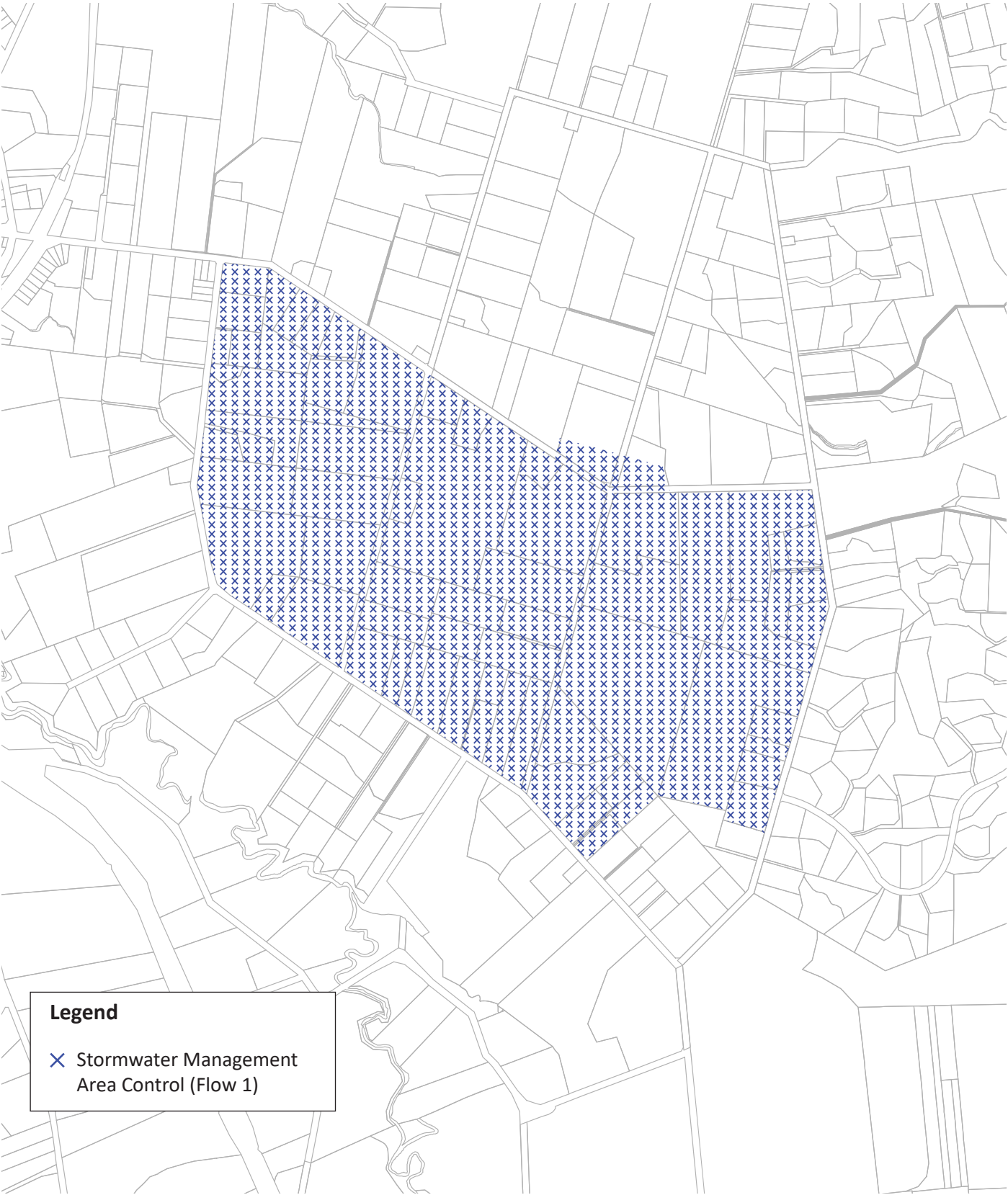
Drury East - Zoning Plan



Drury East - Precinct Plan



Drury East - Stormwater Mangement Area Control (Flow 1)



IX. Drury East Precinct

IX.1 Precinct Description

The Drury East Precinct applies to approximately 184 hectares of land generally bounded by Waihoehoe Road to the north, Drury Hills Road to the east and Fitzgerald Road to the south and west.

The purpose of the Drury East Precinct is to provide for the development of a new, comprehensively planned residential community in Drury East that supports a quality compact urban form. The precinct provides for a range of residential densities, including higher residential densities close to the Drury Centre and the future rapid and frequent public transport. Moderate residential densities are enabled in the eastern part of the precinct to provide a transition between the higher density housing in the west, and the Rural Countryside Living land to the east in the Drury foothills.

A small mixed use centre is provided for at the junction of Cossey Road and the proposed east-west Collector Road to provide for the local day-to-day needs of residents in a central location.

The precinct emphasises the need for development to create a unique sense of place for Drury, by integrating existing natural features, responding the landform and respecting Mana Whenua values. In particular there is a network of streams throughout Drury East precinct, including the Fitzgerald stream. The precinct seeks to maintain and enhance these waterways and integrate them where possible within the open space network.

The transport network in the wider Drury East area as defined on Precinct Plan 2 will be progressively upgraded over time to support development in the wider area. The precinct includes provisions to ensure that the development of land for housing is coordinated with the construction of the transport network upgrades necessary to support it.

The zoning of the land within the Drury East Precinct is Residential – Terrace Housing and Apartment Buildings, Residential - Mixed Housing Urban, Residential – Mixed Housing Suburban and Business - Mixed Use.

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

IX.2 Objectives

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

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

IX.3 Policies

- (1) Require the east to west collector road to be generally in the location shown in IX.10.1 Drury East: Precinct Plan 1 while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network.
- (2) Ensure that development provides a local road network that achieves a highly connected street layout that integrates with the wider collector road network within the precinct and the surrounding transport network, and supports the safety and amenity of the open space and stream network.
- (3) Require streets to be attractively designed and appropriately provide for all transport modes.
- (4) In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contribute to a sense of place for Drury East, by incorporating any distinctive site features and integrating with the stream network.
- (5) Ensure that the timing of development in Drury East Precinct is coordinated with the transport infrastructure upgrades necessary to mitigate the adverse effects of development on the effectiveness and safety of the immediately surrounding transport network.
- (6) Ensure that development in Drury East Precinct is coordinated with supporting stormwater, wastewater and water supply infrastructure, having particular regard to the capacity of the Fitzgerald culvert and culverts under Great South Road.
- (7) Provide for the staging of pedestrian and cycling connections to the Drury Central train station to encourage the use of public and active modes of transport.
- (8) 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 stream, and enable in-stream works to mitigate any effects.
- (9) Support improvements to water quality and habitat, including by providing planting on the riparian margins of permanent and intermittent streams. All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.
- (10) 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.

IX.4 Activity table

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

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

Table IX.4.1 Activity table

Activity		Activity Status
Development		
(A1)	Development of public or private roads	RD
(A2)	Development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit	RD
(A3)	Development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades or Standard IX.6.2 Trip Generation Limit	D
(A4)	Development that does not comply with IX.6.4 Building Setback along Waihoehoe Road	D
Subdivision		
(A5)	Subdivision that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit	RD
(A6)	Subdivision that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades or Standard IX.6.2 Trip Generation Limit	D

IX.5 Notification

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

IX.6 Standards

- (1) All relevant overlay, Auckland-wide and zone standards apply to the activities listed in Activity Table IX.4.1 above except for E27.6.1 Trip generation as specified in Standard IX.6(2) below
- (2) The following Auckland-wide standards do not apply to activities listed in Activity Table IX.4.1 above:
 - E27.6.1 Trip generation

IX.6.1 Staging of Development with Transport Upgrades

- (1) Development within the area shown on IX.10.2 Drury East: Precinct Plan 2 must not exceed the thresholds in Table IX.6.1.1 and Table IX6.1.2 until such time that the identified infrastructure upgrades are constructed and are operational.
- (2) For the purpose of this rule 'dwelling' and 'retail/commercial floorspace' means buildings for those activities that have a valid land use consent or a subdivision that has a 224C certificate for vacant lots less than 1200m².

(3) Table IX.6.1.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Drury East: Precinct Plan 2. Table IX.6.1.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Drury East: Precinct Plan 2.

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

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

New/ Additional Dwelling Threshold	New/ Additional Retail GFA Threshold	New/ Additional Commercial GFA Threshold	Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds
Prior to any new dwellings, retail or commercial development			<ul style="list-style-type: none"> Interim safety upgrade to the Waihoehoe / Great South Road 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.6.1.2 Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 constructed

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

6,428	107,650m ²	60,000m ²	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South Road intersection to signals (on all approaches).
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IX.6.2 Trip Generation Limit

- (1) Development within the area shown on IX.10.2 Drury East: Precinct Plan 2 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational.
- (2) Table IX.6.2.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Drury East: Precinct Plan 2. Table IX.6.2.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Drury East: Precinct Plan 2.
- (3) *Note: Transport infrastructure projects for Drury included in the New Zealand Upgrade Programme 2020 – Transport prepared by the New Zealand Transport Agency are not included in the development thresholds below.*

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

Inbound Trip Generation in vehicles per hour (vph)	Outbound Trip Generation in vehicles per hour (vph)	Transport Upgrades Required to Exceed the Trip Generation Thresholds
Prior to any new dwellings, retail or commercial development		<ul style="list-style-type: none"> Interim safety upgrade to the Waihoehoe / Great South Road intersection to provide safe crossing facilities for pedestrians and cyclists on all approaches.
AM Peak: 1,890 PM Peak: 2,860	AM Peak: 2,340 PM Peak: 2,470	<ul style="list-style-type: none"> Upgrade of the Waihoehoe / Great South Road intersection to signals.
AM Peak: 2,620 PM Peak: 3,730	AM Peak: 3,220 PM Peak: 3,270	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South 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.6.2.2 Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 constructed

Inbound Trip Generation in	Outbound Trip Generation in	Transport Upgrades Required to Exceed the Trip Generation Thresholds
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vehicles per hour (vph)	vehicles per hour (vph)	
Prior to any 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.
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 (western arm only).

IX.6.3 Riparian Margin

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

IX.6.4 Building Setback along Waihoehoe Road

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

- (1) A building or parts of a building must be set back from the 2020 Waihoehoe Road boundary by a minimum depth of 7.5m where the underlying zone is Residential - Terrace Housing and Apartment Building zone.
- (2) A building or parts of a building must be set back from the 2020 Waihoehoe Road boundary by a minimum depth of 8.5m where the underlying zone is Residential - Mixed Housing Urban zone.
- (3) A building or parts of a building must be set back from the 2020 Waihoehoe Road boundary by a minimum depth of 9m where the underlying zone is Residential - Mixed Housing Suburban zone.
- (4) The building setback required by IX.6.4(1)-(3) is inclusive of the front yard required within the underlying zone and a 6m requirement either side of Waihoehoe Road for future widening.

IX.6.5 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.

27.2

IX.7 Assessment – controlled activities

There are no controlled activities in this precinct.

IX.8 Assessment – restricted discretionary activities

IX.8.1 Matters of discretion

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

- (1) Development of public and private roads:
 - a) Location and design of the collector street, local streets and connections with neighbouring sites to achieve an integrated street network;
 - b) Provision of cycling and pedestrian networks;
 - c) Location and design of connections to the Drury Central train station; and
 - d) Matters of discretion IX.8.1(1) (a) - (b) apply in addition to the matters of discretion in E38.12.1.
- (2) Subdivision or development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit: Effects on the transport network consistent with the trips generated by development specified in Table IX.6.2.1 or Table IX.6.2.2;
 - (b) The rate of public transport uptake and travel management measures; and
 - (c) The rate of coordination of retail, commercial and residential development in the wider Drury East area shown on Precinct Plan 2.
- (3) Infringement to standard IX6.3 Riparian Margins:
 - (a) Effects on water quality and stream habitat.
- (4) Infringements to standard IX6.5 Stormwater Quality
 - (a) Matters of discretion E9.8.1(1) 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) Whether the east to west collector road is provided generally in the location shown on IX.10.1 Drury East: Precinct Plan 1 to achieve a highly connected street layout that integrates with the surrounding transport network. An

alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:

- i. The presence of natural features, natural hazards or contours and how this impacts the placement of roads;
 - ii. The need to achieve an efficient block structure and layout within the precinct suitable to the proposed activities; and
 - iii. The constructability of roads and the ability for it to be delivered by a single landowner.
- (b) Whether a high quality and integrated network of local roads is provided within the precinct that provides a good degree of accessibility and supports a walkable street network. Whether roads are aligned with the stream network, or whether pedestrian and/or cycle paths are provided along one or both sides of the stream network, where they would logically form part of an integrated open space network.
- (c) 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.
- (d) 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

- (a) Whether the design of collector and local roads are generally in accordance with the road cross sections provided in IX.10.1 Drury East: Appendix 1.
 - (b) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network. As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 600m;
 - (c) Within the walkable catchment of the Drury Central train station in the Terrace Housing and Apartment Buildings zone, whether the street network provides safe and legible pedestrian and cycle connections to the 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 provides for a direct, legible and safe pedestrian and cycle connection to the Drury Central train station via connections through the Drury Centre precinct, or via Fitzgerald Road, Waihoehoe Road and Flanagan Road/Drury Boulevard.
- (2) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit:

- (a) Whether the effects of the proposal on the transport network are consistent with the trips generated by development specified in Table IX.6.3.1 or Table IX.6.3.2;
 - (b) Whether increased use of public transport provides additional capacity within the transport network including by implementing travel demand management measures.
 - (c) Whether residential development is coordinated with retail and commercial development within the wider Drury East area shown on Precinct Plan 2 to minimise trips outside of the precinct providing additional capacity within the transport network.
 - (d) The effect of the timing and development of any transport upgrades.
- (3) Infringement to standard IX.6.3 Riparian Planting
- a. Whether the infringement is consistent with Policy IX.3(10).
- (4) Infringement to IX.6.5 Stormwater Quality
- a. Assessment criteria E9.8.2(1) apply.

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.

(2) Permanent and intermittent streams and wetlands

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

IX.10 Precinct plans

IX.10.1 Drury East: Precinct plan 1 – Road Network

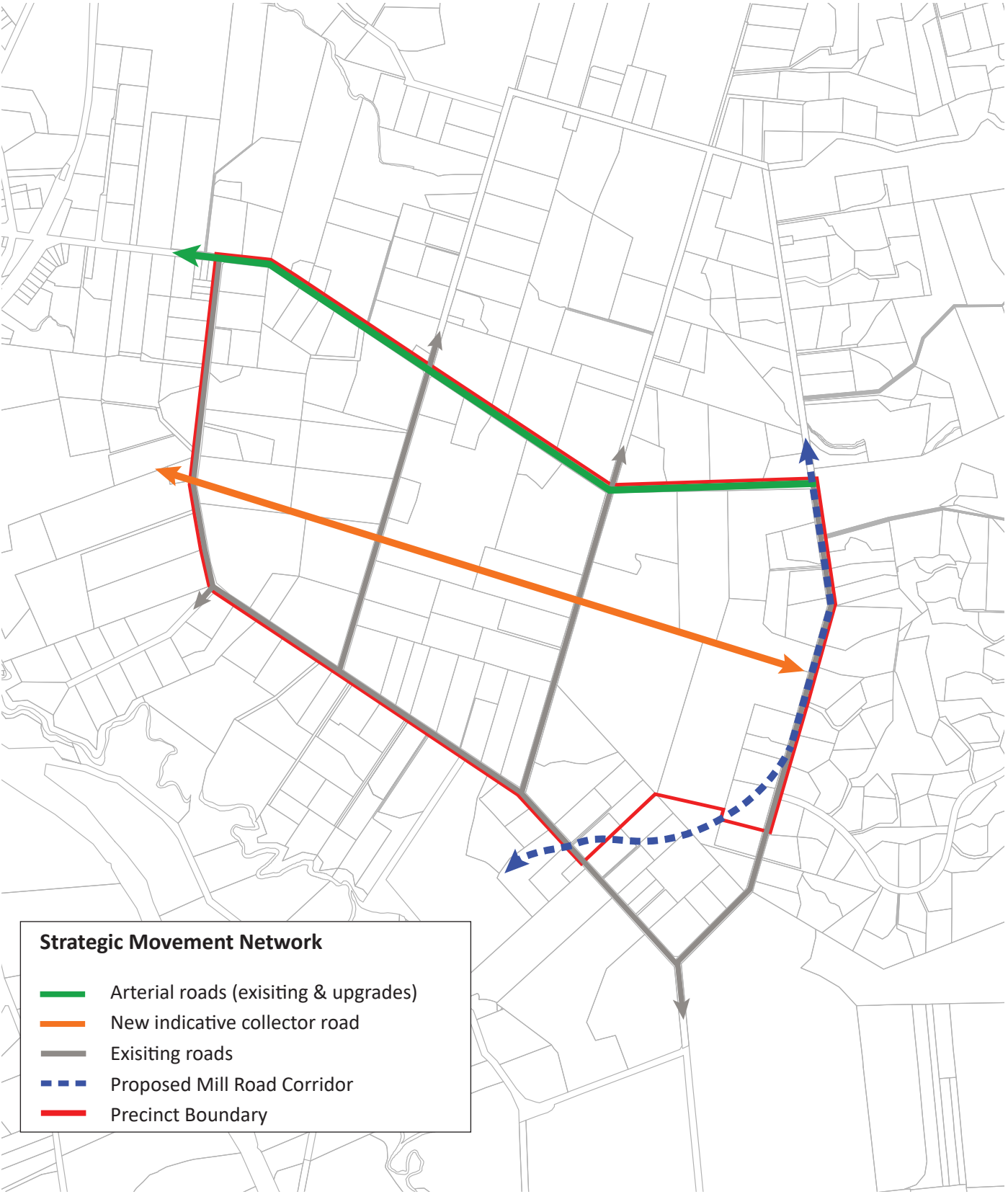
IX.10.2 Drury East: Precinct plan 2 – Transport Staging Boundary

IX.11 Appendices

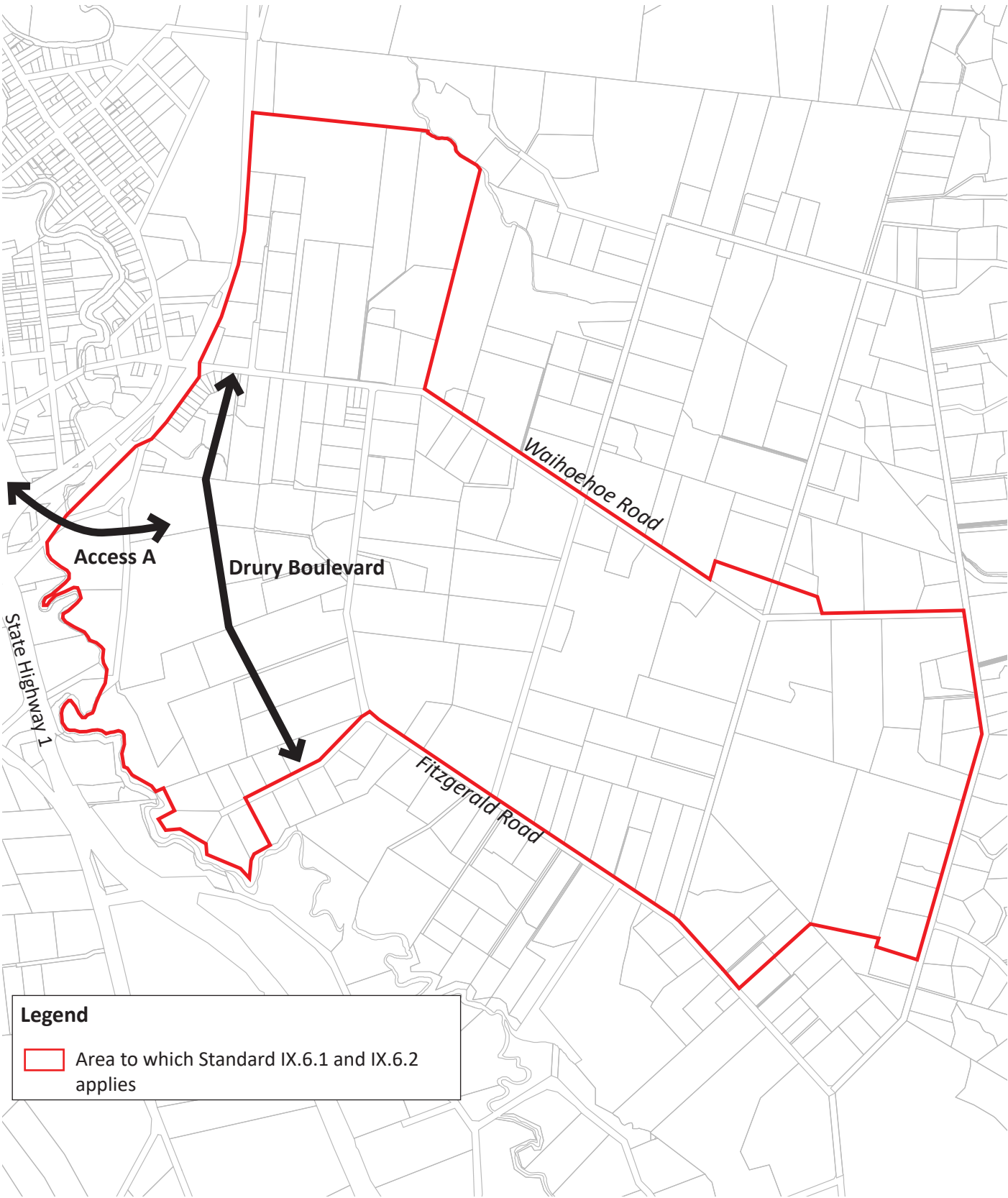
Appendix 1: Road Cross Section Details

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 with on-street parking interspersed between	2.4m each side	40-50kph	Yes – as per E27.6.4.1(3)(c)
Collector Road (Central East-West Spine)	28m	7m	2.6m-3m solid median	1.8m each side plus buffers	Trees / Rain garden with on-street parking interspersed between	1.8m each side	40kph	No
Collector Road	23m - 23.5m	6.4m - 7m	Not required	1.8m each side plus buffers	Trees / Rain garden with on-street parking interspersed between	1.8m each side	40kph	No
Local Road	16m	6m	Not required	Not required	Trees / Rain garden with on-street parking interspersed between	1.8m each side	30kph	No
Local Road – Park Edge	13.5m	6m	Not required	3m reserve shared path	Trees / Rain garden with on-street parking interspersed between	1.8m on lot side	30kph	No

Drury East Precinct Plan 1 - Road Network



Drury East Precinct Plan 2 - Transport Staging Boundary



Contact details

Full name of submitter: Fiona Matthews

Organisation name: Spark New Zealand Trading Limited

Agent's full name:

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

Contact phone number: 021772005

Postal address:
Private Bag 92028

Auckland 1010

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:
Refer to the attached submission

Property address:

Map or maps:

Other provisions:
Refer to the attached submission

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

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

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

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

Details of amendments: Refer to the attached submission

Submission date: 22 October 2020

Supporting documents
Spark submission Private Plan Change 48 49 50_20201022095938.609.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.

28.5

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.

