



# **Fulton Hogan**

LAND DEVELOPMENT LTD.

## **S32 ASSESSMENT REPORT DRURY EAST PRIVATE PLAN CHANGE REQUEST**

MAY 2020

# **B&A**

Urban & Environmental

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## 1.0 THE APPLICANT AND PROPERTY DETAILS

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<b>To:</b>	Auckland Council
<b>Site Address:</b>	Fitzgerald Road, Drury Hills Road and Waihoehoe Road, Drury
<b>Applicant's Name:</b>	Fulton Hogan Land Development
<b>Address for Service:</b>	Barker & Associates Ltd PO Box 1986 Shortland Street Auckland 1140 Attention: Nick Roberts/Rachel Morgan
<b>Legal Description:</b>	Refer to list of properties within <b>Appendix 2</b>
<b>Site Area:</b>	184 hectares
<b>AUP Zoning:</b>	Future Urban Zone
<b>Locality Diagram:</b>	Refer to <b>Figure 1</b>
<b>Brief Description of Proposal:</b>	Private Plan Change request to rezone 184 hectares of land in Drury from Future Urban zone to a mix of Residential – Terrace Housing and Apartment Building zone, Residential–Mixed Housing Urban, Residential–Mixed Housing Suburban and Business–Mixed Use zones.

## 2.0 EXECUTIVE SUMMARY

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Fulton Hogan Land Development (**FHLD**) is applying for a Plan Change to the Auckland Unitary Plan – Operative in Part to rezone 184 hectares of Future Urban land in Drury East to a mix of residential zones (Terrace Housing and Apartment Building, Mixed Housing Urban and Mixed Housing Suburban) serviced by a limited area of business zoning (Mixed Use), consistent with the Council’s Drury-Opāheke Structure Plan. The rezoning proposal provides capacity for at least 2,800 dwellings.

The Plan Change also includes a precinct which details the indicative collector road which provides access east to west and links to the wider road network, and ensures that development capacity is staged with the release of infrastructure.

The Future Urban Land Supply Strategy 2017 (FULSS) states that the Plan Change area will be ‘development ready’ in 2028-2032, which the Drury-Opāheke Structure Plan also applies to the site. The FULSS is a non-statutory document and is a high-level staging plan for Auckland’s future urban areas. The Council’s Structure Plan for Drury-Opāheke does not provide any analysis of the FULSS staging. Despite this, the more detailed analysis undertaken as part of this proposal supports the early release of Drury East for development. The reasons for this are summarised as follows:

- Rezoning land in Drury East now will enable the primary centre and supporting residential area to be developed first and provide the amenities and transport solutions necessary to support balanced urbanisation. This Plan Change together with those for Kiwi Property Limited and Oyster Capital will connect the key employment areas in Drury South and Drury Village and will integrate with development in Drury West.
- In terms of effects on residential land supply and demand in existing urban areas, enabling Drury East to be rezoned now based on the Drury East developer’s proposed staging will mean that there is no net increase in dwelling capacity in the first 20 years, compared with the current FULSS.
- FHLD and the other entities seeking Plan Changes in Drury East (Kiwi Property & Oyster Capital) have an established track record in commercial and residential development and are uniquely placed to deliver a significant volume of housing and jobs in Drury at pace and to a high standard.
- When viewed strategically in the context of future urban growth in the southern sector, rezoning Drury East is preferable to rezoning land in Pukekohe now, given that much of the land in Pukekohe is highly constrained, is on high quality soils with well-established horticultural activities, and is located further away from urban Auckland.

- We understand that the Council's primary concern with rezoning land in Drury East is that there is uncertainty of funding for required transport upgrades. To these matters we make the following comments:
  - The Government has recently announced funding for the key transport updates required to support development in Drury as part of its NZ Upgrade Programme. The New Zealand Transport Agency (NZTA) has confirmed the funding and timing for these projects<sup>1</sup> as follows:
    - Mill Road Corridor - \$1.354 billion in funding and opening in stages from 2025/2026;
    - SH1 Papakura to Drury South improvements, including the Drury interchange - \$423 million and complete late-2025;
    - Papakura to Pukekohe electrification - \$371 million with construction starting late-2020;
    - Drury East and Drury West rail stations, park and ride and bus & rail interchange facilities - \$247 million with construction starting 2023.
  - The technical analysis undertaken in support of this Plan Change, in particular the Integrated Transport Assessment, demonstrates that the land can be developed with targeted upgrades in place.
  - Rules are included within the Plan Change to coordinate the release of development capacity within the Plan Change area with the delivery of required transport infrastructure. This allows much needed residential capacity to be available in the short to medium term. It also allows for consenting and development for preliminary works to proceed without creating any additional demand on infrastructure.
  - The developers volunteered as part of the Plan Change a funding agreement between themselves, the Council and other relevant parties to manage traffic upgrades required and the developers have already reached agreement with Watercare around network upgrades required to be installed and these works have physically commenced.

For these reasons, and in the context of the staging criteria set out in Appendix 1 of the FULSS and Appendix 1 of the Regional Policy Statement (**RPS**), the proposal is consistent with sound resource management practice and Part 5 of the Resource Management Act (**RMA**). Therefore, the Council can accept the Plan Change for processing.

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<sup>1</sup> <https://www.nzta.govt.nz/assets/Roads-and-Rail/20-011/NZ-Upgrade-Programme-Transport.pdf>

Further, the Plan Change responds to the specific characteristics of the Plan Change area, with reference to the future of the wider Drury area, and gives effect to the relevant planning documents for the following reasons:

- 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;
- 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 has been applied 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;
- The Mixed Use centre will provide opportunities for accessible convenience retail for future residents;
- The adverse effects of urban development on the natural environment, including the Hingaia Stream and its tributaries can be effectively managed and key natural features within the Plan Change area will be maintained and enhanced;
- 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
- The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

The proposed land uses have been assessed to be the most optimal to achieve the objectives of the Unitary Plan, and the purpose of the RMA, in this location. The area subject to this Plan Change has been identified in Council's Drury-Opāheke Structure Plan as the location for future residential use with a convenience centre. The detailed site and context analysis completed as part of this Plan Change demonstrates that the proposed use will be an efficient and effective method for achieving the sustainable management purpose of the RMA and the Regional Policy Statement, as the release of development capacity can be staged as transport upgrades are implemented to serve the Plan Change area.



## 3.0 INTRODUCTION

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### 3.1 BACKGROUND

#### 3.1.1 The Applicant

Fulton Hogan Land Development (**FHLD**) 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.

FHLD seeks to rezone 184 hectares of land in Drury East which makes up the Plan Change area. FHLD envisages that the Plan Change will provide quality, compact neighbourhoods adjacent to business-zoned land to the east and south of the Plan Change area. The proposed zoning pattern will encourage a range of housing choice with the more intensive housing development to the east of the Plan Change area in closer proximity to the proposed Drury train station and Drury Centre.

## 4.0 SITE LOCATION AND DESCRIPTION

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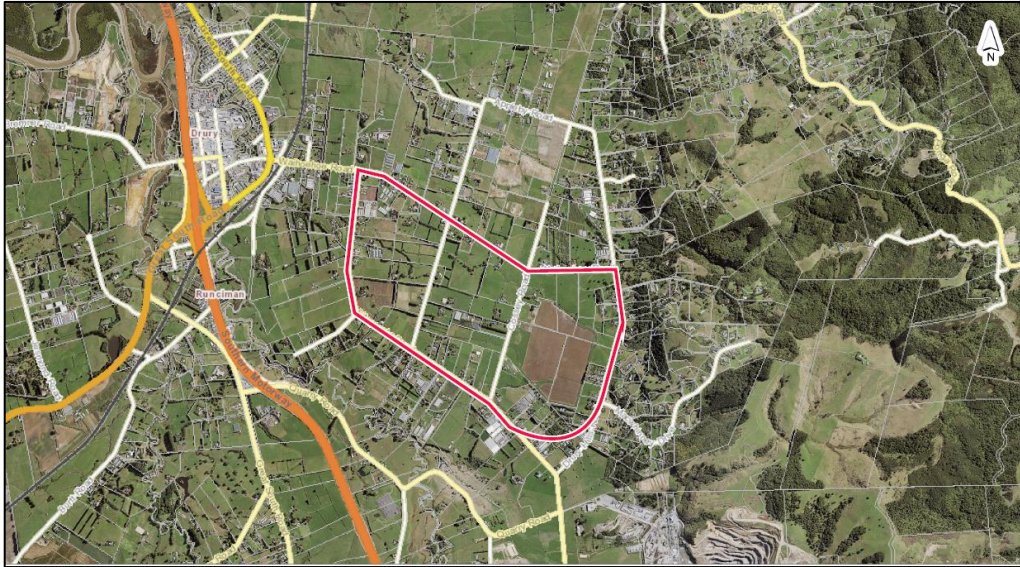
### 4.1 SITE DESCRIPTION

The Plan Change area is 184 hectares and is located within Drury East, on the southern edge of the Auckland metropolitan area. Drury East 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 includes the Future Urban zone land bounded by Waihoehoe Road to the north, Drury Hills Road to the east, Fitzgerald Road to the south and west, and the Mill Road alignment<sup>2</sup> to the south-east. Fielding and Cossey Roads cross the plan change area. FHLD has large landholdings within the Plan Change extent although there are other properties within the Plan Change area that are in private ownership. A locality plan of the Plan Change area is included as **Figure 1** below.

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<sup>2</sup> The Mill Road alignment as shown on Council's Drury – Opāheke Structure Plan August 2019.



**Figure 1: Aerial map showing the location of the plan change area (Source: Auckland Council Geomaps).**

The overall topography of the area is gently undulating with several low ridgelines. Three unnamed tributaries of Hingaia Stream traverse the plan change area and drain ultimately to the Manukau Harbour via Otuwairoa (Slippery Creek). There are no natural wetlands remaining within the site, but several ponds have been created to provide water for livestock.

Vegetation within the plan change area is characterised by exotic pasture used to graze sheep and cattle, crops and exotic trees and shrubs planted for shelter, amenity or as part of gardens. The only example of predominantly indigenous vegetation is a small area of forest located near the corner of Waihoehoe Road and Drury Hills Road. This area is approximately 4,300m<sup>2</sup> (0.43ha) in extent and is surrounded to the north and west by a number of isolated mature pūriri, totara and kahikatea trees in the adjoining paddock. Riparian vegetation where it exists along the watercourses are dominated by exotic trees and shrubs.

The Plan Change Area is currently used primarily for farming activities (agricultural and horticultural) as well as rural lifestyle blocks.

The Plan Change area is located 700 metres from Great South Road and the adjacent North Island Main Trunk line. Although there is no train station yet at Drury the Government has now confirmed the funding for a train station at Drury East with the completed station expected to be delivered in 2024. Electrification of the line from Papakura to Pukekohe is funded through the Regional Land Transport Plan and is currently progressing through a business case process. We understand that as part of the electrification project a temporary station at Drury Central is likely to be provided.

The western corner of the plan change area is situated 1.5-1.6km away from the Drury interchange between Great South Road and State Highway 1, which provides northern and southern on and off-ramps to the motorway.

## 4.2 SURROUNDING AREA LOCAL CONTEXT

In terms of land use and built form in the immediate locality, the surrounding area is characterised by a mix of activities and building types. The properties in Waihoehoe Road comprise a mixture of suburban scale residential activities and horticultural / rural production activities. The subdivision pattern within this area is finer grained, within the context of a rural area. To the east, south and west of the Plan Change area are large rural / residential blocks. The Drury Town Centre and light industrial area is located to the north west of the site, fronting Great South Road.

In the wider context, the Plan Change area and the surrounding locality is within the Future Urban zone under the Auckland Unitary Plan (Operative in Part). The Karaka and Opāheke / Drury Future Urban zone combined, provides for 2,150 hectares of land for urban redevelopment.

Other significant existing and planned land use characteristics of the wider locality include:

- The existing Drury Light Industrial area to the north of the site – approximately 30 hectares of land currently occupied by light industrial activities.
- The Drury South Industrial area to the south of the site – approximately 260 hectares of greenfield land has been rezoned and is currently being constructed as industrial activities, supportive commercial services and recreation/reserve/stormwater management areas, with development currently underway. The area when completed is designed to accommodate 6,900 jobs. The land is zoned Light Industry and Heavy Industry in the AUP.
- Various Special Housing Areas (SHA's), including:
  - Quarry Road – (Drury South Residential Precinct) is a joint Stevenson and Goodman venture which has obtained operative residential zoning to enable approximately 750 houses to be developed over the next 5 – 10 years. Development is currently underway.
  - Hingaia (Hingaia 1, 2 and 3 Precinct) - various developers providing residential development across 57ha in the short-medium term, with provision for a small Local Centre and Mixed Use area at the corner of Hingaia Road and Harbourside Drive. A decision on this SHA has been released and the land now has operative residential zoning.

- Bremner Road, Drury (Drury 1 Precinct) – operative residential zoning provides for 1000-1500 new homes over 7-9 years and development is currently underway.
- Bellfield Road, Papakura (Opāheke 1 Precinct) – operative residential zoning which provides for 500 new homes in a mix of typologies and Stage 1 is currently underway.
- Wesley College, Paerata (Franklin 2 Precinct) – operative residential zoning provides for 4550 home over 15 to 20 years and Stage 1 is currently being constructed with residents in occupation ..
- Takanini - provision for 2,395 new homes within three SHAs.

Collectively, these SHA's provide additional capacity for residential development and are supported by new small scale local and neighbourhood centres and the existing network of Metropolitan and Town Centres in south Auckland.

In terms of educational facilities, 485 Burt Road, Drury has been rezoned Special Purpose School zone, and a Notice of Requirement is currently processing to designate 41 Burberry Road, Drury for a Primary School and Early Childhood Education Centre.

## **5.0 DESCRIPTION OF THE PLAN CHANGE REQUEST**

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### **5.1 DESCRIPTION OF THE PROPOSAL**

#### **5.1.1 Approach to the Planning Framework for Drury East**

The proposed Plan Change relies largely on standard zones and Auckland-wide provisions to manage the way in which the Plan Change area is used and developed. This is consistent with the policy intent of precincts under the AUP. In this regard we note that the AUP sets out a clear hierarchy of provisions in A1 – Introduction. The purpose of precincts is to “enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling”<sup>3</sup>. In a greenfield context, these place-based provisions relate to specific environmental features that development needs to respond to, and which are justified following a s32 analysis. This approach does not support the use of precincts to provide a greater or lesser degree of regulation than the zone or Auckland-wide provisions, unless there are clear place-based reasons for doing so, which are different to other parts of the region.

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<sup>3</sup> Refer A1.6.5 of the AUP.

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

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

On balance, this approach enables the Plan Change area to develop to a scale and intensity which is broadly consistent with areas of similar zoning patterns across the region. The precinct will however, include some variation to the standard Auckland-wide and zone provisions to introduce more tailored standards and assessment criteria. This will support the development of a quality built environment within this locality that creates a distinctive sense of place.

## 5.1.2 Overview of the Plan Change

### 5.1.2.1 Proposed Zoning

This Proposed Plan Change seeks to rezone 184 ha of Future Urban zoned land for urban development, which will comprise:

- 22 ha Residential – Terrace Housing and Apartment Building (THAB) zone;
- 65 ha Residential – Mixed Housing Urban (MHU) Zone;
- 95 ha Residential – Mixed Housing Suburban (MHS) Zone; and
- 2 Ha Business – Mixed Use Zone.

The proposed zoning pattern is shown in **Figure 2** below. The zoning pattern shown in this report and within the plan change differs slightly to the zoning pattern shown in the technical reports. This is to align the zoning pattern with property boundaries, whereas the technical reporting is based on the indicative alignment of the Mill Road Corridor shown in the Drury-Opaheke Structure Plan. There will be an opportunity to refine the zoning boundary in this location prior to notification of the Plan Change once the alignment for the Mill Road Corridor is better defined.

The intention of the proposed zoning is to provide for the establishment of a new residential area in Drury East offering a range of housing types. The new residential area will be integrally linked to the adjacent Drury South Crossing Industrial Area for potential employment, the existing Drury township, and Kiwi Property's proposed

Metropolitan Centre, which will provide local employment and retail opportunities for the development.

The THAB zone is proposed to be applied to the western portion of the Plan Change area to provide for higher density residential development on the land in closest proximity to the proposed Metropolitan Centre and the rapid and frequent transport network. The MHU zone provides a transition between the land that is proposed to be rezoned to THAB and the MHS zone proposed to apply to the eastern portion of the Plan Change area.

This proposed zoning pattern will result in the location of the THAB and MHU zones locating across the road from the Business – Mixed Use zone, on the western edge of Fitzgerald Road. This arrangement is anticipated within the AUP and there are many examples of this occurring in Auckland, including Broadway, Newmarket; Park Road, Grafton; Great North Road, Pt Chevalier; Ash Street, New Lynn and Great North Road, Glen Eden, to name a few.

The Mixed Use zone requires buildings to be setback 6m above 18m in height when opposite a residential zone, which would provide a consistent street frontage height along Fitzgerald Road. Also, within these zones, assessment criteria for all new buildings are relevant. The assessment criteria ensure that development achieves attractive and safe streets.

The MHS zone is proposed to be applied on the eastern portion of the Plan Change area to create a transition between the MHU land, and the Rural Countryside Living zone that currently applies to the east of the plan change area in the Drury foothills.

The Mixed Use zone is proposed to be applied at the junction of Fielding and Fitzgerald Roads to provide a small centre that can service the daily convenience needs of the surrounding residential and industrial development. The Mixed Use zone is proposed to provide flexibility to establish commercial and residential activities in this location.

With the zoning proposed, the land will have capacity to accommodate at least 2,800 dwellings.