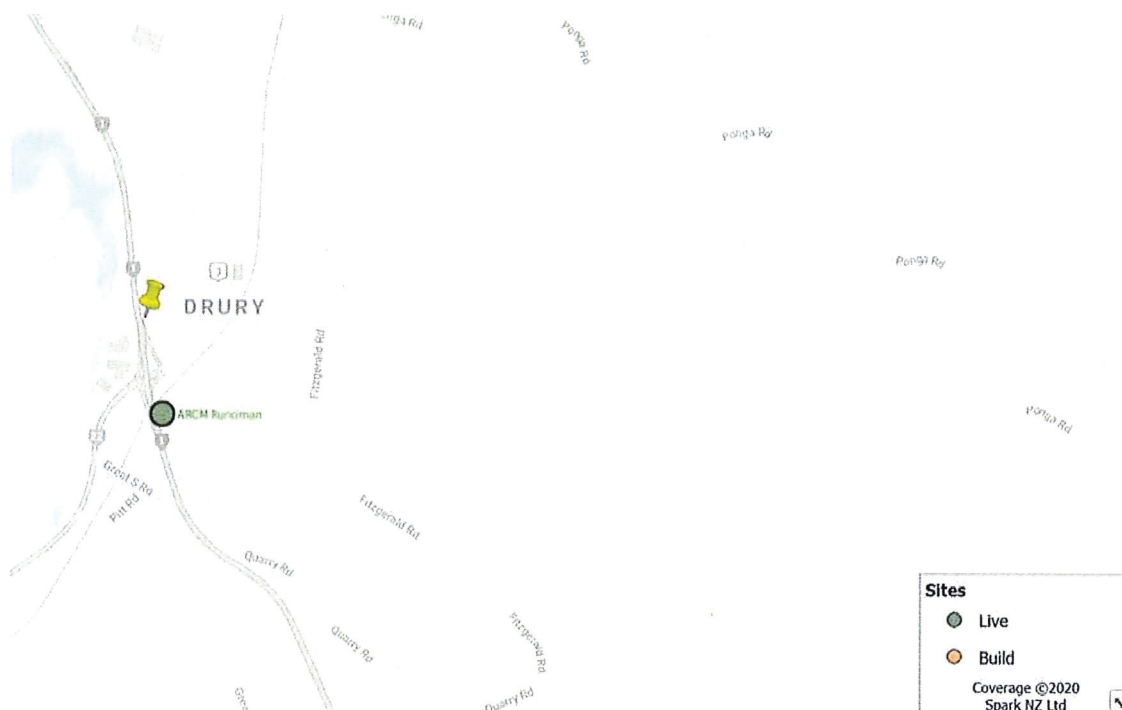


Figure 1. Drury Mobile site (Spark) (Source: Ventura GIS Mapping)

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. | 28.1 |
| 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. | 28.2 |
| 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. | 28.3 |
| 5. Spark and the other telecommunication network providers are consulted with to ensure funding is available through the infrastructure funding agreements. | 28.4 |

Conclusion

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

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

Yours sincerely,



Fiona Matthews
Senior Environmental Planner

The address for service and contact details are:

Fiona Matthews

Spark New Zealand Trading Limited
Private Bag 92028
Auckland 1010

Fiona.matthews@spark.co.nz
021772005

Contact details

Full name of submitter: Mitchell Tweedie

Organisation name: Fletcher Residential Limited

Agent's full name:

Email address: mtweedie@frl.co.nz

Contact phone number: 021453331

Postal address:
810 Great South Road
Penrose
Auckland 1061

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:
All Plan Change Rules

Property address: Total Plan Change Area

Map or maps: Total Plan Change Area

Other provisions:

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

Details of amendments:

Submission date: 22 October 2020

Supporting documents
201022 Fletcher Submission - Drury East 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 49 – Drury East 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 49 (PC49) 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 49 as a whole.

4. SUBMISSION

Fletcher Living supports PC49 in its notified form.

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

- a) The proposed zoning pattern is consistent with the Drury-Opāheke Structure Plan and the three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East;
- b) A variety of residential typologies and densities are proposed and respond to locational attributes. The proposed zoning pattern focuses the Residential Terrace Housing and Apartment Building zone close to public transport and Kiwi's proposed Metropolitan Centre. The Residential-Mixed Housing Suburban zone has been applied to provide a transition between the Mixed Housing Urban zone and the Countryside Living zone to the east;
- c) The adverse effects of urban development on the natural environment, including the Fitzgerald Stream and its tributaries can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced;
- d) The zoning pattern and proposed Precinct enables a connected and high-quality road network to be established that provides appropriately for all transportation modes; and

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

5. Decision Sought

Fletcher Living seeks the following relief from Auckland Council on PC49:

- a) That PC49 be retained and approved, as notified.

| 29.1

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 49 (PRIVATE): DRURY EAST 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 49: Drury East Precinct (**PPC49** 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 PPC49 relies on; and
 - (b) the potential traffic effects arising from PPC49.
4. Lomai opposes PPC49 for the reasons outlined in this submission.
5. Lomai could potentially support PPC49 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 49 (Drury East Precinct)

10. PPC49 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. 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, PPC49, has been lodged by Fulton Hogan Land Development Ltd (**Fulton Hogan**) and seeks to rezone 184 hectares of land in Drury East from Future Urban zone to a mixture of Business: Mixed Use zone, Residential: Terrace Housing and Apartment Buildings zone, Residential: Mixed Housing Urban zone and Residential: Mixed Housing Suburban zone. PPC49 provides capacity for at least 2,800 dwellings.
13. The effect of PPC49 would be to create a high density residential 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 PPC49 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 Fulton Hogan can bring forward the development of their land into Stage 1. Should Fulton Hogan 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. PPC49 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 PPC49 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 PPC49 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 PPC49 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 PPC49 would result in adverse traffic effects on the broader Drury roading network. The Submitter is concerned that Fulton Hogan 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 PPC49 site will be appropriately avoided, remedied or mitigated.

DECISION SOUGHT

21. Lomai seeks the following decision from Auckland Council: Decline PPC49, 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.

30.1

22 October 2020



Bill Loutit / Rachel Abraham
On behalf of Lomai Properties Limited

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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.

31.2

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

31.3

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.

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.

31.1

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.

31.3

31.2

31.1

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

Contact Person: Ernst Zollner

Email: Ernst.Zollner@hud.govt.nz

Phone: 021 241 5308

Postal Address: Ministry of Housing and Urban Development, PO Box 82, Wellington 6140



SUBMISSION ON PLAN CHANGE 49 (PRIVATE): DRURY EAST PRECINCT

To: Auckland Council

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

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 49: Drury East Precinct (**PPC49**) by Fulton Hogan Land Development Ltd (**applicant**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. PPC49 seeks to rezone 184 hectares of land in Drury East from Future Urban zone to a mixture of Business: Mixed Use zone, Residential: Terrace Housing and Apartment Buildings zone, Residential: Mixed Housing Urban zone and Residential: Mixed Housing Suburban zone. PPC49 provides capacity for at least 2,800 dwellings.
3. PPC49 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 PPC49.
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** PPC49 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 PPC49, and that adverse environmental, social and cultural effects are avoided, remedied or mitigated.
8. Ngāti Te Ata Waiohua prepared a Cultural Values Assessment for the applicant which set out in detail the cultural connections Ngāti Te Ata Waiohua has with the PPC49 land and the surrounding Drury-Opāheke area. We do not repeat this detail provided in the CVA.

SUBMISSION

9. The Submitter considers that PPC49 is inconsistent with Part 2 of the RMA, including:

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WELLINGTON: Level 24, HSBC Tower, 195 Lambton Quay, PO Box 2402, Wellington 6140, New Zealand. T +64 4 499 4599

CHRISTCHURCH: Level 1, 151 Cambridge Terrace, PO Box 874, Christchurch, 8140, New Zealand. T +64 3 365 9914

www.simpsongrierson.com

- (a) The purpose of the RMA to promote the sustainable management of natural and physical resources, including by safeguarding the life-supporting capacity of air, water, soil and ecosystems;
 - (b) Section 6(a) the preservation of the natural character of the coastal environment, wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development;
 - (c) Section 6(e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other Taonga;
 - (d) Section 6(f) the protection of historic heritage from inappropriate subdivision, use and development;
 - (e) Section 6(g) the protection of protected customary rights;
 - (f) Section 7(a) which requires all persons exercising functions and powers under the RMA to have particular regard to kaitiakitanga; and
 - (g) Section 8 which requires all persons exercising functions and powers under the RMA to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
10. It is vital for the people of Ngāti Te Ata Waiohū that the mana of the land subject to PPC49 is upheld, acknowledged and respected and that its 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 (along with other iwi holding Mana Whenua) 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 PPC49 will result in adverse environmental and cultural effects, as it is currently proposed by the applicant. Specifically:
- (a) Wai (Water): PPC49 does not give effect to Te Mana o te Wai and risks damaging the mauri of wai within the project area. This includes through PPC49's proposed treatment of waterways and its proposed stormwater and wastewater solutions. 32.6
32.7
32.8
32.9
 - (b) Sustainable Management: The Submitter considers that PPC49 should in some, if not most ways, be self reliant and self sustainable. Sustainable management has not been adequately given effect to in PPC49. 32.12
 - (c) Native Trees and Plants: The Submitter supports whakapapa sourced trees and plants within the PPC49 site. 32.10
 - (d) Te Aranga Design Principles: These principles have been developed by Auckland Council and Tamaki Makaurau iwi over a number of projects. The principles include mana (treaty based relationships), whakapapa (naming), tohu (acknowledgement of wider cultural landscape), taiao (bringing natural landscape elements into urban environments), mauri tu (environmental health of the site including wai and whenua), mahi toi (inscribing Māori narratives into architecture and design), and ahi ka (living presences for iwi and hapu to undertake their kaitiaki roles). Te Aranga Design Principles have not been incorporated into PPC49. 32.3

- | | | |
|-----|--|------|
| (e) | Landscapes: The Submitter seeks that PPC49 identifies and preserves landscapes, including view shafts, hilltops, tuff rings and ridge lines. | 32.5 |
|-----|--|------|

RELIEF

- | | | |
|-----|---|-------|
| 12. | The Submitter requests a decision on PPC49 that confirms, at a minimum, the following: | |
| (a) | Ongoing participation, consultation and engagement in the project; | 32.1 |
| (b) | Acknowledgement within the project design of the history of Mana Whenua in the PPC49 area; | 32.2 |
| (c) | Te Aranga Principles incorporated in design concepts; | 32.3 |
| (d) | Iwi monitoring; | 32.4 |
| (e) | Natural and cultural landscaping accounted for in the project design; | 32.5 |
| (f) | A minimum of 20 metre riparian margin for all waterways especially those to contain walkways / cycleways; | 32.6 |
| (g) | A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway; | 32.7 |
| (h) | Roof capture for reuse and groundwater recharge; | 32.8 |
| (i) | Park edge design adjacent to all waterways; | 32.9 |
| (j) | Native trees and plants only within the precinct; | 32.10 |
| (k) | Ridgelines hilltops and wetlands protected; and | 32.11 |
| (l) | Sustainable development reflected in the design and outcomes. | 32.12 |
| 13. | The Submitter seeks the following decision from Auckland Council: | |
| (a) | Reject PPC49 unless the issues addressed in this submission can be adequately addressed. | |
| 14. | The Submitter wishes to be heard in support of its submission. | |
| 15. | The Submitter would consider presenting a joint case if others make similar submissions. | |

22 October 2020



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

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Postal address: Private Bag 92518, Auckland 1141, New Zealand

Contact person: Bill Loutit, Simpson Grierson

Contact details

Full name of submitter: George and Agnes Neate

Organisation name:

Agent's full name: Adam Neate

Email address: adam@neate.co.nz

Contact phone number: 021615566

Postal address:
421 Fitzgerald Road
Drury
Auckland 2577

Submission details**This is a submission to:**

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

The Area's the map has included / excluded, we believe this will lead to fragmented development and planning issues, with large tranches of land remaining Future Urban Zoned / Rural, effectively "land locked" between urban and industrial developments.

Property address:

Map or maps: pc-49-appendix-2-drury-east-zoning-map.pdf

Other provisions:

Drury -Opaheke Structure Plan 2019
pc-46-appendix-1.1-proposed-plan-change.pdf
pc-48-appendix-2-plan-change-zoning-map.pdf

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

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

The reason for my or our views are:

The new Precinct Plan 1, page 35 of RC46 and plan change map of PC 48 combined with Map of the this plan change (PC49) identifies a strip of properties s.south west of Fitzgerald Road and s.south East of Brookfields Road that will remain unchanged in zoning, effectively leaving these properties land locked interms of zoning until Council complete the remaining areas their Drury / Opaheke structure plan change which may be some years behind.

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

Details of amendments: Amend the map for PC49 to include those properties as indicated in the attached map (421 Fitzgerald Road Drury Submissions Map).

33.1

Submission date: 22 October 2020

Supporting documents

421 Fitzgerald Rd Drury - Submission Maps.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.

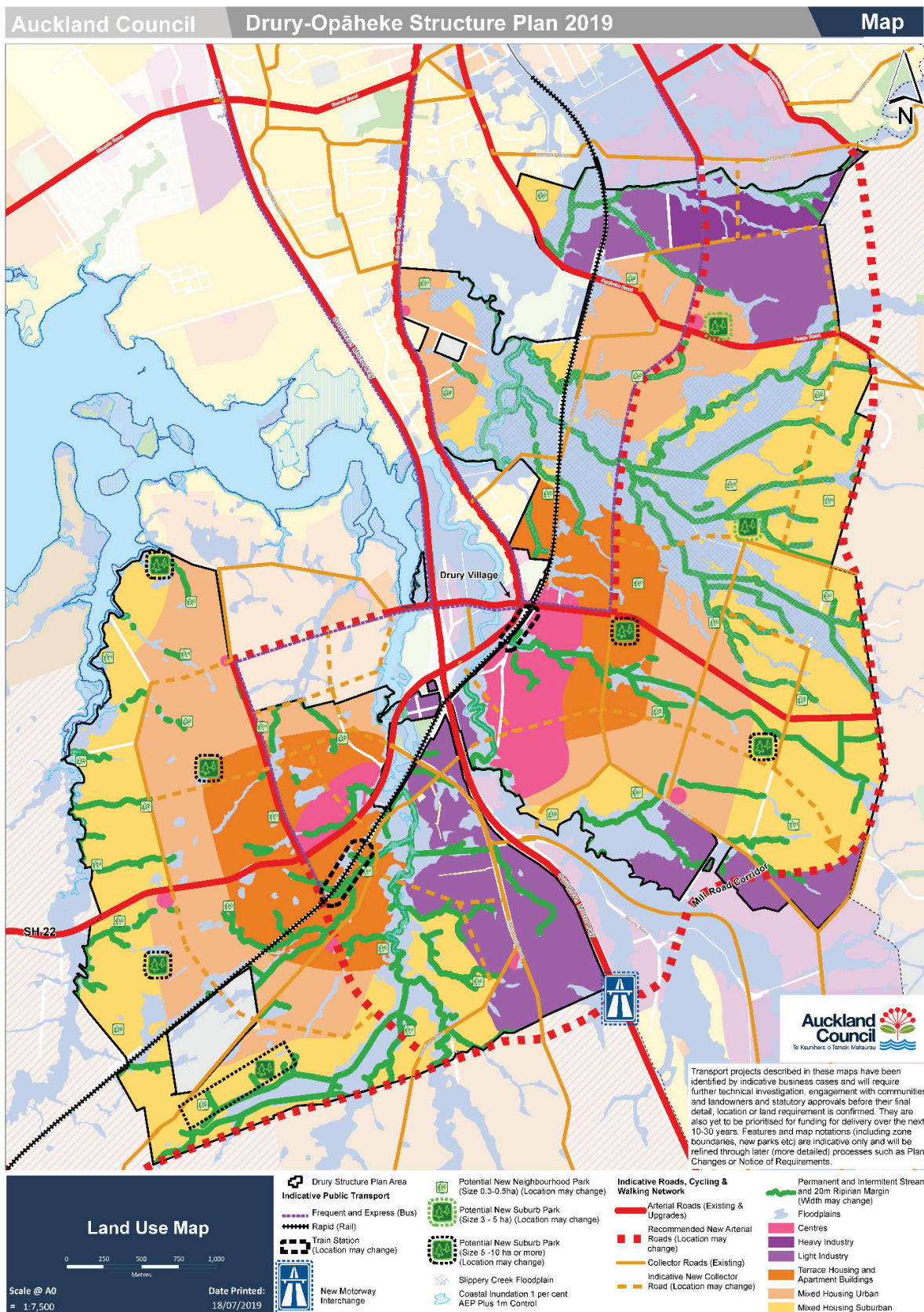
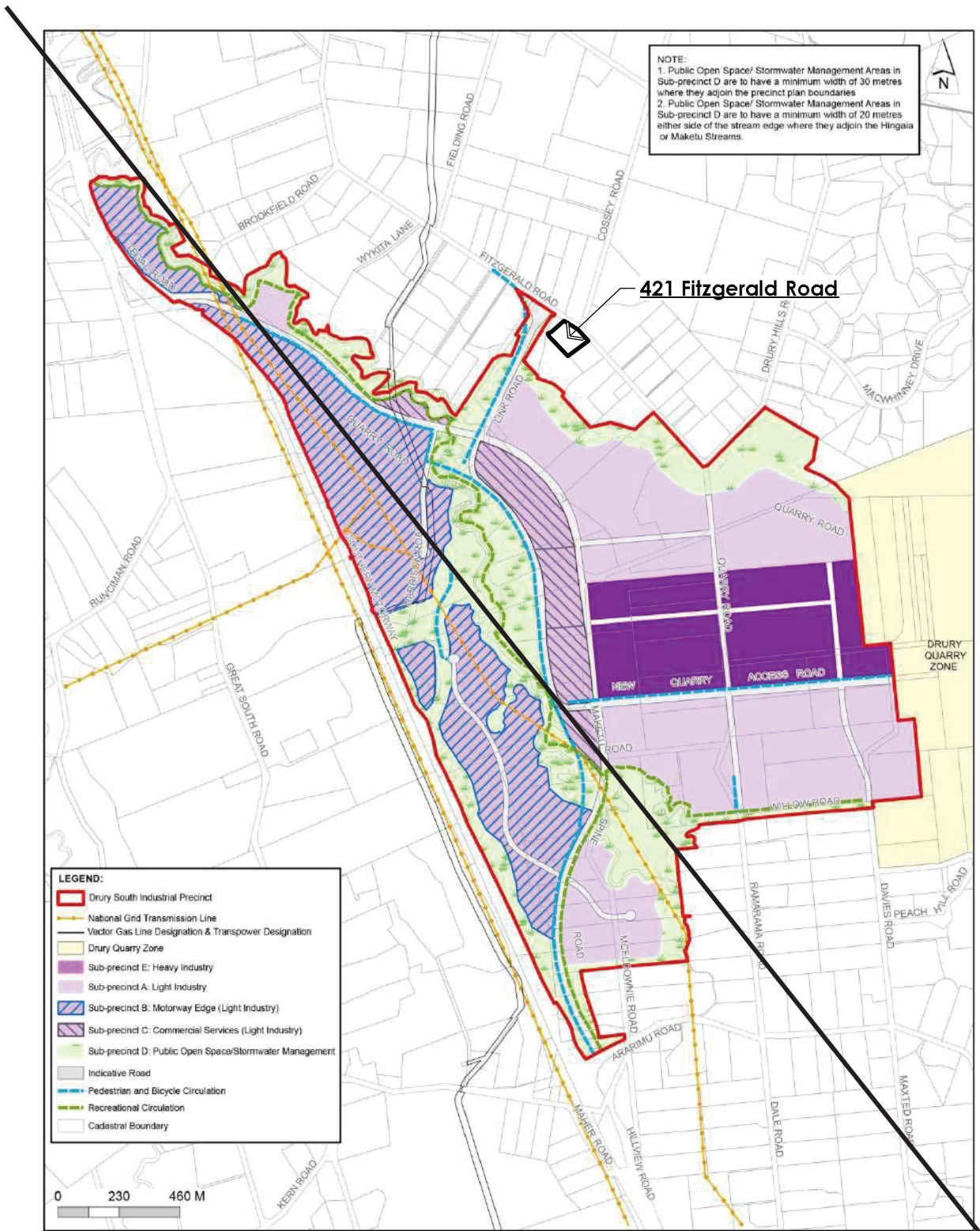


Figure 1: The Drury - Opāheke Structure Plan 2019 land use map 2019

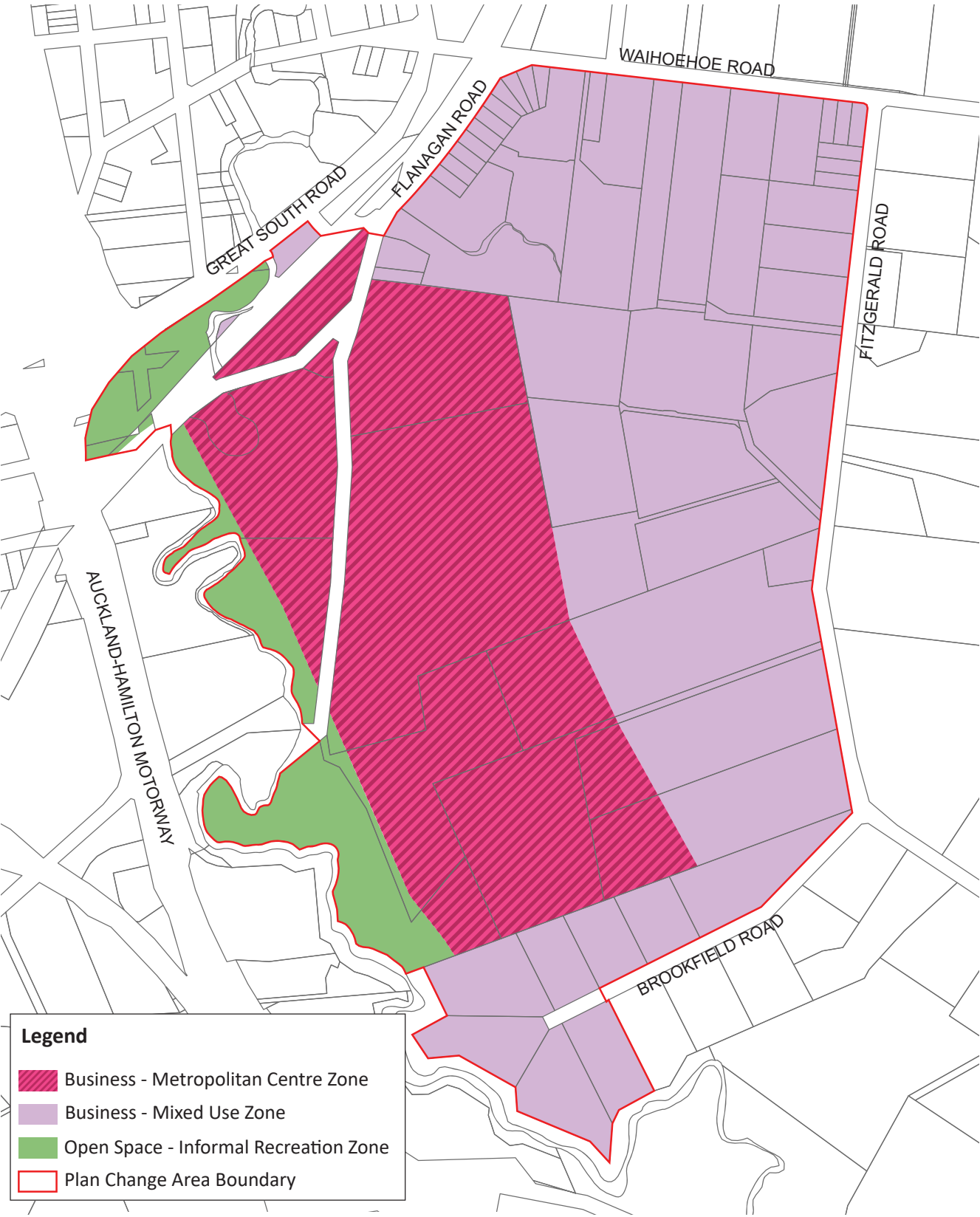


Insert new Precinct Plan 1 as follows:

PC46 Map

Drury Centre Precinct

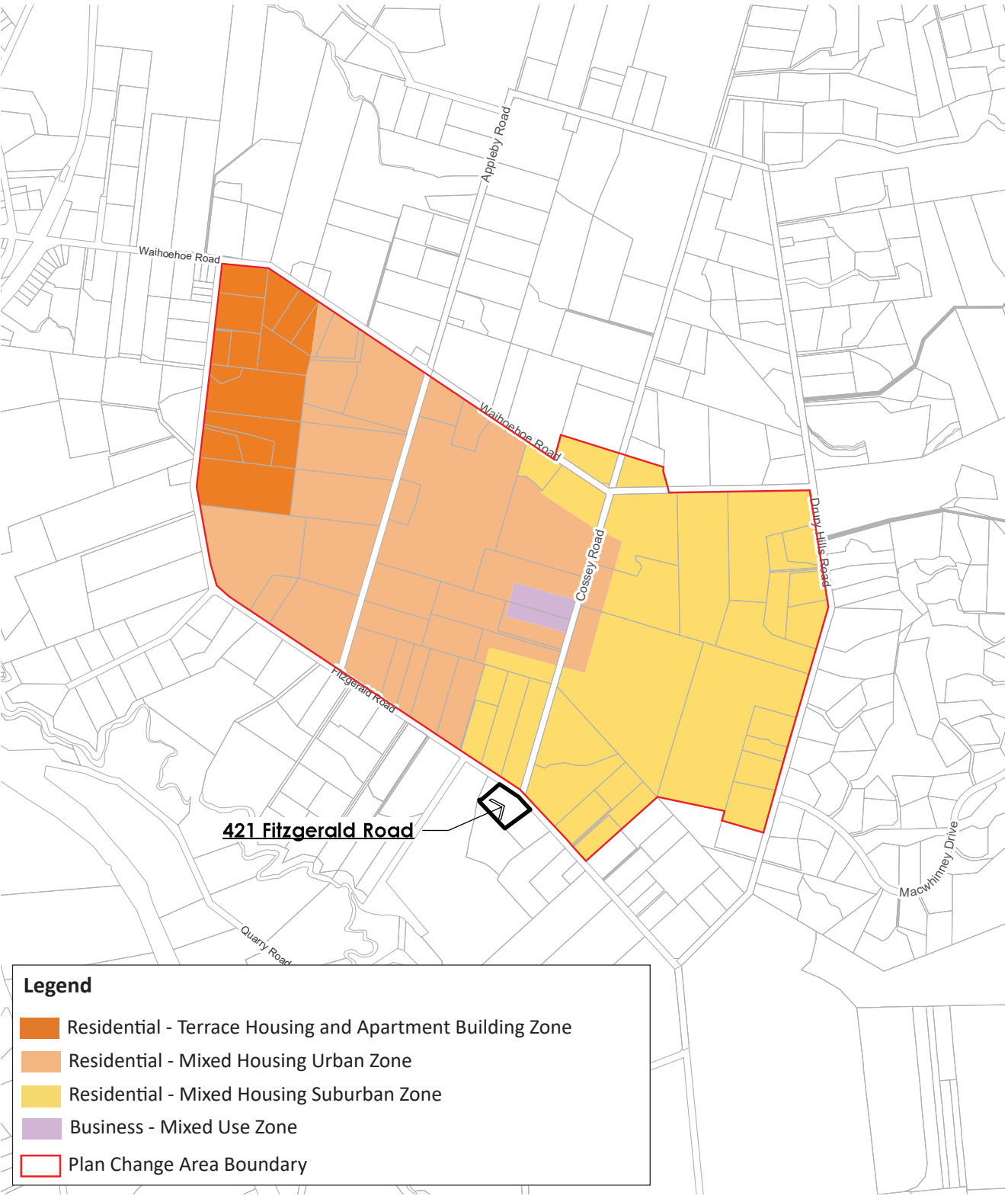
Drury Centre - Zoning Plan



PC48 Map

Drury East Precinct

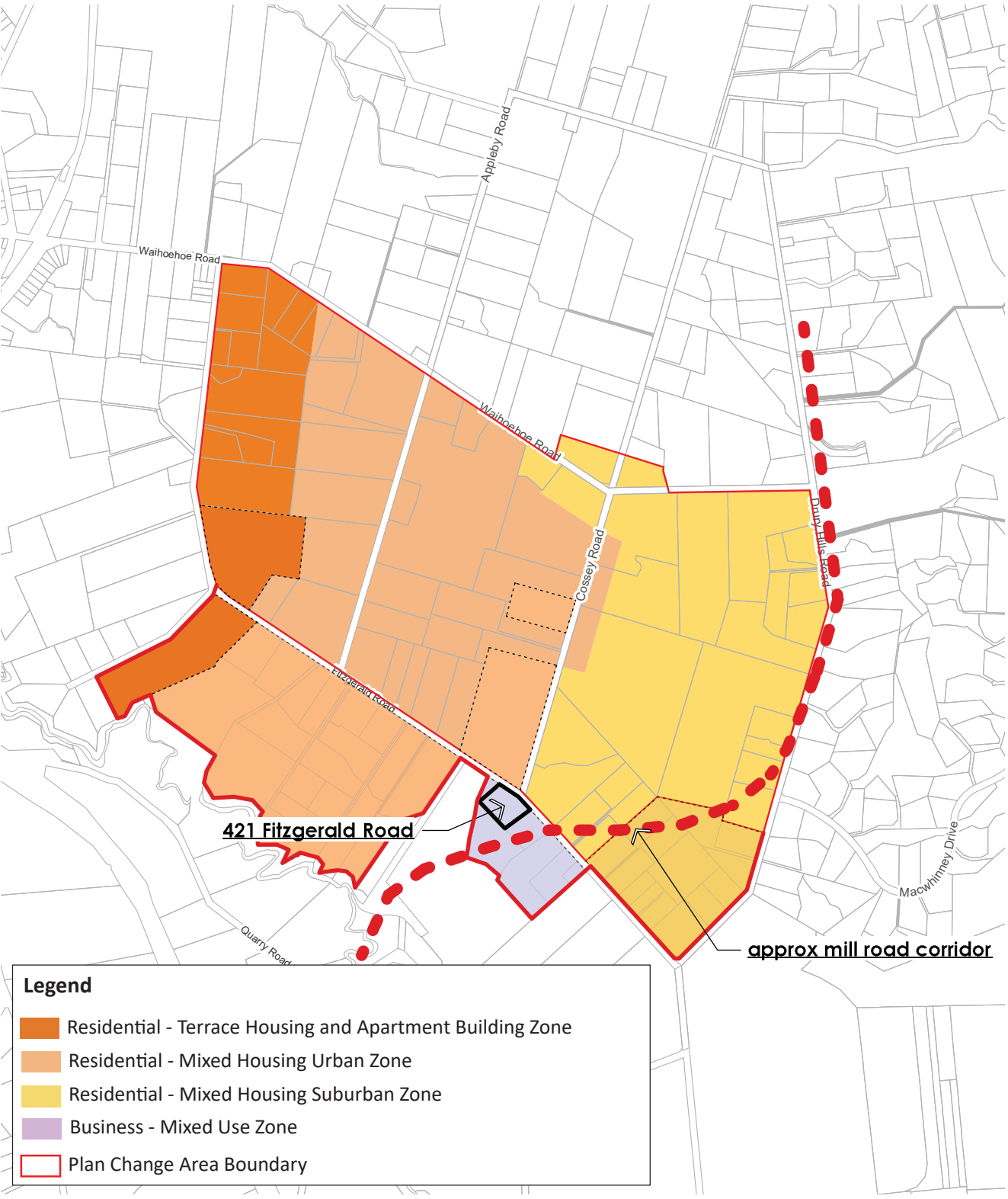
Drury East - Zoning Plan



PC49 Map

Drury East Precinct

Drury East - Zoning Plan



Proposed PC49 Map

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 49 –
Drury East Precinct

SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 49 – DRURY EAST PRECINCT (PC 49)

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 Fulton Hogan Land Development Limited ("FHL"):

Plan Change 49 – Drury East Precinct ("**PC 49**")
2. Auckland Council could not gain an advantage in trade competition through this submission.
3. This submission relates to PC 49 in its entirety and all provisions of PC 49 including:
 - a. the IX Drury East Precinct
 - b. the Auckland Unitary Plan Maps.
4. PC 49 has been notified contemporaneously with three other proposed private plan changes, Plan Change 48 (Drury Centre Precinct) by Kiwi Property No.2 Ltd, Plan Change 50 (Waihoehoe Precinct) by Oyster Capital Limited, and Plan Change 51 (Drury 2 Precinct) by Karaka and Drury Limited (together with PC 49 "**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 49 land, play an important role in Auckland's future growth. Auckland Council supports the future urbanisation of the land subject to the Drury Plan Changes, acknowledges the commitment made by the Government to the Drury area through the New Zealand Upgrade Programme, and is working with the Drury Plan Change applicants,

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

6. However, Auckland Council has significant concerns with PC 49 in its present form in its entirety as it:
- a. does not promote sustainable management of resources, will not achieve the purpose of the RMA, and is therefore inconsistent with Part 2 of the RMA;
 - b. does not manage or enable the efficient and integrated use, development and protection of natural and physical resources;
 - c. does not avoid, remedy or mitigate adverse effects;
 - d. is inconsistent with, or fails to give effect to, provisions of relevant planning instruments; and
 - e. does not meet the requirements of section 32 of the RMA;
 - 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 49 in its entirety for the reasons stated below.

PC 49 fails to integrate infrastructure planning / funding with land use

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

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

PC 49 is inconsistent with relevant planning instruments

11. Until an infrastructure funding and financing solution is found, PC 49 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 49 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 49 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 49 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 49 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 49 land is rezoned.

LTP

18. PC 49 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 49 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 49 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 49 (and the Drury Plan Changes) to integrate with infrastructure provision are a strategic and whole of Auckland issue. Out of sequence development would require infrastructure funding be removed / re-allocated from other parts of Auckland.
21. Auckland is highly constrained in its ability to finance and fund infrastructure across the region to support growth. With limited funding ability, scarce funding must be utilised in the most efficient way to enable region wide growth. Strategically, there is a need to open up land in a co-ordinated and joined up fashion when capacity is needed across Auckland, and where infrastructure delivery and funding is integrated.
22. PC 49, and the Drury Plan Changes, are out of sequence with the coordinated and integrated approach to infrastructure provisions to support urban growth set out in the Auckland Plan, LTP and RLTP. Out of sequence development will have major funding implications for infrastructure providers, will affect their ability to co-ordinate delivery and is likely to have major implications for the ability to service other areas. This in turn will undermine the ability to deliver infrastructure to support development capacity in other growth areas of Auckland.

Further specific reasons

23. Without derogating from the generality of the above and the submitter's opposition to PC 49, 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 FHL and the other Drury Plan Change developers in an effort to find a solution to its concerns. However, at this point in time, the fundamental issues raised in this submission remain unresolved. Accordingly, as matters stand, the primary relief sought by Auckland Council is to decline PC 49 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 49, amend PC 49 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 49's objectives, policies, rules, methods, and maps, that reflects or responds to the reasons for this submission.

34.28

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 49 is reliant on major infrastructure projects to ensure the area can be developed. However, there is no clear indication of how the infrastructure would be financed and funded.</p> <p>There is a substantive amount of unfunded infrastructure required to service the anticipated development in the Drury Future Urban Zone Land. A lack of council funding for infrastructure means that it is unlikely that the infrastructure (except for Government NZUP funded projects) required to support the development will be available when required. In the short term there is not adequate infrastructure to support the development and in the medium term the necessary infrastructure to support the development is not funded through the LTP or RLTP. Council is reviewing the Long-Term Plan which includes the 10-year budget. It is too early to predict any change to infrastructure funding.</p> <p>Sections of the existing transport network are heavily congested and cannot convey more traffic until upgraded, without causing high travel time delay, costs and safety risks.</p> <p>Even where proposed infrastructure is funded, it will take years to permit, design and construct.</p> <p>The location of some key transport infrastructure is still to be determined and is subject to notice of requirement</p>	<p>Ensure that the council's concerns about infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <ol style="list-style-type: none"> 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

34.1

	<p>processes that are still to be initiated. This affects the ability to determine appropriate land uses and zoning.</p> <p>The proposed infrastructure threshold and staging rules are not adequate to address the issue.</p> <p>There is no co-ordinated plan to stage development and infrastructure.</p>	<p>developers and there is no agreement to apportion costs and benefits in place.</p> <ul style="list-style-type: none">• Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems).• Threshold rules are not used in circumstances where the extent and location of works have not been determined yet.• Use of prohibited activity status for infringement could be considered. <p>d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.</p>	34.1
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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 (NPS-FM).	Include more policies and rules to give full effect to the direction in the NPS-FM, including but not limited to Te mana o te wai.	34.2
3.	<p>Stormwater Management Plans (SMP(s)) identify effects of stormwater and how effects should be managed both to achieve the RPS, NPS-FM and regional plan and to be in accordance with the region-wide Network Discharge Consent (NDC) granted by the Environment Court on 30 October 2019. Without an SMP approved by the Network Utility Operator there is uncertainty if the SMP adequately manages effects and if there are sufficient provisions to enact the direction that the SMP would provide.</p> <p>Policy and matters of discretion/assessment criteria are required to ensure that consenting of subdivision and land uses is consistent with the SMP in its final adopted form which may be included in the council's NDC.</p>	<p>Amend precinct to include additional policies and rules to manage the effects of stormwater as described in the SMP.</p> <p>This includes:</p> <ul style="list-style-type: none"> a. New policy: <u>Require subdivision and development to be assessed for consistency with any approved network discharge consent and supporting stormwater management plan including the application of water sensitive design to achieve water quality and hydrology mitigation.</u> b. Additional matters of discretion/assessment criteria that would apply to any restricted discretionary activity in the area of the precinct to ensure that new development and subdivision can be assessed for consistency with the NDC and SMP. c. Any other rules necessary to give specific effect to the SMP during development. 	34.3
4.	Stormwater management area flow 1 (SMAF 1) as proposed in PC 49, 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.	34.4

	region wide NDC and based on current knowledge is the most practicable option.		
5.	Flood modelling provided for the Drury Plan Changes suggests a reliance on culvert upgrades to manage flood flows, particularly in the Fitzgerald Rd area and under the North Island Main Trunk line. If culverts are not upgraded prior to development of impervious surfaces, then attenuation of flood volume will be needed.	Retain policy IX.3(6).	34.5
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.	<p>Insert a new policy to the following effect:</p> <p><u>Provide sufficient floodplain storage within the Drury East precinct to avoid increasing flood risk upstream and downstream, and manage increased flood risk within the precinct unless downstream infrastructure capacity means this is not required. This is subject to the upgrade of the downstream culvert upgrade.</u></p> <p>Insert rules to give effect to this.</p>	34.6
7.	A new policy relating to the treatment of impervious surfaces is requested to give effect to the SMP and protect the receiving environment of the Te-Manukanuka-O-Hoturoa (Manukau Harbour).	<p>Insert a new policy to the following effect:</p> <p><u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u></p>	34.7
8.	Proposed standard IX6.5 (1) Stormwater Quality is supported in principle but cross references to the activity rules and standards in E9, including the parent AUP rule 9.6.1.4 which has additional, and in some cases, confusing exemptions. These undermine its effectiveness because many roads, private roads and carparks may not be required to have stormwater treatment. Consequently, it is not sufficient to protect the upper Te-Manukanuka-O-Hoturoa (Manukau Harbour) from contaminant	<p>Retain and amend standard IX6.5 (1) Stormwater Quality but amend it to read as follows (including a correction to the precinct reference):</p> <p>The activity rules and standards in E9 apply to development in the Drury Centre <u>East</u> precinct as if the reference to 'high use roads', was <u>were</u> a reference to 'all <u>existing, new, upgraded or redeveloped</u> roads, <u>accessways and carparks</u>'.</p>	34.8

	<p>accumulation from the combined contaminant discharges from all the new, existing or upgraded roads, access ways and parking areas. Alternative methods of achieving the same outcome could be considered. The requested amendment includes all these areas in the precinct rules to provide for treatment of these areas. 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>or other amendments that would achieve the same environmental outcome.</p> <p>Insert new matters of control and discretion, in addition to those in E9, to the effect of:</p> <ul style="list-style-type: none"> • <u>How the location and design of stormwater treatment assets reduces their operating costs.</u> • <u>The consolidation and community scale of stormwater treatment assets.</u> • <u>The location of stormwater treatment assets where they will be most effective in reducing contaminants.</u> 	34.8
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>	34.9
10.	<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 	<p>Replace standard IX.6.3(2) with a new standard and consequential amendments to effect that the riparian yards set for buildings in tables H13.6.5.1 Yards, H6.6.9.1 Yards, H5.6.8.1 Yards and H4.6.7.1 Yards read as follows:</p>	34.10

	<ul style="list-style-type: none">○ 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>	<table><tr><td>Riparian</td><td>4020m from the edge of all permanent streams and 10m from the edge of all intermittent streams</td></tr></table> <p>Other yards in these tables are not amended.</p>	Riparian	4020m from the edge of all permanent streams and 10m from the edge of all intermittent streams	34.10
Riparian	4020m from the edge of all permanent streams and 10m from the edge of all intermittent streams				
11.	Additional matters of discretion are requested for assessing infringements of standard IX.6.3 referred to above.	<p>Add the following matters of discretion to IX.8.1(3):</p> <p>...(b) <u>Effects on floodplain management taking into account maximum probable development, climate change and the roughness coefficient of existing and planned planting.</u></p> <p>(c) <u>Effects on stream bank stability taking into account the cohesiveness of the soil and steepness of the bank angle.</u></p> <p>(d) <u>Effects on the ability to provide for any proposed paths, cycleways, infrastructure and facilities outside the 10m wide strip of riparian planting.</u></p>	34.11		

		Add related assessment criteria at IX.8.2(3).	
12.	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.	34.12
13.	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.	34.13
14.	Proposed policy IX.3(8) 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(8).	34.14
15.	It is important to focus on improving biodiversity as distinct from just planting. It is also important to provide for ecological corridors. A new policy and amendments to proposed policy IX.3(9) are proposed to address these matters.	Provide for improved biodiversity and ecological corridors (blue-green network) by amending IX.3(9), adding a new policy as follows, and relocating the cross-reference to all relevant overlay, Auckland-wide and zone policies, together with any other amendments that may be required to give effect to these matters: <u>Support-Ensure</u> improvements to water quality, and habitat and biodiversity, including by providing planting on the riparian margins of permanent and intermittent streams. All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above. <u>Enable a network of open space, riparian corridors and park edge roads that provides for:</u>	34.15

		<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> <p><u>All relevant overlay, Auckland-wide and zone policies apply in this precinct in addition to those specified above.</u></p>	34.15
16.	Riparian planting is important to maintain and enhance the life-supporting capacity of freshwater systems and restore biodiversity. Cross-referencing in standard IX.6.3 (1) to Appendix 15 of the AUP will assist in ensuring good outcomes.	Retain and amend IX.6.3 (1) by including a cross reference to the matters in Appendix 15.6(3)(b-f) and (4) of the Auckland Unitary Plan.	34.16

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(4) to read: In addition to matters (a)-(c) of Policy E38.3.18, ensure that the location and design of publicly accessible open spaces contribute to a sense of place for Drury East, by incorporating any distinctive site features and integrating with the stream network. <u>Also, if Auckland Council ownership is proposed, the open spaces must be consistent with the council's open space and parks acquisition and provision policies.</u>	34.17
18.	To provide a transparent starting point for discussion between the council and landowners/developers it is recommended that indicative public open spaces are shown on the precinct plan. The plan attached to this submission (Attachment 1) indicates approximate location, type and quantum of public open space for civic, neighbourhood and suburb scale parks consistent with Auckland Council open space policies and supportable for acquisition by the council (subject to political approval).	Include indicative open spaces in the precinct plan as shown in Attachment 1 to this submission.	34.18

Rules general

Row	Specific Reasons for the Submission	Relief Sought	
19.	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.	34.19
20.	The various categories of consent activity status and matters of discretion/assessment criteria should be reviewed to ensure that they are the most appropriate to give effect to objectives and policies and decision making on submissions.	Ensure that the consent categories in IX4.1 Activity table, matters of discretion in IX.8.1, and assessment criteria in IX.8.2 are the most appropriate to give effect to: matters raised in this submission, the objectives and policies of the precinct, the RPS and any national policy statement.	34.20

Land use

Row	Specific Reasons for the Submission	Relief Sought
21.	<p>The National Policy Statement on Urban Development 2020 (NPS-UD), the RPS and the Drury – Opāheke Structure Plan August 2019 aim to achieve high densities within walkable catchments of rapid transit network (RTN) stations.</p> <p>Walkable distances are not defined in the RMA or RMA documents. However, this matter was investigated in preparation of Drury – Opāheke Structure Plan August 2019 in relation to RTN train stations.</p> <p>The local road network does not fully exist yet in these greenfield locations so actual walking distances along road footpaths cannot be measured yet. Instead it is appropriate to use a walkable radius from the proposed train station as a proxy for median actual walkable distances. 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. The council will be able to contribute information on specific distances at the hearing.</p> <p>The actual position of the Drury east station has not been confirmed at the time of writing. But it is likely that the Terrace Housing and Apartment Buildings part of the PC49 precinct will be within the station walkable catchment. Therefore, increased density should be enabled in this area.</p> <p>The NPS-UD prioritises increased densities within a walkable distance of RTN stations with a focus on use of</p>	<p>Add a policy and standards to provide for increased density near RTN stations including:</p> <ul style="list-style-type: none"> a. Adding a policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u> b. Building height standards enabling 7-8 storey building height within an extended walkable radius of the proposed RTN station. c. Any alterations to other building standards to respond to increased building height. d. 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.

34.21

	<p>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 RTN station to enable greater density. This can be given effect to by applying the AUP 27m height variation control within an extended walkable radius of the station. Some adjustment beyond this distance may be appropriate to better align with property boundaries.</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 collectively provide for policy and standards to enable increased density and walkability near the RTN station.</p>	
22.	<p>The proposed building setback standard IX.6.4 is to protect the future corridor for widening of Waihoehoe Road. However, if a notice of requirement has been lodged for the road upgrade, the proposed rule is not necessary.</p>	<p>Review the need for IX.6.4 if a notice of requirement has been lodged for the upgrade of Waihoehoe Road.</p>
23.	<p>The Business Mixed Use Zone was intended to be used at the rear of major centres or along major public transport corridors. It was not intended to be used in remote suburban locations as a substitute for a small centre zoning or low to medium density residential zoning. This site is over 2km from the proposed RTN station and is not</p>	<p>Replace the Business - Mixed Use Zoning with Local Centre Zone and reevaluate whether this is the best location for a centre once the position of the Mill Road Corridor and points of access off that corridor have been confirmed.</p> <p>If the Business - Mixed Use zoning is retained, then provide standards for daylight and living space (as set out in PC 48).</p>

34.22

34.23

	<p>on a corridor. Therefore, it may not be an appropriate location for high intensification.</p> <p>Local centre zoning provides for residential use so can be used for housing if there is uncertainty in commercial demand. In addition, the Business Mixed Use Zone controls were not specially designed for low to medium density residential use and it can produce lower quality outcomes if used for that purpose.</p> <p>The location of the centre should be reviewed once the location of Mill Road and points of access off Mill Road onto other roads are confirmed. This affects traffic flow on other roads and thus the relative commercial viability of alternative local centre locations.</p>	
24.	<p>The Drury - Opāheke Structure Plan shows that there is a need for more Light Industry in the south of Auckland near Drury. Providing for business land is also a requirement of the NPS-UD. This land is suitable for industrial use and will in the future have good access to the highway network.</p>	<p>Provide for Light Industry Zoning on any land in the precinct that lies east of the Mill Road Corridor as determined by the future notice of requirement.</p>

34.24

Mana whenua

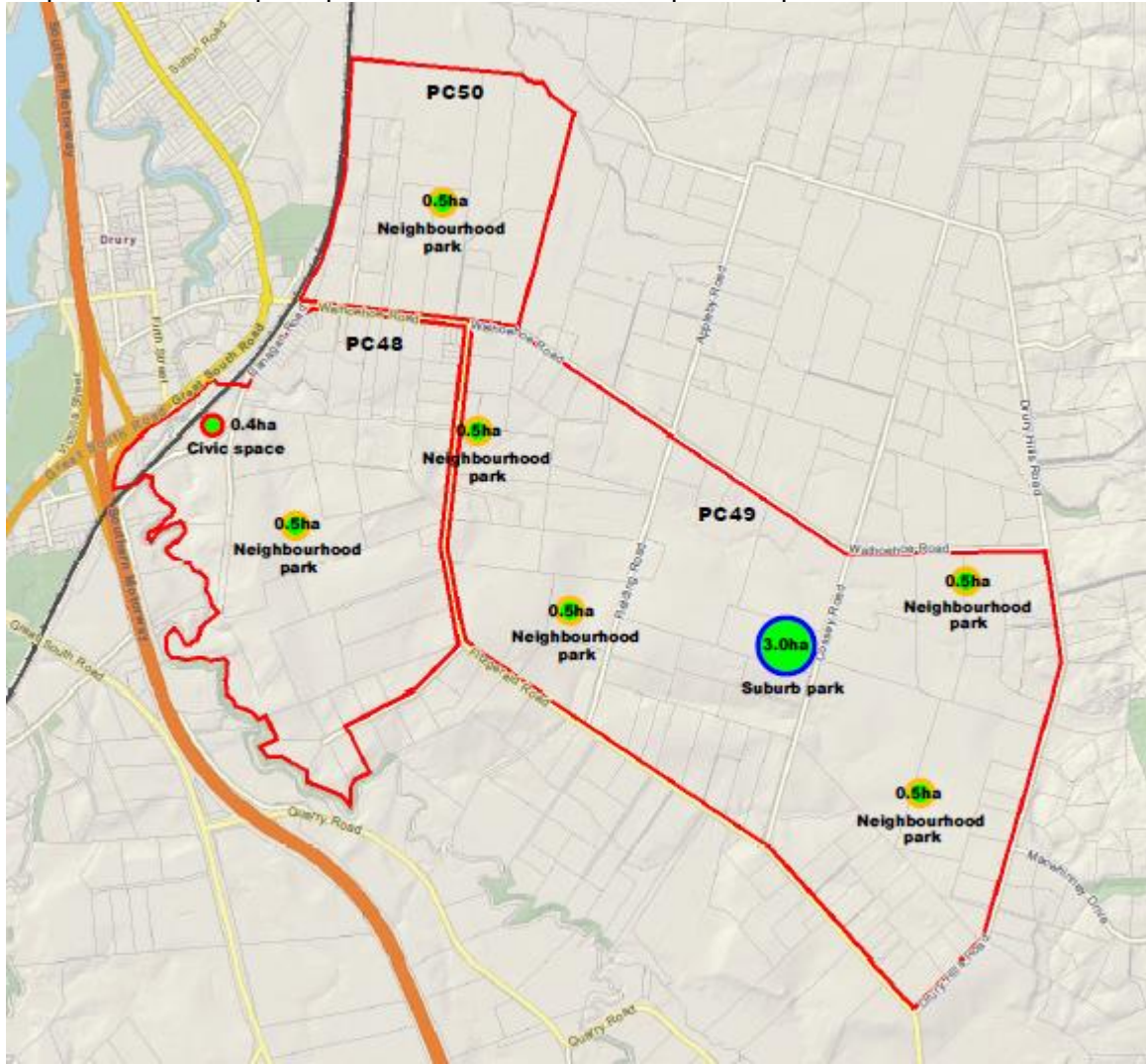
Row	Specific Reasons for the Submission	Relief Sought	
25.	Mana whenua values and traditions should be reflected in the new development with their participation.	Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development taking into account 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.	34.25
26.	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.	34.26

Natural heritage

Row	Specific Reasons for the Submission	Relief Sought	
27.	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.	34.27

Attachment 1

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



22 October 2020

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

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Proposed Private Plan Change 49 – Drury East Precinct

Please find attached Auckland Transport's submission on the Proposed Private Plan Change 49 from Fulton Hogan – Land Development 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 49 – Drury Centre Precinct





**FORM 5 – SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 49
DRURY EAST PRECINCT UNDER CLAUSE 6 OF SCHEDULE 1, RESOURCE
MANAGEMENT ACT 1991**

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

From Auckland Transport
Private Bag 92250
Auckland 1142

1.0 Introduction

1.1 Fulton Hogan – Land Development Ltd (**the applicant**) has lodged a private plan change (**PPC 49** or **the plan change**) to the Auckland Unitary Plan: Operative in Part (**AUPOP**) to rezone 184 hectares of land in Drury from Future Urban zone to a mix of Business and Residential zones. PPC 49 also seeks to introduce a new Drury East 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

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



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

- 1.4 The Integrated Transport Assessment completed for the Drury – Opāheke Structure Plan identified a strategic transport network for the area and the transport projects it identifies that are relevant to this plan change include, but are not limited to, a new rail station at Drury Central with a park and ride facility, connector bus network, 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 49 and the proposed Drury East 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 discrete plan changes with the provision of transport infrastructure and services is contingent on having a high level of certainty around the funding and delivery of the required infrastructure and services. Without this certainty, Auckland Transport is concerned that there will continue to be a significant transport network deficiency in the provision and coordination of transport responses to the dispersed growth enabled across the region.