#### *5.1.2.2 Other Unitary Plan Controls*

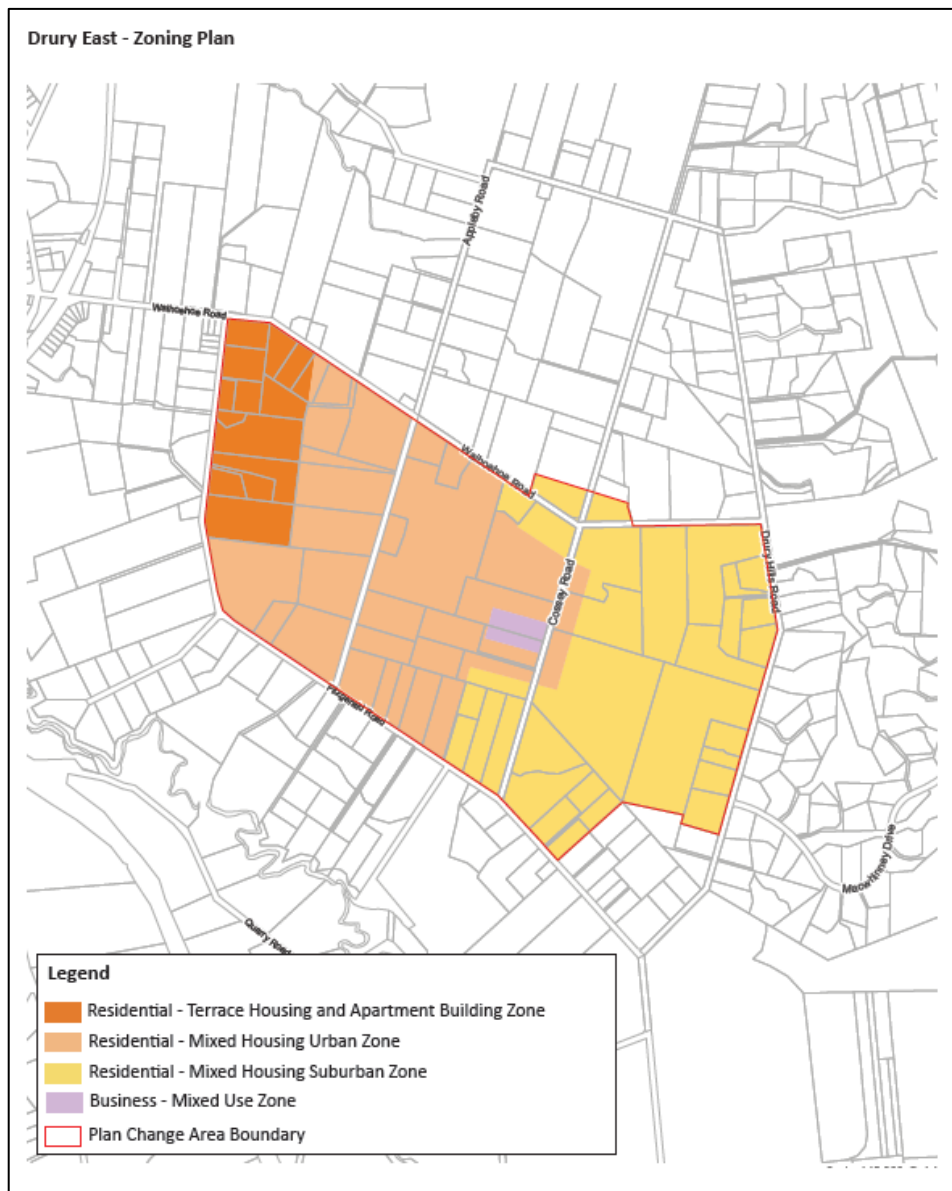
In relation to stormwater, it is proposed to apply the Stormwater Management Area Control – Flow 1 across Plan Change area to manage the increase in stormwater discharge to sensitive stream environments. Additionally, the Council's recently approved Network Discharge Consent includes requirements to prepare a Stormwater Management Plan (SMP) and meet defined outcomes. This requirement will be triggered as part of future consent processes.



### *5.1.2.3 Proposed Precinct Provisions*

FHLD propose to apply a precinct to Drury East to manage the effects of urbanisation on the local environment and to ensure that a quality built environment is achieved. FHLD propose to apply the following activities and controls in addition to the standard zone and Auckland-wide controls:

- A transport staging rule and a trip generation assessment to coordinate development with the delivery of required transport infrastructure to manage the effects of development on the transport network;
- Inclusion of a building line restriction on properties along Waihoehoe Road to allow for future widening to manage effects of development on the transport network;
- A riparian planting rule requiring a 10m riparian buffer each side of a permanent or intermittent stream to mitigate the effects of urbanisation on water; and
- Additional assessment criteria and indicative cross sections for roads to ensure a highly connected street layout that integrates with the wider Drury East area.



**Figure 2: Proposed zoning map.**

#### 5.1.2.4 Street Network

The Urban Design Report prepared by Woods sets out key moves and project goals which seek to develop a permeable grid, establish a connected community with a focus on active modes of transport and improve connections to existing and future communities<sup>4</sup>. To achieve this, the Urban Design Report depicts a walking and cycling network and an integrated movement network to achieve a connected and safe transport network that caters for all transport modes. The approach to delivering this movement network within the Plan Change area involves relying on the Auckland-wide provisions and also incorporating place based provisions into the precinct.

<sup>4</sup>



Resource consent is required for the development of public or private roads within the Plan Change area as a restricted discretionary activity. The assessment criteria at clause IX.8.2 of the Plan Change provide further guidance to both Council and an applicant as to how the street network should be established across the Plan Change area. In practice, this activity would be included in a resource consent application for subdivision or land use - whichever proceeds first.

Precinct Plan 2 sets out the key new collector roads required to support future development of the Plan Change area.

The Urban Design Report sets out cross-sections for various street typologies across the Plan Change area. These cross-sections are included within **Appendix 1** of the Plan Change. On the major vehicle routes through and around the Plan Change area provision has been made for segregated cycle facilities with physical buffers. Footpath widths vary depending on location and function of the road.

The cross-sections will require the roads that provide connections from the Plan Change area to the future Metropolitan Centre and Drury South Industrial area to provide walking and cycling paths, to increase the use of active transport modes to move between these areas.

To ensure that development provides pedestrian and cycle connectivity to the Drury Central train station once operational, additional assessment criteria have been included. The proposed assessment criteria set out the staged delivery of interim and permanent cycle and pedestrian connections to the Drury Central Trains Station, generally within an 800m walking catchment of the station. These criteria would ensure that people are able to access the train station once operational, irrespective of where development occurs first in the precinct.

#### *5.1.2.5 Open Space Network and Ecological Enhancement*

The Urban Design Report prepared by Woods sets out key moves and project goals which seek to provide quality public spaces, identify key ecological corridors and retain the natural values of existing streams. The approach to delivering these key moves and project goals within the Plan Change area involves relying on the Auckland-wide provisions and also incorporating place based provisions into the precinct.

E38 Subdivision – Urban provisions applies within the Plan Change area and includes policies and assessment criteria to guide the provision of open space generally across the Plan Change area. These provisions will ensure that there is adequate provision of open space across the Plan Change area to meet the recreational needs for the future population.

There is a policy direction included within the Drury East Precinct to integrate the provision of open space with the natural features of the Plan Change area. This will ensure that consideration is given to locating open space around stream networks to create ecological corridors.

Tailored rules are proposed to apply with the Drury East Precinct that require riparian margins to be planted either side of a permanent or intermittent stream to a minimum width of 10m measured from the bank of the stream.

The Urban Design report and the Ecological Effects Assessment both identify a stand of Puriri trees to the north east corner of the Plan Change area towards Drury Hills Road. It is not proposed to include provisions within this Plan Change to protect these trees as they are already protected through a consent notice and the Mill Road Corridor alignment is likely to require the removal of these trees in any case.

#### 5.1.2.6 Provisions for Mana Whenua Values

The Urban Design Report prepared by Woods sets out a project goals of respecting the local iwi's aspirations of Kaitiakitanga. In preparing the Plan Change the applicant has undertaken extensive consultation with Iwi authorities who have an interest in the Plan Change area. Iwi have also prepared Cultural Value Assessments. The outcomes of this consultation and the assessments have directly informed the development of the Plan Change. The table below provides an overview of the outcomes sought by Mana Whenua and how these are being provided for within the Plan Change:

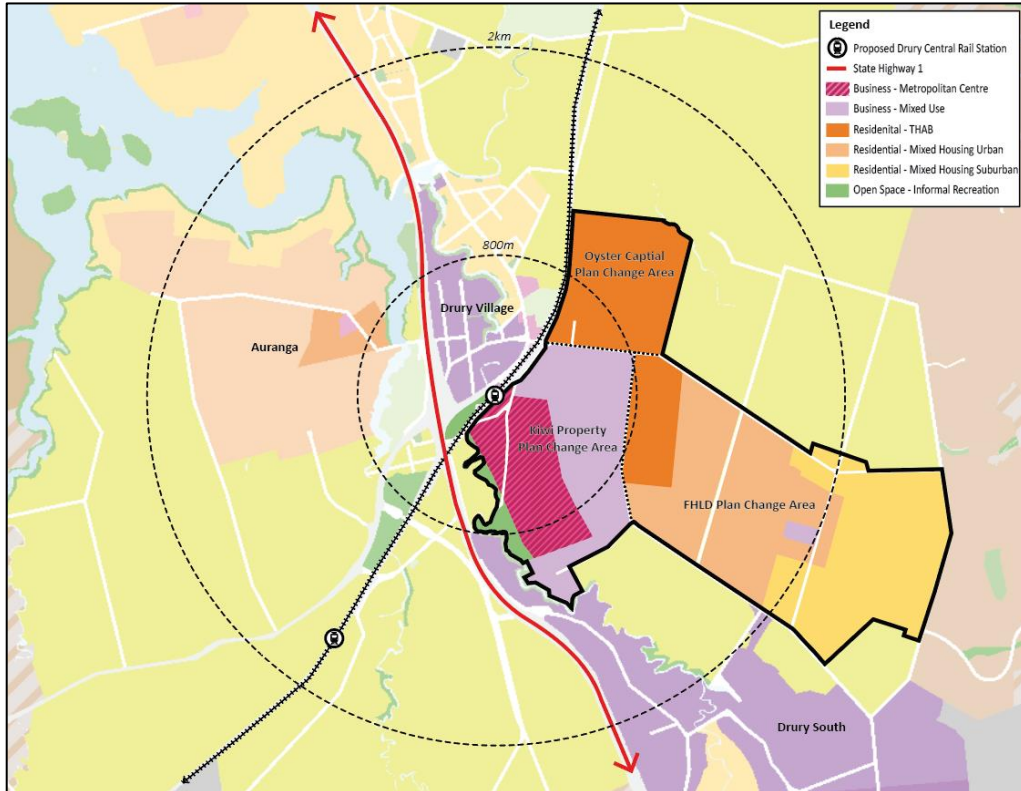
**Table 1: Overview of Drury East Precinct Provisions that relate to Outcomes Sought by Mana Whenua**

Overview of outcomes sought and issues raised by Mana Whenua	Plan Change Provisions
<b>Protection of streams/wetlands/swamps</b>	
Protection of permanent and intermittent stream tributaries	<ul style="list-style-type: none"> <li>The Plan Change does not propose to amend the Auckland-wide rules applying to lakes, rivers and streams (E3) and these would apply to future development as they relate to any proposed stream works.</li> <li>Some stream reclamation will be required to facilitate urban development in the Plan Change area. The required stream reclamation and if any offsetting required will be determined at the resource consent stage. Mana Whenua will be involved in identifying opportunities for offsetting if it is required.</li> </ul>

<b>Tree/Vegetation Planting</b>	
The riparian margins are degraded and Mana Whenua would like to see these restored to a 20m riparian setback	<ul style="list-style-type: none"> <li>The Plan Change includes an additional rule requiring riparian planting to a minimum width of 10m measured from the bank of the stream.</li> <li>It is not proposed to amend the esplanade reserve and riparian yard requirements of the AUP. These are: <ul style="list-style-type: none"> <li>20m esplanade reserve for streams greater than 3m in width (E38.7.3.2);</li> <li>10m riparian yard i.e. no buildings from the edge of all permanent and intermittent streams (required in all zones).</li> </ul> </li> </ul>
The use of native trees/plants	<ul style="list-style-type: none"> <li>The required riparian planting must be in accordance with an approved riparian planting plan identifying the location, species, planter bag size and density of the plants. This will include consideration of native species.</li> <li></li> </ul>
Retention of the Puriri trees on the properties which front Drury Hills Road	<ul style="list-style-type: none"> <li>These trees are currently not scheduled for protection under the AUP however, they are protected via a consent notice on the certificate of title for the site on which they're located. FHLD do not own this land so have no control over what happens on it.</li> </ul>
<b>Stormwater Management</b>	
"Treatment Train" approach for dealing with stormwater	<ul style="list-style-type: none"> <li>A treatment train approach forms part of the approach to stormwater management set out in the Woods Stormwater Management Plan.</li> </ul>
<b>Heritage and Archaeology</b>	
Potential for cultural sites within the Plan Change area	<ul style="list-style-type: none"> <li>If any sensitive material is discovered the accidental discovery rules under the AUP will apply under E12.6.1. Sensitive material includes in particular any human remains or kōiwi or a Māori cultural artefact/taonga tūturu. A clear process must be followed if any sensitive materials are uncovered.</li> </ul>
<b>Cultural Monitoring</b>	
Cultural monitoring of earthworks in case of the potential discovery of kōiwi, Māori artefacts or archaeological features	<ul style="list-style-type: none"> <li>If any sensitive material is discovered the accidental discovery rules under the AUP will apply.</li> <li>Conditions for undertaking earthworks including any cultural monitoring will be determined at a resource consent stage and in discussion with iwi.</li> </ul>

## 5.2 PLAN CHANGE APPROACH FOR DRURY

Kiwi Property, FHLD, Oyster Capital and Fletcher Living (“the Drury East developers”), collectively have an interest in land within Drury East. Their areas of interest are shown on the plan in **Figure 3**. The Drury East developers have an established track record in commercial and residential development and want to progress development in ‘Decade 1’ (2018-2027).



**Figure 3: Areas of interest for Drury East developers and proposed zoning pattern across Drury East**

Between 2017-2019, FHLD has worked together with Kiwi Property 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 has recently concluded. The Drury East developers have continued to work together to develop a series of Plan Changes that build on the vision for Drury East within their agreed Structure Plan.

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.

The series of private Plan Changes will bring forward the staged release of land at Drury East from what is proposed in the FULSS<sup>5</sup>. The Council has stated that there is insufficient funding available to deliver the transport infrastructure necessary to support the developer's proposed staging.

The developers agree that securing funding for the required transport projects and coordinating the timing of their construction with development will be crucial. The Applicant plans to work collaboratively with other major landowners in Drury, the Council and Central Government to resolve this through an Infrastructure Funding Agreement or similar mechanism prior to a Council Hearing on the Plan Change. This will tie in with the Drury Transport Investment Project led by Council and Central Government that is investigating options for funding the necessary transport network projects to accelerate the urban rezoning of future urban land in Drury.

### **5.3 PURPOSE AND REASONS FOR THE PLAN CHANGE**

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

The purpose of the Plan Change 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.

The report provides an assessment of effects of the Plan Change and an evaluation of the Plan Change prepared in accordance with Section 32 of the RMA. Supporting expert assessment reports are appended to the report. The evaluation of Plan Change concludes that these amendments are the most appropriate way to achieve the purpose of the RMA.

## **6.0 TIMING OF THE PLAN CHANGE**

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### **6.1 DRURY DEVELOPERS ALTERNATIVE STAGING FOR DRURY**

The proposed staging of development within the Drury- Opāheke Structure Plan is based on the Future Urban Land Supply Strategy (FULSS) which identifies Drury East as being development ready in 2028-2032. The FULSS is a non-statutory document and the publicly available analysis that informed the staging as part of the 2017 Refresh was high level, and reflects the broad-brush nature of the staging proposed.

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<sup>5</sup> The Future Urban Land Supply Strategy 2017 (FULSS) states that the Plan Change area will be 'development ready' in 2028-2032.

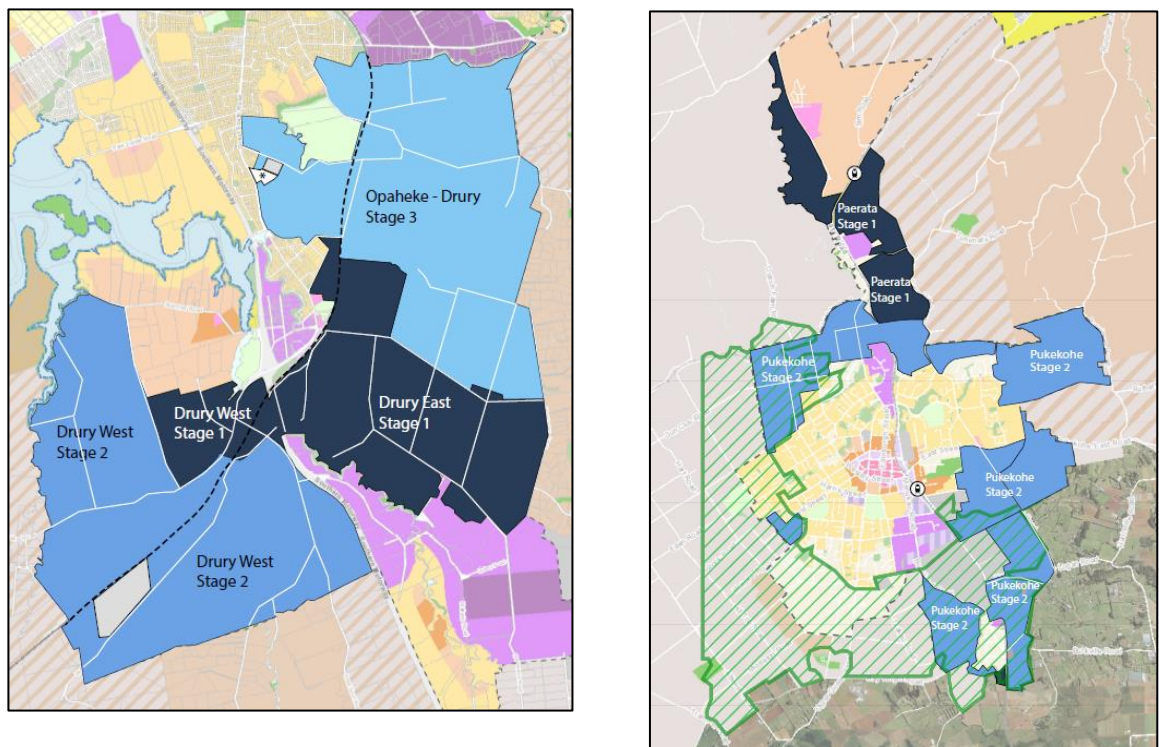


To inform this Plan Change a more detailed analysis of the staging of release of land within the wider southern Auckland FUZ has been undertaken against the staging principles in Appendix 1 of the FULSS 2017, which are consistent with the Structure Plan Guidelines in Appendix 1 of the RPS. The culmination of these principles should inform the staging rather than focussing on infrastructure funding and delivery. In our view, while infrastructure funding and delivery is a very important factor, this should not be the starting point. Of greater importance is achieving an efficient, integrated and quality urban form that minimises environmental impacts. Decisions on infrastructure funding priorities should flow from that, although it is acknowledged that is not always possible where large-scale infrastructure investment is required.