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

- 2.6 Guidance on the sequencing and timing of future urban land identified in the Auckland Plan (i.e. “unzoned” greenfield areas of development) was discussed in the Future Urban Land Supply Strategy 2017 (**FULSS**), subsequently incorporated into the updated Auckland Plan in 2018. This document sets out the anticipated timeframes for “development ready” areas over a 30-year period. The FULSS helps to inform infrastructure asset planning and funding priorities, and in turn supporting development capacity to ideally be provided in a coordinated and cost-efficient way via the release of “development ready” land.
- 2.7 The urbanisation of future urban land enabled through plan changes (such as PPC 49) 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 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.

- 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 49 and other plan changes in the Drury area, such as PPC 48 (Drury Centre 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 49 should be considered in conjunction with the potential effects from PPC 48 (Drury Centre Precinct), PPC 50 (Waihoehoe Precinct), and PPC 51 (Drury 2 Precinct). These plan changes have been notified concurrently with PPC 49 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 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 The Supporting Growth Programme is a collaboration between Waka Kotahi NZ Transport Agency, Auckland Transport and Auckland Council.



- 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 49, 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 49 is reliant and dependent on a suite of wider strategic transport network connections, upgrades and facilities that are programmed to support the Drury – Opāheke Structure Plan area. The identification and programming of these transport network improvements is being undertaken as part of the Supporting Growth Programme and is subject to a separate investigation, planning and delivery process. Ideally, these transport network improvements would be in place before the land use development is implemented. The scale of the Supporting Growth Programme means that there will be a lag time relating to the planning, design, consenting and construction of the strategic transport network connections, upgrades and facilities.
- 2.18 Given this inter-dependency on a separate process where there is no certainty around funding for all the identified network improvements, there is a need to consider a range of mitigation methods including the potential deferral of development or a review of land development staging to ensure coordination and alignment with the required transport network mitigation.
- 2.19 The above overarching considerations have informed the following specific submission points addressed in Auckland Transport's submission.

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

- 3.1 Auckland Transport's submission seeks to ensure that PPC 49 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 **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');
- Waihoehoe Road route protection;
- Land use integration with public transport networks;
- Public transport and active modes
- Development of new roads / road cross section / arterial road control;
- Consistency of approach and provisions across Drury private plan changes; and
- Noise mitigation.

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

3.3 Although all four plan changes (PPCs 48, 49, 50 and 51) have been notified by the Council at the same time, they are being processed separately. 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 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 48, PPC 50 and PPC 51 are included in **Attachment 2**.

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

4.0 Decisions sought from the Council

4.1 Auckland Transport's primary position at this time is that Council should decline PPC 49, 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 49 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.'.

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

Date: 22 October 2020

Contact person: Josephine Tam
Principal Planner

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Attachment 1

The following table sets out where amendments are sought to the PPC 49 Drury East Precinct provisions and also identifies those provisions which Auckland Transport supports.

Italics = *PPC 49 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 49 provides no clear indication of how transport infrastructures required to support the plan change proposal would be financed and funded. PPC 49 is reliant on major transport infrastructure projects (i.e. both bulk infrastructure as well as upgrades to existing infrastructures that are not currently built to urban standard or upgrades to operation services) to be provided by third parties, in order to service and support the rezoning of the precinct area from Future Urban Zone to a mix of Business and Residential 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 peripheral transport infrastructure improvements have been planned, the Regional Land Transport Plan 2018-2028 has not identified or allocated funding for major transport infrastructures to support the urbanisation in Drury area before 2028.</p> <p>Developments happening ahead of any supporting transport infrastructure being in place is not sound resource management practice and is contrary to, and does not give, and does not give effect to, the NPS-UD which supports out of sequence only when the funding and delivery of transport infrastructures/upgrades are available and being provided to support the development. Moreover, uncoordinated transport infrastructure provision will</p>	Auckland Transport's primary position at this time is that PPC 49 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.

35.1



			<p>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 49 is not declined, there is a need to consider a range of mitigation methods including the potential deferral of development or a review and implementation of land development staging to ensure coordination and alignment with the required transport network mitigation.</p>	
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 49 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.</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 opposed to alternative modes of transport (i.e. public transport, walking and cycling).</p> <p>It is also important to note that the applicant's Integrated Transport Assessment has relied upon a modal shift at around 14% when assessing the overall trip generation potential from the onset. If this is not achieved, then the impacts of the proposal (i.e. the plan change provisions and the resulting</p>	<p>Auckland Transport's primary position at this time is that PPC 49 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 outlines below.

35.2



			<p>anticipated development enabled by these amendments) will be greater than assessed and the timing of the recommended development triggers as stated under the proposed Standards IX6.1 and IX.6.2 would also be incorrect.</p> <p>Moreover, Auckland Transport is concerned that the proposed rezoning will bring about adverse effects on the existing transport network that will not be fully mitigated through the proposed plan change provisions.</p>		
	IX.1 Precinct Description	Oppose	<p>The proposed precinct description, objectives and policies do not recognise the need for both subdivision and development to be coordinated with the provision (including funding and delivery) of the transport infrastructure and services that are required to support the precinct and connecting it to the wider network. In this respect, these provisions do not give effect to higher order NPS-UD and RPS provisions. Importantly, coordination is required to avoid, remedy and mitigate adverse effects on the transport network and to achieve integration of land use and transportation. Therefore, wording supporting the above should be explicitly stated in the objectives and policy.</p>	<p>Amend the Precinct Description as follows:</p> <p><i>The transport network in the wider Drury East area as defined on Precinct Plan 2 will be progressively upgraded over time to support development in the wider area. The precinct includes provisions to ensure that the subdivision and development of land for 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.</i></p>	35.3
	IX.2 Objectives (2) and (3)	Oppose		<p>Amend Objectives IX.2 (2) and (3) as follows:</p> <p>(2) Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network. <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></p> <p>(3) Development is supported by appropriate infrastructure. <u>Subdivision and development are supported by the timely and coordinated provision of robust and sustainable transport, stormwater, water,</u></p>	<p>35.4</p> <p>35.5</p>



				<u>wastewater, energy and communications infrastructure networks.</u>	35.5			
	IX.3 Policy (5)	Oppose		<p>Amend Policy IX.3 (5) and add a new policy as follows:</p> <p>(5) Ensure that the timing of <u>subdivision and</u> development in <u>the wider</u> Drury East Precinct <u>area as defined in Precinct Plan 2</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</u> development on the <u>safe and efficient operation</u> effectiveness and safety of the immediately surrounding <u>and wider</u> transport network.</p> <p><u>(x) Avoid any subdivision and development in the wider Drury area as defined on Precinct Plan 2 until the required transport infrastructure is in place.</u></p>	35.6			
	IX.4.1 Activity table	Oppose	<p>As proposed by the applicant, the activity status for development and subdivision within the precinct is determined based on compliance with Standards IX.6.1 and/or IX.6.2. These standards set out the transport upgrades required to exceed specified development and trip generation thresholds.</p> <p>Auckland Transport acknowledges the intention of the proposed rules is to manage and mitigate adverse effects of subdivision and development on the transport network, and hence Auckland Transport considers that failure to comply with both standards (i.e. allowing subdivision and development to advance before the required transport upgrades are implemented) will have the potential to result in significant adverse effects on the transport network.</p> <p>Auckland Transport therefore seeks a non-complying activity status for development and subdivision which fail to comply with both Standards IX.6.1 and IX.6.2. This will make sure that such consents can only be granted if the adverse effects will be</p>	<p>Amend Rules IX.4.1 (A2), (A3), (A5) and (A6) to introduce more onerous activity status for any development and/or subdivision not complying with Standards IX.6.1 Staging of Development and IX.6.2 Trip Generation Limit (Such as non-complying activity status).</p> <p>In the alternative, amend Rules IX.4.1 (A2) and (A3) as follows:</p> <table><tr><td>(A2)</td><td>Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent.</u></td><td>RD</td></tr></table>	(A2)	Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent.</u>	RD	35.7
(A2)	Development <u>and/or subdivision</u> that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit <u>as confirmed in the Transport Assessment submitted with application for consent.</u>	RD						
					35.8			



			<p>minor or if the activity will not be contrary to the relevant objectives and policies. This will make sure that such consents can only be granted if the adverse effects will be minor or if the activity will not be contrary to the relevant objectives and policies.</p> <p>Auckland Transport also seeks the combination of Rules IX.4.1 (A5) with (A2) and (A6) with (A3) to avoid duplication.</p>	<p>(A3) <i>Development and/or subdivision that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades and of Standard IX.6.2 Trip Generation Limit as confirmed in the Transport Assessment submitted with application for consent.</i></p> <p>NC D</p>	35.8
	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).	<p>As a consequential amendment, delete Rules IX.4.1 (A5) and (A6).</p> <p>Amend the IX.5 Notification rules (1) to (3) which require non-notification to require the normal tests for notification under the relevant sections of the RMA.</p>	35.9
	IX.6 Standards	Oppose	Standard IX.6 (2) is not required because it is explicitly stated under Rule E27.6.1 (2)(b) that Standard E27.6.1(1) does not apply where development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment.	<p>Delete Standard IX.6 (2) as follows:</p> <p>(2) The following Auckland wide standards do not apply to activities listed in Activity Table IX.4.1 above:</p> <p>E27.6.1 Trip generation</p>	35.10
	IX.6.1 Standard	Oppose	<p>Amendment is sought to Standard IX.6.1 (1) to ensure that both subdivision and development are covered.</p> <p>Standard IX.6.1 (2) proposed by the applicant implies that subdivision of vacant lots of 1200m² or greater will not have any impacts on the transport network. However, it is Auckland Transport's view that all subdivision (including vacant lots) and any development of land which precedes a subdivision (e.g. earthworks) will generate construction traffic which can in turn affect both the network capacity and road conditions (e.g. provision of a safe pavement condition). Auckland Transport</p>	<p>Amend Standards IX.6.1 (1) and (2) and delete Standard IX.6.1 (3) and the note as follows:</p> <p><i>IX.6.1 Staging of Development with Transport Upgrades</i></p> <p>(1) <i>Development and subdivision within the area shown on IX.10.2 Drury East: Precinct Plan 2 must not exceed the thresholds in Table IX.6.1.1 and Table IX.6.1.2 until such time that the identified infrastructure upgrades are constructed and are operational.</i></p>	35.11



			<p>therefore seeks to amend Standard IX.6.1 (2) to ensure that the requirements under this standard will apply to all subdivision.</p> <p>Auckland Transport seeks to delete Standard IX.6.1 (3). As outlined above, the need for Access A has not been adequately justified, and hence there is no basis for the required transport upgrades to be different with or without Access A. The reference to Table IX.6.1.2 in Standard IX.6.1 (1) will also need to be deleted.</p> <p>Auckland Transport also seeks to delete the note under Standard IX.6.1. This is a consequential amendment which relates to changes sought to Table IX.6.1.1 as outlined below.</p>	<p>(2) For the purpose of this rule ‘dwelling’ and ‘retail/commercial floorspace’ means buildings for those activities that have are subject to a valid land use and/or building consent or subdivision that is subject to a subdivision consent that has a 224e certificate for vacant lots less than 1200m².</p> <p>(3) Table IX.6.1.1 sets out the development thresholds if ‘Access A’ is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Drury East: Precinct Plan 2. Table IX.6.1.2 sets out the development thresholds if ‘Access A’ is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Drury East: Precinct Plan 2.</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>							
Table IX.6.1.1	Oppose	<p>Amend Table IX.6.1.1 as follows, including to specify additional transport infrastructure upgrades and network improvements required to be completed (NB: the upgrades / network improvements required for PPC 49 is a matter of ongoing discussion and review – the upgrades / network improvements specified below are those which Auckland Transport has identified to date as needing to be completed, as a minimum, noting also that triggers may change as a result of negotiations with developers and/or additional assessment):</p> <p>Table IX.6.1.1 Threshold for Development and Subdivision with ‘Access A’ as shown on IX.10.2 Drury East: Precinct Plan 2 not constructed</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 (notes: transport upgrades are triggered if any one of these thresholds is not complied with)</td></tr><tr><td colspan="3">Prior to any subdivision, new dwellings, retail or commercial development</td><td>• Interim safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for pedestrians and cyclists on all approaches.</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 (notes: transport upgrades are triggered if any one of these thresholds is not complied with)	Prior to any subdivision , new dwellings, retail or commercial development			• Interim safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for pedestrians and cyclists on all approaches.
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 (notes: transport upgrades are triggered if any one of these thresholds is not complied with)								
Prior to any subdivision , new dwellings, retail or commercial development			• Interim safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for pedestrians and cyclists on all approaches.								



					<ul style="list-style-type: none"><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>Initial 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>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 East and West Rail Stations.</u>	
	3,406	62,430m ²	34,800m ²	<ul style="list-style-type: none"><u>Upgrade of the Waihoehoe / Great South Road intersection to signals.</u><u>Upgrade Great South Road to four traffic lanes (Drury Interchange to at least 400m north of Great South Road / Waihoehoe Road intersection).</u><u>Upgrade of the Waihoehoe Road / Great South Road and Waihoehoe Road / Fitzgerald Road / Opāheke North-South intersections to signals with capacity (on all approaches).</u>	



						<ul style="list-style-type: none"> • <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). • <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>State Highway 1 three laning Drury to Bombay.</u> • <u>Mill Road Full Route.</u> • <u>Pukekohe Expressway Full Route.</u> • <u>Proposed Opāheke North-South Road Full Route.</u>
			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> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> • <u>Provision for a third and fourth rail line</u>

Table IX.6.1.1 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



		<p>development yields. It appears that Table IX.6.1.1 was formulated based on the applicant's modelling outcomes, and Table 13 of the applicant's Integrated Transport Assessment and Attachment 3 of the RFI 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.6.1.1 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. provision of a safe pavement condition). Therefore, the transport upgrade requirements should apply to subdivision. • As proposed by the applicant under Table IX.6.1.1, no transport upgrade except for interim safety upgrades (i.e. safe crossing facilities for pedestrians and cyclists) to the Waihoehoe / Great South Road intersection is required until 3,406 dwellings, 62,430m² of retail GFA or 34,800m² of commercial GFA are developed. This is different to Table 13 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 wider network improvements required to enable each threshold level were not included in Table IX.6.1.1. While the funding and/or programme of a number of these wider works have already been planned, the plan change proposals (including the Drury Centre, Drury East, Waihoehoe and Drury 2 Precincts) are effectively bringing forward the need for a proportion of the wider 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 IX.6.1.1. This aligns with Table 13 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>
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	Table IX.6.1.2	Oppose	Refer to discussion in relation to Access A above.	Delete Table IX.6.1.2.	35.13
	IX.6.2 Standard	Oppose	<p>The reasons for the amendment sought to Standards IX.6.2 (1) and the deletion of Standards IX.6.2 (2) and the note have been discussed above (refer to submission point in relation to Standard IX.6.1 above).</p> <p>Auckland Transport seeks to include a new clause to provide clear guidance on how compliance with the standard should be determined i.e. by a traffic assessment prepared by a suitably qualified expert.</p>	<p>Amend Standards IX.6.2 (1), delete Standard IX.6.2 (2) and (3), and add a new clause as follows:</p> <p>IX.6.2 Trip Generation Limit</p> <p>(1) Development <u>and subdivision</u> within the area shown on IX.10.2 Drury East: Precinct Plan 2 must not exceed the thresholds in Table IX.6.2.1 and Table IX.6.2.2 until such time that the identified infrastructure upgrades are constructed and are operational.</p> <p>(2) Table IX.6.2.1 sets out the development thresholds if 'Access A' is not constructed to provide direct access to the Drury Centre from State Highway 1, as shown on IX.10.2 Drury East: Precinct Plan 2. Table IX.6.2.2 sets out the development thresholds if 'Access A' is constructed to provide direct access to the Drury Centre from State Highway 1 as shown on IX.10.2 Drury East: Precinct Plan 2.</p> <p>(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</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>	35.14
	Table IX.6.2.1	Oppose	<p>Amend Table IX.6.2.1 as follows:</p> <p>Amend Table IX.6.2.1 as follows, including to specify additional transport infrastructure upgrades and network improvements required to be completed (NB: the upgrades / network improvements required for PPC 49 is a matter of ongoing discussion</p>		35.15



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):

Table IX.6.2.1 Trip Generation Limits Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 not constructed

Inbound Trip Generation in vehicles per hour (vph)	Outbound Trip Generation in vehicles per hour (vph)	Transport Upgrades Required to Exceed the Trip Generation Thresholds
Prior to any subdivision , 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 Drury Hills Road intersection) meeting a two lane Arterial design standard in accordance with Auckland Transport's current design standards.</u> <u>Initial 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> <ul style="list-style-type: none"> <u>State Highway 1 three-laning to Drury.</u>



					<ul style="list-style-type: none"> • <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 / Opāheke North-South signalised intersections (on all approaches).</u> <p><u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u></p> <ul style="list-style-type: none"> • <u>State Highway 1 three laning Drury to Bombay.</u> • <u>State Highway 1 Drury South Interchange.</u> • <u>Mill Road Full Route.</u> • <u>Pukekohe Expressway Full Route.</u>



					<ul style="list-style-type: none"> <u>Proposed Opāheke North-South Full Route.</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> <u>Wider network improvements required to enable these threshold levels to be safely and effectively accommodated:</u> <u>Third Main Rail Line (Pukekohe to Papakura).</u>

Table IX.6.2.1 set out the transport upgrades required once specified trip generation limits are met, each applying to successively higher limits. It appears that Table IX.6.2.1 was formulated based on the applicant's modelling outcomes, and Table 14 of the applicant's Integrated Transport Assessment and Attachment 3 of the RFI Response: Transport. It is concluded in the applicant's Integrated Transport Assessment that the developments are unlikely to have a significant adverse effect on the traffic network, provided that the transport infrastructure required to support the developments is implemented.

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

- It is unclear as to how the proposed development thresholds (by way of number of dwellings and gross floor areas) will be able to capture subdivision. As discussed above, it is Auckland Transport's view that all subdivision (including vacant lots) and any development of land which precedes a subdivision (e.g. earthworks) will generate construction traffic which can in 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.6.2.1, that 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 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 14 of the applicant's Integrated Transport Assessment and Attachment 3 of the Request for Information Response: Transport which includes additional transport upgrade requirements at trip generation limits.
- There is lack of mitigation proposed to address construction traffic effects on both the capacity and condition of roads. The pavement condition of both Fitzgerald Road and Waihoehoe Road will 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.	
			<ul style="list-style-type: none">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 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, NZUP projects and other wider network improvements should be included in Table IX.6.2.1. This aligns with Table 14 of the applicant’s Integrated Transport Assessment 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.	
Table IX.6.2.2	Oppose	Refer to discussion in relation to Access A above.	Delete Table IX.6.2.2.	35.16
IX.8.1 (2) Matters of discretion	Support in principle	Auckland Transport acknowledges that a number of transport upgrade requirements as stated in Tables IX.6.1.1 and IX.6.2.1 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 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. In addition, amendment is sought to ensure that both subdivision and development are covered by these provisions and that Drury East is clearly defined as the area shown on IX.10.2 Precinct Plan 2.	Correct number in IX.8.1 (2), and amend as follows: (2) Subdivision <u>and</u> /or development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit: <u>(a)</u> Effects on the transport network consistent with the trips generated by development specified in Table IX.6.2.1 or Table IX.6.2.2 ; <u>(b)</u> The rate of public transport uptake and travel management measures; and <u>(c)</u> The rate of coordination of retail, commercial and residential development in the wider Drury East area shown on Precinct Plan 2-; <u>and</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>	35.17



				<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>	35.17
	IX.8.2 (2) Assessment criteria	Support in principle		<p>Amend IX.8.2 (2) as follows:</p> <p>(2) Development <u>and/or</u> subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit:</p> <p>(a) Whether the effects of the proposal on the transport network are consistent with the trips generated by development specified in Table IX.6.3.1 or Table IX.6.3.2;</p> <p>(b) Whether increased use of public transport provides additional capacity within the <u>local</u> transport network <u>included within the area shown on IX.10.2 Precinct Plan 2;</u> including by implementing travel demand management measures.</p> <p>(c) Whether residential development is coordinated with retail and commercial development within the wider Drury East area shown on Precinct Plan 2 to minimise trips outside of the precinct providing additional capacity within the transport network;</p> <p>(d) The effect of the timing and development of any transport upgrades;</p> <p><u>(x) Where new, upgrades and/or extensions to transport infrastructure are required, whether infrastructure funding agreements or other agreements exist to ensure that the new, upgraded or extended infrastructure required to</u></p>	35.18



				<p><u>service the subdivision and/or development can be funded and delivered; and</u></p> <p><u>(x) Whether the effects of development proceeding ahead of the required transport upgrades are mitigated by any conditions of consent including those relating to the scale, staging or operation of an activity, review conditions or interim network improvements proposed by the applicant.</u></p>	35.18
State Highway 1 Drury Interchange direct access ('Access A')	IX.6.1 and IX.6.2 Standard, and IX.10.2 Drury East Precinct Plans 2	Oppose	<p>The proposed Standards IX.6.1 and IX.6.2 set out the transport upgrades required to exceed specified development and trip generation thresholds. The level at which the thresholds are set differs according to whether a direct access to the proposed Drury Centre Precinct (PPC 48) from the State Highway 1 Drury Interchange is assumed to be provided (referred to as 'Access A' in Precinct Plan 2).</p> <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>Delete all reference to 'Access A' under Standards IX.6.1 and IX.6.2.</p> <p>Remove 'Access A' from Precinct Plan 2.</p>	35.19



			<p>In addition, there are a number of factors which prove that the provision of Access A will be problematic:</p> <ul style="list-style-type: none"> • Most of the land required for transport upgrades falls on third party land outside the ownership of the applicant. It is not demonstrated by the applicant how this will be addressed and managed; and • It is subject to the approval of Auckland Transport, Waka Kotahi and KiwiRail (i.e. crossing bridge structure with sufficient vertical clearance over the rail corridor will be required). 		
Waihoehoe Road route protection	IX.3 Policies	Oppose	<p>The proposed policies do not recognise the importance of Waihoehoe Road as an arterial road and its function as a multi-modal connection. Auckland Transport considers that two new policies are needed to:</p> <ul style="list-style-type: none"> • Recognise and protect the route for Waihoehoe Road as a four-lane arterial road (between Great South Road and Fitzgerald Road) and two-lane arterial road (between Fitzgerald Road and Drury Hills Road intersection) in order to service growth in Drury; and • Support the safe and efficient use of Waihoehoe Road for walking, cycling and public transport by restricting direct vehicle access from adjoining properties. 	<p>Add two new policies as follows:</p> <p><u>(x) Recognise and protect the route for Waihoehoe Road as a multi-modal arterial route which provides for the east-west movements between Great South Road, 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>	<p>35.20</p> <p>35.21</p>
	IX.6.4 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.6.4 is to protect the future corridor for widening of Waihoehoe Road. However, the proposed rule would not be necessary after a notice of requirement has been lodged for the road upgrade.</p>	<p>Amend the building line restrictions to reflect the final alignment and width required and ensure any yard requirements that apply are considered in addition to the building setbacks. The need for IX.6.4 should be reviewed if a notice of requirement is lodged for the upgrade of Waihoehoe Road.</p>	35.22



	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.	35.23
Land Use Integration with Public Transport Networks	Entire Plan Change	Oppose	<p>Auckland Transport supports transit-oriented developments where these are appropriately located, well designed and multi-modal transport opportunities are enabled and encouraged. In particular, opportunities should be provided for people who live and work within an area so as to reduce the length and/or number of private vehicle trips through the availability of public transport and/or other active modes such as cycling and walking.</p> <p>Auckland Transport believes that transport-land use integration outcomes are a prerequisite to mitigate the effects of urban development. Spatial, physical and operational integration of the land use development (enabled by this plan change) with public transport networks and facilities is critical. The principles of a transit or transit-oriented development model should therefore underpin the spatial location of infrastructure, prioritisation of transport modes, patterns of land use development and associated development potential/intensity within the plan change.</p> <p>Transit-oriented development is a well understood concept that is characterised by compact developments with moderate to high densities, located within walking distance of a transit station or stop, generally with a mix of residential and non-residential opportunities, designed for pedestrians, that does not exclude vehicles.^[1]</p>	<p>The precinct provisions should be amended to better address the following related matters:</p> <ol style="list-style-type: none"> 1. Define the key transit-oriented development principles, characteristics and outcomes as they apply to the plan change area. 2. Ensure there is consistency through the suite of precinct provisions in regard to giving effect to the transit-oriented development related outcomes. 3. Applying appropriate mechanisms in the precinct provisions to support transit-oriented development related outcomes e.g. managing the provision of parking as part of the wider suite of travel demand management measures that are applied to transit-oriented development scenarios. <p>In addition:</p> <ul style="list-style-type: none"> • Provide further assessment of the impacts of the proposal on accessibility between the Drury East Plan Change area the Drury Central rail station for all modes including public transport and pedestrian access, focusing on safety, permeability and connectivity between the areas. • Include provisions in the plan change to ensure that funding for public transport services (i.e. bus services) is available to support and provide public transport 	<p>35.24</p> <p>35.25</p> <p>35.26</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 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>connections between the developments and the Drury Central rail station upon its completion.</p>	35.26
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			<p><u>Parking</u></p> <p>Car parking is discouraged and provided in lower numbers compared to surrounding development (non-transit oriented developments).^[2]</p> <p>These transit-oriented development attributes are consistent with transport and land use outcomes sought by Auckland Transport, when implemented in an integrated and appropriate manner in terms of optimising investment in public transport, providing for transport alternatives and managing network impacts and effects.</p> <p>Auckland Transport seeks a more directive approach on how the precinct as a whole will enable and encourage the realisation of a transit-oriented development. Amendments are sought to a number of precinct provisions to support this.</p> <p>^[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>		
Public transport and active modes	IX.2 Objective (1)	Support in principle	Auckland Transport seeks amendments to the objective and policies proposed by the applicant to ensure that strong emphasis is directed on the need to provide for public transport and active modes such as walking and cycling. It is important to note that the applicant's Integrated Transport Assessment has relied upon a modal shift at around 14% when assessing the overall trip generation potential. If this is not achieved, then the impacts of the proposal (i.e. the plan change provisions and the resulting anticipated development enabled by these amendments) will be greater than assessed and the timing of the recommended development triggers as stated under Standards IX6.1 and IX.6.2 above would also be incorrect.	Amend Objective IX.2 (1) as follows:	35.27
	IX.3 Policies (3) and (7)	Support in principle		<p>Amend Policies IX.3 (3) and (7) as follows:</p> <p>(3) <i>Require streets to be attractively designed and appropriately provide for all transport modes by:</i></p> <p>a) <u>providing a high standard of pedestrian amenity, safety and convenience; and</u></p>	35.28



				<p>b) <u>providing for safe separated access for cyclists on arterial and collector roads that link key destinations; and</u></p> <p>c) <u>providing a level of landscaping that is appropriate for the function of the street; and</u></p> <p>d) <u>providing for the safe and efficient movement of public transport and private vehicles.</u></p> <p>(7) Provide for the staging of bus pedestrian and cycling connections to the Drury Central train <u>rail</u> station <u>upon its completion</u> to encourage the <u>immediate</u> use of public and active modes of transport <u>as soon as practically possible.</u></p>	35.28		
					35.29		
Development of new roads	IX.3 Policies (1) and (2)	Support in principle	Auckland Transport generally supports Policies IX.3 (1) and (2) as proposed but seeks amendments for consistency and to ensure that subdivision is also covered.	<p>Retain Policy IX.3 (1) and amend Policy IX.3 (2) as follows:</p> <p>(1) Require the east to west collector roads to be generally in the locations shown in IX.10.1 Drury East: Precinct Plan 1, while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network.</p> <p>(2) Ensure that <u>subdivision and</u> development provide 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.</p>	35.30		
	IX.4.1 Activity table	Oppose in part	Rule IX.4.1 (A1) as proposed requires the development of public or private road as a restricted discretionary activity. The associated assessment criteria under IX.8.1 (1) relate to matters on how and where the roads should be developed. It appears that the intention of this rule is to capture the development of new roads only.	<p>Amend Rule IX.4.1 (A1) as follows:</p> <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>	(A1)	Development of <u>new</u> public or private road <u>(this rule does not apply to Auckland Transport)</u>	RD
(A1)	Development of <u>new</u> public or private road <u>(this rule does not apply to Auckland Transport)</u>	RD					
					35.32		



			To avoid confusion, Auckland Transport seeks to amend Rule IX.4.1 (A1) by adding the word 'new' before public or private road with a note which explicitly states that this rule does not apply to Auckland Transport. The requirements of activities within roads and unformed roads by Auckland Transport are covered under E26 the Infrastructure Chapter of the AUPOP.	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.	35.32			
IX.6 Standards and IX.4.1 Activity table	Oppose	The proposed rules and standards do not include any requirements in relation to road vesting. To provide clear direction, Auckland Transport seeks to include a new standard and rule about the requirement of road vesting.		<p>Add a new standard to require the vesting of proposed public roads as follows:</p> <p><u>IX.6.X Road Vesting</u></p> <p><u>Proposed public roads (including separated pedestrian and bicycle routes) must be constructed and vested in Council upon subdivision or development of the relevant area at no cost to the Council.</u></p> <p>As a consequential amendment, add a new rule as follows:</p> <table><tr><td>(X)</td><td><u>Development and/or subdivision that does not comply with IX.6.X Roading Vesting.</u></td><td>NC</td></tr></table>	(X)	<u>Development and/or subdivision that does not comply with IX.6.X Roading Vesting.</u>	NC	35.33
(X)	<u>Development and/or subdivision that does not comply with IX.6.X Roading Vesting.</u>	NC						
IX.8.1 (1) Matters of discretion	Support in principle	The proposed matters of discretion do not address the matters of public transport and the location and design of intersection with existing roads. Auckland Transport therefore seeks amendments to IX.8.1 (1)(b) and request a new clause to ensure that these matters are included.		<p>Amend IX.8.1 (1) as follows:</p> <p>(1) Development of <u>new</u> public and private roads:</p> <p>(A) Location and design of the collector streets<u>roads</u>, local roads streets and connections with neighbouring sites to achieve an integrated street network;</p> <p>(B) Provision of <u>safe and efficient public transport, cycling and pedestrian networks;</u></p>	35.34			



				<p>(C) Location and design, and sequencing of connections to the Drury Central train <u>rail</u> 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-; <u>and</u></p> <p><u>(x) Location and design of intersections with existing roads.</u></p>	35.34
IX.8.2 (1) Assessment criteria	Support in principle	<p>It appears that there is a formatting error in the proposed provisions resulting in the two sets of assessment criteria for the location of roads and design of roads having the same reference number. For the purposes of this submission, the assessment criteria for the location of roads is referred to as IX.8.2 (1) (a), (b), (c) and (d) and the assessment criteria for the design of roads is referred to as IX.8.2 (1) (A), (B) and (C).</p> <p>The proposed assessment criteria do not include the matters of public transport and the location and design of intersection with existing roads. Auckland Transport therefore seeks to add three new assessment criteria under IX.8.2 (1) (B) to ensure that these matters are included for assessing consent applications for the development of new roads.</p> <p>Auckland Transport seeks to delete Assessment Criterion IX.8.2 (1)(a)(iii) as proposed by the applicant. The constructability of any new roads is already covered by Auckland Transport’s Transport Design Manual (TDM) and a requirement for new roads to be delivered by a single landowner is not warranted in terms of managing effects. Therefore, this assessment criterion is not considered necessary and should be deleted.</p> <p>Amendments are sought to Assessment Criterion IX.8.2 (1)(b) to ensure that the road network are accessible and also well connected. It also appears that two separated assessment criteria have been grouped under IX.8.2 (1)(b) for the location of roads.</p>	<p>Amend IX.8.2 (1) as follows:</p> <p>(1) Development of <u>new</u> public and private roads:</p> <p>Location of roads</p> <p>(a) Whether the collector roads are provided generally in the locations shown on IX.10.1 Drury East: Precinct Plan 1 to achieve a highly connected street layout that integrates with the surrounding transport network. An alternative alignment that provides an equal or better degree of connectivity and amenity within and beyond the precinct may be appropriate, having regard to the following functional matters:</p> <p>(i) The presence of natural features, natural hazards or contours and how this impacts the placement of roads;</p> <p>(ii) The need to achieve <u>a permeable</u> 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 <u>and connectivity</u>, and supports public and active modes</p>	<p>35.35</p> <p>35.36</p>	



			<p>Auckland Transport generally supports Assessment Criteria IX.8.2 (1)(c) and (C) which seek the provision of pedestrian and cycle connections. Auckland Transport therefore seeks the retention of these assessment criteria, with minor amendment to IX.8.2 (1)(C).</p> <p>Auckland Transport also seeks the retention of Assessment Criteria IX.8.2 (1)(d) which seeks connectivity with neighbouring sites by requiring new roads to be developed to the site boundaries, and hence reduce the risk of sections of the roads being developed in a uncoordinated and piecemeal manner.</p> <p>Auckland Transport also considers it appropriate that when development is undertaken next to a rural road, the road should be upgraded to the appropriate urban standard.</p>	<p><u>of transport</u> a walkable street network. Whether roads are aligned with the stream network, or whether pedestrian and/or cycle paths are provided along one or both sides of the stream network, where they would logically form part of an integrated open space network;</p> <p>(c) Where pedestrian and/or cycle paths are proposed within proposed open spaces, whether they are located adjacent to, and not within the 10m planted riparian area;</p> <p>(d) 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>Design of roads</p> <p>(A) 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</p> <p>(B) Whether the layout of the street network provides a good degree of accessibility <u>and connectivity</u>, and supports <u>the development of Drury East Precinct as a walkable centre and community street network</u>. As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 600m;</p> <p>(C) Within the walkable catchment of the Drury Central train station in the Terrace Housing and Apartment Buildings zone, whether the street network provides safe and legible pedestrian and cycle connections to the <u>Drury Central rail station as development occurs</u></p>	<p>35.36</p> <p>35.37</p> <p>35.38</p>
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				<p>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 provides for a direct, legible and safe pedestrian and cycle connection to the Drury Central train rail station via connections through the Drury Centre precinct, or via Fitzgerald Road, Waihoehoe Road and Flanagan Road/Drury Boulevard.</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 include safe and efficient intersection treatments with existing roads; and</u></p> <p><u>(x) Where development is adjacent to a rural road, whether the road is to be upgraded to an urban standard.</u></p>	35.38
	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>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 	35.39 35.40



			<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. Auckland Transport acknowledges the benefits of using rain gardens as a stormwater detention/treatment device. However, the blanket rule of requiring the establishment of rain garden on all roads is not practical and may not necessarily achieve the best environmental outcomes. For example, rain gardens are not suitable for areas with steep slopes, the volume of stormwater detention and/or runoff reduction can also be limited depending on the size of the rain gardens, and they are known to be expensive to maintain and/or service and hence may not be the most cost-effective solution.</p> <p>Auckland Transport therefore seeks to delete the reference to rain gardens in IX.11 Appendix 1. The relevant stormwater management requirements are covered in E8 and E9 the Stormwater Discharge and Diversion and the Stormwater Quality Chapters of the AUPOP.</p>	<ul style="list-style-type: none"> • Building Setback • Design Speed <p>As part of the new provisions, retain the vehicle access restriction provisions, as addressed above.</p>	35.40
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,</p>	<p>Seek provisions to add layers to the AUPOP for:</p> <ul style="list-style-type: none"> • Arterial roads within the Precinct area; and • 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 	<p>35.41</p> <p>35.42</p>



			<p>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>specify the future intended classification of these roads.</p>		
Consistency of approach and provisions across Drury Private Plan Changes		Oppose in part	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 49 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.	35.43	
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>	35.44	
	IX.6 Standards and IX.4. Activity table	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><u>Development that does not comply with IX.6.X Noise Mitigation.</u></td><td>RD</td></tr></table>	(X)	<u>Development that does not comply with IX.6.X Noise Mitigation.</u>
(X)	<u>Development that does not comply with IX.6.X Noise Mitigation.</u>	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>
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35.46



Attachment 2

See attached Auckland Transport submissions on:

- Proposed Private Plan Change 48 (Drury Centre Precinct)
- Proposed Private Plan Change 50 (Waihoehoe Precinct)
- Proposed Private Plan Change 51 (Drury 2 Precinct)

Auckland Unitary Plan
PC 49 (Private): Drury East Precinct
Submission



C O U N T I E S P O W E R

Quality Control Sheet

Submitter: Counties Power Limited

Asset: Counties Power Electricity Distribution Network

Plan: Auckland Unitary Plan - Proposed Plan Change 49 (Private) Drury East Precinct

Document: Submission

Counties Power Contact: Rachel Bilbe, Land Access Coordinator

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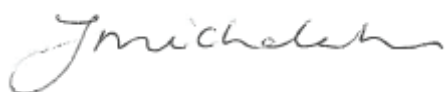
File Reference: COUNT038

Version:

Issue 1.0	22 October 2020	For approval
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Date: 22 October 2020

Limitations:

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1. Introduction

This document provides a submission on Plan Change 49 (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 changes 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 49. 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 2 and 3;
- Policies 1, 3, 5, 6 and 7;
- IX.8.1 Matters of discretion (1);
- IX.8.2 Assessment criteria (1); and
- IX.11 Appendices – Appendix 1.

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 49. 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 49 Area, the Business: Mixed Use Zoning will be immediately adjacent to the Cossey Road line. There is a 110kV sub-transmission line on the north side of Fitzgerald Rd and west side of Fielding Road. A diagram is included in Appendix 1 which shows the location of Counties Power assets. Both the Bombay-Opaheke (west) and Bombay-Opaheke (east) lines are in this plan change area.

If and where overhead lines are to be retained, the design and location of any new buildings, must be considered in light of NZECP34 but this will occur outside of RMA processes. 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.

All lines are 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 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.

4. Low carbon development

The Government is targeting 100% renewable electricity generation. Non-renewable alternatives, such as the reticulation of natural gas, unnecessarily increases carbon dioxide emissions when alternative electricity solutions already exist. These solutions are locked in for the economic life of the equipment (e.g. gas boilers, home gas heaters). With this in mind, Counties Power requests that Auckland Council uses this opportunity to implement policies that will enable low carbon energy options within the development precinct that will reduce future carbon emissions for the Auckland and be cost effective for households and businesses.

- Enabling security of electricity supply (targeted to be 100% renewable) to provide for end-use electricity consumption activities where cost-effective.
- Reducing transport carbon dioxide emissions through encouraging the electrification of transport infrastructure, including rail. The development should consider the need for provision of charging stations for an increasing electric vehicle fleet, with numerous OECD countries now looking to stop the sale of petrol and diesel vehicles around 2035.

Chapter: Drury Centre Precinct				
Objective/ Policy	Provision	Position	Reason for position	Relief Sought
Chapter IX: Drury East Precinct				
IX.2 Objective (2)	Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network.	Support	Counties Power relies on the effectiveness and efficiency of the State Highway to ensure access for vehicles to carry out timely construction, maintenance and repair to the network for the essential electricity service.	Include objective as drafted.
IX.2 Objective (3)	Development is supported by appropriate infrastructure.	Support	Counties Power provides electricity infrastructure to enable and support development. Once construction of the Quarry Road substation is completed over 2025 - 2030, Counties Power will have the capacity to supply power to the area covered by Plan Change Area 49. The 110kV lines shown in Appendix 1 are 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.
IX.3 Policy (1)	Require the east to west collector road to be generally in the location shown in IX.10.1 Drury East: Precinct Plan 1 while	Support	Counties Power generally supports the location of the roads as there is no conflict with existing infrastructure. It is anticipated that some undergrounding of lines within road reserves will be	Include policy as drafted.

36.1

36.2

36.3

	allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network.		carried out by the developer and Counties Power can accommodate this.	
IX.3 Policy (3)	Require streets to be attractively designed and appropriately provide for all transport modes.	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. Trees, branches and windblown tree debris falling onto lines are a major cause of power outages in Auckland. The Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 require that trees must be kept clear of network power lines. The presence of trees can also impede access for maintenance purposes.</p> <p>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 and thereby the security of electricity supply.</p>	<p>Counties Power seek recognition of the rights that the Electricity Act 1992, New Zealand Electrical Code of Practice for Electrical Safe Distances, NZECP 34:2001 and the Electricity (Hazards from Trees) Regulations 2003 offer in order to protect the lines from encroachment from vegetation/trees to ensure their safe and reliable operation and ensure access for maintenance is not restricted.</p> <p>Counties Power seek consultation regarding the species of trees/shrubs proposed required by any standard in the vicinity of overhead lines or underground cables 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.</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 arterial roads to ensure that the berm is an acceptable width for installation of underground electrical reticulation.</p>
Policy (5)	Ensure that development in Drury East Precinct is coordinated with the transport infrastructure upgrades necessary to mitigate the adverse effects of development	Support	The timing of development should be coordinated with all infrastructure providers in order to be able to provide the Drury East Precinct with appropriate supporting infrastructure and avoid disruption caused by	Include the provision as drafted.

36.4

36.5

	on the effectiveness and safety of the immediately surrounding transport network.		delayed installation of other (non-water) utilities.		
Policy (6)	Ensure that development in Drury East Precinct is coordinated with supporting stormwater, wastewater and water supply infrastructure, having particular regard to the capacity of the Fitzgerald culvert and culverts under Great South Road.	Support in part	The timing of development should be coordinated with all infrastructure providers in order to be able to provide the Drury East 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.	36.6
Policy (7)	Provide for the staging of pedestrian and cycling connections to the Drury Central train station to encourage the use of public and active modes of transport.	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.	36.7
New Policy <u>IX.3 (5)(e)</u>	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.	36.8
New Policy <u>IX.3 (5)(f)</u>	Require subdivision and development to: ... <u>(f) Provide for the inclusion of vehicle</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 and any consequential amendments to the (AUP (OP).	36.9

	<u>recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.</u>				36.9
Rules/Standards	Provision	Position	Reason for position	Relief Sought	
IX.8.1 Matters of discretion	(1) Development of public and private roads: (a) Location and design of the collector streets, local streets and connections with neighbouring sites to achieve an integrated street network; (b) Provision of cycling and pedestrian networks; (c) Location and design of connections to the Drury Central train station; and (d) Matters of discretion IX8.1 (1)(a) - (b) apply in addition to the matters of discretion in E38.12.1.	Support in part	Each category of road (or service lane) must provide suitable space for installation of electrical infrastructure to meet the needs of the area or building, as well as adequate separation between the different utilities, landscaping and other road users. Where electrical infrastructure is required, vehicular access of a suitable construction standard must be provided to allow access for maintenance of electrical infrastructure. Note: the indicative road layouts are supported by Counties Power. We query whether the item(d) provision should also reference item (c).	Counties Power seeks that the provisions are amended to consider these factors.	36.10
				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.	
				Amend provision (d) as follows, if this is what was intended: (d) Matters of discretion IX8.1 (1)(a) - (bc) apply in addition to the matters of discretion in E38.12.1.	
IX.8.2 Assessment criteria	(1) Development of public and private roads: Location of roads (a) Whether the east to west collector road is provided generally in the location shown on IX.10.1 Drury East: Precinct Plan 1 to achieve a highly connected street layout that integrates with the surrounding transport network. An alternative	Support in part	Counties Power support the road layout as indicated in IX.10.1 Drury East: Precinct Plan 1, or an alternative which provides similar connectivity for the installation of the electrical distribution network. Counties Power support the functional matters (i) and (ii) in that these may also be matters which would otherwise impact on their ability to install and maintain the electrical infrastructure. Counties Power support functional matter (iii) as this will enable a coordinated and sequential approach to the supply and installation of new	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 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	36.12

	<p>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 roads are aligned with the stream network, or whether pedestrian and/or cycle paths are provided along one or both sides of the stream network, where they would logically form part of an integrated open space network.</p>		<p>electrical reticulation. This is of particular importance where existing overhead infrastructure is to be replaced with underground cables and where connectivity needs to be maintained across distinct areas within a specific Plan Change area or between the different Plan Change Areas (48-51).</p> <p>Electrical infrastructure must be taken into consideration when planning landscaping and planting of street trees and should be carried out in consultation with Counties Power. This is of particular importance where existing overhead lines are to be retained but is also relevant in terms of access to, and the safe operation of existing and new underground cables.</p> <p>Each category of road must provide suitable space for installation of electrical infrastructure as well as adequate separation between the different utilities, landscaping and other road users.</p>	<p>installation of underground electrical reticulation.</p>
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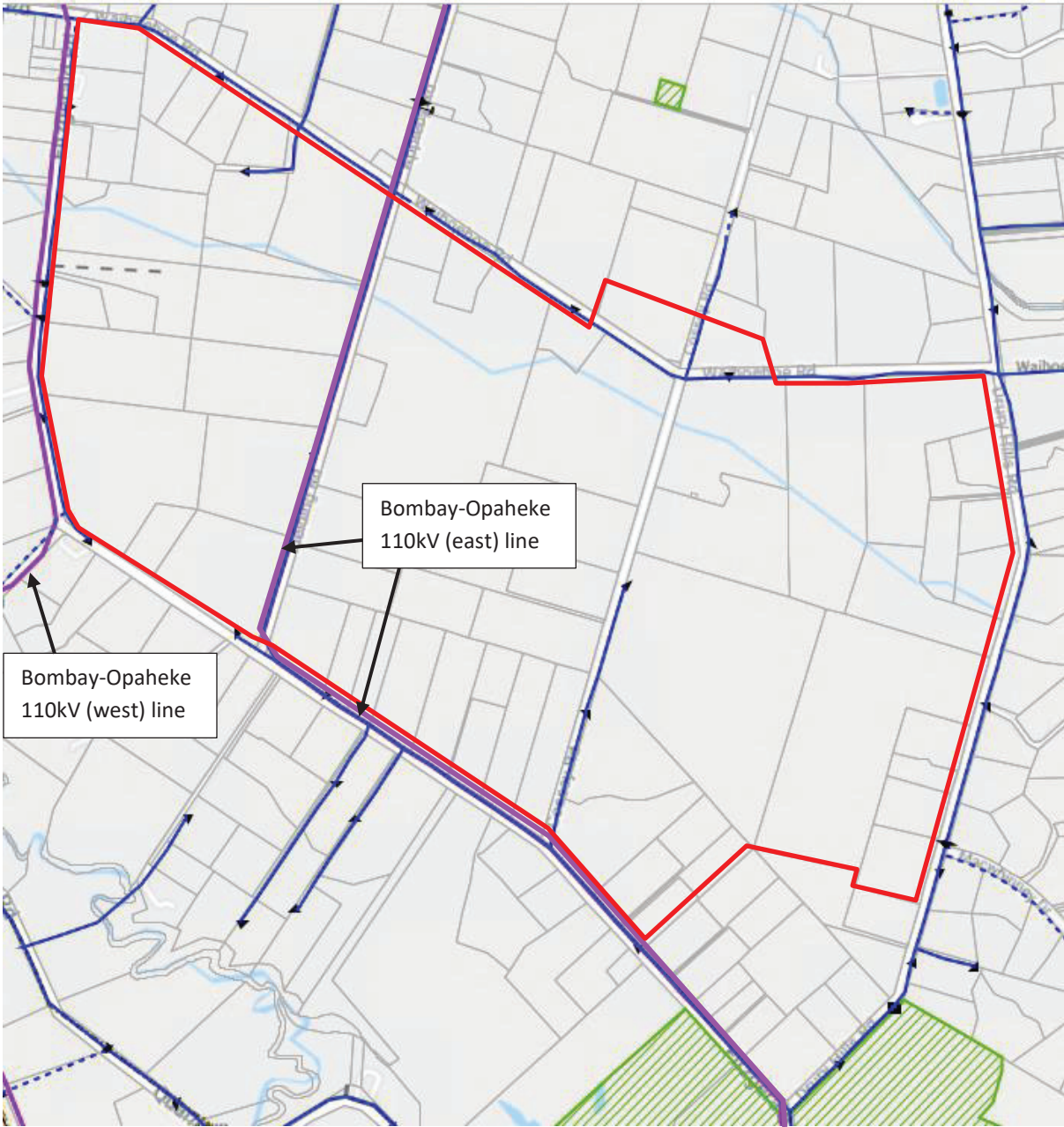
36.12

	<p>...</p> <p>(d) 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>...</p> <p>Design of roads</p> <p>(a) Whether the design of collector and local roads are generally in accordance with the road cross sections provided in IX.10.1 Drury East: Appendix 1;</p> <p>...</p> <p>(c) Within the walkable catchment of the Drury Central train station in the Terrace Housing and Apartment Buildings zone, whether the street network provides safe and legible pedestrian and cycle connections to the 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 provides for a direct, legible and</p>			
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	safe pedestrian and cycle connection to the Drury Central train station via connections through the Drury Centre precinct, or via Fitzgerald Road, Waihoehoe Road and Flanagan Road/Drury Boulevard.			
Appendices	Provision	Position	Reason for position	Relief Sought
IX.11 Appendices	Appendix 1: Road Cross Section Details	Support	<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.</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>	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.