The more detailed analysis of the staging of the release of the wider Southern Auckland FUZ against the staging principles in Appendix 1 of the FULSS 2017 supports the early release of the Drury East land for development, while simultaneously:

- Deferring development to the west of Jesmond Road to Decade 2;
- Deferring land to the south, west and east of Pukekohe to Decade 2
- Deferring land within the major flood plains in the Slippery Creek catchment to Decade 3+.

The proposed staging proposal for Drury and Pukekohe is shown in **Figure 4 & 5** below:



**Figure 4 & 5: Alternative staging for Drury- Opāheke (left) and for Pukekohe-Paerata (right).**

The key reasons for this alternative staging are as follows:

- Promotes a more connected land use outcome for Drury by concentrating development around existing urban areas at Drury and Drury South;
- Provides for significant amenities and services to be provided in Decade 1 to support the residential catchment;
- Provides for employment land in Decade 1 in Drury to support the residential catchment;
- Integrates with planned public transport, noting that the Drury Central station is proposed to be constructed ahead of the station at Drury west;
- Focuses development around the Drury Interchange, making efficient use of required upgrades and reducing pressure on State Highway 22;
- Recognises the significant constraints to developing land in the floodplains in Slippery Creek, noting that the Council's Stormwater Management Plan for the draft Drury-Opāheke Structure Plan recommends no development in this area<sup>6</sup>;
- Prioritises land for development where large landholdings are single ownership, which can be developed efficiently, which is not the case in for the land to the west of Jesmond Road, or Pukekohe which is in highly fragmented ownership;
- Recognises that developing on prime and elite soils at Pukekohe for low density housing (Single House zone) should not be prioritised and is contrary to policy B2.2.2(2)(j) of the Regional Policy Statement; and
- Brings forward land that can be serviced, and for which meaningful funding contributions can be made by a few large developers.

With respect to Pukekohe, the Council reporting for the FULSS 2017 did not include any evaluation of the staging proposed for Pukekohe and simply 'rolled over' the staging from the 2015 strategy. In light of the further work undertaken in Drury-Opāheke, it is appropriate to reconsider the staging for Pukekohe.

While Pukekohe is a Satellite Town, it creates significant pressure on transport infrastructure within the urban area proper, including SH22, the Drury Interchange and SH1. The majority of future development for Pukekohe is residential however, in our view the starting point should be to prioritise higher density development close to current and future public transport to minimise the impact on existing roading. Areas planned for low density residential away from public transport should be reconsidered, as should development on prime and elite soils, particularly where they are currently in horticultural use. It is also noted that much of the landholdings in Pukekohe are fragmented lifestyle blocks, the owners of which would have limited

capacity to develop in an integrated way themselves, or for which it would take a long time for developers to aggregate.

An analysis of the Council's proposed staging and the Drury East Developers staging against the staging principles in Appendix 1 of the FULSS 2017 is included within **Appendix 5**. It is appropriate to consider this alternative staging proposal based on its merits through the Plan Change process.

Based on the proposed alternative staging, bringing forward residential development in Drury east to Decade 1 would have a neutral effect on the demand for residential in the existing urban area. In fact, the proposed alternative staging would result in a slower release of housing capacity than the FULSS as discussed below.

## 6.2 EFFECTS ON ACHIEVING INTENSIFICATION IN URBAN AREAS

Consideration has been given to the impact of bringing forward development in Drury East on the ability to achieve intensification in brownfield areas. Related to this, consideration has also been given to whether the primary centre at Drury East might be brought forward, ahead of the residential land in Drury East.

The proposed delaying of development in Drury West (west of Jesmond Road), the flood prone areas in Opaheke, and the less accessible and developable parts of Pukekohe, would result in a slower pace of development over 30 years. It would also provide a more even spread of development, enabling infrastructure to be provided over a longer time horizon than is currently planned.

In relation to whether the primary centre at Drury East might be brought forward, ahead of the residential land in Drury East, it is considered that delaying the residential land in Drury East would be a poor planning and development outcome, as it would directly impact the success of the primary centre in Drury East and would not achieve sustainable transport patterns or an integrated or efficient urban form.

As stated in the Property Economics and MRCagney reports prepared on behalf of Council to inform the Drury-Opāheke Structure Plan, the catchment for the primary centre and supporting public transport should be maximised to ensure its success<sup>7</sup>. Delaying the residential land around the centre would not achieve this as the centre would be relying on a customer-base from further afield and public transport would have a limited walk-up catchment. These factors would tend to support vehicles as the primary mode of transport to the centre, which would be inconsistent with the policy direction set out in the Government and Council's transport policy documents<sup>8</sup>

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<sup>7</sup> MRCagney Technical Note dated 16 November 2018, 'Success factors for rapid transit network stations'.

<sup>8</sup> Government Policy Statement on Land Transport, Auckland Plan 2050, Regional Land Transport Plan 2018.



to prioritise public transport, and support integrated land use and transport planning.

Delaying the residential land in Drury East would also not connect the existing land at Drury South with the centre in Drury East and the existing village and employment. This would not connect residential and employment areas across Drury- Opāheke.

## **7.0 ACCEPTING THE PLAN CHANGE REQUEST**

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

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

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

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

In this context, the Plan Change is considered to be in accordance with sound resource management practice for the following reasons:

- The proposed zoning is consistent with that shown in Council’s own Structure Plan for Drury/ Opāheke.
- While the proposed timing of the rezoning differs from Council’s current proposed staging set out in the Future Urban Land Supply Strategy (FULSS), the more detailed technical analysis undertaken as part of this proposal and as detailed above, demonstrates that there is no planning reason for preventing development occurring earlier.

- All necessary statutory requirements have been met, including an evaluation in accordance with S32<sup>9</sup> with supporting evidence, and consultation with interested iwi groups is on-going.
- The Plan Change is considered to be consistent with the sustainable management purpose of the RMA as discussed in the report below.

The RPS places a strong emphasis on delivering integrated urban development in Future Urban areas (B2.2.1(5)<sup>10</sup> and B2.2.2(7)(c)<sup>11</sup>. This requires that the infrastructure needed to support urban development is delivered at the same time as housing and jobs. The technical 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.

Securing funding for the transport projects and coordinating the timing of their construction with development will be crucial. The Government's recent announcement to fund and construct key transport upgrades in the area supports the Council releasing land at Drury East for development now. Collectively these upgrades total \$2.4 billion in Government investment, with projects due for completion generally by 2026. Enabling the rezoning to progress now will ensure that the timing of development coordinates with the delivery of this infrastructure and will ensure it is efficiently used from the outset.

As stated earlier FHLD intends to work collaboratively with others to develop an Infrastructure Funding Agreement or similar mechanism prior to a Council Hearing on the Plan Change, which would now focus on the local upgrades necessary to enable development. This will tie in with the Drury Transport Investment Project led by Council and Central Government that is investigating options for funding these local transport network projects.

In addition to the issue of funding required for transport infrastructure, rules are included within the Plan Change to stage the release of development capacity within the Plan Change area with the delivery of required local transport upgrades. This approach to releasing the land for urbanisation is very common throughout the AUP and has been used in many greenfield precincts including at Redhills<sup>12</sup>, Puhunui<sup>13</sup> and Wainui<sup>14</sup> Precincts to name a few. We note that in those cases, funding of the required upgrades was not resolved prior to the Hearing and has been worked through currently in tandem with Plan Change and consenting processes. Therefore,

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<sup>9</sup>S32 of the RMA

<sup>10</sup> 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.

<sup>11</sup> 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 of the following: ... integrate with the provision of infrastructure.

<sup>12</sup> AUP Table I610.4.1(A15), I610.6.2 Infrastructure Upgrades and Location of Development - Transport

<sup>13</sup> Include the reference here

<sup>14</sup> AUP Table I544.4.1 (A1), I544.6.2 Infrastructure

as the Plan Change follows an approach that has been tested through different Schedule 1 processes it is considered to accord with sound resource management practice.

In relation to (c), the proposed zoning is not inconsistent with Part 5 given that the Plan Change area has been identified as the primary centre for Drury in the Council's own Structure Plan for Drury- Opāheke.

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

## **8.0 POLICY FRAMEWORK**

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

### **8.1 NATIONAL POLICY DOCUMENTS**

#### **8.1.1 National Policy Statement on Urban Development Capacity**

The National Policy Statement on Urban Development Capacity 2016 (NPS on Urban Development Capacity) came into effect on 1 December 2016. It recognises the national significance of urban environments and provides direction to decision-makers on planning for urban environments. The NPS on Urban Development Capacity seeks to ensure there is sufficient development capacity for housing and business with a suite of objectives and policies to guide decision-making in urban areas. There is an emphasis on integrated planning of land use, development and infrastructure provision.

Policy PA1 sets out housing and business land development capacity that local authorities are required to provide in the short, medium and long-term. The NPS-UDC requires that high growth councils (of which Auckland Council is one) must produce a future development strategy that demonstrates there will be sufficient, feasible development capacity in the medium and long terms and that the minimum targets will be met. For the greenfield expansion areas of Auckland, the council has produced the FULSS 2017 that identifies the location, timing and sequencing of future development capacity.

The FULSS anticipates that approximately 8,200 dwellings will be provided for in Opāheke Drury. The Plan Change area will provide capacity for at least 2,800 dwellings and a range of dwelling types for the increasing population.

## 8.1.2 The Proposed National Policy Statement on Urban Development

In August 2019 the Ministry for the Environment released the proposed National Policy Statement on Urban Development (**NPS – Urban Development**). The NPS – Urban Development will replace the NPS on Urban Development Capacity. The NPS – Urban Development contains objectives and policies that require councils to carry out long term planning to accommodate growth and ensure well-functioning cities. There is an emphasis on allowing for growth ‘up’ and ‘out’ in a way that contributes to a quality urban environment, and to ensure their rules do not necessarily constrain growth. Councils must also enable higher density development in areas close to employment, amenity, infrastructure and demand.

Of particular relevance to this Plan Change is the proposal to include a policy direction that will direct local authorities in major urban centres in their jurisdiction to consider plan change requests for urban development in locations that are out of sequence where development will support good urban outcomes, environmental effects could be adequately managed and the costs of development can be met.

While not yet having statutory effect, the Plan Change is consistent with the policy direction within the proposed NPS-Urban Development. The Plan Change allows for increased residential capacity in close proximity to a planned Metropolitan Centre, planned train station and an industrial employment area at Drury South. The Plan Change will support good urban outcomes as the proposed rezoning and associated rules is likely to have positive effects on the quality of the built environment, and development within the Plan Change area will integrate well with the wider Drury area. As outlined in Section 11 the Plan Change will not adversely affect the environment as any effects can be appropriately mitigated.

## 8.1.3 New Zealand Coastal Policy Statement

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

The Auckland-wide stormwater quality and Stormwater Management Area Flow 1 (**SMAF 1**) provisions will apply within the Plan Change area which will manage sediment and contaminant runoff which could make its way into the coastal receiving environment. Further mitigation measures will be considered as part of a future resource consent process via the certification requirements of the Council’s regional Network Discharge Consent. This has been discussed in greater detail in Section 9.

## 8.1.4 National Policy Statement for Freshwater Management

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

The Objectives of the NPSFM are consistent with the objective and policy framework within the AUP for Freshwater (B7, E1 and E2). A comparative analysis is provided within **Appendix 19** to show how the AUP gives effect to the NPSFM. The Plan Change is consistent with AUP objectives and policies for freshwater systems, water quality and integrated management. This is analysed in a detailed assessment of the proposed Plan Change against the objectives and policies freshwater systems, water quality and integrated management are provided in Appendix 6.

It is proposed to apply the Stormwater Management Area Control – Flow 1 (**SMAF 1**) across the Plan Change area to manage the increase in stormwater discharge to sensitive stream environments. Accordingly, 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. The ‘Stormwater Management Toolbox’ is proposing a higher standard of stormwater management than what is required within SMAF 1. In particular all roads are proposed to be treated irrespective of whether they are high contaminant or not.

The intermittent and permanent streams present within the Plan Change area have been identified by The Ecology Company (refer to **Appendix 9**). All stream tributaries within the Plan Change Area are highly eroded and degraded. This is attributed to a combination of poor bank stability, unrestricted stock access leading to ongoing agricultural related nutrient inputs, instream channel disturbance, minimal stream channel shading and bare or sparsely vegetated riparian vegetation within the catchment. The Plan Change will enhance streams as Riparian enhancement along the identified streams is required under the proposed Drury Centre Precinct.

It is considered that the implementation of the stormwater management toolbox in conjunction with the enhancement of riparian margins will be sufficient to manage the potential effects associated with changes in water quality and as measured by the macroinvertebrate community indices.

To facilitate urban development of the land, some stream reclamation may be necessary to construct roads. The effects of reclamation and the adequacy of the mitigation or compensation proposed will be considered as part of the resource consent process under the standard AUP provisions. Where any stream reclamation is required which may result in loss of stream habitat, the effects can be mitigated or offset through enhancement of other sections of streams within the Plan Change area, or off site as proposed for under the AUP, to ensure no net loss is achieved. Given that the effects of development on streams and wetlands is comprehensively managed by the rules in E3, in our view, it is unnecessary to illustrate the stream network on a precinct plan.

The proposed measures to address any effects on freshwater is discussed in greater detail in Section 9.

### **8.1.5 National Planning Standards**

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

### **8.1.6 National Environmental Standards**

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

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

This NES document has been taken into account in the preparation of the relevant expert reports and are further discussed in Section 9 of the report below.

### **8.1.7 Discussion Document – Valuing Highly Productive Land**

In August 2019 the Ministry for the Environment and the Ministry for Primary Industries released the proposed National Policy Statement for Highly Productive Land (**NPS – HPL**). The purpose of the proposed NPS-HPL is to improve the way that highly productive land is managed under the RMA. It does not provide absolute protection of highly productive land, but rather it requires local authorities to proactively consider the resource in their region or district to ensure it is available for present and future primary production. The proposal does not impact on existing urban areas and land that councils have identified as future urban zones in district plans. Further, the majority of sites in the Plan Change area are used for pastoral farming, commercial or countryside living and are not in productive use.

As the Plan Change area is currently within the Future Urban Zone the policies contained within the NPS-HPL are not proposed to apply.

## 8.2 COUNCIL STRATEGIC PLANS

### 8.2.1 Auckland Plan 2050

The Auckland Plan is the key strategic document which sets the Council's social, economic, environmental and cultural objectives. A key component of the Auckland Plan is the Development Strategy which sets out how future growth will be accommodated up to 2050. The Auckland Plan focusses new development in existing urban areas and provides for 'managed expansion' in future urban areas. This managed expansion is with reference to structure planning processes. As noted above, this Plan Change, while not strictly consistent with the timing for development set out in the Drury-Opāheke Structure Plan, nevertheless delivers integrated and managed development.

In terms of the form of development, the Auckland Plan takes a quality compact approach to growth and development. The Auckland Plan defines this as<sup>15</sup>:

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

The proposed residential zoning pattern at Drury East will provide quality, compact neighbourhoods adjacent to industrial land to the south of the Plan Change area. The proposed zoning pattern will encourage a range of housing choice with the more intensive housing development to the east of the Plan Change area in closer proximity to Kiwi's proposed Metropolitan Centre.

The Drury East area will be well serviced by public transport. The railway lines will be electrified to Pukekohe allowing for additional rail capacity. The Drury-Opāheke Structure Plan identifies three new train stations to be constructed between Drury and Drury West. There is also proposed to be a high frequency bus corridor between Manukau and Drury West. The proposed Terrace Housing and Apartment Building

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<sup>15</sup> Auckland Plan 2050, pg. 206.

zoning supports maximising the efficient use of land within the Plan Change area which is most accessible to the proposed public transport network for Drury.

New open spaces to serve the new residential neighbourhoods will be developed in accordance with the provisions in E38 Subdivision - Urban.

Infrastructure upgrades are required to service Drury East and the wider Drury area. As previously discussed, a Drury Transport Investment project is underway to look into funding options to accelerate the delivery of the preferred transport network projects to enable the urban zoning of the Future Urban Zoned land at Drury. The three private Plan Change requests contain triggers that stage the release of development capacity with the delivery of supporting infrastructure, with the timing to be determined through the Drury Transport Investment project.

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

### **8.2.2 Future Urban Land Supply and Strategy 2017**

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 20 years of supply of development capacity at all times 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 FULSS informs the council's infrastructure funding priorities and feeds directly into the council's long-term plans, annual plans and other strategic documents.

The FULSS anticipates 20,400 dwellings will be provided across the Drury Structure Plan area. In particular, the FULSS has identified the Opāheke /Drury area as having land capacity to accommodate 8,200 dwellings, with one town centre and two local centres. A further 11,200 dwellings are anticipated in Drury West, and 1,000 dwellings in Drury South.

As discussed in Section 6 of the report above, the proposed alternative staging for Drury east better achieves the staging criteria in Appendix 1 of the FULSS than the current proposed staging.



## 8.2.3 Open Space and Community Facilities

### 8.2.3.1 General Policies and Action Plans

The Council has prepared various policies and action plans regarding the provision of community facilities and open space in Auckland, including:

- I. Open Space Provision Policy 2016;
- II. Parks and Open Space Acquisition Policy 2013; and
- III. Community Facilities Network and Action Plan 2015.

These policies have been taken into account in preparing the open space strategy for the Plan Change area and determining future community facility needs. This is discussed further in Section 9 of the report below.

## 8.3 REGIONAL POLICY STATEMENT AND PLANS

### 8.4 AUCKLAND UNITARY PLAN (OPERATIVE IN PART)

The AUP is the primary statutory planning document for Auckland. It is comprised of the Regional Policy Statement, Regional Coastal Plan, Regional Plan and District Plan. The AUP provides the regulatory framework for managing Auckland's natural and physical resources while enabling growth and development and protecting matters of national importance.

The RPS sets out the overall strategic statutory framework to achieve integrated management of the natural and physical resources of the Auckland Region. The RPS broadly gives effect to the strategic direction set out in the Auckland Plan. Section 75(3)(c)<sup>16</sup> states that a District Plan must give effect to any Regional Policy Statement and Section 75(4)(b)<sup>17</sup> states that a District Plan must not be inconsistent with a Regional Plan for any matter specified in Section 30(1)<sup>18</sup>.

A comprehensive assessment of the proposed rezoning against the relevant objectives and policies of the RPS are provided at **Appendix 6**. This demonstrates that the proposed rezoning will give effect to the RPS.

Of particular relevance to this Plan Change is Chapter B2 of the RPS which contains provisions directing urban growth and form in Auckland. Policy B2.2.2(7) of the RPS is enabling of the urbanisation of land within the Future Urban Zone as long as urban growth can be accommodated in ways that support a quality urban form, provide a range of housing types and employment choices and integrate with the provision of

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<sup>16</sup> RMA

<sup>17</sup> RMA

<sup>18</sup> RMA

infrastructure. There is also the direction to avoid urbanisation without carrying out a structure planning exercise first. Appendix 1 of the AUP sets out the structure planning guidelines which are to be followed when undertaking a structure planning exercise.

Overall, the proposal is consistent with this integrated approach to managing development in Future Urban areas. The Plan Change has been informed by the Drury-Opāheke Structure Plan, and the proposed zoning pattern is consistent with the structure plan. This Plan Change request has been lodged concurrently with the Plan Change requests by the Drury East Developers to ensure an integrated land use pattern is established across Drury East.

The Plan Change will see the release of land happen earlier than that proposed in the structure plan. However, as discussed more detailed work is continuing as part of the Drury Transport Investment project on the funding, sequencing and delivery of infrastructure in the wider Drury area with the aim of accelerating the key transport projects. 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.

## **8.5 OTHER PLANS**

### **8.5.1 Iwi Planning Documents**

A number of Iwi Management Plans have been reviewed as part of the structure planning process. These identify a range of matters, many of which are either reflected in the AUP or referenced in the Cultural Valuation Assessments (“CVAs”) and addendums prepared by Ngāti Te Ata Waiohū, Ngāti Tamaoho, Te Ākitai and Ngāitai ki Tāmaki. Extensive consultation has been undertaken with Iwi to consider the local application of a number of the principles advanced in the Iwi Management Plans and CVAs. These matters are outlined in more detail in the Consultation Report in **Appendix 18**.

## **9.0 DEVELOPMENT OF THE STRUCTURE PLAN AND PLAN CHANGE**

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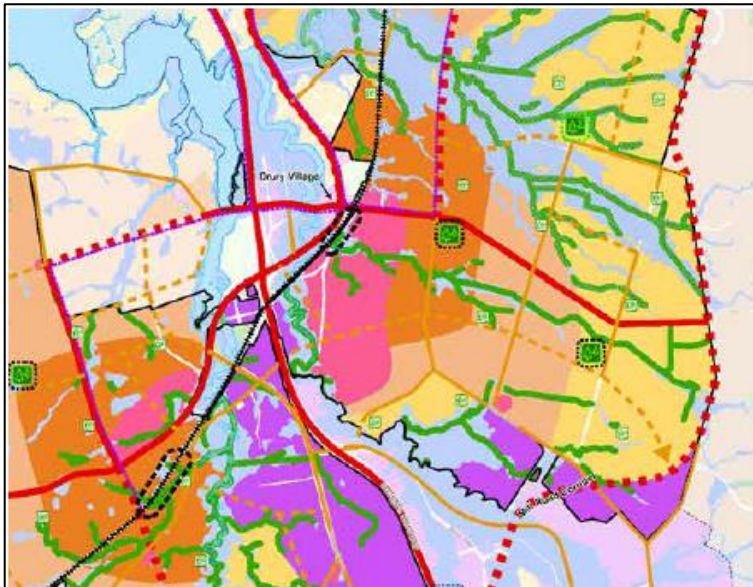
### **9.1 THE COUNCIL’S DRURY-OPĀHEKE STRUCTURE PLAN**

In accordance with Policy B2.2.2(3) of the Regional Policy Statement, the proposed Plan Change has been prepared following the preparation of a Structure Plan that accords with the Structure Plan Guidelines at Appendix 1 of the AUP.

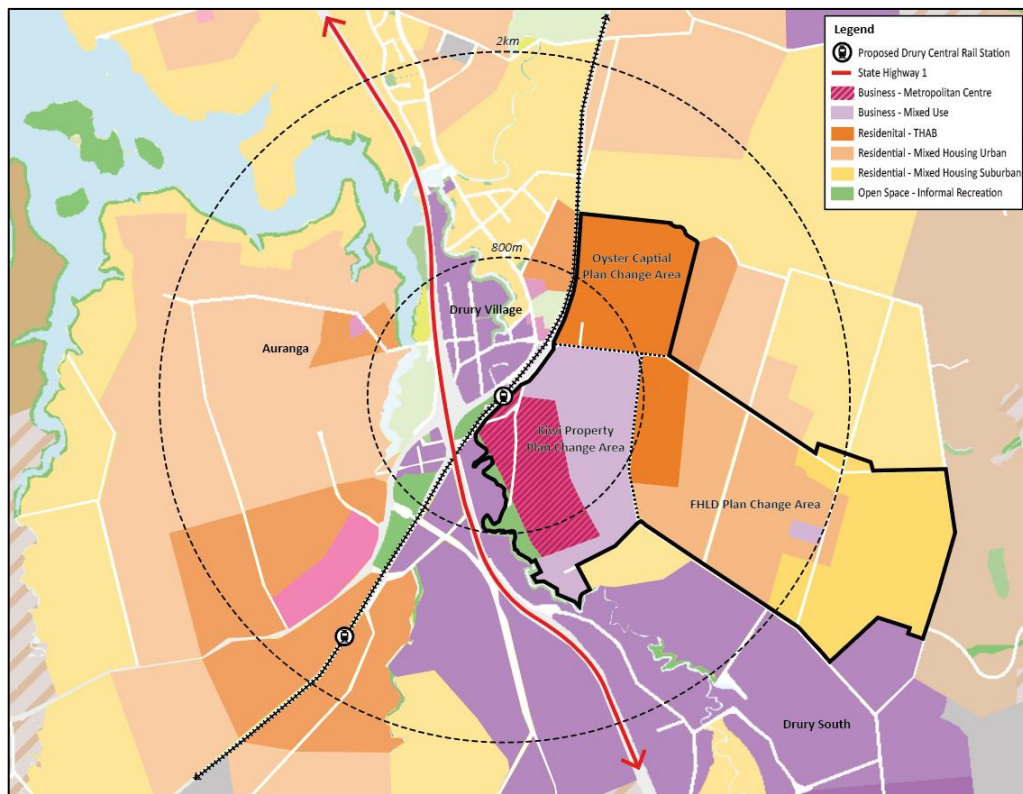
The Council's Drury-Opāheke Structure Plan has been in development for over two years. The Council has consulted with the public on the Structure Plan on three occasions:

- Issues and opportunities – September 2017;
- Draft land use plan – October 2018;
- Draft Structure Plan – April 2019.

The Council's Drury-Opāheke Structure Plan applies to the greater Drury- Opāheke as illustrated in **Figure 6**. The total area is about 1921 ha. It includes: Opāheke in the north east, Drury in the south east, and part of Karaka sometimes referred to as Drury West. It adjoins Drury Creek - Pahurehure Inlet and Te-Manuka-O-Hoturoa (Manukau Harbour). It is bisected by State Highway 1 (SH 1), the North Island Main Trunk Line railway, and Transpower's transmission lines. Land use is predominantly rural including countryside living and some business uses. The existing Drury village is located near the middle but is not part of the Drury – Opāheke structure planning area. The Drury-Opāheke Structure Plan 2019 was reported to, and adopted by Auckland Council's Planning Committee on Tuesday 6 August 2019. The Structure Plan document is included at **Appendix 4**.



**Figure 6: Auckland Council Drury-Opāheke Structure Plan.**



**Figure 7: Drury East developers proposed zoning pattern and the Auckland Council Drury-Opāheke Structure Plan land use pattern.**

From 2017, a group of developers, including FHL D, prepared a Structure Plan for Drury- Opāheke. This was developed in tandem with the Council’s Structure Plan and was a the developers Structure Plan and the supporting technical analysis was informed the Council’s Structure Plan.

## 9.2 FHL D’S MASTERPLAN

Following an iterative and consultative process with the Council and local Drury stakeholders, FHL D engaged Woods to undertake a broad master planning exercise for the Drury East Plan Change area. As part of the master planning exercise a comprehensive assessment of the land has been undertaken to determine the constraints and opportunities within the Plan Change area and to identify the most logical and desirable development pattern (refer **Appendix 7**).

The master planning exercise has acknowledged the Council’s desire to lead its own Structure Plan, and is premised on the ability to advance detailed planning for Drury East in the short term, without undermining or predetermining the wider Drury Town and Drury East vision that the council may settle on.

The masterplan provides indicative collector and local roading patterns, positioning of key access points, roading connections and public open squares and spaces,

distribution of land use activities, and general block layout. The proposed zoning pattern for the Plan Change area and the Drury Centre Precinct Plans have been informed by the masterplan document to ensure that the outcomes sought for Drury are able to be successfully implemented.

The applicant has also undertaken high level master planning of the surrounding area in collaboration with the Drury East Developers. This has been undertaken to develop compatible land use and roading connections and to ensure transport and infrastructure solutions are available to support growth anticipated by the Councils Drury-Opāheke Structure Plan for the wider Drury East area.

### 9.3 CONSULTATION AND ENGAGEMENT

The Structure Plan and Plan Change were subject to extensive engagement between 2017-2019. FHLD has engaged with iwi and have held seven round table discussions, site visits, cultural values reports, and a trip to identify a paa site. Mana Whenua Representatives involved in the FHLD Hui have also been liaising with Auckland Council on their proposed Structure Plan. Specialists including Ecologists, Stormwater Engineers, Urban Designers, and Planners have all given presentations on their respective disciplines, as well as taking questions or suggestions from the Mana Whenua Representatives during meetings.

Cultural Values Assessments (CVA's) were prepared by four Iwi (Ngāti Te Ata Waiohua, Ngāti Tamaoho, Te Ākitai, Ngaitai ki Tamaki) with specific recommendations varying between the reports. Specific concerns were raised around maintaining water quality in runoff, and preservation of any archaeological finds during construction, protection of waterways and a stand of native vegetation near the intersection of Drury Hills and Waihoehoe Roads.

A summary of the consultation with Iwi and meeting minutes are attached in **Appendix 18**.

In terms of wider community views, FHLD has relied on the consultation undertaken as part the Council's Structure Plan for Drury- Opāheke to inform its masterplan and Plan Change.

## 10.0 ASSESSMENT OF ENVIRONMENTAL EFFECTS

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

## 10.1 URBAN FORM AND QUALITY BUILT ENVIRONMENT

The Urban Design Report prepared by Woods has informed the masterplan and Plan Change (refer **Appendix 7**). The Urban Design Report identifies the opportunities and constraints presented by the Plan Change area, and develops a series of project goals specific design principles which the zoning pattern responds to. These are copied below as follows:

***Goal 1: Create strong neighbourhood communities for people of all ages;***

- *Create a range of housing choices by varying density through different residential zone types*
- *Provide neighbourhoods defined by the grid of collector roads and ecological corridors that establish a sense of place*

***Goal 2: Improve connections to existing and future urban communities;***

- *Improve connections to Future Urban areas to the North, proposed employment zones in the existing Drury township and Drury South.*

***Goal 3: Establish a healthy and socially connected community focused on pedestrians and cyclists;***

- *Encourage efficient use of land and accessibility by providing higher intensity of housing around centres, and open space amenities.*
- *Concentrate intensity around the local and neighbourhood centres to encourage activity and vibrancy*

***Goal 4: Focus on pedestrians, cyclists and integration with public transport;***

- *Create compact and walkable neighbourhoods that are pleasant and safe to move around, reducing dependency on cars.*
- *Deliver a permeable movement network that is designed to encourage pedestrian and cycle activity and responds to the topography*

***Goal 5: Provide quality public spaces easily accessible to residents;***

- *Protect and enhance existing stream networks and native vegetation.*
- *Create key ecological corridors that offer visual and recreation amenity.*
- *Provide a range of high quality suburb and neighbourhood parks in locations that are legible and walkable, bounded by both roads and ecological corridors.*

These project goals and design principles directly underpin the proposed design response for Drury East, including the distribution and location of zones, the location of roads and connections and the open space network. They respond to the key characteristics of the Plan Change area and build on the urban design and place-making objectives of the AUP and Auckland Design Manual.



The Urban Design Report assists in defining the likely effects of the proposed design response, secured by the zoning layout and precinct provisions on the quality of the built environment. In the context of achieving a quality built environment, the proposal will:

- **Respond to intrinsic qualities:** The Urban Design Report sets out the environmental conditions of the Plan Change area in detail and the masterplan at **Appendix 7** and shown in **Figure 8** below demonstrates how future development within the Plan Change area is able to respond to these conditions effectively. This includes concentrating densities to the west to integrate with Kiwi's proposed Metropolitan Centre, retaining the existing stream network where possible and optimising the location of roads to achieved a permeable, connected grid.
- **Hierarchy of centres:** The proposed zoning layout encourages higher residential intensity in areas within close proximity to Kiwi's proposed Metropolitan Centre to create a compact urban form and ensure vibrancy within the centre.
- **Housing Choice:** There is a level of flexibility in the Terrace Housing and Apartment Building zone, Mixed Housing Urban and Mixed Housing Suburban zone standards to enable a variety of housing typologies. Therefore, the proposal will contribute to a diverse mix of housing choice by providing for a range of densities and living opportunities within Drury East.
- **Resource and infrastructure efficiency:** The Plan Change seeks to apply zones that ensure infrastructure is used efficiently. Specifically, zones have been identified based on proximity to services, the rapid and frequent transport network, opens space amenity, site topography and interface conditions.
- **Safety of site, street & neighbourhood:** Applying the Terrace Housing and Apartment Building zone, Mixed Housing Urban and Mixed Housing Suburban zones to the Plan Change area will ensure that future development contributes to the safety of the site, street and neighbourhood. This is achieved by requiring resource consent for multi-unit development, which will be assessed against matters that encourage buildings to address the street and provide an appropriate degree of activation and surveillance to it<sup>19</sup>. Taking into account the existing rural environment, this is likely to result in development that enhances the safety of the street & neighbourhood beyond what currently exists in the surrounding area.
- **Quality of future street and block patterns:** The indicative masterplan for the Plan Change area clearly illustrates that future development can deliver a roading pattern creates a permeable, connected grid for movement, sets the

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<sup>19</sup> Refer to H6.8.2(2)(d) of the Terrace Housing and Apartment Building zone, H5.8.2(2)(c) of the Mixed Housing Urban zone and H4.8.2(2)(d) of the Mixed housing suburban zone.





Waihoehoe Road and Fitzgerald Road, and the 8 ha Drury Sports Fields on the west side of motorway, which is 1.5 km from the Waihoehoe Road and Fitzgerald Road junction. Both of these parks are deemed Suburb Parks in Council's Open Space policy.

With respect to open space, the Council's Open Space Provision Policy 2016 is a key guiding document. The policy states:

- Neighbourhood Parks should be within a 400m walk in high and medium density residential areas, are typically between 0.3 to 0.5 ha and typically include play space and flat 'kick a ball' space.
- Suburb parks should be within a 1km walk of high and medium density residential areas, are typically between 3 – 5 ha and typically include provision for organised sport and recreation.

A variety of open spaces are indicated within the Urban Design report that will cater for the varying needs of the future community (refer **Appendix 7**) and which align with Council's Open Space Provision Policy. In particular the indicative open spaces within the Urban Design report include:

- **Ecological Corridors:** Four ecological corridors of varying lengths proposed. The main ecological corridor is the existing Waihoehoe Stream and tributaries to the main Hingaia Stream form the three southern ecological corridors. Ecological corridors which are multi-purpose linear parks that provide recreational and passive open space, visual amenity and areas for stormwater management.
- **Suburb Parks:** Two large suburb parks (3-5 hectares) are indicated at either end of the Drury East Precinct. These parks would logically be located adjacent to the ecological corridor to enable park users to use the walking and cycling network to access the parks. This, in turn, reduces the parking demand for these larger parks that typically have organised sports due to their size.
- **Neighbourhood Parks:** In line with Council's Open Space Provision Policy 2016, four neighbourhood parks are proposed to provide open space within walkable catchments.

The urban subdivision provisions included within Chapter E38 of the AUP will apply within the Plan Change area, including Policy E38.3(18) which requires subdivision to provide for the recreation and amenity needs of residents by providing for open spaces which are prominent, sufficiently sized to cater for future residents and enable pedestrian and/or cycle linkages. This will ensure that there are provisions in place to ensure there is accessible open spaces of a range of sizes to service the future population While allowing flexibility to ensure that the final layout of open spaces within the Plan Change area can be determined through the resource consent process once a final design is settled on.

In relation to social facilities, the Plan Change area is within approximately 1.5km of the existing Drury Centre and close proximity to Kiwi's proposed Metropolitan Centre. The proposed Mixed Use zoning at the junction of Appleby and Fitzgerald Roads local service and convenience retail for future residents.

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 .

In summary, the Auckland-wide provisions will ensure the adequate provision of accessible and quality open space for future residents. The surrounding existing and planned amenities and social facilities, are and will be accessible by active and public modes of transport, and are or will be of a sufficient size to cater for the social and cultural needs and well-being of future residents of the Plan Change area.

### 10.3 TRANSPORT

An Integrated Transport Assessment (ITA) was undertaken by the Strategic Growth Alliance (SGA) in support of Council's Drury-Opāheke and Pukekohe-Paerata Structure Plans, outlining the transportation effects of the proposed Structure Plan areas in further detail. The SGA ITA however is limited in the level of detail provided given that it focuses on the full development beyond the year 2048 and does not provide a detailed breakdown of the intermediate years. As FHLd is proposing to undertake development in stages an ITA has been prepared by Mott McDonald for the Plan Change application and is included at **Appendix 8** to this report.