36.13

Appendix 1 – Counties Power Assets Diagram



Existing Counties Power Infrastructure

- 110kV sub-transmission (overhead)
- 22kV distribution (overhead)
- 22kV distribution (underground)

Plan area



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 49 to the Auckland Unitary Plan ('Plan Change 49').

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 49 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 49 is seeking to rezone approximately 184ha of Future Urban zoned land in Drury East to a mix residential zones (Terrace Housing and Apartment Building, Mixed Housing Urban and Mixed Housing Suburban) serviced by a limited area of Mixed Use Business zoning. Once the urban zonings are in place, the Drury East development (Plan Changes 48, 49, and 50) will enable approximately 7,000 new dwellings accommodating 19,000 new residents. The rezoning of the proposed area covered by Plan Change 49 will provide capacity for at least 2,800 dwellings.

The Ministry broadly supports the proposed plan changes in Drury in so far as they will provide a framework for the development of much needed housing for the wider Auckland Region. This will, however, require additional capacity in the local school network to cater for this growth as the area develops. The section 32 Report supporting the plan change records that: *“New schools will be required to service urban growth in Drury and the Ministry of Education is currently undertaking a needs assessment. The Ministry of Education will designate the land for future schools as required.”*

The Ministry agrees that new schools will be required to service the urban growth enabled through the proposed plan changes. The Ministry has had a number of high-level discussions with developers in East Drury; however, it has not commenced a site acquisition process. These plan changes, if approved, will influence the site selection process and determine what level and type of educational facilities are required. The Ministry will still need to go through a formal notice of requirement processes before any designation is included in the Unitary Plan. The underlying District Plan provisions will be considered as part of any future the designation processes within the Plan Change areas. Currently the proposed plan change provisions do not recognise or acknowledge the need for a future school site to be enabled to support the social and educational needs of the East Drury community.

The Section 32 report states that 485 Burt Road, in West Drury has been rezoned Special Purpose School zone and a Notice of Requirement is currently processing to designate 41 Burberry Road, West Drury for a Primary School and Early Childhood Education Centre. The Ministry would like to clarify that:

- The school at 485 Burt Road will be a State Integrated School and the Ministry will not determine the timing for this school.
- The site at 41 Burberry Road, Drury has now been designated for a Primary School.
- Land at 401 and 281 Jesmond Road, Drury has been purchased for the establishment of a Secondary School; however the notice of requirement process has not been lodged to date.

The Ministry provides and plans for schools in response to demand created by residential development or intensification. It is important to ensure that other key infrastructure such as roading, wastewater and utilities are addressed up front as part of the Plan Change process to ensure wider infrastructure provision is timed appropriately to avoid access or service issues for education facilities (for example needing to establish appropriate road infrastructure to access a new school site).

The Ministry therefore has an interest in:

- How development is planned and sequenced, particularly in terms of infrastructure provision such as roading as this will impact where and when schools can be established.

- Ensuring the Precinct provisions specifically acknowledge and provide for schools. This is critical given schools are critical piece of social and community infrastructure. An absence of supportive provisions can place obstacles in the way of establishment of education facilities in future years.
- The urban form and amenity provided through connectivity and usable areas of public open space.

We note that the plan change reports were drafted prior to the publication of the National Policy Statement on Urban Development 2020 (NPS-UD) but that the Section 32 Report does include an assessment of the Proposed National Policy Statement on Urban Development. Of particular importance to the Ministry is Policy 10 of the NPS-UD, which states that local authorities should engage with providers of development infrastructure and additional infrastructure (schools are considered additional infrastructure) to achieve integrated land use and infrastructure planning. In addition to this, subpart 3.5 of the NPS-UD states that local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available. We have requested amendments to the precinct provisions below, which reflect the importance of providing for additional infrastructure in areas of growth.

The Ministry broadly support provisions in the plan change that seek to put in place a framework that will deliver integrated communities with a street and block pattern that supports the concepts of liveable, walkable and connected neighbourhoods. This includes a transport network that is easy and safe to use for pedestrians and cyclists and is well connected to public transport, shops, schools, employment, open spaces and other amenities.

Decision sought

The Ministry requests the following decision:

- Amendments to the proposed IX. Drury East Precinct Chapter (requested changes are underlined):
- *Objective IX.2 (3) Development is supported by appropriate infrastructure (including education infrastructure).*
- *Policy IX.3 (6) Ensure that development in Drury East Precinct is coordinated with supporting education infrastructure, stormwater, wastewater and water supply infrastructure, having particular regard to the capacity of the Fitzgerald culvert and culverts under Great South Road.*
- *IX.8.1 Matters of discretion*

37.1

37.2

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:

37.3

- 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) ...

- 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

37.4

iii. ...

(b) ...

(c) ...

(d) Whether subdivision and development provides for collector roads and local roads to the site boundaries to coordinate with neighbouring sites (including potential future school sites) and support the integrated completion of the network within the precinct over time;

37.5

Design of Roads

(a) ...

(b) Whether the layout of the street network provides a good degree of accessibility and supports a walkable street network, including to existing schools or sites designated for this purpose. As a general principle, the length of a block should be no greater than 280m, and the perimeter of the block should be no greater than 600m;

37.6

(c) ...

i. ...

- Amendments to ensure there is provision of appropriate public open space to support the surrounding community.

37.7

- The retention of:

- Standard IX.6.1 Staging of Development with Transport Upgrades. These standards will help ensure appropriate transport infrastructure is provided prior to significant development occurring in the area. It will also enable greater ability to stage the provision of education facilities as development progresses.

37.8

- 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 vehicles for travel to and from school and have health and safety benefits for communities.

37.9

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 Fulton

Hogan 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 49

Plan Change/Variation Name

Drury East Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

Or

Property Address

Or

Map

Or

Other (specify)

The zoning and precinct provisions

Submission

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

I support the specific provisions identified above ☒

I oppose the specific provisions identified above ☐

I wish to have the provisions identified above amended

Yes ☒

No ☐

The reasons for my views are:

Support in part. The overall development of the area is supported to support Auckland's Growth.

Increased commitment, by the way of open space zoning, is requested to ensure a positive community outcome.

Concerns regarding negative traffic, transport and infrastructure effects.

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation

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

Decline the proposed plan change / variation

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

☐
☒
☐
☐

Zone areas for parks and public space.

38.1

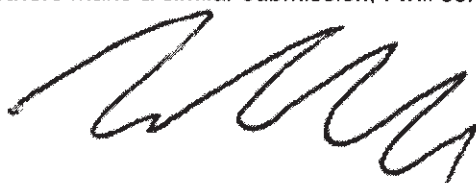
Ensure infrastructure upgrades are tied to staging through precinct provisions.

38.2

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 49 (Private)

Plan change name: PC 49 (Private): Drury East 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 PPC49 - Drury East.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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



22nd October 2020

Attention: Planning Technician
Auckland Council
Level 24
135 Albert Street
Private Bag 92300
Auckland 1143

Dear Sir or Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

PROPOSED PLAN CHANGE 49 (PRIVATE): DRURY EAST 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 49 (Private): To rezone 184 hectares of land in the area generally bounded by Waihoehoe Road, Drury Hills Road and Fitzgerald Road, from Future Urban to 2 hectares of Business: Mixed Use zone, 22 hectares of Residential: Terrace Housing and Apartment Buildings zoning; 65 hectares of Residential: Mixed Housing Urban zoning and 95 hectares of Residential: Mixed Housing Suburban zoned land.

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 as a whole.

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 wider Drury area has a number of notable historical associations relating to Maori settlement and activity, early European settlement, the New Zealand Wars, development of transport and industry, and rural activities from the mid-19th to the mid-20th centuries. The proposed plan change encompasses an area with a number of these notable 19th century historical associations relating to: European settlement; construction of the Great South

Road; the New Zealand Wars; the Drury Tram/Mineral Railway and the Drury Fireclay and Pottery works; and pre-European Māori associations.

- 5.2. The archaeological assessment accompanying the plan change request provides background information and assessment but at this stage only two properties across the whole plan change area have been surveyed which means there is not sufficient information to fully determine the extent of archaeology within the proposed plan change area.
- 5.3. 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.
- 5.4. As both the Archaeological Assessment and AEE acknowledge, there is the potential for unrecorded archaeological sites in the proposed plan change area. Heritage New Zealand seeks that an archaeological assessment be undertaken during the subdivision or resource consent stages of proposed developments. Heritage New Zealand particularly notes:
 - 5.4.1. There is potential for archaeological remains of military campsites from the New Zealand Wars, particularly in the area currently being proposed as Terrace House and Apartment Building (THAB) in the northern part of Fitzgerald Road. This is directly across the road from General Cameron's House (R12/755) which is in a separate plan change. Heritage New Zealand seeks that a provision be included in the plan that requires that an archaeological assessment be undertaken in this area. 39.1
 - 5.4.2. A number of watercourses run within the proposed plan change area. Riparian margins often contain archaeological sites. Sites within this area could be particularly related to the context of Ballards Cone Pa (R12/278, CHI 10206, AUP(OP) Schedule 14.1 ID 693, also known as Karearea, Te Maketu, Ballards Road Cone), located on a ridgeline to the east just outside the precinct boundary. Heritage New Zealand seeks that provision is included for archaeological assessment of the riparian boundaries to inform development and before any works, including planting, takes place. 39.3
- 5.5. In areas where there is a probability of archaeological remains, reliance on the Accidental Discovery Protocol provisions of the Auckland Unitary Plan is not appropriate. The Accidental Discovery Protocol should only be relied on in areas where an archaeological assessment identifies a low probability of archaeology being present.
- 5.6. 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, 39.5

interpretation and maintenance of significant historic heritage as suggested in the Structure Plan for the area.

- 5.7. Heritage New Zealand supports mana whenua in the exercising of kaitiakitanga and would ask that appropriate provisions are incorporated in the precinct plan to address any Māori cultural heritage values that may have been identified.

39.4

6. Heritage New Zealand seeks the following decision from the local authority:

- Accept the proposed plan change with amendments as outlined below:
 - Include provisions within the precinct plan to require that archaeological assessments of the area undertaken by a suitable qualified professional during the subdivision or resource consent stage of proposed developments.
 - Include provisions for the interpretation of the Drury tramway (the 'Mineral Railway', R12/1122) that crosses the precinct diagonally running northwest to southeast as per the recommendations contained within the archaeological assessment.
 - Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to exclude archaeological site extents as assessed by a professionally qualified archaeologist and require the preparation of an archaeological assessment by a suitably qualified person to inform the planting plan.
 - Include appropriate provisions within the precinct plan to address any Māori cultural heritage values identified.

39.1

39.2

39.3

39.4

7. Heritage New Zealand does wish to be heard in support of our submission.

Yours sincerely

Sherry Reynolds
Director Northern Region

Address for Service:

Susan Andrews

PO Box 105 291, Auckland

09 307 9920

sandrews@heritage.org.nz

Contact details

Full name of submitter: Matthew Royston Kerr

Organisation name:

Agent's full name:

Email address: Royston.Kerr@Hirepool.co.nz

Contact phone number: 092947636

Postal address:
34 Appleby Road
Drury
Auckland 2577

Submission details

This is a submission to:

Plan change number: Plan Change 49 (Private)

Plan change name: PC 49 (Private): Drury East Precinct

My submission relates to

Rule or rules:

Reverse sensitivity effects of the proposed Terrace Housing and Apartment Building zone on adjacent Future Urban Zoned land.

Increased traffic effects along Waihoehoe Road with insufficient provisions for the upgrade of the corridor.

Increased traffic safety issues at the intersection of Waihoehoe Road and Appleby Road associated with the insufficient provisions for the upgrade of the intersection.

Inefficiency and uncertainty with regard to the rezoning and urban development of the remaining Future Urban Zoned land in the Opaheke Drury area.

Property address:

Map or maps:

Other provisions:

Reverse sensitivity effects of the proposed Terrace Housing and Apartment Building zone on adjacent Future Urban Zoned land.

Increased traffic effects along Waihoehoe Road with insufficient provisions for the upgrade of the corridor.

Increased traffic safety issues at the intersection of Waihoehoe Road and Appleby Road associated with the insufficient provisions for the upgrade of the intersection.

Inefficiency and uncertainty with regard to the rezoning and urban development of the remaining Future Urban Zoned land in the Opaheke Drury area.

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

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

The reason for my or our views are:

Reverse sensitivity effects of the proposed Terrace Housing and Apartment Building zone on adjacent Future Urban Zoned land.

Increased traffic effects along Waihoehoe Road with insufficient provisions for the upgrade of the corridor.

Increased traffic safety issues at the intersection of Waihoehoe Road and Appleby Road associated with the insufficient provisions for the upgrade of the intersection.

Inefficiency and uncertainty with regard to the rezoning and urban development of the remaining Future Urban Zoned land in the Opaheke Drury area.

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

40.1

Submission date: 22 October 2020

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PRIVATE PLAN
CHANGE UNDER CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE
MANAGEMENT ACT 1991**

TO: Auckland Council

SUBMITTER: Drury South Limited

SUBMISSION ON: Proposed Plan Change 49 (Private): Drury East Precinct to the Auckland Unitary Plan ("**PC49**").

Introduction

1. Drury South Limited ("**DSL**") owns approximately 257ha of land within the Drury South Industrial Precinct, located to the south of the PC49 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 PC49 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 PC49 in its entirety, but is particularly focused on specific provisions of PC49 as set out in **Schedule 1**.

Nature of submission

5. DSL supports further urban development in the Drury area and is supportive of PC49, subject to appropriate provisions being included within PC49 to ensure that PC49 does not adversely affect others in the area.

Reasons for submission

6. PC49, 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 PC49 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 PC49 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 include detailed provisions to ensure that development does not change flooding risks upstream or downstream. DSL seeks to ensure a consistent approach is taken with PC49.

Decision sought

8. The following decision is sought from the local authority:
- (a) confirmation of PC49 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:	Daniel Minninnick
Date:	22 October 2020
Address for Service:	C/- Lauren Eaton

Telephone:
Email:

Russell McVeagh
Barristers and Solicitors
Level 30
Vero Centre
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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 PC49 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 PC49 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 PC49 area to avoid increasing flood risk upstream and downstream, and manage increased flood risk within the precinct, to habitable rooms for all flood events.	41.1
IX.4.1(A2), (A3), (A5) and (A6) IX.6.2	Activity Table IX.4.1 (A2), (A3), (A5) and (A6) together with Standard IX.6.2 provides an alternative mechanism (via trip generation thresholds) to meeting the GFA thresholds in Standard IX.6.1 that trigger transport upgrades. 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.	41.2
IX.4.1	Activity Table IX.4.1 does not address the issue of non-compliance with Standard IX.6.5 (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.6.5 (Stormwater Quality and Flooding); and</i> (b). <i>Subdivision that does not comply with Standard IX.6.5 (Stormwater Quality and Flooding).</i>	41.3
IX.5(2)	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 PC49 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.	41.4

IX.5(3)	<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 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.</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 style="padding-left: 40px;">(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 style="padding-left: 40px;">(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-compliance with these standards within the PC49 area.</p>	<p>Delete the provision so that 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 subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991.</p>
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41.5

IX.6(2)	IX.6(2) exempts activities within the PC49 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 PC49 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.	41.6
IX6.1	Tables IX.6.1.1 and IX.6.1.2 set out the development GFA thresholds and upgrades to the Waihoehoe Road / Great South Road intersection both with and without direct access being provided to the Drury Centre from State Highway 1, as shown on IX.10.2 Drury East: Precinct Plan 2. The transportation upgrades proposed in both Tables IX.6.1.1 and IX.6.1.2 are inadequate in scope and nature to ensure that there are not adverse effects on the Drury South Industrial Precinct and the surrounding transport network. The transport assessment which supports PC49 places undue reliance on currently unfunded transportation upgrades being provided by other parties or through as yet unspecified developer funding agreements.	Amend PC49 to ensure that: (a). adequate upgrading of the surrounding road network (for example Waihoehoe Road, Appleby Road, Cossey Road, Fitzgerald Road and the proposed connections between the PC49 area and Drury South Industrial Precinct Road shown on Precinct Plan 1) is undertaken; and (b). any non-compliance with this standard is a discretionary activity.	41.7
Precinct Plan 1 – Road Network	The Precinct Plan Roding Network identifies various aspects of the roading network, including a proposed alignment for Mill Road. The location of Mill Road is not confirmed and is subject to a separate process. It may be that a different alignment results as a result of that process. On that basis it is unnecessary and inappropriate to show the route on the Precinct Plan.	Remove Mill Road from Precinct Plan 1 – Road Network.	41.8
IX6.5 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 IX6.5 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 management devices;</i> <i>(iv) provide for overland flowpaths;</i> <i>(v) ensure that subdivision and development does not result in increased</i>	41.9

		<i>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>
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FORM 5

Submission on a notified proposal for Private Plan Change 49 – Drury East under Clause 6 of Schedule 1 Resource Management Act 1991

22 October 2020

Auckland Council
 Plans and Places
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 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 49 Drury East 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

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Table 1: NZ Transport Agency Submission on Auckland Unitary Plan (OIP) Plan Change 49 (Private) Drury East

Sub #	Provision Number	Reason for Submission	Relief Sought Base text is PC49 as notified New text <u>underline</u> Deleted text strikethrough	
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.	42.1
2	Whole Plan Change	The terms <i>active transport</i> and <i>public transport</i> are utilised within the National Policy Statement Urban Development 2020 (NPSUD). It is requested that references referring to <i>pedestrians and cyclists</i> is replaced with <i>active transport</i> . For clarity, where the individual term pedestrian or cyclist is used, these should remain.	Support with amendment. Relief sought: 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).	42.2
3	Whole of plan change	The proposed zoning pattern is generally supported and is consistent with the Drury-Opaheke Structure Plan. However, since that time, the NPSUD has come into effect and prescribes a zoning and density response to Metropolitan Centre zones and rapid transit stops.	Review the proposed zoning and associated provisions in light of the NPSUD requirements.	42.3
4	Whole of plan change	Waka Kotahi holds responsibility for the construction of the Mill Road Corridor (the Corridor) which will provide a safer, more reliable and accessible transport corridor to support residential and employment growth in south Auckland. The	Include provision for the Mill Road Corridor within the plan change. Waka Kotahi will work collaboratively with the applicant and Auckland Council on this outcome.	42.4

		<p>new 21.5km corridor, between Manukau and Drury will be a four-lane corridor with separated walking and cycling facilities and provide residents and provide more reliable public transport services.</p> <p>In order to provide efficient and coordinated land use and transport planning, the Corridor should be included in PC49 with consequential amendments. This coordination includes seeking to limit effects on sensitive activities in locations where noise and vibration levels result in negative health and amenity outcomes.</p>		
5	Precinct plan 2	Modifications to references to Access A are requested consequential to other parts of the submission.	Delete 'Access A' from Precinct Plan 2.	42.5
6	IX Precinct description	Subject to other submission points, the Precinct Description is generally supported as it proposes a transport network which is progressively upgraded over time to support development in the wider area.	Retain as notified.	42.6
7	IX Objectives	<p>Waka Kotahi proposes to introduce a suite including an objective, policies and methods which will seek to limit effects on sensitive activities in locations where noise and vibration levels result in negative health and amenity outcomes.</p> <p>Waka Kotahi also seeks a gradual reduction in exposure as existing activities are altered or relocated. This outcome aligns with Waka Kotahi's Toitū Te Taiao – Our Sustainability Action Plan which in turn implements the Government Policy Statement on Land Transport 2018/2019-2027/2028 and the enduring Transport Outcomes: A framework for shaping our transport system: Enabling New Zealanders to flourish Transport outcomes and mode neutrality, Ministry of Transport, June 2018.</p> <p>The introduction of provisions to provide human health and amenity protection within District Plans is one of a number</p>	<p>Inset new objective: <u>Protect sensitive activities from potential health and amenity effects that may arise from noise and vibration associated the operation of the transport network.</u></p>	42.7

		of methods employed by Waka Kotahi to achieve these outcomes.		
8	IX.2 Objective 1, 2 and 3	With a minor modification, the objectives are generally supported as they provide for active and public transport, appropriate infrastructure and the safe and efficient operation of the transport network. However, they should be expanded to include recognition of active (as well as public) transport.	Retain with amendment. (1) Drury East is a comprehensively developed residential environment that integrates with the Drury Centre Precinct and the natural environment, supports <u>active and public transport use</u> , and respects Mana Whenua values.	42.8, 42.9, 42.10
9	IX Policies	Refer to submission point 7 above.	Insert new provisions: Policy X <u>Locate and design new and altered buildings, and activities sensitive to noise to minimise potential effects of the transport network</u> Policy XX <u>Manage the location of sensitive activities (including subdivision) through set-backs, physical barriers and design controls.</u>	42.11 42.12
10	IX.3 Policies 1, 2, 3, 5 and 7.	The policies are supported as they enable a safe and connected transport network which accommodates all modes and its provision is timed to reflect development demand. Policy 7 needs to be amended to broaden the active transport to linkages to Drury Centre.	Retain with amendment. (7) Provide for the staging of pedestrian and cycling connections to the Drury Central train station <u>and Drury Centre</u> to encourage the use of public and active modes of transport.	42.13, 42.14, 42.15, 42.16, 42.17
11	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.	42.18
12	IX.4.1 (A5) and (A6)	The provisions are opposed for the following reasons. a. Monitoring the thresholds would be extremely difficult and it would be onerous to keep up to date and convey when and what threshold had been reached. 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).	Consequential amendments and deletions which respond to Waka Kotahi's submission in its entirety.	42.19