The Mott McDonald ITA builds on the findings of SGA ITA and considers the existing road and rail network as well as the future land uses and transport network that will be developed through committed infrastructure upgrade projects in the current National Land Transport Programme and Auckland Regional Land Transport Plan.

Key matters addressed in the ITA include the following:

- a) Access to the Plan Change Area;
- b) The additional upgrades that are required and the timing of those upgrades to enable development ahead of the planned upgrades to the wider Drury network;
- c) The appropriateness of the future road network within the Plan Change area; and
- d) The appropriateness of the future public transport network service of the Plan Change Area.

These matters are addressed in turn below.

## 10.3.1 Access to the Plan Change Area

It is proposed to provide staged accesses to the Plan Change area in response to the level and rate of development and required roading infrastructure.

The ITA indicates that for full development, in 2048+ it is anticipated that there will be multiple access options to/from the Plan Change area as shown in Figure 9. The east/west collector road will provide access to the Plan Change area from the proposed Drury Metropolitan Centre.

The ITA indicates that vehicle access into the Plan Change area will be based on the road hierarchy so that the arterial network connects to the collector network before entering the network of local roads to provide access to properties within the Plan Change area. The ITA further indicates that direct access will not be provided from arterial roads into individual properties, but direct connection to local roads from arterial roads may occur at limited locations.

The ITA also indicates that the future Mill Road corridor and its connection to Fitzgerald Road will further improve the Plan Change area access and connection to the wider region. SH1 and the future Mill Road will provide linkage to the north and south, while Great South Road and Waihoehoe Road provides links to the east and west.

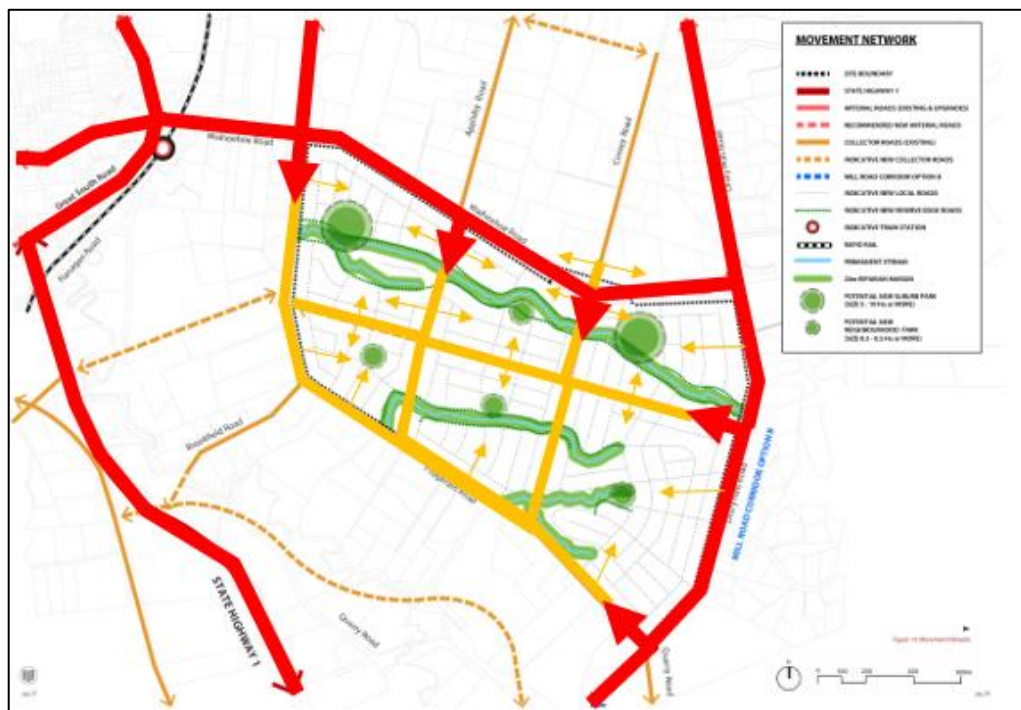


Figure 9: Drury East Movement Network (indicative).

## 10.3.2 Effects on the External Transport Network

Traffic modelling has been undertaken to assess the effects of the proposed developments within Drury East on the external transport network. The modelling has considered the proposed developments by Kiwi, FHLDL, and Oyster Capital. The modelling has considered the effects on the wider network and has concluded that the effects at the Drury interchange and the Waihoehoe/Great South Road intersection are relevant.

The modelling has also determined the requiring timing of the upgrades and how this coordinates with the release of residential, retail and commercial capacity. The modelling has assumed the following funded infrastructure upgrades will be delivered within the NZTA timeframes:

- Mill Road (Southern and Papakura Section) – by 2025/2026;
- Drury Central and Drury West train stations – by 2024;
- Rail electrification Papakura to Pukekohe – by 2024;
- SH1 Papakura to Drury South widening, interchange improvements, new Drury South interchange – by 2025;
- Mill Road (Northern section).

In general, the modelling has found that the Drury East developments can be accommodated by the surrounding transport network, with several targeted local upgrades within the first two decades, assuming that the NZTA upgrades noted above are delivered:

- Interim safety upgrade to the Waihoehoe / Great South Road intersection to provide safe crossing facilities for pedestrians and cyclists on all approaches.
- Upgrade and signalisation to the Great South Road/Waihoehoe Road intersection to signals.
- Capacity upgrade of the Waihoehoe / Great South Road intersection.

After an initial safety interim upgrade of the Waihoehoe / Great South Road intersection, the local transport network can operate until 2033/2038 (depending on whether direct access from SH1 into the Plan Change is provided) until further upgrades are required.. The modelling has also confirmed that direct access from SH1 into the Plan Change area is not required however, if it is provided this will result in further capacity at the Great South Road/Waihoehoe Road intersection.

The ITA recommends that additional number of dwellings and commercial GFA (in sqm) within the Drury East development area should not exceed the thresholds outlined in **Table 10.3.2.1 and 10.3.2.2 below**, until such time that the identified infrastructure upgrades are constructed.

**Table 10.3.2.1: Threshold for Development with 'Access A' as shown on IX.10.3  
Drury Centre: Precinct Plan 3 not constructed**

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

**Table 10.3.2.2 Threshold for Development with 'Access A' as shown on IX.10.3  
Drury Centre: Precinct Plan 3 constructed**

New/ Additional Dwelling Threshold	New/ Additional Retail GFA Threshold	New/ Additional Commercial GFA Threshold	Transport Upgrades Required to Exceed the Dwelling, Retail/Commercial GFA Thresholds
Prior to any new dwellings, retail or commercial development			<ul style="list-style-type: none"> <li>Interim safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for</li> </ul>

			pedestrians and cyclists on all approaches.
4,640	83,960m <sup>2</sup>	46,800m <sup>2</sup>	<ul style="list-style-type: none"> <li>Upgrade of the Waihoehoe / Great South Road intersection to signals.</li> </ul>
6,428	107,650m <sup>2</sup>	60,000m <sup>2</sup>	<ul style="list-style-type: none"> <li>Capacity upgrade of the Waihoehoe / Great South Road intersection to signals (on all approaches).</li> </ul>

These thresholds have also been converted to in-bound and out-bound trip rates that would provide a secondary layer of assessment if the above thresholds are exceeded. Infringing the above thresholds and the external trip rate thresholds would require consent as a discretionary activity, subject to the normal tests for notification.

These thresholds have also been converted to in-bound and out-bound trip rates that would provide a secondary layer of assessment if the above thresholds are exceeded. Infringing the above thresholds and the external trip rate thresholds would require consent as a discretionary activity, subject to the normal tests for notification.

### 10.3.3 Proposed Transport Network – Internal Road Network

The Plan Change area is proposed to be serviced by a combination of collector and local roads. The indicative location of collector roads and where these will intersect with the existing road network is shown indicatively on proposed Precinct Plan 1. The location of these roads are principles-based are not intended to be precise. It is expected that the location of these roads would be confirmed through the resource consent process.

The Plan Change also includes provisions to guide the location and layout of local roads to ensure these achieve a highly connected street layout that integrates with the surrounding transport network. The Plan Change includes indicative road cross sections to ensure that the road network within Drury East integrates with the surrounding development within the Oyster Capital and Kiwi Property Plan Change areas. These road cross sections include provision of pedestrian and cycle paths to promote active transport modes.

Additional assessment criteria have been included for roads *refer IX8.2(1) (d)*. The proposed assessment criteria set out the staging of interim and permanent cycle and pedestrian connections to the Drury Central Train Station, generally within the 400m

walking catchment of the station, being the Terrace Housing and Apartment Buildings zone within the Plan Change area. Other than the required transport upgrades noted above, access to the surrounding road network would be provided on an 'as required' basis as development occurs, as is typical practice for greenfield development in Auckland. This includes the construction of new roads to support development and the progressive urbanisation of existing rural roads within and surrounding the Plan Change area.

Public transport to service the development would be provided by Auckland Transport on the Collector Road network as the demand arises.

While the exact form and function of the road network within the Plan Change area will be determined as part of future resource consent applications, the Precinct provisions will guide this process to ensure an integrated road network across Drury East.

#### **10.3.4 Proposed Transport Network – Public Transport**

The ITA identifies the Drury Central train station and public transport hub as the focus for the public transport network servicing Drury East. The train station and public transport hub integrates multiple modes of transport that link the local network and the wider, regional network. The train station, located on the southern line between Papakura and Pukekohe, will provide high capacity, high frequent movement to / from the Auckland CBD particularly once the future electrification of the rail line between Drury and Pukekohe is completed. The bus network will primarily service the local network, providing critical connections between routes. The combination of these public transport facilities alleviates traffic congestion and allows for a more sustainable outcome.

The Drury Central station location has been investigated within the ITA undertaken by the Strategic Growth Alliance in support of Council's Drury-Opāheke Structure Plan has indicated that the preferred potential location is further north than the proposed Metropolitan Centre. The ITA notes that to better support public transport use the location of the hub and train station should be located adjacent to the proposed Drury Metropolitan Centre.

The proposed bus network will utilise the arterial and connector roads with access from local roads.

#### **10.3.5 Transport Summary**

The effects of the Plan Change on the existing and future transport network have been assessed in the ITA and are determined to be acceptable. The ITA has shown that extent of development enabled by the Plan Change can be accommodated on



the surrounding road network while maintaining acceptable levels of safety and efficiency through the next three decades. Additional upgrades are required within the first two decades however, the Plan Change includes rules to sequence development with the delivery of this infrastructure. The Plan Change will enhance accessibility all modes of transport within the Plan Change area by providing a connected an integrated road network which provides for cyclists and pedestrians and creates linkages to the new Drury Central train station.

## 10.4 VEGETATION AND ECOLOGY

An Ecological Assessment prepared by The Ecology Company has been undertaken to support the Plan Change and is included as **Appendix 9** to this report. This includes an assessment of ecological values of freshwater and terrestrial ecosystems.

A combination of desktop assessments and site visits were carried out for the Plan Change area, during which, key terrestrial and aquatic habitat features were identified across the site.

### 10.4.1 Aquatic and Freshwater Ecology

The Plan Change area falls within the Hingaia Stream catchment, and includes three streams which are all first order tributaries of Hingaia Stream. In undertaking the Ecological Assessment, the unnamed tributaries of Hingaia Stream were inspected (where possible) and categorised according to the Auckland Council definitions. The stream classifications are shown in **Figure 10** below and also included within **Appendix 9**, but it should be noted that this assessment was undertaken during unusually dry weather and not all sites could be accessed. Therefore, there are some differences between the Council assessment of the streams. And the assessment by the Ecology Company.



**Figure 10: Stream categorisation of the tributaries of Hingaia Stream within the Plan Change area.**

Most streams were identified as being subject to modification and degradation, with little riparian vegetation present. Stream modifications include channelization and straightening, removal of riparian vegetation, installation of structures such as culverts and dams which affect fish passage and water quality, construction of ponds and pollution. There is also the presence of aquatic weeds such as parrot feather and evidence of livestock accessing the channels at some locations. These changes have resulted in low aquatic habitat diversity, low aquatic biodiversity and poor water quality.

Any original wetlands have been drained, filled or otherwise reclaimed, largely for agricultural purposes. These modifications have resulted in a near complete loss of wetland ecosystem types from the area along with the biota dependent on them.

It is proposed to create natural wetlands at suitable locations. Additionally, where possible the tributaries of the Hingaia Stream that traverse the Plan Change area will be retained and enhanced. Stream restoration will involve reconfiguring the stream channel to create a variety of channel widths, depths and profiles, addition of wood and variably sized inorganic substrates to add to channel complexity and create refuges for fish and invertebrates, installation of fish passages where culverts and other stream crossings are created (if required). The Ecological Assessment notes that riparian planting of an average at least 10m each side of intermittent streams and 20m on each side of a permanent streams should be undertaken. The proposed Drury East Precinct incorporates a riparian margin standard that has been incorporated in other greenfield precincts. This standard requires riparian margins to be planted either side of an intermittent or permanent stream to a minimum width

of 10m. This is a minimum requirement which allows some flexibility for the final design at the resource consent stage.

To facilitate urban development of the land, some stream removal is likely to be required.

The effects of reclamation and the adequacy of the mitigation or compensation proposed will be considered as part of the resource consent process under the standard AUP provisions within Chapter E3 Lakes, rivers, streams and wetlands. Where any stream reclamation is required which may result in loss of stream habitat, the effects can be offset through enhancement of other sections of streams within the Plan Change area to ensure no net loss is achieved.

The Ecological Assessment finds that there is not currently sufficient design detail to work out the extent of offsetting required, but it is likely that the effects of any stream loss would be able to be mitigated by other enhancement works over the rest of the site. The extent of any stream loss will be quantified as part of detailed design and the effects will be assessed as part of a future consenting process.

Earthworks within the Plan Change area have the potential to create an uncontrolled discharge of sediment laden water which can impact water quality of receiving watercourses. In this case, implementation of an erosion and sediment control plan that is designed and maintained in accordance with Auckland Council GD05 - Guidance for Erosion and Sediment Control will be appropriate to deal with effects of sedimentation from earthworks. This can be dealt with through the resource consent process via the rules in Chapter E11 Land disturbance – Regional and Chapter E12 Land disturbance – District within the AUP.

The proposed urban land use will change the type of contaminants entering the stream environment, with an expected reduction in nutrients and increase in heavy metals and hydrocarbons associated with impervious surfaces. These contaminants can impact aquatic flora and fauna and the way that streams function as a whole. The approach to managing the effects on freshwater quality as a result of stormwater runoff is discussed below.

Overall, it is considered that the impacts of the urbanisation of land within the Plan Change area can be managed to mitigate or offset any adverse effects on aquatic and freshwater quality within the Plan Change area. Furthermore, the Plan Change presents an opportunity to restore and enhance the aquatic and freshwater quality values in the Plan Change area.

## 10.4.2 Terrestrial Ecology

Vegetation within the Plan Change area is predominately exotic pasture, crops and exotic trees and shrubs planted for shelter, amenity or as part of gardens. No Significant Ecological Areas (SEA) or notable trees are identified within the Plan Change area. It is noted that the nearest SEA is located approximately 220m east across Drury Hills Road (SEA\_T 1175).

The only example of predominantly indigenous vegetation in the Plan Change area, that is likely to have potential value as habitat for native species, is a small area of forest remnant located near the corner of Waihoehoe Road and Drury Hills Road. The Ecological Assessment notes that this stand of vegetation will be impacted by the Mill Road alignment. Utilisation of Corridor A in particular could result in the complete removal of the remaining forest remnant. Corridor B would bisect the area and would also likely result in vegetation removal. Given that the alignment for the Mill Road Corridor is not finalised at this time and the trees are protected by a consent notice, no additional protection is proposed as part of this Plan Change.

Existing vegetation on site is identified as being a potential habitat and food source for native avifauna, bat, and lizard populations, as well as common non-native bird species. The marine environment downstream of the Plan Change area is within a SEA and is an important wintering ground for wading birds.

The Drury – Opāheke area generally lacks indigenous habitats and poses a barrier to ecological connectivity and function at the broader landscape scale. The Plan Change will result in loss of vegetation to facilitate land development however, this will be kept to a minimum and will be avoided where possible. There is also considerable potential to restore habitats at the site as part of the proposed riparian planting standard within the Plan Change.

On the basis of the above, it is considered that the potential effects of the rezoning proposal on the terrestrial ecological values of the Plan Change area will be acceptable, and are appropriately managed through the Auckland-wide provisions of the AUP.

## 10.4.3 Stream Erosion and Sedimentation

Tonkin & Taylor, together with The Ecology Group and Freshwater Solutions has undertaken an assessment of the potential effects of urbanisation on the ecological effects associated with stream erosion and sedimentation. With respect to the existing environment the ecologists note that stream banks and channels have been highly impacted by stock access and stream banks are often highly erodible due to the general lack of vegetation and the soft erosive soils within the catchment. With respect to the receiving environment, the ecologists research suggests that the

marine receiving environment is a natural deposition zone, and sediment deposition is expected and required for the environment to continue to function.

In terms of the potential effects of development on this existing environment, the ecologists find that the change in hydrological regime may result in streambank sediment entering the receiving environment at times (e.g. after heavy rain). However, this will be balanced in part by the effective removal of contributing sediment loads from agricultural land use and the future potential benefits associated with planting along the blue-green network throughout the plan change area (e.g., root establishment, increased streambank stability and filtering capacity).

In addition, the plan change area comprises only a very small portion of the 37,637 ha Pahurehure Inlet catchment. Even at the more local scale of the upper Drury Creek, the plan change area comprises a small proportion of the overall contributing catchment. On that basis, any changes within the Plan Change area on sediment levels in Hingaia Stream would be very difficult to distinguish from changes elsewhere within the catchment.

On the basis of this analysis, in our view, the proposed effects of the Plan Change and urbanisation on freshwater systems, freshwater and coastal water will be acceptable, particularly when taking into account the nature of the existing environment and receiving environment.

The Council has requested that the Applicant use a Stream Erosion Risk Tool to quantify the changes in stream erosion due to urbanisation. Issues have been encountered with this tool, which has affected the reliability of the results and further work would be required to ensure the results are robust. Notwithstanding that, in our view, the research undertaken by the ecologists provides a sufficient evidence base to evaluate the effects of the Plan Change relating to stream erosion and sedimentation.

## 10.5 FLOODING AND STORMWATER MANAGEMENT

### 10.5.1 Flooding

The Plan Change area is identified on Council's GIS mapping system as being subject to overland flow paths and flood plains, and is within flood prone areas. A Stormwater Management Plan has been prepared by Woods, and is included as **Appendix 10** The SMP reports on the flood risk assessment carried out within the Plan Change area to identify any flooding effects associated with development of the Plan Change area and whether there is any need to provide flood mitigation measures.

The flood risk assessment involved developing an integrated flood model that takes into account the proposed development within the Kiwi Property Plan Change area. This model is based on the Auckland Council data currently available on the Councils GIS which is soon to be updated<sup>20</sup> and a pass forward approach to flood mitigation. As the existing Great South Road and Flanagan Road culverts are undersized, flows from the full development cannot be passed forward until the capacity of the culverts have been increased. Woods have developed options for upgrading the culverts within the Drury East - Great South Road culvert assessment<sup>21</sup>. Until such time as the culverts are upgraded stormwater attenuation may possibly be temporarily required for the northern portion of the Plan Change area. Woods has undertaken a high-level assessment to determine the pre-development and post-development flows resulting from the proposed development in order to determine indicative sizes of the temporary attenuation devices. The modelling has taken these different scenarios into account.

Overall, the modelling showed that changes in flood levels are less than minor. Development will result in some localised changes to flood levels (increases and decreases) within the Plan Change area. The only increase in flood levels that are outside the Plan Change area occur at the downstream boundary with the Kiwi Property Plan Change area along the Great South Road tributary. The reason for this increase is the increased runoff generated from development enabled by the Drury Centre Plan Change request results in higher tailwater level for the Drury East development. This is mitigated by the upgrade options proposed for the Great South and Flanagan Road culverts. Further analysis will be required as part of the next stages to confirm the extent of effects on neighbouring sites.

The standard provisions in Chapter E36 of the AUP will apply to any development within identified flood plains and/or overland flow paths, which would sufficiently manage the effects of potential development in these areas. Therefore, any increases to flood levels these can be minimised through optimising the design through the resource consent stage.

### 10.5.2 Stormwater Management

A Stormwater Management Plan (SMP) has been prepared by Woods, and is included as **Appendix 10**. The SMP aims to align the proposed stormwater management approach for the Plan Change area with the requirements of the Auckland Unitary

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<sup>20</sup> The integrated flood model is based on a Flood Hazard Assessment for the 1% AEP event in the area by Auckland Council in 2010. The Integrated Flood Modelling undertaken by Woods was based on this data. The Hingaia Stream has recently been remodelled by Auckland Council (Drury Structure Plan Draft SMP). The draft flood plains as shown on Drury Structure Plan Draft SMP do not show much variation to the floodplain published on Auckland Council GIS. It is noted that the remodelled flood plains are draft and awaiting final sign off prior to being finalised and published on Auckland Council GIS. The Wood model will continue to be refined through the Plan Change process as this updated data becomes available.

<sup>21</sup> Appendix D of the Drury East Stormwater Management Plan.

Plan (AUP), taking into account the catchment specific issues, constraints and opportunities.

The proposed approach to managing stormwater within the Plan Change area has been discussed with Mana Whenua through a series of Hui and workshops. The outcomes of these Hui have influenced the proposed approach to managing stormwater within Drury East.

#### *10.5.2.1 Stormwater Management – Quality*

The findings of the SMP are that the impacts on stormwater management – quality, from the land use change from rural to urban can be managed through the incorporation of a water sensitive design approach, stormwater quality treatment for high use roads and carparks and avoidance of high contaminant yielding roof and cladding materials.

The SMP identifies the best practicable options for managing the quality of stormwater runoff as:

- A requirement to avoid high contaminant generating roof and cladding materials for all new buildings; and
- Treatment to be provided for stormwater runoff generated from high use roads (> 5000 VPD) and car parks (> 30 vehicles) using large device, raingardens, tree pits, swales, filter strips etc.

Furthermore, the SMP also identifies communal devices as a treatment train approach for providing secondary treatment and hydrology mitigation. Pre-treatment can be provided through Gross Pollutant Traps and propriety devices prior to flows discharging to the communal devices. Mana Whenua were supportive of using communal devices with pre-treatment provided via the use of Gross Pollutant Traps because these devices are more efficient, particularly in respect of ongoing operation and maintenance costs.

The stormwater quality provisions included within Chapter E9 of the AUP will apply within the Plan Change area. This will ensure that there are rules in place to manage the stormwater runoff quality from new impervious areas that have the potential to adversely affect waterways. Specific mitigation measures as set out within the SMP will be considered as part of a future resource consent process via the certification requirements of the Council's regional Network Discharge Consent. This will enable an assessment of proposed options for managing the quality of stormwater runoff in the context of a particular development proposal.

In addition to this, the SMP proposes stormwater quality treatment for all roads, and not just high use roads as required by the Section E9 of the AUP. This goes beyond



what is required by the AUP and is generally consistent with the approach of the Council's regional Network Discharge Consent.

The proposed approach to managing Stormwater-quality will ensure that stormwater runoff quality from new impervious areas that have the potential to adversely affect waterways, including high contaminant generating carparks and all roads will be appropriately managed.

#### 10.5.2.2 Stormwater Management – Flow

The findings of the SMP are that the impacts on stormwater management-quality, from the land use change from rural to urban can be managed through providing hydrological mitigation (detention and retention) for impervious surfaces within the Plan Change area.

The SMP identifies the following devices as the best practicable options for meeting retention requirements:

**Rain Tanks:** Rain tanks are proposed to be provided for all roofed areas. Rain tanks will allow for re-use for non-potable use e.g. toilet flushing, laundries and gardens. Overflow connection to piped network could also be adopted. It is proposed that the focus would be to re-use greater than the minimum requirement of 5mm as per the AUP: OP. Underground storage tanks or trenches with seepage to ground and overflow to piped network could also be adopted, however the appropriateness of this option will need to be determined as the site specific design stage.

**Bioretention Devices:** Bioretention devices such as rain gardens and tree pits are proposed. As previously discussed, the use of larger communal devices as part of a treatment train approach are also proposed providing secondary treatment and hydrology mitigation.

**Permeable Pavement:** Use of permeable pavers, porous concrete or asphalt could be used for hardstand areas such as driveways (private) and carpark areas, footpaths and parking bays (public). The use of permeable pavement is dependent on local ground stability and soil infiltration rates which is to be checked for devices during detailed design stages.

The SMP identifies the following devices as the best practicable options for meeting detention requirements:

- A detention component can be provided within the large communal devices for meeting the hydrology requirements of public roads, private hardstand and Jointly Owned Access Lot (JOAL) areas;
- Rain tanks;

- Permeable pavements;
- On lot bio-retention devices (raingardens, tree pits, vegetated swales); and
- Living roofs.

The findings of the SMP are that the stormwater management approach outlined above will result in hydrological mitigation that is consistent with Policy E1.3.10. The application of the SMAF1 Control will ensure that specific mitigation measures as set out within the SMP will be considered as part of a future resource consent process. This will enable an assessment of proposed options for managing the quality of stormwater runoff in the context of a particular development proposal.

Overall, it is considered that the above methods will be sufficient to achieve hydrological mitigation of the effects of stormwater runoff generated by increased impervious areas, to ensure aquatic ecosystems remain healthy.

#### *10.5.2.3 Stormwater Management – Conveyance*

In terms of conveyance, it is proposed to convey stormwater through a combination of piped networks, swales and discharge to streams within the Plan Change area via formed and unobstructed overland flow paths.

The primary network consists of pipelines and swales. The primary network will collect the developed catchment and convey rainfall events up to and including the 10% AEP, 10-minute duration rain event incorporating climate change.

Any excess flows or secondary flows will be conveyed using the secondary network which is to be designed to convey the 1% AEP rain event incorporating climate change. Overland flows are to be contained within road reserves and green spaces so as to not create a nuisance within the built environment.

Overall, it is considered that the proposed methods for the conveyance of stormwater will ensure that the effects of urban development are acceptable.

## **10.6 SERVICING**

The land within the Plan Change area is not currently serviced by any piped wastewater reticulation. The options for wastewater servicing of the Plan Change area have been discussed with Watercare Services Limited and the Drury East developers. Watercare Services Limited has confirmed that the development enabled by the Plan Change can be serviced in the future through extending the water and wastewater network to provide services to meet the anticipated demand in the areas marked as “Decade 1” and “Development underway”.

Watercare and the applicant are entering into an infrastructure funding agreement which provides a delivery mechanism for connecting infrastructure to service the Plan Change area.

Watercare have confirmed that services are expected to be available progressively from 2019 and 2020.

Power, telecommunications and gas infrastructure, network upgrades will be required to fully service development within the Plan Change area, however, there should be no constraints or issues with undertaking these upgrades progressively as development occurs.

## 10.7 HERITAGE AND ARCHAEOLOGY

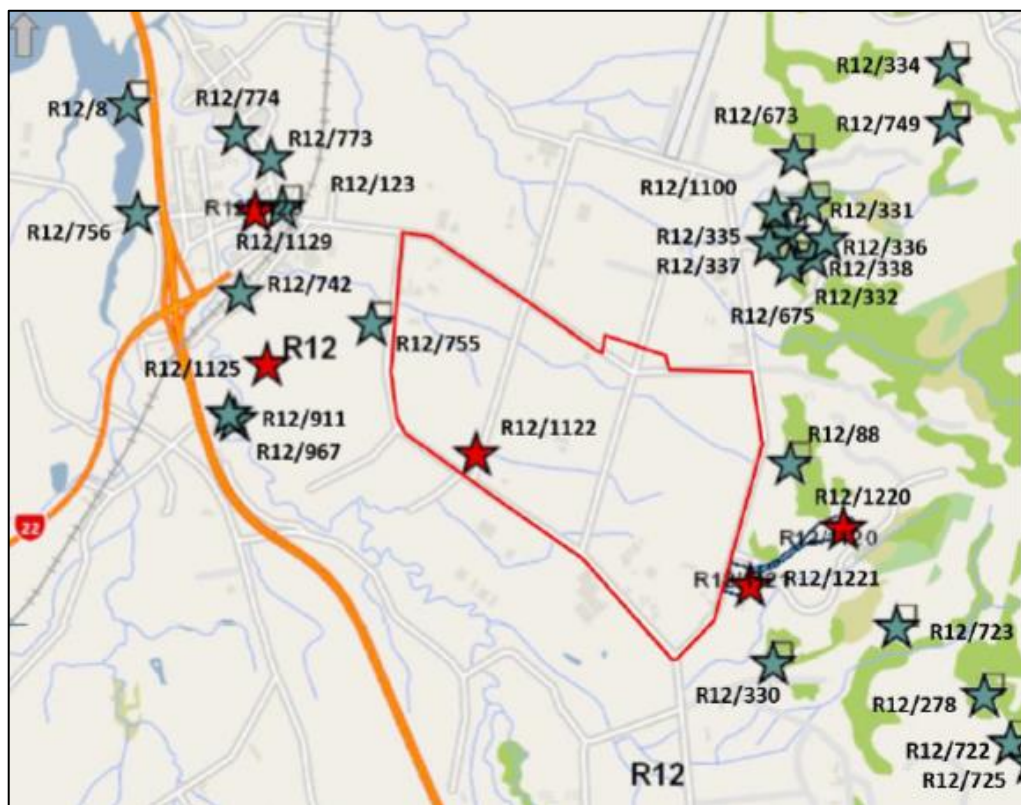
An assessment of the archaeological and heritage values of the Plan Change area has been undertaken by Clough & Associates, and their report is included as **Appendix 11** of this report. The Archaeology Assessment involved a desktop review of the Plan Change area, and a visual inspection and ground surface examination during a site visit.

The Archaeology Assessment identifies one archaeological site within the plan change area which is recorded on Auckland Council's Cultural Heritage Inventory (identified as R12/122 on **Figure 11**). This site is the Drury Tramway/Mineral Railway which is associated with the Waihoihoi Coal Mining Company in the 1850s and Drury Coal Mining Company and Pottery works in the early 20th century. The estimated route runs from the southeast corner through the central part and exits near the northeast corner of Fitzgerald Road. The site visits did not reveal surface evidence of the tramway however, subsurface remains cannot be discounted. An evaluation was undertaken by Auckland Council to assess whether the Mineral Railway meets the criteria for scheduling. This evaluation concluded that there is little physical evidence remaining and scheduling would not provide for reasonable use of the land.

The Archaeology Assessment acknowledges that based on the nature of the archaeological site i.e. a linear alignment crossing through the central Plan Change area, it is not considered practical to implement measures to completely avoid the site upon redevelopment of Drury East. The report recommends that where development cannot avoid this archaeological site, recordings of any identifiable remains should be undertaken to mitigate any adverse effects on archaeological and historic heritage values.

Based on historical research, it is considered likely that additional unrecorded subsurface archaeological sites are located within the Plan Change area which could be exposed during future development. Further investigations of these areas would be required once development have been progressed, which can be undertaken through the resource consenting process.

If modification of a pre-1900 archaeological site/s (including any unrecorded sites) is necessary for future development, an Authority issued under the HNZPTA would be sought prior to the commencement of site works. It is also anticipated that standard accidental discovery protocols will be implemented in the event that any archaeological material is uncovered during excavation works, and any sites will be recorded for inclusion in the Cultural Heritage Inventory.



**Figure 11: Map showing the Plan Change area in red and the recorded archaeological sites in the general area (source: NZAA ArchSite).**

Overall, it is considered that the effects on any archaeological values existing within the Plan Change area will be appropriately managed or mitigated through the methodology outlined in this report.

## 10.8 CULTURAL VALUES

Engagement has been undertaken with all Mana Whenua groups with known customary interests in the Plan Change. The consultation report included at **Appendix 18** details the results of this engagement to date.

It is noted that there are no known identified sites of Significance or Value to Mana Whenua within the Plan Change area.

Four Iwi groups, Ngāti Te Ata, Ngāi Tai Ki Tāmaki, Te Akitai and Ngāti Tamaoho Trust have prepared Cultural Valuation Assessments (refer **Appendix 12-15**).

In summary these assessments highlighted the following areas of interest to the iwi groups:

- Ongoing degradation of waterways through further development, loss of habitat and increased stormwater runoff;
- Loss of mature vegetation and natural habitats for native species;
- Extent of earthworks and potential to disturb kōiwi, Maori artefacts or archaeological features;
- Protection of streams including provision for stream management plans and special policy requirements (greenspace, infrastructure, wider riparian margins);
- Treatment of stormwater prior to discharge;
- Unforeseen adverse impacts to the environment;
- Sustainability;
- Ongoing engagement has been requested;
- The application of Te Aranga Maori Design Principles; and
- Meaningful cultural interpretation occurs through incorporation of place names (e.g. streets and parks) and if and as appropriate cultural art and design elements to offset the impacts to the cultural and natural landscape.

These matters have been considered and addressed in developing the Plan Change where possible, particularly with respect to the development layout and zoning pattern. The proposed provisions seek to ensure that the intrinsic values of the Hingaia Stream and its tributaries are respected and riparian enhancement occurs throughout the Plan Change area.

## 10.9 LAND CONTAMINATION

A preliminary Environmental Site Investigation report has been prepared by EHS Support New Zealand Limited, and is included as **Appendix 16** to this report. Overall, the Land Contamination Assessment concludes that the Plan Change area is suitable for future residential and commercial development.

The Land Contamination Assessment found that based on a review of aerial photos, an inspection of the relevant property files and inspections of the Plan Change area that the historical and present land uses are confined to residential and rural activities including market gardens, greenhouses, cropping and stockyards. There were areas of uncontrolled filling and an aboveground storage tank. Sheep-dip activities could not be confirmed.

As many of the houses and farm structures were built prior to 2000, hazardous materials such as asbestos and lead paint are likely to have been used which may have impacted surrounding soils.

The Land Contamination Assessment notes that there are a number of septic tank systems which have the potential to locally impact shallow unconfined groundwater. It is unlikely the impacts will be significant however, once the treatment systems from each property have been removed.

Further investigation is required to confirm other potential contaminants which may include (but are not limited to), agrichemicals, asbestos products disposal and privately closed landfill sites.

Notwithstanding the above, the Land Contamination Assessment finds that based on the information available, the Plan Change area will be suitable for future commercial and residential development, with some targeted remediation likely required. Consent will be required under the NES, and any future applications will be supported with an appropriate assessment to determine the likely level of contaminants present on-site, and any remediation works required. Any land contamination will therefore be managed through the resource consent process.

## **10.10 GEOTECHNICAL**

A Geotechnical Report has been prepared by CMW Geosciences to inform the proposed Plan Change and a copy is included as **Appendix 17** of this report.

The findings of the geotechnical report are based on published geotechnical and geological information, Auckland Council's GeoMaps database and Aerial photographs. From this, the report concludes that the ground conditions are suitable for the type of development proposed through the Plan Change. Detailed geotechnical investigations will be required as part of future resource consent applications regarding management of groundwater, earthworks design and building foundation design within the Plan Change area.

Based on the findings of this analysis, it is considered that the land conditions are generally suitable for urban development and can be appropriately managed through the resource consent process.

## **10.11 REVERSE SENSITIVITY AND POTENTIAL EFFECTS ON RESIDENTIAL AMENITY**

In establishing the proposed zoning pattern, consideration has been given to the existing and proposed future edge conditions to ensure potential reverse sensitivity on surrounding land uses and the amenity of future residents within the Plan Change Area are minimised.

Currently the Plan Change area is surrounded by Countryside Living zone to the east, Future Urban zoned land to the north and the west. The southern boundary of the Plan Change area is largely Future Urban zone with an interface with the Light Industry zone just before the junction of Crossey and Fitzgerald Roads and at the south east corner of the Plan Change area.

Within the Plan Change area, the potential for reverse sensitivity and residential amenity effects arises along Fitzgerald Road, as it forms the southern boundary of the Plan Change area. This is where there are areas of Mixed Housing Urban and Mixed Housing Suburban zone are directly adjacent to the proposed and existing Light Industry zone at Drury South. The Light Industrial zoning reflects the existing and future activities that occur within the Drury South area. The proposed zoning pattern seeks to minimise the interface between the light industry and residential zones. The Mixed Use centre which, is the only proposed business land in Drury East, has been located at the interface with the Light Industrial zone. Furthermore, a tributary of the Hianga Stream also creates a natural buffer.