		<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>		
13	IX.5(2), (3) and (4) Notification	The provision is opposed as it precludes notification / affected persons approvals for activities within Table E11.4.1. Table E11.4.1 includes public and private roads (A1) and non-compliance with standards IX6.2 and 6.3 (transport upgrades and trip generation limits). Waka Kotahi opposes this provision as it would preclude its consideration as an affected party for activities which may affect the provision or operation of transport infrastructure.	<p>Opposed notified provision; relief sought:</p> <p>Either:</p> <p>Delete IX.5(3); or</p> <p>Modify IX.5(3) to ensure that Activity E11.4.1(A1) (new public or private roads) and infringements to standards IX6.2 and 6.3 (transport upgrades and trip generation limits) are subject to normal notification tests.</p>	42.20
14	IX.6(2) Standards	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.	42.21
15	IX.6.1 (3) Staging of Development with Transport Upgrades	Waka Kotahi seeks deletion of Access A from Precinct Plan 2 and all consequential amendments. IX.6.1 (3) needs to be deleted to reflect this.	Delete provision.	42.22
16	IX.6.1(4) Note	The purpose of the italicised Note is uncertain.	Delete provision.	42.23
17	Table IX.6.1.1 Threshold for Development	The provision is supported as it assists in managing effects on the transport network. Amend title to reflect deletion of Access A.	Retain with amendment.	42.24

			Table IX.6.1.1 Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 not constructed.	42.24
18	Table IX.6.1.1 Threshold for Development	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 ¹ , column headed <i>Revised (2020) Modelling – Infrastructure Upgrades Required</i> .	42.25
19	Table IX.6.1.2	Waka Kotahi seeks deletion of Access A from Precinct Plan 2 and all consequential amendments. Table IX.6.1.2 needs to be deleted to reflect this.	Delete Table IX.6.1.2 <i>Threshold for Development with 'Access A' as shown on IX.10.2 Drury East: Precinct Plan 2 constructed</i>	42.26
20	IX.6.2 Trip Generation Limit Including Table IX.6.2.1 and Table IX.6.2.2	<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> <ul style="list-style-type: none"> (a) a provision which ensures a Level of Service of no less than LOS E at the Great South Road/ Waihoehoe Road Intersection; and (b) provides a range of improvements which may be required to ensure LOS E. 	<p>Delete IX.6.2 Trip Generation Limit including Tables IX.6.2.1 and IX.6.2.2.</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 ie. comply (noting that all development requires consent so compliance could be considered as part of this process).</p> <p><u>IX.6.2 Transport Infrastructure</u></p>	42.27

¹ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

		The proposed range of transport network improvements would reflect those from Table 8.1 ² .	<p><u>Development and subdivision to comply with the following:</u></p> <p>(a) <u>Great South Road/ Waihoehoe Road Intersection Operation:</u></p> <p>(i) <u>Where the baseline intersection operation is at Level of Service E (LOS E) or better at the time of application, no subdivision or development shall generate traffic movements which result in:</u></p> <ol style="list-style-type: none"> 1) <u>a Level of Service of less than LOS E; or</u> 2) <u>have a degree of saturation higher than 95%.</u> <p>(ii) <u>Where the baseline intersection operation is at Level of Service F (LOS F) at the time of application, no subdivision or development shall generate traffic movements which results in:</u></p> <ol style="list-style-type: none"> 1) <u>degrees of saturation of more than the base line scenario, or</u> 2) <u>delays of more than 10% greater than the baseline scenario.</u> <p>Other relief would include additional provisions which outline transport upgrades to be considered (as listed in Table 8.1³). Waka Kotahi would like to work with the applicant on this proposal.</p>	42.27
21	IX.6.2.1 Table for Development with 'Access A' not constructed and	If the relief in point 18 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.	<p>Retain with amendment if submission point 18 not accepted:</p> <p>Provide more specificity as to the details of works required in the right hand columns of both Tables by including</p>	42.28

² Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

³ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

	IX.6.2.2 Table for Development with 'Access A' is constructed		upgrade details listed in Table 8.1 ⁴ , column headed <i>Revised (2020) Modelling – Infrastructure Upgrades Required.</i>	42.28
22	IX.6.2(3) Note	The purpose of the italicised <i>Note</i> IX.6.2(3) is uncertain.	Delete provision.	42.29
23	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> <u><i>(e) the outcome of engagement with the relevant road controlling authority,</i></u>	42.30
24	IX.8.1 Matters of discretion	Provide matter of discretion to effect to submission point 6	Insert activity controls as per attachment 1 below	42.31
25	IX.8.1 Matters of discretion (2)	The matters of discretion are supported and one further additional matters proposed to ensure that the relevant road controlling authority outcomes are considered.	Support with amendment. <i>Subdivision or development that does not comply with Standard IX.6.1 Staging of Development with Transport Upgrades but complies with Standard IX.6.2 Trip Generation Limit: Effects on the transport network consistent with the trips generated by development specified in Table IX.6.2.1 or Table IX.6.2.2;</i> <i>(b)...</i> <i>(c)...</i> <u><i>(d) the outcome of engagement with the relevant road controlling authority,</i></u>	42.32
26	IX.8.2(1) Assessment criteria	The assessment criteria are supported with additional matters proposed to ensure that the relevant road controlling authority outcomes are considered and to strengthen active transport provision.	Support with amendment. <i>(1) Development of public and private roads:</i> <i>Location of roads</i> <i>(a) ...</i>	42.33

⁴ Integrated Transport Assessment Drury Metropolitan Centre Prepared For Kiwi Property Group, March 2020, Stantec

			<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 an <u>integrated active transport</u> walkable street network. [...]</p> <p>(c) ...</p> <p>(d) ...</p> <p>Design of roads</p> <p>(a) ...</p> <p>(b) Whether the layout of the street network provides a good degree of accessibility and supports an <u>integrated active transport</u> walkable street network. [...]</p> <p>(c)(i) ...</p> <p><u>Road Controlling Authority</u></p> <p><u>(a) how the outcome of engagement with the relevant road controlling authority has been responded to.</u></p>	42.33
27	IX.8.2(2) Assessment criteria	The assessment criteria are supported with additional matters proposed to ensure that the relevant road controlling authority outcomes are considered and to strengthen active transport provision.	<p>Support with amendment:</p> <p>(2) Development or subdivision that does not comply with IX.6.1 Staging of Development with Transport Upgrades but complies with IX.6.2 Trip Generation Limit:</p> <p>(a)...</p> <p>(b) Whether increased use of public <u>and active</u> transport provides additional capacity within the transport network including by implementing travel demand management measures.</p> <p>(d)...</p> <p><u>(e) how the outcome of engagement with the relevant road controlling authority has been responded to.</u></p>	42.34
28	IX.8.2 Assessment Criteria	Insert new assessment criteria to give effect to submission point 6 above.	Insert assessment criteria as per attachment 1 below	42.35

29	IX.8.2.	Matter of discretion and assessment criteria	Insert matter of discretion and assessment criteria as per attachment 1 below.	42.35
30	IX.6 Standards (new standard)	Insert technical standard to provide for human health protection adjacent to state highways for the reasons outlined in submission point (6).	Insert activity controls as per attachment 1 below	42.36

Attachment 1:

Permitted Activity Rule IX.6

At any point within 100 metres from the edge of a state highway carriageway or the proposed Mil road corridor:

Outdoor road noise

1. Any noise sensitive space in a new building, or alteration to an existing building, that contains an activity sensitive to noise where:
 - a. External road noise levels are less than 57 dBL_{Aeq}(_{24h}) at all points 1.5 metres above ground level within the proposed notional boundary; or
 - b. there is a noise barrier at least 3 metres high which blocks the line-of-sight to the road surface from all points 1.5 metres above ground level within the proposed notional boundary.

Indoor road noise

2. Any noise sensitive space in a new building, or alteration to an existing building, that contains an activity sensitive to noise where the building or alteration is:
 - a. Designed, constructed and maintained to achieve indoor design noise levels resulting from the road not exceeding the maximum values in Table 1; or
 - b. At least 50 metres from the carriageway of any state highway and is designed so that a noise barrier entirely blocks line-of-sight from all parts of doors and windows, to the road surface.

Table 1

Occupancy/activity	Maximum road noise level $L_{Aeq}(24h)$
<i>Building type: Residential</i>	
Sleeping spaces	40 dB
All other habitable rooms	40 dB
<i>Building type: Education</i>	
Lecture rooms/theatres, music studios, assembly halls	35 dB
Teaching areas, conference rooms, drama studios, sleeping areas	40 dB
Libraries	45 dB
<i>Building type: Health</i>	
Overnight medical care, wards	40 dB
Clinics, consulting rooms, theatres, nurses' stations	45 dB
<i>Building type: Cultural</i>	
Places of worship, marae	35 dB

Mechanical ventilation

3. If windows must be closed to achieve the design noise levels in clause 2(a), the building is designed, constructed and maintained with a mechanical ventilation system that:
 - a. For habitable rooms for a residential activity, achieves the following requirements:
 - i. Provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and
 - 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
 - iii. provides relief for equivalent volumes of spill air; and
 - iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18CC and 25CC; and
 - v. does not generate more than 35 dB $L_{Aeq}(30s)$ when measured 1 metre away from any grille or diffuser.
 - b. For other spaces, is as determined by a suitably qualified and experienced person.

Indoor road vibration

4. Any noise sensitive space with a noise sensitive room in a new buildings or alterations to existing buildings containing an activity sensitive to noise, closer than 40 metres to the carriageway of a state highway, is designed constructed and maintained to achieve road vibration levels not exceeding 0.3mm/s $V_{w.95}$.

Design report

5. A report is submitted by a suitably qualified and experienced person to the council demonstrating compliance with clauses (1) to (4) above (as relevant) prior to the construction or alteration of any building containing an activity sensitive to noise. In the design:
- Road noise is based on measured or predicted noise levels plus 3 dB.

Restricted Discretionary Activity – Matters of Discretion IX.8.2

Discretion is restricted to:

- Location of the building;
- The effects of the non-compliance on the health and amenity of occupants;
- Topographical, ground conditions or building design features that will mitigate noise or vibration effects; and
- The outcome of any consultation with the NZ Transport Agency.

42.31

Restricted Discretionary Activity – Assessment Criteria IX.8.2

Discretion is restricted to:

- Whether the location of the building minimises effects;
- Alternative mitigation which manages the effects of the non-compliance on the health and amenity of occupants;
- Any identified topographical, ground conditions or building design features that will mitigate noise and vibration effects or; and
- The outcome of any consultation with the NZ Transport Agency.

42.35

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 49 (Drury East
Precinct), to the Auckland Unitary
Plan

**SUBMISSION OF KARAKA AND DRURY LIMITED ON
PRIVATE PLAN CHANGE 49 (DRURY EAST 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 49 Drury East Precinct ("PPC 49") to the partly operative Auckland Unitary Plan ("AUP").
2. Identical submissions have been lodged by KDL in respect of
 - (a) Private Plan Change 48 Drury Centre Precinct; and
 - (b) Private Plan Change 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 49 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 49 and could not gain an advantage in trade competition through this submission.

Context - KDL and MADE - the Auranga development in Drury West

6. KDL is a subsidiary of MADE Group Limited ("MADE") that has put in place the policy and planning framework that has (and will) enable the staged development of a

significant urban community, Auranga, in Drury West. The first two stages of the Auranga development have been authorised as follows:

- (a) Drury Precinct 1 (Auranga A) via PAUP Plan Variation 15 ("PV15"), which rezoned an area of approximately 84.6ha in Bremner Road, Drury, from Future Urban to a mix of Mixed Housing Suburban, Mixed Housing Urban, Terraced Housing and Apartment Building and Local Centre zones to facilitate residential development.
 - (b) Drury Precinct Expansion (Auranga B1) via AUP Plan Change 6 ("PC6"), which re-zoned approximately 83ha of land in Drury West to the immediate west of "Auranga A", known as Auranga B1, from Future Urban to a mix of Mixed Housing Suburban and Mixed Housing Urban to facilitate and support residential development on that land, including providing a precinct plan for the PC6 land within the Drury 1 Precinct.
7. Significant progress has already been made on the first two stages of the Auranga development. The roads have been formed, all other infrastructure is in place, houses have been built and people are living there.

Planning for Drury

8. Over the last five years, significant structure planning and master planning of the Drury West area has been undertaken to ensure that a vibrant, cohesive and compact urban outcome can be achieved for that area. As a result and in accordance with PV15 and PC6, the planning and development of Drury West has largely been completed and is actively underway.
9. Further, KDL has:
- (a) Participated extensively in the development of the Council's adopted Drury Opaheke Structure Plan ("DOSP"); and
 - (b) Worked with the PPC 48, 49 and 50 applicants as part of the Drury Developers Group to test and agree a shared masterplan for the wider Drury-Opaheke area (for both Drury East and Drury West).

Reasons for KDL submission

10. KDL seeks that PPC 49 is approved as notified. That is on the basis that as currently drafted, PPC 49:
- (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 49 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 49:
- (a) That PPC 49 be approved as notified. 43.1
 - (b) In particular, that no amendments be made to PPC 49 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 43.2
 - (ii) The timing in which those outcomes are delivered.
12. KDL wishes to be heard in support of its submission.
13. If others make a similar submission, KDL will consider presenting a joint case with them at any hearing.

KARAKA AND DRURY LIMITED by its solicitors
and duly authorised agents, Berry Simons



S J Berry

Date: 22 October 2020

Address for service:

Karaka and Drury Limited's address for service in respect of this submission is as follows:

Karaka and Drury Limited
C/- Berry Simons
PO Box 3144
Auckland 1140

T: (09) 909 7316
E: helen@berrysimons.co.nz

SUBMISSION ON PLAN CHANGE 49 – DRURY EAST 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 49 – Drury East Precinct, Drury South (“**PC49**”) 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 PC49 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 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’**), Residential Mixed Housing Suburban zone (**‘MHS’**) along with a small Business – Mixed Use zone (**‘MU’**) area. This is subject to Kāinga Ora’s relief being granted and matters raised in its submission being addressed.
14. Kāinga Ora generally 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 (**‘RPS’**).

44.1

15. 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 PC49 has taken place following the Drury-Opāheke Structure Plan 2019, and is therefore aligned with the sequence for urban land rezoning outlined within the Auckland Regional Policy Statement (as-assessed within the Planning Assessment supporting the PC49);
 - (b) The proposed Drury East Precinct's location, intensity and timing is consistent with the relevant objectives and policies of the National Policy Statement on Urban Development 2020 ('**NPS: UD**') because in particular:
 - (i) Urbanisation of land at this time is responsive to the need to ensure sufficient development capacity for the wider Auckland Region and to deliver housing supply (Objective 1, 6 and Policy 8);
 - (ii) The proposed Drury East Precinct enables buildings heights and intensity surrounding the proposed Metropolitan Centre Zone within the PC48 spatial extent, which is consistent with Policy 3 and would otherwise be strengthened through Kāinga Ora's submission to include a 22.5m Height Variation Control; and
 - (iii) The proposed Drury East Precinct 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 Drury East 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 East 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 Drury Centre Precinct close to the 2028 timeframe otherwise envisaged by the FULSS.
16. Kāinga Ora seeks a number of amendments to PC49 which are set out in further detail in this submission below, and in **Attachment 1** which Identifies the specific provisions of PC49 which Kāinga Ora either supports, seeks amendment to, or opposes. In particular, but without limiting the generality of the above:
17. Kāinga Ora considers Policy 3(c) of the National Policy Statement on Urban Development 2020 ('**NPS: UD**') to be of relevance to the intensity of land use proposed within PC49, in concert with the zonings concurrently-sought under PC48 and PC50. This policy encourages building heights of at least six storeys within a walkable catchment to existing and planned rapid transit stops. In relation to the planned establishment of the Drury East Rail Station, Kāinga Ora submit it is appropriate to apply a 22.5m Height Variation Control over the extent of the proposed THAB zone to better-provide for design flexibility in achieving six storey development in proximity to centres (refer **Attachment Three**).
18. Section 11.3.1.6 of the Section 32 Analysis notes that an Open Space – Informal Recreation zone is to be established to give-effect to the Drury-Opāheke Structure Plan 2019. However, Kāinga Ora observe that no such zoning is proposed under the precinct. Kāinga Ora submit that due to the intensity of the collective zonings proposed across PC48, 49 and 50, it is wholly-appropriate that a form of public open space is incorporated into the PC49 spatial extent, to support the Urban and Suburban environments sought to be established. If this is not practical at this time, Kāinga Ora is of the view that at the very least, a 'future neighbourhood park' should be identified on the Precinct Plans (including consequential amendments to the proposed provisions) to provide a directive as to the establishment of such a land use – as-identified on the Drury-Opāheke Structure Plan 2019 land use map. The notified precinct provisions, while making reference under Policy IX.3 (4) to the '*the location and design of publicly accessible open spaces*', does not sufficiently provide for or encourage/require publicly-accessible open space.

44.2

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19. Kāinga Ora opposes in part the Business – Mixed Use zone within the PC49 spatial extent. While Kāinga Ora supports the intention (as noted in the precinct description) to provide a centre for local day-to-day needs in a central location, the Business Mixed Use zone is not well-suited to achieve the stated purpose of a Business zoning in the proposed location. In particular:

44.1

- (a) The Business – Mixed Use zone provides for a range of commercial and residential land use activities, but does not prescribe any particular mix or location of residential and commercial activities to ensure that the planned ‘centre’ and supporting commercial activities are achieved;
- (b) As the MU zone enables ‘dwellings’ as a permitted activity, there is the potential for future development to establish largely-residential development and not sufficiently-cater to ‘day-to-day’ needs;
- (c) The precinct provisions do not contain standards or criteria (in addition to those within H13 Business – Mixed Use Zone of the AUP(OP)) to ensure that the planned outcome of providing for the ‘day-to-day’ needs of local residents;
- (d) 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 adjacent to lower-intensity zones.

20. Kāinga Ora seeks the establishment of a Business – Neighbourhood Centre Zone (**‘NCZ’**) rather than the Business – Mixed Use Zone as-notified (refer **Attachment Two**). In particular it is noted that:

44.1

- (a) The NCZ is better-aligned with the stated purpose of providing a Business zoning within the PC49 spatial extent;
- (b) New development within the zone requires assessment in order to ensure that it is designed to a high standard which enhances the quality of streets within the area and public open spaces;
- (c) The NCZ applies to single corner stores or small shopping strips located in residential neighbourhoods. They provide residents and passers-by with frequent retail and commercial service needs, while discouraging dwellings at the ground floor (H12.3(6) and 10)) while ensuring a measure of commercial activity is provided in accordance with the planned outcomes for the precinct;

- (d) Consistent with the submissions within Attachment One on the location of the collector road identified in Precinct Plan 1; the a NCZ 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;
 - (e) The policies that apply to the NCZ zone (H12.3(15)) also seek to discourage large scale commercial activities, which Kāinga Ora view as important within the wider context of the Metropolitan Centre sought to be established through PC48.
21. Kāinga Ora notes that the Plan Change documentation has identified the need to various healthcare and educational facilities to service the level of development sought to be enabled across the combined extent of PC48, 49 and 50. Kāinga Ora is of the view that 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.

Relief Sought

22. Kāinga Ora seeks the following decision from Auckland Council on PC49:
- (a) That PC49 be approved subject to the proposed zonings and provisions of the Proposed Drury East Precinct being deleted or amended, to address the matters raised in this submission and its attachments so as to provide for the sustainable management of the Region's natural and physical resources and thereby achieve the purpose of the Act.
 - (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.
23. In the absence of the relief sought, PC49:

- (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 achieve a centre for local day-to-day needs in a central location;
 - (d) Will not sufficiently provide for six-storey residential development in proximity to centres and rapid transit, consistent with policy 3(c) of the National Policy Statement on Urban Development 2020 ('NPS: UD'); and
 - (e) will in those circumstances impact significantly and adversely on the ability of people and communities to provide for their social, economic and cultural wellbeing.
24. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.
25. Kāinga Ora wishes to be heard in support of this submission.
26. 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:

Campbell Brown Planning Ltd

PO Box 147001

Auckland

Attention: Michael Campbell

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Kāinga Ora – Homes and Communities

PO Box 74598

Greenlane, Auckland

Email:

developmentplanning@kaingaora.govt.nz

Attachment 1

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
	<i>Note: Kāinga Ora's submission relates to PC 49 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 East Precinct	Support in part	The proposed residential zonings are generally aligned with the zoning indicated on the Drury-Opāheke Structure Plan 2019, and will promote and enable a compact urban form with an efficiency of land use and residential development in proximity to the proposed Metropolitan Centre to the west.	Approve the plan change, subject to amending the proposed Business – Mixed Use zone to Business – Neighbourhood Centre Zone.
2.		Oppose in part	Consistent with its primary submission Kāinga Ora opposes the proposed Business – Mixed Use Zone. While Kāinga Ora supports the intention (as noted in the precinct description) to provide a centre for local day-to-day needs in a central location, the Business Mixed Use zone is not well-suited to achieve the stated purpose of a Business zoning in the proposed location.	Approve the plan change, subject to amending the proposed Business – Mixed Use zone to Business – Neighbourhood Centre Zone.
3.	Drury East Precinct Plans	Support in part	<p>Kāinga Ora considers Policy 3(c) of the National Policy Statement on Urban Development 2020 ('NPS: UD') to be of relevance to the intensity of land use proposed within PC49, in concert with the zonings concurrently-sought under PC48 and PC50. This policy encourages building heights of at least six storeys within a walkable catchment to existing and planned rapid transit stops.</p> <p>In relation to the planned establishment of the Drury East Rail Station, Kāinga Ora submit it is appropriate to investigate the application of a 22.5m Height Variation Control over the extent of the proposed THAB zone within a walkable catchment to the planned station, to better-provide for design flexibility in achieving six storey development in proximity to centres.</p>	<p>Approve the plan change subject to:</p> <ul style="list-style-type: none"> • application of a 22.5m Height Variation Control across the proposed THAB zone; • identification of future open space / park (or alternatively Open Space – Informal Recreation zoning); • Amendment of precinct plans to reflect overall submission.

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	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought	
			Consistent with its primary submission, due to the intensity of the collective zonings proposed across PC48, 49 and 50, it is wholly-appropriate that a form of public open space is incorporated into the PC49 spatial extent, to support the Urban and Suburban environments sought to be established. If this is not practical at this time, Kāinga Ora is of the view that at the very least, a 'future neighbourhood park' should be identified on the Precinct Plans to provide a directive as to the establishment of such a land use – as-identified on the Drury-Opāheke Structure Plan 2019 land use map. The notified precinct provisions, while making reference under Policy IX.3 (4) to the 'the location and design of publicly accessible open spaces', does not sufficiently encourage/require publicly-accessible open space.		44.2
4.	IX.1 Drury East Precinct Description	Support in part	Kāinga Ora generally supports the description of the precinct	Retain Drury East Precinct description subject to consequential amendments to reflect Kāinga Ora's submission.	44.3
5.	IX.2 Objective (1)	Support in part	<p>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.</p> <p>It is also unclear whether, by implication, a Cultural Values Assessment ('CVA') would be required for all resource consent applications within the precinct to understand what those particular values are within the context of a development or the wider precinct.</p> <p>Kāinga Ora suggest that those values may be better-incorporated into the precinct provisions themselves to avoid administrative ambiguity. If this has been undertaken though the setting o</p>	Retain Objective (1) subject to clarification and amendment.	44.4

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought	
			reduced impervious coverage standards (IX.6.5) and stormwater quality requirements (IX.6.6) then policies should be included to specifically reflect these as giving effect to Objectives IX.2 (1).		44.4
6.	IX.2 Objective (4)	Support	Kāinga Ora supports the proposed objective which is aligned with the National Policy Statement on Fresh Water Management.	Retain Objective (4) as notified.	44.5
7.	IX.3 Policy (1)	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, associated identification of the Collector Road within Precinct Plan 1 – Road Network, identified as ‘New <i>indicative</i> collector road’ (emphasis added), and associated activities and development standards which allow for an alternative location.</p> <p>The proposed Business – Mixed Use zone centre (sought in this submission to be changed to Business – Neighbourhood Centre Zone) relies upon frontage and proximity to this Collector Road in order to ensure exposure to ‘passers-by’ to provide convenience-type retail to support the surrounding residential land. The policy (and associated provisions) as-notified do not ensure that, where an alternative collector road location is to be investigated, it does not compromise the planned amenity and vitality that the Mixed Use / Neighbourhood Centre seeks to achieve through an alternative location that is not integrated with that zoning.</p> <p>The policy should be reworded as follows:</p> <p><i>“Require the east to west collector road to be generally in the location shown in IX.10.1 Drury East: Precinct Plan 1 while allowing for variation, where it would achieve a highly connected street layout that integrates with the surrounding transport network and planned neighbourhood centre”.</i></p>	Retain Policy (1) with amendment.	44.6

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
8.	IX.3 Policy (5), (6) and (7);	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.6.1 (4) and IX.6.2 (3) as “...not included in the development thresholds...” have influenced the setting of the development thresholds proposed, and whether the thresholds have assumed those upgrades have taken place. 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>	Retain Policies (5), (6) and (7) subject to Clarification and / or amendment to account for public infrastructure upgrades.
	IX.6.1 Staging of Development with Transport Upgrades	Support in part	<p>Kāinga Ora supports in part the need to manage the actual and potential effects that residential development may generate on the transportation network, where necessary upgrades to support such development may not have occurred.</p> <p>However, Kāinga Ora questions the extent to which the various publicly-funded infrastructure works (noted under IX.6.1 (4) and IX.6.2 (3) as “...not included in the development thresholds...” have influenced the setting of the development thresholds proposed, and whether the thresholds have assumed those upgrades have taken place. 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>	Retain IX.6.1 subject to clarifying and / or amending provisions and thresholds to account for public infrastructure upgrades.
	IX.6.2 Trip Generation Limit	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.	Retain IX.6.2 subject to clarifying and / or amending provisions and thresholds to account for public infrastructure upgrades.