Where the zoning pattern has not been able to avoid the interface between residential and industrial zoning there are provisions within the Light Industry zone that require effects on residential neighbours to be managed, including requiring resource consent for particular activities within 30m of a residential zone and applying yards, storage screening and noise controls. It is noted that there are several examples in urban Auckland of Light Industry adjacent to residential zones, including at Rockfield Road, Penrose and Panama Road, Mt Wellington to name a few.

The potential for reverse sensitivity and residential amenity effects also arises within the Plan Change area along the southern portion of Fitzgerald Road as it makes up the eastern boundary of the Plan Change area, and at the Junction of Fielding and Fitzgerald Roads. This is where the Mixed Housing Urban zone is adjacent or adjoins the Mixed Use zone. Any reverse sensitivity effects however, will be appropriately mitigated through the controls of the Mixed Use zone that require effects on residential neighbours to be managed, including requiring resource consent for particular activities within 30m of a residential zone and applying a height in relation to boundary control (3m & 45 degrees) as well as yards and screening and noise controls.

The Mixed Housing Suburban zone has been located on the eastern portion of the plan change area to create a transition between the Mixed Housing Urban and Rural Countryside Living zone in the Drury foothills.

Overall, it is considered that the proposed zoning pattern appropriately manages potential reverse sensitivity effects on existing and future business and potential amenity effects on future residential.



## 10.12 LANDSCAPE AND VISUAL EFFECTS

A Landscape and Visual Effects Assessment has been undertaken by Boffa Miskell to support the Plan Change application and is included as **Appendix 20**.

In the context of the existing rural environment, it is important to note that any urban development will alter the existing landscape. However, this is generally anticipated given that the area has a Future Urban zoning and change has been signalled and foreshadowed through Council's Structure Plan.

The Landscape Assessment concludes that while substantial landscape change will occur the Plan Change and AUP provisions will sufficiently provide for the landscape attributes of the Plan Change area. In particular:

- The Plan Change provides for the retention, restoration and enhancement of the main watercourses as natural features of the urban landscape that will structure the form of development and establish linear, connected open space;
- While future earthworks will reduce the more intimate rolling nature of the topography the positioning of the new indicative collector road along the main east / west ridgeline will further reinforce the original underlying topography, acknowledging at the same time that earthworks will be required and the ridgeline lowered;
- The small cluster of trees located in the north-east corner of the site by Drury Hills Road have landscape value however these are likely to be impacted by the proposed Mill Road arterial alignment and therefore formal protection is not proposed as part of the Plan Change;
- All other vegetation which will be removed relates to rural/rural lifestyle use and is not of sufficient value to warrant protection or retention;
- Immediately east of the plan change area is the Rural Countryside living zone and rural residential properties at the foothills of the Hunua Ranges which along with the Mill Road arterial road upgrade in this location is anticipated to provide a natural delineation between the rural and urban areas;

The Landscape Assessment further concludes that although the proposal will result in a loss of rural character there will be a number of positive landscape elements that are associated with the development. These include the retention and enhancement of streams, the general overall landform and the provision of connected open space.

Boffa Miskell has also undertaken a detailed assessment of the potential visual amenity effects of the Plan Change. The Visual Effects Assessment notes that the specific nature of the visual effects arising from the Plan Change will depend on the future more detailed master planning and design of specific development proposals. Any development proposal will require resource consent and be subject to a range

of assessment criteria including those that address visual amenity and interface outcomes.

The Visual Effects Assessment identifies the visual catchment for future development within the Plan Change area. This catchment is extensive and includes:

- Users of local roads – views from local roads are likely to be only glimpsed due to speed and sequence of movement, being seen for a short timeframe or obstructed by intervening buildings and vegetation;
- Occupiers of rural residential properties and workers within the wider rural landscape – their views towards the plan change area are likely to be partially or fully screened by intervening landform, vegetation or distance from the area; and
- Elevated residential on the west facing slopes of the Hunua Ranges (Macwhinney Drive).

The Visual Effects Assessment notes that the context of these views will however encompass a much wider changing landscape with the full Drury – Opāheke Structure Plan area. Including that of the Drury Centre with potential future development up to 72.5m in height, as well as the more advanced Drury South plan change area comprising both industrial (light and heavy zones), some commercial and medium density residential (SHA) housing activities.

Overall, the Visual Effects Assessment finds that the location, layout and concentration of the proposed development will have a noticeable visual effect in respect of the surrounding rural / rural lifestyle character. This is due to the introduction of an urban form of development including roads and a range of forms of residential housing / a small commercial centre as well as corridors and pockets of open space. The primary established viewing audience with the potential to be adversely affected by the introduction of buildings up to the heights enabled by the Plan Change are those people living in elevated rural residential properties on the west facing slopes of the Hunua Ranges including those on Macwhinney Drive and to a lesser extent in Drury Heights and properties located on Taraire Drive. The Future Urban zone however, extends to the base of the Hunua foothills and through to the Drury Centre to the north and west of the Plan Change area. Therefore, the views from these properties can be anticipated to change from their current rural / rural residential outlook to one encompassing an urban middle-ground.

The Visual Effects Assessment also considers the existing views from within the Plan Change area out east towards the Hunua Ranges. As the surrounding area develops, the anticipated development together with the low-lying nature of the land will result in the screening of many views to the Hunua Ranges from within the Plan Change area. Roads that are orientated in an east west direction will however, reinforce a visual connection to this landform backdrop. In this respect the alignment

of the defined east / west collector road will maintain and visually reinforce the presence of the Ranges defining the eastern edge to the future urban area. From further afield the proposed height of the anticipated built form will not visually interrupt these more distant views or the presence of the Hunua Ranges in the wider landscape.

## 10.13 SUMMARY OF EFFECTS

The actual and potential effects of the proposed Plan Change have been considered above, based on extensive reporting and analysis undertaken by a wide range of technical experts. On the basis of this analysis, it is considered that the area is suitable for urban development and the proposed mix of uses will result in positive effects on the environment in terms of the social and economic well-being of the community. Where adverse effects are anticipated, the proposed policies and rules of the Plan Change, in addition to those in the Auckland-wide and zone provisions, will ensure they are appropriately avoided, remedied or mitigated.

## 11.0 SECTION 32 ANALYSIS

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### 11.1 APPROPRIATENESS OF THE PROPOSAL TO ACHIEVE THE PURPOSE OF THE ACT

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

#### 11.1.1 Objectives of the Plan Change

The purpose of the Plan Change 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 quality housing in the southern part of Auckland

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

- (1) Drury East is a comprehensively developed residential environment that integrates with the Drury Centre 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.*

### **11.1.2 Assessment of the Objectives Against Part 2**

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

The objectives of the Plan Change are consistent with Section 5 of the RMA, for the following reasons:

- 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 Hingaia Stream, 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 would be protected while at the same time mitigating the adverse effects of development on the environment.

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

The Plan Change does not compromise the recognition of, or provision for these matters of national importance for the reasons set out in Section 9 of the report above. In particular, the proposal responds to the matters identified as being of importance to Mana Whenua as identified in the Cultural Impact Assessments, there is no protected historic heritage on the site and the proposal will not involve significant risks from natural hazards.

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

- b) *The efficient use and development of natural and physical resources* – The Plan Change will support the efficient use of natural and physical resources by applying land uses zones that are appropriately sized to provide for more intensive residential and business activities in accordance with relative market demand. The land uses will be in accessible locations and in close proximity to public transport, thereby reducing development pressure in areas outside of the RUB.
- c) *The maintenance and enhancement of amenity values and f) Maintenance and enhancement of the quality of the environment* – The proposed zoning pattern and indicative collector road which provides east to west access and links to the wider road network will enable a connected and high quality urban environment to be achieved that responds to the specific land characteristics of the site and edge conditions. The provisions that would apply to future development under the AUP would ensure that a high quality, built environment is achieved at the street, block and site scale.

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

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

## **11.2 APPROPRIATENESS OF THE PROVISIONS TO ACHIEVE THE OBJECTIVES**

### **11.2.1 The Objectives**

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

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

As the proposed Plan Change is amending the AUP (District Plan), the above assessment must relate to the provisions and objectives of the proposed Plan Change, and the objectives of the AUP to the extent that they are relevant to the proposed Plan Change and would remain if the Plan Change were to take effect<sup>22</sup>.

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

Within the RPS:

- A quality compact urban form that enables better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects.
- Ensure there is sufficient development capacity to accommodate growth and require the integration of land use planning with the infrastructure to service growth;
- A quality built environment where subdivision, use and development respond to the intrinsic qualities and physical characteristics of the area, reinforce the hierarchy of centres and corridors, contribute to a diverse mix of choice and maximise resource and infrastructure efficiency.
- Ensure residential intensification supports a quality compact urban form and land within and adjacent to centres and corridors or in close proximity to public transport is the primary focus for residential intensification;
- An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population;
- Ensure employment and commercial and industrial opportunities meet current and future demands; and
- Ensure recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities and that public access to streams is maintained and enhanced.

Within the residential zones:

- Within the Terrace Housing and Apartment Building zone - Land adjacent to centres and near the public transport network is efficiently used to provide high-

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<sup>22</sup> RMA s32(3)

density urban living that increases housing capacity and choice and access to centres and public transport.

- Within the Mixed Housing zones - 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;
- Ensure land is used efficiently in areas close to centres and public transport;

Within the business zones:

- Support a strong network of centres that are attractive environments and attract ongoing investment, promote commercial activity, provide employment, housing and goods and services at a variety of scales.
- Activities within the Mixed Use zone do not compromise the function, role and amenity of the Metropolitan Centre zone.

Auckland – wide:

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

The objectives and provisions of the Plan Change and the relevant objectives of the AUP can be categorised into the following themes:

- Theme 1: Land Use Pattern and timing of development in Drury- Opāheke
- Theme 2: Coordinating the development of land with transport infrastructure in Drury East
- Theme 3: Achieving integrated and quality development
- Theme 4: Riparian Planting Rule

The following sections address the matters set out in Schedule 1 and Section 32 of the RMA on the basis of the themes listed above.



## 11.3 OTHER REASONABLY PRACTICABLE OPTIONS FOR ACHIEVING THE OBJECTIVES

### 11.3.1 Theme 1: Land Use Pattern and Timing of Development in Drury- Opāheke

The RPS objectives which have particular relevance for Theme 1 include:

- B2.2.1 (1) A quality compact urban form that enables better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects.
- B2.2.1(3) Sufficient development capacity and land supply is provided to accommodate residential, commercial, industrial growth and social facilities to support growth.
- 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.
- B2.3.1 (1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- B2.4.1 (1) Residential intensification supports a quality compact urban form.
- B2.4.1 (3) Land within and adjacent to centres and corridors or in close proximity to public transport and social facilities (including open space) or employment opportunities is the primary focus for residential intensification.
- B2.4.1 (4) An increase in housing capacity and the range of housing choice which meets the varied needs and lifestyles of Auckland's diverse and growing population.
- B2.4.1 (5) Non-residential activities are provided in residential areas to support the needs of people and communities.
- B2.5.1 (1) Employment and commercial and industrial opportunities meet current and future demands.
- H6.2 (1) Land adjacent to centres and near the public transport network is efficiently used to provide high-density urban living that increases housing capacity and choice and access to centres and public transport.
- H5.2 (1) Land near the Business – Metropolitan Centre Zone and the Business – Town Centre Zone, high-density residential areas and close to the public transport network is efficiently used for higher density residential living and to

provide urban living that increases housing capacity and choice and access to public transport.

- H4.2(1) Housing capacity, intensity and choice in the zone is increased.
- H13.2(4) Business activity is distributed in locations, and is a scale and form, that (a) provides for the community's social and economic needs; (b) improves community access to goods, services, community facilities and opportunities for social interaction; and (c) manages adverse effects on the environment, including effects on infrastructure and residential amenity.

#### 11.3.1.1 Issue 1.1: Location of the Mixed Use Centre

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

**Option 1:** Apply the Business – Mixed Use zone at the junction of Cossey Road and the Indicative West-East Collector Road

This option involves applying the Mixed Use Zone Centre at the junction of Cossey Road and the indicative West-East Collector Road so that the centre is located in the middle of the Plan Change area.

This alignment does not align with the spatial layout of zones included within the Council's Drury Opaheke Structure Plan.

**Option 2:** Preferred option – Proposed Plan Change

The Mixed Use zone is proposed to be applied at the junction of Fielding and Fitzgerald Roads to provide a small centre that can service the daily convenience needs of the surrounding residential and industrial development.

This alignment aligns with the spatial layout of zones included within the Council's Drury Opaheke Structure Plan.

#### 11.3.1.2 Evaluation of Other Reasonably Practicable Options

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in Table 11.3.1.1.

	<b>Option 1: Apply the Business – Mixed Use zone at the junction of Cossey Road and the Indicative West-East Collector Road</b>	<b>Option 2: Apply the Zoning Layout as per the Structure Plan</b>
<b>Benefits</b>	This option is located in a more central position within the Plan Change area so it will more	This option applies the Mixed Use centre in a location that is consistent with the Drury-Opāheke

	<b>Option 1: Apply the Business – Mixed Use zone at the junction of Cossey Road and the Indicative West-East Collector Road</b>	<b>Option 2: Apply the Zoning Layout as per the Structure Plan</b>
	conveniently service the frequent retail needs of the future residential community within the Plan Change area and provide a community focal point.	<p>Structure Plan and therefore the community's expectations.</p> <p>This location of the local Mixed Use Centre will better service the local convenience needs of the industrial area to the south.</p> <p>This option applies the Mixed Use Centre to land at the junction of two existing roads, providing more certainty that the centre will have road frontage.</p>
<b>Costs</b>	<p>This spatial location for the Mixed Use Centre is located at the junction of an indicative road which could lead to a centre with a reduced road frontage as the final alignment of the West-East collector Road may not align with the zone pattern.</p> <p>This option does not align with the Drury-Opāheke Structure Plan nor does it align with the results of the detailed master planning exercise which informed the Plan Change development and tested the feasibility of the proposed spatial layout of the zones to ensure good urban design outcomes are achieved.</p>	This option is less convenient at servicing the frequent retail needs of the future residential community within the northern portion of the Plan Change area.
<b>Efficiency &amp; Effectiveness</b>	This option is efficient and effective and will achieve H13.2(4) as it will better serve the frequent retail and local commercial needs of the residential community within the Plan Change area.	This option is not as efficient or effective at serving the frequent retail and local commercial needs of the residential community within the Plan Change area.

## 11.3.1.3 Summary of Reasons for Deciding on the Provisions

Option 1 is preferred. The spatial positioning of the Local Mixed Use centre at the junction of Fielding and Fitzgerald Roads, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed location of the Mixed Use Centre is consistent with H13.2(4) as it will better serve the frequent retail and local commercial needs of the residential community within the Plan Change area.

## 11.3.1.4 Issue 1.2: Timing of Development in Drury- Opaheke

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

### **Option 1: Do nothing**

This option involves retaining the Future Urban zone and waiting for the Council to initiate a Plan Change to rezone the Plan Change area.

### **Option 2: Rezone the Plan Change Area in accordance with the timeframes in Councils Drury-Opāheke Structure Plan**

The Drury-Opāheke Structure Plan indicates that the Plan Change area will be development ready in 2028-2032. Therefore, this option would delay a plan change so that land is released in accordance with these timeframes.

### **Option 3: Preferred option – Proposed Plan Change**

This option brings forward the release of land for urban development in Drury East in accordance with the alternative staging outlined in Section 6.1 of this report.

## 11.3.1.5 Evaluation of Other Reasonably Practicable Options

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

**Table 11.3.1.1: Summary of Options Analysis Addressing S32(2) Matters**

	<b>Option 1: Do nothing (wait for Council to rezone the land)</b>	<b>Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council's Structure Plan</b>	<b>Option 3: Preferred option – the proposed Plan Change</b>
<b>Benefits</b>	Removes the cost of initiating a plan change for the applicant.	Stages the release of land for development in a manner that is consistent with the Drury-Opāheke Structure Plan and	Enables the staged development of the Plan change area as infrastructure upgrades are complete, providing

	<b>Option 1: Do nothing (wait for Council to rezone the land)</b>	<b>Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council's Structure Plan</b>	<b>Option 3: Preferred option – the proposed Plan Change</b>
	Allows the Council to progress a wider plan change for the future land use for the Drury Opāheke area in accordance with the structure plan.	therefore the community's expectations.	additional business and residential capacity from the short term.  Provides greater certainty for the council, community, developers and landowners about the nature, extent and pace of development of Drury Centre.
<b>Costs</b>	<p>This option does not add to Auckland's housing and business land supply to accommodate growth in the short term and is therefore likely to have a negative impact on economic growth and employment opportunities s32(2)(a)(i)-(ii).</p> <p>Taking into account the timeframes required to process a plan change and prepare the land for urban development, this option is likely to result in a significant delay in the redevelopment of land, where there are efficient and effective infrastructure solutions available now that are either funded by the Government or can be partially funded by major landowners in Drury East. The Council may lose the opportunity to secure early funding for required upgrades if there are delays to zoning.</p>	<p>Taking into account the timeframes required to process a plan change and prepare the land for urban development, this option is likely to result in a significant delay in the redevelopment of land, where there are efficient and effective infrastructure solutions available now that can be funded by the Government or partially funded by major landowners in Drury East. The Council may lose the opportunity to secure early funding for required upgrades if there are delays to zoning.</p>	<p>Cost to developers, the Council, Auckland Transport and Watercare to provide the necessary infrastructure to service the plan change area ahead of the current timetable. These costs however, will eventually need to be realised when the land is urbanised. Therefore, the eventual costs are simply being brought forward to align with the \$2.4 billion investment in transport infrastructure planned for Drury by the Government.</p>
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or consistent with B2.2.1(3) and the	This option is not efficient or in keeping with B2.2.1(3) and the	This option is efficient as it brings forward the release of land that can

	<b>Option 1: Do nothing (wait for Council to rezone the land)</b>	<b>Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council's Structure Plan</b>	<b>Option 3: Preferred option – the proposed Plan Change</b>
	requirements of the NPS-UDC as no additional business and residential capacity is enabled in the short – mid-term despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.2.1(5) and B3.2.1(5). Therefore, delays to rezoning the land unjustifiably 'lock up' land for urban development that could be efficiently developed sooner to support an increase in housing capacity.	requirements of the NPS-UDC as no additional business and residential capacity is enabled in the short – midterm despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.2.1(5) and B3.2.1(5). Therefore, delays to rezoning the land unjustifiably 'lock up' land for urban development that could be efficiently developed sooner to support an increase in housing capacity.	be serviced and is able to be developed efficiently by an experienced development company, who controls large land holdings in the Plan Change area and who can make meaningful infrastructure funding contributions, contributing to an increase in housing capacity and choice in the short to medium term accordance with B2.2.1(3) and B2.4.1(4).  The alternative staging option that brings forward the release of land at Drury East is efficient as it provides for significant amenities, employment and services to be provided in Decade 1 to support the residential catchment in accordance with B2.4.1 (3).