44.7

44.8

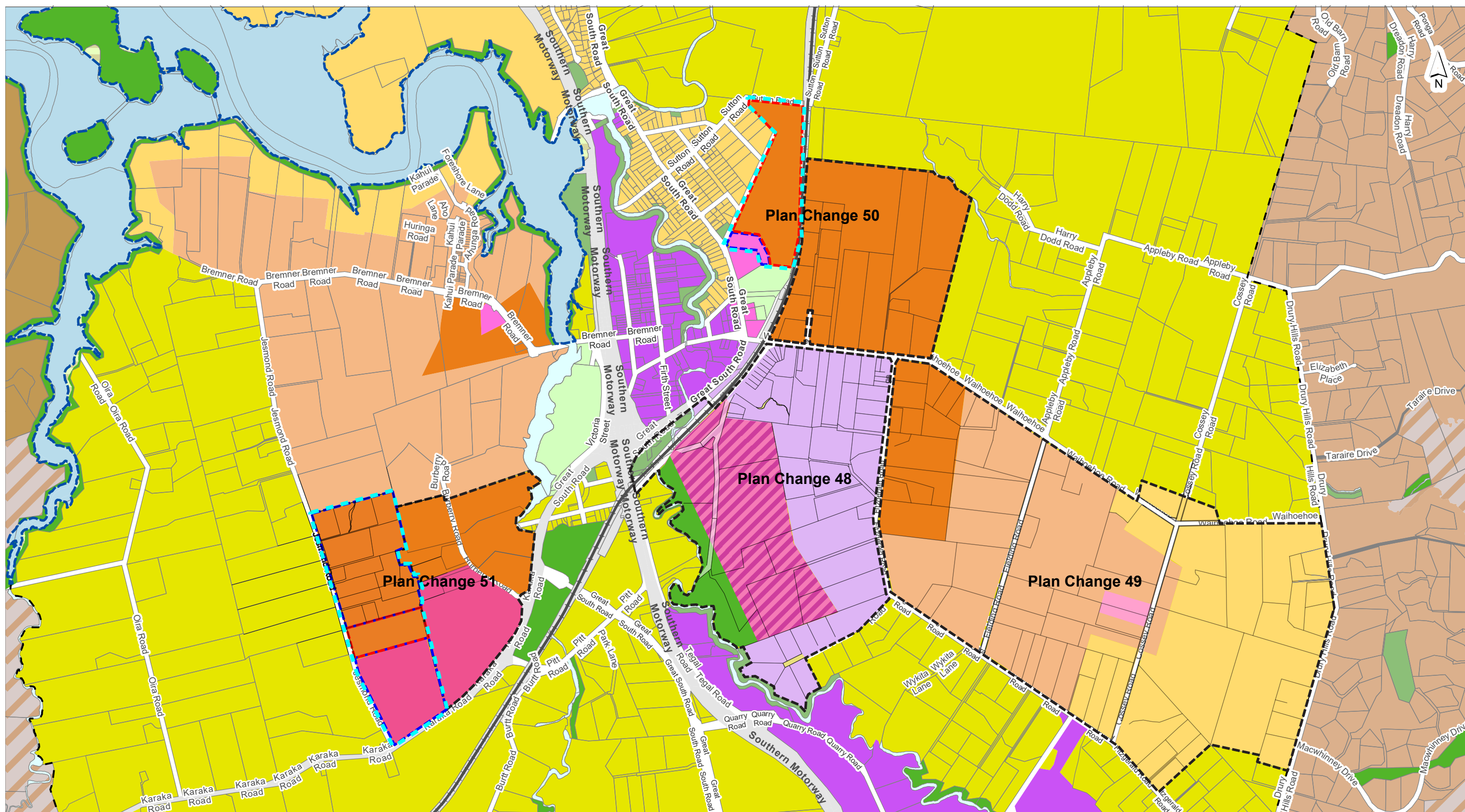
44.9

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
			<p>However, Kāinga Ora questions the extent to which the various publicly-funded infrastructure works (noted under IX.6.1 (4) and IX.6.2 (3) as “...not included in the development thresholds...”)</p> <p>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>	
	IX.8.2 (1) (a) Assessment Criteria	Support in part	<p>Consistent with its submission on IX.3 (1), 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, associated identification of the Collector Road within Precinct Plan 1 – Road Network, identified as ‘New <i>indicative</i> collector road’ (emphasis added), and associated activities and development standards / criteria which allow for an alternative location.</p> <p>The proposed Business – Mixed Use zone centre (sought in this submission to be changed to Business – Neighbourhood Centre Zone) relies upon frontage and proximity to this Collector Road in order to ensure exposure to ‘passers-by’ to provide convenience-type retail to support the surrounding residential land. The policy (and associated provisions) as-notified do not ensure that, where an alternative collector road location is to be investigated, it does not compromise the planned amenity and vitality that the Mixed Use / Neighbourhood Centre seeks to achieve through an alternative location that is not integrated with that zoning.</p> <p>The criterion should be reworded as follows:</p>	Retain IX.8.2 (1)(a) with amendment.

44.9

44.10

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
			<p><i>Whether the east to west collector road is provided generally in the location shown on IX.10.1 Drury East: Precinct Plan 1 to achieve a highly connected street layout that integrates with the surrounding transport network <u>and planned neighbourhood centre</u>. 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></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 layout integrates with and provide frontage to the planned neighbourhood centre.</u></i> 	



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Proposed Rezoning Map Plan Change 50 and 51

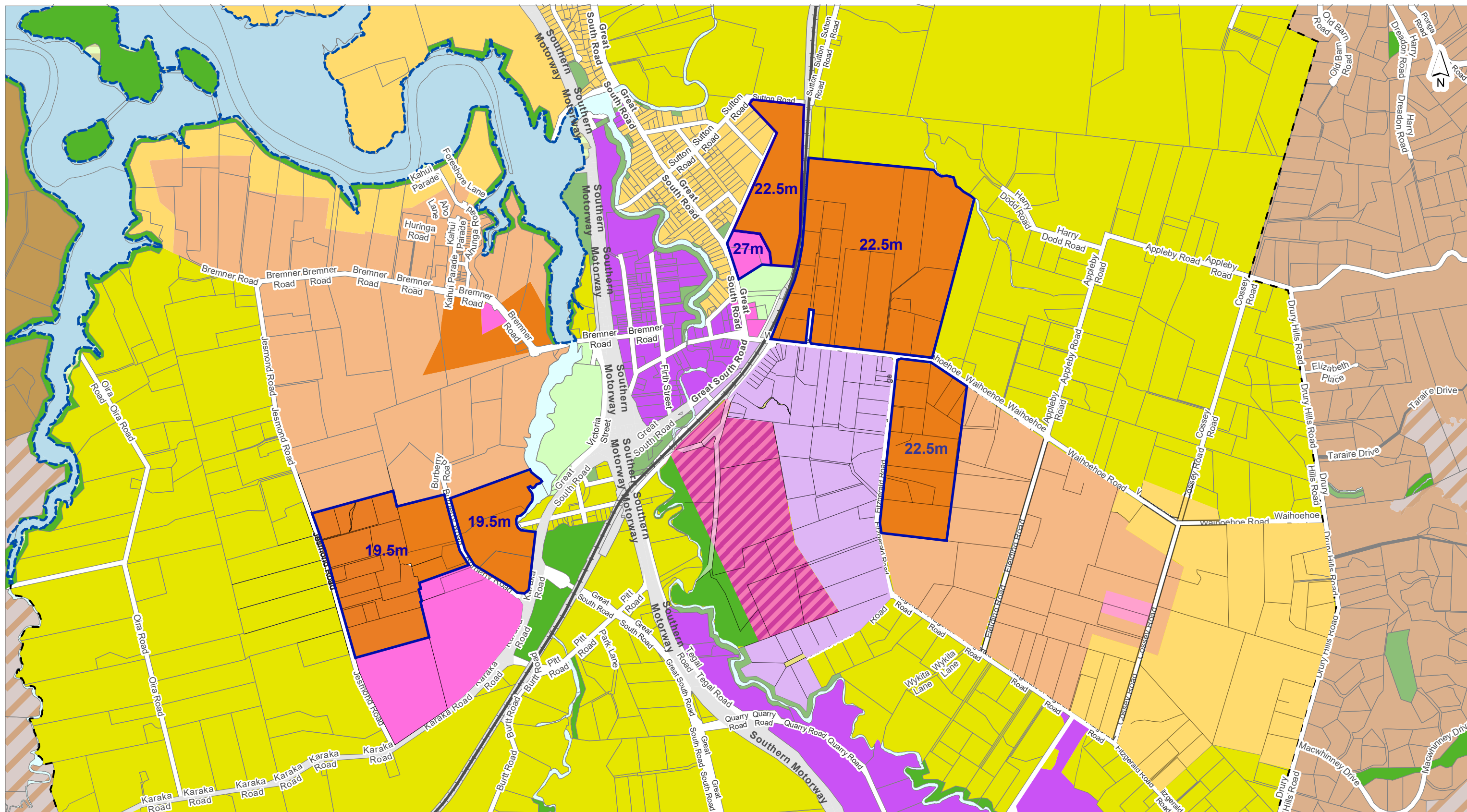
0 150 300 450
Meters

Scale @ A3
= 1:15,000

Date Printed:
29/09/2020

Legend

- Metropolitan Centre Zone
- Town Centre Zone
- Mixed Use Zone
- Terraced Housing and Apartment Building Zone
- Mixed Housing Urban Zone
- Mixed Housing Suburban Zone
- Local Centre Zone
- Neighbourhood Centre Zone
- Open Space Zone
- Notified Plan Change areas
- Proposed Zoning inclusion
- Kāinga Ora sites
- Adjacent sites



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Proposed Rezoning Map Height Variation Control

0 150 300 450
Meters

Scale @ A3
= 1:15,000

Date Printed:
29/09/2020

Legend

- Metropolitan Centre Zone
- Mixed Use Zone
- Terraced Housing and Apartment Building Zone
- Mixed Housing Urban Zone
- Mixed Housing Suburban Zone

- Local Centre Zone
- Neighbourhood Centre Zone
- Open Space Zone
- 19.5m Height Variation Control

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Plan Change 49 (Private): Drury East 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 Fulton Hogan Land Development Limited to the Auckland Unitary Plan (Operative in Part) that was publicly notified on 27 August 2020 ("**Plan Change**").

The applicant proposes to rezone 184 hectares of Future Urban zoned land in the area generally bounded by Waihoehoe Road, Drury Hills Road and Fitzgerald Road, to 2 hectares of Business: Mixed Use zone, 22 hectares of Residential: Terrace Housing and Apartment Buildings zoning, 65 hectares of Residential: Mixed Housing Urban zoning and 95 hectares of Residential: Mixed Housing Suburban zoned land ("**Plan Change Area**"). The Plan Change also introduces the Drury East Precinct to the Auckland Unitary Plan (Operative in Part).

Watercare neither supports nor opposes the Plan Change.

The purpose of this submission is to address the technical feasibility of the proposed water and wastewater servicing arrangement to ensure that the effects on Watercare's existing and planned water and wastewater network are appropriately considered and managed in accordance with the Resource Management Act 1991.

2.2. Specific parts of the Plan Change

The specific parts of the Plan Change that this submission relates to are:

- (a) the proposed water and wastewater servicing arrangement; and
- (b) the effects of the Plan Change on Watercare's existing and planned water and wastewater network.

Watercare has reviewed the Plan Change and considers that:

- (a) the proposed water and wastewater capacity and servicing requirements have been adequately assessed as part of the Plan Change;

¹ Local Government (Auckland Council) Act 2009, s58.

- (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 applicant has entered into a commercial agreement with Watercare to support the construction of a Second Watermain from the bulk water supply point to supply water to the Plan Change Area. This agreement provides water supply capacity to the applicant for 1,500 Dwelling Unit Equivalents ("DUEs").

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 DUEs. This project is due for completion in March 2021.

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

Watercare is currently constructing wastewater infrastructure to service the Plan Change Area. As set out above, this will provide initial capacity for the Plan Change Area for up to 1,500 DUEs.

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.

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 East Precinct provisions:

(a) Amend Policy 6 as follows:

(6) Ensure that development in Drury East Precinct is coordinated with, and does not precede, supporting stormwater, wastewater and water supply infrastructure, having particular regard to the capacity of the Fitzgerald culvert and culverts under Great South Road.

45.1

(b) Include new Policy 6A as follows:

(6A) 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.

45.2

(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

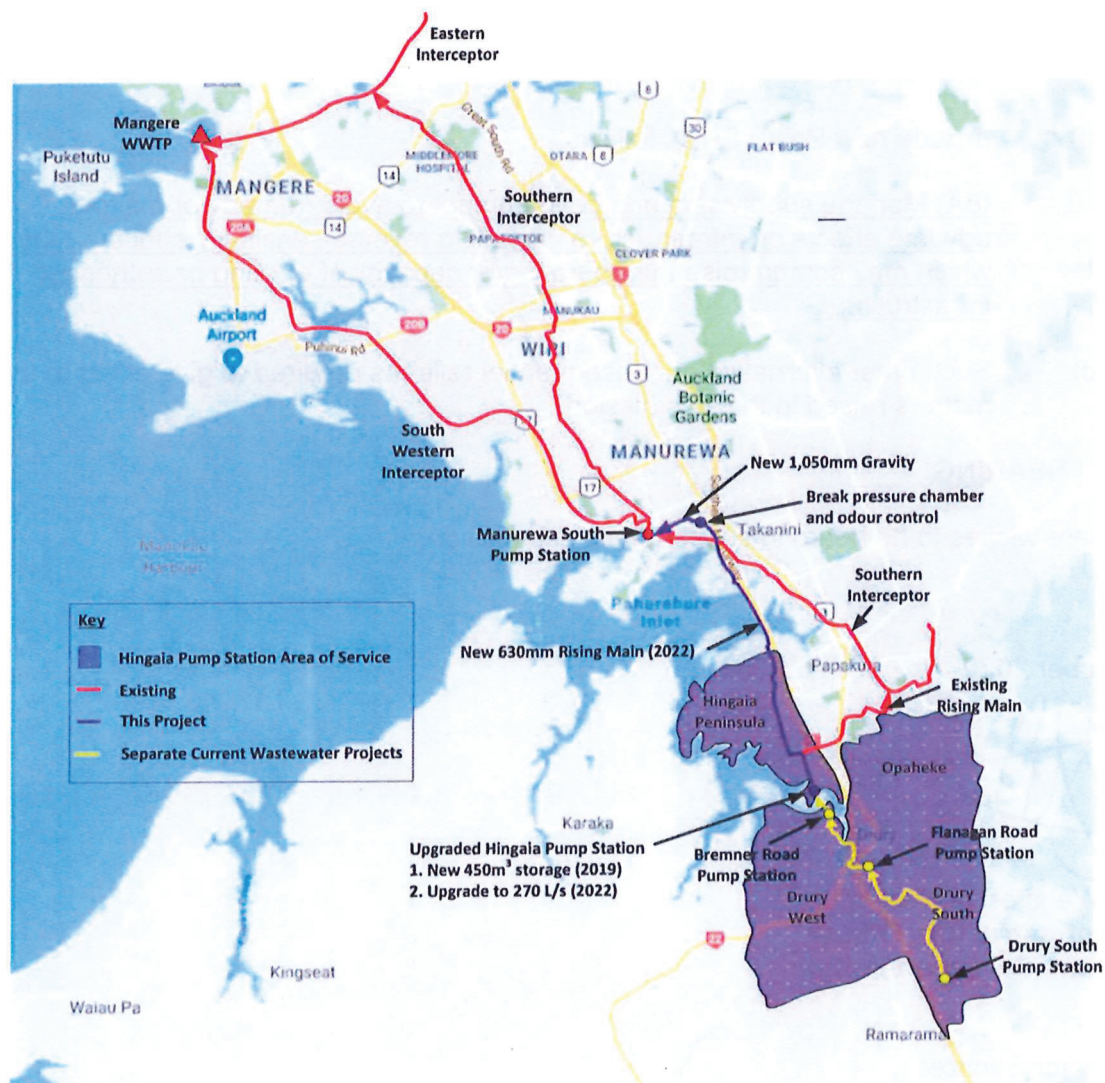


Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Address for Service:
Ilze Gotelli
Head of Major Developments
Watercare Services Limited
Private Bag 92 521
Wellesley Street
Auckland 1141
Phone: 021 831 470
Email: ilze.gotelli@water.co.nz

Appendix A

Figure 1: The Hingaia Wastewater Pump Station Upgrade Project.





SUBMISSION ON PLAN CHANGE 49 (PRIVATE): DRURY EAST PRECINCT

To: Auckland Council

Name of Submitter: Ngāti Tamaoho (the **Submitter**)

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 49: Drury East Precinct (**PPC49**) by Fulton Hogan Land Development Ltd (**applicant**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. PPC49 seeks to rezone 184 hectares of land in Drury East from Future Urban zone to a mixture of Business: Mixed Use zone, Residential: Terrace Housing and Apartment Buildings zone, Residential: Mixed Housing Urban zone and Residential: Mixed Housing Suburban zone. PPC49 provides capacity for at least 2,800 dwellings.
3. PPC49 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 PPC49.
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** PPC49 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 PPC49, and that adverse environmental, social and cultural effects are avoided, remedied or mitigated.
8. Ngāti Tamaoho prepared a Cultural Values Assessment 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 PPC49 is upheld, acknowledged and respected and that its 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 have responsibility (along with other iwi holding Mana Whenua) 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 PPC49 will result in adverse environmental and cultural effects, as it is currently proposed by the applicant. Specifically:
- (a) Wai (Water): PPC49 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. 46.6
46.7
46.8
48.9
 - (b) Sustainable Management: The Submitter considers that PPC49 should in some, if not most ways, be self-reliant and self-sustainable. Sustainable management has not been adequately given effect to in PPC49. 46.12

- | | | |
|-----|---|-------|
| (c) | Native Trees and Plants: The Submitter supports whakapapa sourced trees and plants within the PPC49 site. | 46.10 |
| (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 PPC49. | 46.3 |
| (e) | Landscapes: The Submitter seeks that PPC49 identifies and preserves landscapes, including view shafts, hilltops, tuff rings and ridge lines. | 46.5 |

RELIEF

12. The Submitter requests a decision on PPC49 that confirms, at a minimum, the following:
- | | | |
|-----|---|-------|
| (a) | Ongoing participation, consultation and engagement in the project; | 46.1 |
| (b) | Acknowledgement within the project design of the history of Mana Whenua in the PPC49 area; | 46.2 |
| (c) | Te Aranga Principles incorporated in design concepts; | 46.3 |
| (d) | Iwi monitoring; | 46.4 |
| (e) | Natural and cultural landscaping accounted for in the project design; | 46.5 |
| (f) | A minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways; | 46.6 |
| (g) | A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway; | 46.7 |
| (h) | Roof capture for reuse and groundwater recharge; | 46.8 |
| (i) | Park edge design adjacent to all waterways; | 46.9 |
| (j) | Native trees and plants only within the precinct; | 46.10 |
| (k) | Ridgelines hilltops and wetlands protected; | 46.11 |
| (l) | Sustainable development reflected in the design and outcomes | 46.12 |
13. The Submitter seeks the following decision from Auckland Council:
- | | |
|-----|---|
| (a) | <u>Reject</u> PPC49 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.

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

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



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

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

For office use only

Submission No:

Receipt Date:

22 OCT 2020

received at Epsom library
22/10 at 3:30pm

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms (Full Name)

TIM JOHN MACWHINNEY

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

FOR KILKEEL HOLDINGS LTD.

Address for service of Submitter

13 A WAPITI AVE EPSOM AUCKLAND

Telephone:

027,5225116

Fax/Email:

a.t.macwhinney@gmail.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC-51 (Private) P.C. 49

Plan Change/Variation Name

Drury 2 Precinct DRURY EAST.

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 49

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: REFER TO TYPED SUBMISSION
ATTACHED

(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

20/10/20

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.

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.

I oppose the specific provisions involving plan change 49 for the following reasons where they impact on properties owned by my company Kilkeel Holdings LTD (T J MacWhinney).

These properties include:

2 Drury Hills Road

83 Drury Hills Road

93 Drury Hills Road

111 Drury Hills Road

And various other properties on MacWhinney Drive.

1. That this plan change should not take place until the major arterial route called the Mills Road Drury South has been finalised.

47.1

2. The Drury East Precinct Plan change proposal is bounded by significant borders in the form of Waihoehoe Road, Drury Hills Road and Fitzgerald Road. However an area in the south east of this precinct is not included in the plan change 49 in which Kilkeel Holdings owns a property at 2 Drury Hills Road. This would prevent a comprehensive and integrated plan covering the whole Drury East Precinct particularly as regards infrastructure such as roading, sewage, water and electric power. Should this area not be rezoned at the same time it could be degraded by lack of investment in the land and this could have a detrimental impact on the proposed surrounding residential areas.

47.2

3. I was born in Drury in 1955 and spent most of my life farming on Drury Hills Road and in later years MacWhinney Drive. The southern end of Drury Hills Road (between MacWhinney Drive and Waihoehoe Road) is unsuitable for the present traffic flow particularly where it rises up a hill and curves to the west. I have personally been involved in two road accidents at this location. If the Mill Road - Drury route way is located along the Cossey Road alignment it would provide the Council and Transport NZ and Auckland Transport to consult with Fulton Hogan to provide a direct route way from Cossey Road - Waihoehoe Road intersection to meet with Drury Hills to the north of 152 Drury Hills Road. There are 72 (51 built on) countryside living lots on MacWhinney Drive and its various lanes which as well as 14 other lots to the north of MacWhinney Drive house over 200 people approximately. The provision of a road directly linking Waihoehoe Road - Cossey Road intersection should be an integral part of the rezoning of Drury East Precinct. Should the Mills Road - Drury south road route be moved to the east to parallel Drury Hills Road some other direct link would need to be provided for safety and optimum traffic flow.

47.3

Significant trees at 28 Waihoehoe Rd.



Proposed road link between Waihoehoe Rd & Drury Hills Rd

Submission Process: Area left out of plan change

The four private plan change requests are to be publicly notified for submissions.

While three of the private plan change requests are contiguous, they have all been lodged as four separate private plan change requests. Therefore, if you wish to submit on one or more of the requests you **must lodge separate submissions for each private plan change request or on any part of the request that you wish to comment on.**

Clearly identify the private plan change request and any parts you are submitting on by reference to the private plan change number and its precinct name.

Submissions close on 22 October 2020, being 40 working days following notification. This is double the normal submission period in recognition of the large amount of information that has been provided by the requestors. The four private plan change requests will be notified at the same time as one other private plan change request for the Drury area. The other private plan change request is:

Plan Change (Private) 52: 520 Great South Road Limited

Further details on how to make a submission are set out in the attached copy of the public notice; a summarised version of this public notice for each private plan change request will appear in the New Zealand Herald and Franklin County News on **27 August 2020** and in the Papakura Courier on **26 August 2020**.

Find out more about these Private Plan Change requests:

The Resource Management Act provides the opportunity for private plan change requests to be made to the Council to amend the Auckland Unitary Plan (Operative in Part). The private plan change requests seek to set in place a framework of zoning, standards and assessment criteria that will enable development of the land within the subject areas, while managing adverse effects on the environment. If approved, subdivision and development can proceed in context of the framework and may involve subsequent resource consent applications.