## 11.3.1.6 Summary of Reasons for Deciding on the Provisions

Option 3 is preferred. Rezoning the subject land from Future Urban zone to Metropolitan Centre zone, Mixed Use zone and Informal Recreation Zone, while bringing forward the release of land within Drury East in accordance with alternative staging plan outlined within Section 6.1, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed zoning pattern will ensure that the sufficient development capacity is provided to accommodate residential, commercial and social facilities to support growth in the medium to long term in accordance with B2.2.1(3) while enabling some residential and commercial development in the short term.

- Evidence has been prepared that demonstrates that the Plan Change area can be adequately serviced with identified upgrades in place and therefore is consistent with B2.2.1(5) and B3.2.1(5).

### 11.3.2 Theme 2: Coordinating the development of land with transport infrastructure

The AUP objectives which have particular relevance for Theme 5 include:

- 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.
- B3.2.1(5) Infrastructure and land use planning are integrated to service growth efficiently.
- B3.3.1(1)(b) Effective, efficient and safe transport that integrates with and supports a quality compact urban form.
- E27.2(1) Land use and all modes of transport are integrated in a manner that enables: (a) the benefits of an integrated transport network to be realised; and (b) the adverse effects of traffic generation on the transport network to be managed.

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

**Option 1:** *Do not include provisions to coordinate the development of land with transport infrastructure*

This option involves putting in place urban zoning and coordinating the development of land with transport infrastructure to processes and agreements which site outside of the AUP.

**Option 2:** *Coordinate the development of land with transport infrastructure within the AUP through a deferred zoning which releases land for development when all the local infrastructure upgrades are operational*

This option involves putting in place urban zonings with a precinct that applies the Future Urban Zone provisions until a certain date from which the urban zone provisions will take effect. The date will be based on the point in time when all required local infrastructure upgrades are projected to be complete.



**Option 3:** *Coordinate the development of land with transport infrastructure within the AUP through a deferred zoning which releases land for development when the Drury Central Train Station is operational*

This option involves putting in place urban zonings with a precinct that applies the Future Urban Zone provisions until a certain date from which the urban zone provisions will take effect. The date will be based on the point in time when the Drury Central Train Station is operational.

**Option 4:** *Coordinate the development of land with transport infrastructure within the AUP through a transport staging rule*

This option coordinates development with the delivery of required transport infrastructure within the AUP through the inclusion of a transport staging rule. The transport staging rule ensures that development does not exceed the dwelling, retail GFA or commercial GFA thresholds until such time as the infrastructure upgrades are constructed and are operational.

Subdivision and development that does not comply with transport staging rule requires resource consent as a full discretionary activity.

**Option 5:** *Coordinate the development of land with transport infrastructure within the AUP through an external trip cap*

This option coordinates development with the delivery of required transport infrastructure within the AUP through the inclusion of staged limits on vehicle trips to and outside of the precinct (external trip cap). Under this approach subdivision or development that complies with the external trip cap is a restricted discretionary activity with matters of discretion limited to:

- Whether the Integrated Transport Assessment demonstrates compliance with the external trip generation cap;
- Travel management measures;
- Whether the rate of commercial and residential development in Drury East is coordinated.

Subdivision and development that does not comply with trip generation cap requires resource consent as a full discretionary activity.

Development within the Drury Centre Precinct will not be subject to E27.6.1 Trip generation.

**Option 6:** *Preferred option – Proposed Plan Change (Transport staging rule and trip generation cap)*

This option coordinates development with the delivery of required transport infrastructure within the AUP through the inclusion of a transport staging rule and

an external trip generation assessment. The transport staging rule ensures that development does not exceed the dwelling, retail GFA or commercial GFA thresholds until such time as the infrastructure upgrades are constructed and are operational.

Under this approach subdivision or development that complies with the transport staging rule is permitted. Subdivision and development that does not comply with the transport staging rule but complies with the trip generation cap is a restricted discretionary activity with matters of discretion limited to:

- Whether the Integrated Transport Assessment demonstrates compliance with the external trip generation cap;
- Travel management measures;
- Whether the rate of commercial and residential development in Drury East is coordinated.

Subdivision and development that does not comply with the transport staging rule or the trip generation cap requires resource consent as a full discretionary activity.

Development within the Drury Centre Precinct will not be subject to E27.6.1 Trip generation.

#### *11.3.2.1 Evaluation of Other Reasonably Practicable Options*

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in **Table 11.3.5.1**.

**Table 11.3.5.1:** Summary of Options Analysis Addressing S32(2) Matters

	<b>Option 1:</b> Do nothing – no staging provisions	<b>Option 2:</b> Deferred zoning – when all the local infrastructure upgrades are operational	<b>Option 3:</b> Deferred zoning – when Drury Central Train Station is operational	<b>Option 4:</b> Transport staging rule	<b>Option 5:</b> External trip cap	<b>Option 6:</b> Preferred option – Proposed Plan Change
<b>Benefits</b>	<p>Removes the cost of developing rules for the applicant.</p> <p>Avoids the complexity in the planning provisions associated with Options 2-6.</p>	The administration of this rule is less complex than options 4-7.	The administration of this rule is less complex than options 4-7.	<p>Provides certainty for the community, developers and landowners about the nature, extent and pace of development of Drury Centre and can tie in closely with a funding and development agreement that sits outside of the AUP.</p> <p>Provides certainty of the timing of zoning, making securing funding for local upgrades more feasible.</p>	The rule more closely aligns with the activity that generates effects on the transport network.	<p>Provides certainty for the community, developers and landowners about the nature, extent and pace of development of Drury Centre and can tie in closely with a funding and development agreement that sits outside of the AUP.</p> <p>Provides an appropriate activity status for infringement where effects on the external network are within an acceptable level.</p>
<b>Costs</b>	This option is heavily reliant on infrastructure/funding agreements that sit outside the AUP. There is nothing in the AUP to tie the release of development capacity	This option does not provide for interim development to increase housing capacity despite the traffic modelling showing that a significant level of development can occur	The inclusion of a rule to delay the urban zoning of land at Drury East until the Drury Central Train Station is operational is not necessary as there is general alignment between the delivery of the train station and	<p>Requires greater monitoring by Council than Options 1-3.</p> <p>This is a blunt approach relative to Option 6 which may unnecessarily limit development if the</p>	<p>Requires greater monitoring by Council of Options 1-3.</p> <p>This option does not provide as much certainty to landowners and developers.</p>	<p>This is a more complex set of provisions which will require greater monitoring by Council than the above options.</p> <p>It is recognised that to administer this permitted standard</p>

	<b>Option 1:</b> Do nothing – no staging provisions	<b>Option 2:</b> Deferred zoning – when all the local infrastructure upgrades are operational	<b>Option 3:</b> Deferred zoning – when Drury Central Train Station is operational	<b>Option 4:</b> Transport staging rule	<b>Option 5:</b> External trip cap	<b>Option 6:</b> Preferred option – Proposed Plan Change
	<p>with the delivery of transport infrastructure.</p> <p>However, if a funding agreement was in place this cost would be eliminated.</p>	<p>prior to the signalisation and capacity upgrades to the Waihoehoe Road/ Great South Road intersection being required.</p> <p>This option is blunt and does not enable consenting to progress for land modification or development, which would create unnecessary delays in the development process.</p>	<p>construction of Drury East getting underway.</p> <p>It is not essential for the Drury Central train station to be aligned with the release of development capacity as demand will drive the investment in supporting public transport services and therefore a level of development prior to completion of the train station will provide a population to support investment in supporting bus networks<sup>23</sup>.</p> <p>This option does not address traffic effects on the local road network. While the train offers an alternative travel mode</p>	<p>residential or retail GFA is unrealised.</p> <p>This option may result landowners and developers competing to use up development capacity. This will be mitigated if there is a development/funding agreement in place.</p>	<p>This option may result in landowners and developers competing to use up vehicle trip capacity and is potentially better suited where the land is within single ownership. This will be mitigated if there is a development/funding agreement in place.</p> <p>Small scale developments will have to prepare Integrated Transport Assessments to show compliance with the vehicle tip cap.</p>	<p>Council will be required to keep a register of the number of dwellings that are new or additional, including valid but unimplemented resource consents to create lots or develop multi units within Drury East. As the standard requires all vacant lot subdivisions to comply with this standard therefore all dwellings and GFA can be counted through subdivision consents.</p> <p>Although there are risks with this approach Council has the ability and technology to monitor this it will just be</p>

	<b>Option 1:</b> Do nothing – no staging provisions	<b>Option 2:</b> Deferred zoning – when all the local infrastructure upgrades are operational	<b>Option 3:</b> Deferred zoning – when Drury Central Train Station is operational	<b>Option 4:</b> Transport staging rule	<b>Option 5:</b> External trip cap	<b>Option 6:</b> Preferred option – Proposed Plan Change
			<p>this is not going to be suitable choice for all residents/employees.</p> <p>This option is blunt and does not enable consenting to progress for land modification or development, which would create unnecessary delays in the development process.</p>			<p>a matter of putting a system in place.</p> <p>This option may result in different landowners and developers competing to use up development capacity. This will be mitigated if there is a development/funding agreement in place.</p>
<b>Efficiency &amp; Effectiveness</b>	<p>This option is ineffective as there are no provisions within the plan to decline applications for development which cannot be serviced by transport infrastructure, which would not achieve B2.21(5), B3.2.1(5), B3.3.1(1)(b) or E27.2(1). This would however be mitigated if there is a</p>	<p>This option is highly inefficient as traffic modelling shows that a significant extent of development can occur prior to the signalisation and capacity upgrades to the Waihoehoe Road/ Great South Road intersection. Therefore, this option allows for no additional capacity in the interim to service growth</p>	<p>This option is ineffective as the start of development is already aligned with the delivery of the Drury Central Train Station and therefore plan provisions that seek to achieve this are not necessary.</p> <p>This option is not in keeping with E27.2(1) as</p>	<p>This option is less effective at coordinating development with transport infrastructure and achieving B3.2.1(5) and E27.2(1) than Option 4 because the thresholds are blunt and could unnecessarily limit development if residential or retail GFA is unrealised.</p>	<p>This option is potentially more effective at achieving B3.2.1(5) and E27.2(1) because it more clearly regulates the effects of the activities on the environment, rather than the activities themselves.</p> <p>This option is less efficient at coordinating</p>	<p>This option will efficiently coordinate development with transport infrastructure and achieve the policy direction of B2.21(5), B3.2.1(5) and B3.3.1(1)(b), because the provisions stage the release of development capacity with the delivery of required infrastructure while</p>

	<b>Option 1:</b> Do nothing – no staging provisions	<b>Option 2:</b> Deferred zoning – when all the local infrastructure upgrades are operational	<b>Option 3:</b> Deferred zoning – when Drury Central Train Station is operational	<b>Option 4:</b> Transport staging rule	<b>Option 5:</b> External trip cap	<b>Option 6:</b> Preferred option – Proposed Plan Change
	funding agreement in place.	which is not in keeping with B3.2.1(5).	it will not manage adverse effects on the local road network.		development with transport infrastructure than Option 4 because small scale development with limited effects on the transport network would need to prepare Integrated Transport Assessments.	allowing minor infringements if an assessment targeted to effects on the transport network finds that any effects are an acceptable level.  This option is efficient and effective as it prioritises active modes of transport to Drury Centre. This is because the proposed standard requires a safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for pedestrians and cyclists on all approaches prior to any new dwellings, retail or commercial development.

## 11.3.2.2 *Summary of Reasons for Deciding on the Provisions*

Option 6 is preferred, although if a funding agreement is in place prior to a Hearing on the Plan Change, Option 1 may be preferred, as this option best minimises complexity. Coordinating development with the delivery of required transport infrastructure through the inclusion of a transport staging rule and a trip generation assessment within the Drury Centre precinct, is the most appropriate mechanism for achieving the objectives of the AUP. The proposed provisions will stage the release of development capacity with the delivery of required infrastructure while allowing minor infringements if an assessment targeted to effects on the transport network finds that any effects are an acceptable level. Therefore, the provisions are consistent with B2.21(5), B3.2.1(5) and B3.3.1(1)(b).

## 11.3.3 **Theme 3: Achieving integrated and quality development**

The RPS objectives which have particular relevance for Theme 1 include:

- B2.3.1 (1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- E27.2(2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.
- E27.2(5) Pedestrian safety and amenity along public footpaths is prioritised.
- E38.2(6) Subdivision has a layout which is safe, efficient, convenient and accessible.

## 11.3.3.1 *Other Reasonably Practicable Options for Achieving the Objectives*

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

### ***Option 1: Rely on the underlying Auckland-wide provisions***

The street network is controlled by the development standards, matters of discretion and assessment criteria in the underlying Auckland-wide provisions (E38 Subdivision – Urban, E27 Transport).



Applications for resource consent are subject to the normal tests for notification under the relevant sections of the Resource Management Act 1991 as per the provisions of the underlying zone.

## **Option 2: Preferred option – Proposed Plan Change**

Provisions are included within the Drury East precinct to achieve quality outcomes within Drury East in addition to those contained within the underlying Auckland-wide provisions (E38 Subdivision – Urban, E27 Transport). These additional provisions include:

- Requiring consent with additional assessment criteria for roads to ensure a connected street network which integrates with the wider Drury area;
- The road cross sections will ensure there are pedestrian and cycle paths to encourage active transport modes;
- The assessment criteria for roads will also ensure that the delivery of pedestrian and cycling linkages to the train station are staged with development; and
- Additional policy direction is provided within the precinct to integrate the network of public open spaces with natural features including the stream network.

### **11.3.3.2 Evaluation of Other Reasonably Practicable Options**

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in **Table 11.3.3.1**.

**Table 11.3.3.1: Summary of Options Analysis Addressing S32(2) Matters**

	<b>Option 1: Rely on the underlying Auckland-wide provisions</b>	<b>Option 2: Proposed Plan Change</b>
<b>Benefits</b>	A less complex set of planning provisions will apply within the Plan Change area.	Expectations and requirements of key stakeholders, land owners and land developers can be clearly set out within the proposed precinct.
<b>Costs</b>	More time and costs involved in the resource consent process as applications are subject to notification assessments.	Cost to future applicants to prepare resource consent applications assessing additional planning provisions and implementing the requirements.

	Option 1: Rely on the underlying Auckland-wide provisions	Option 2: Proposed Plan Change
<b>Efficiency &amp; Effectiveness</b>	<p>Ineffective as the indicative primary road network is not shown in the plan so piecemeal and ad hoc development may occur.</p> <p>Less efficient resource consenting process as notification assessments will result in a lengthier and more costly process.</p> <p>Without the guidance of a precinct, the Plan Change area is unlikely to be developed in a comprehensive and coordinated manner.</p> <p>Existing AUP (OP) Auckland-wide provisions may not be suitable for managing greenfield growth.</p> <p>Area - specific approaches are not considered which is less effective in giving effect to B2.3.1(1)(a).</p>	<p>This option is the most effective option as the precinct provisions ensure that development will occur in an integrated and co-ordinated way.</p> <p>The proposed precinct meets Objective B2.3.1(1)(a) of the RPS as it ensures that subdivision, use and development will respond to the intrinsic qualities and physical characteristics of the site.</p> <p>This option will result in a more efficient resource consent process as there is no requirement to undertake a notification assessment.</p>

### 11.3.3.3 Summary of Reasons for Deciding on the Provisions

Option 2 is preferred. The implementation of a new Drury East Precinct, with objectives, policies, rules, matters of assessment and assessment criteria to determine development and subdivision layout, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed precinct provisions are consistent with B2.3.1(1)(a) as they have been designed to ensure future subdivision, use and development respond comprehensively to the intrinsic qualities and physical characteristics of the Plan Change area.

### 11.3.4 Theme 4: Riparian Planting Rule

The RPS objectives which have particular relevance for Theme 8 include:

- B7.2.1(2) Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring.
- E3.2(2) Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced.
- E15.2 (2) Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring.

#### 11.3.4.1 *Other Reasonably Practicable Options for Achieving the Objectives*

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

##### ***Option 1: Status Quo – Rely on the Auckland-wide Provisions***

This option does not require any planting of riparian margins of streams and wetlands.

##### ***Option 2: Require 20m of Riparian Planting along Streams and Wetlands***

This option will require a planted riparian margin of 20m along streams and wetlands. This margin will be free of pedestrian and cycle paths.

##### ***Option 3: Preferred option – Proposed Plan Change (Require 10m of Riparian Planting along Permanent Streams and Intermittent Streams)***

This option will require a planted riparian margin of 10m along streams and wetlands. This margin will be free of pedestrian and cycle paths. This option aligns with guidance within the Auckland Regional Council Technical Publication TP148 Riparian Management Guideline (Becker et al., 2001) which recommends a 10m riparian buffer width based on research undertaken into what constitutes a sustainable riparian zone that is self-seeding and able to minimise weed growth and the Auckland Design Manual.

#### 11.3.4.2 *Evaluation of Other Reasonably Practicable Options*

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in Table 11.3.8.1.

**Table 11.3.8.1:** Summary of Options Analysis Addressing S32(2) Matters

	Option 1: Status Quo	Option 2: Require 20m of Riparian Planting along Streams and Wetlands	Option 3: Proposed Plan Change
<b>Benefits</b>	<p>A less complex set of planning provisions will apply within the Plan Change area.</p> <p>Less costs associated with developing along streams as there is no requirement to provide riparian planting.</p>	<p>This option will enhance the ecological values of streams through requiring planted riparian margins along both sides of permanent and intermittent streams however, it does not provide flexibility for the layout of cycle and pedestrian paths.</p> <p>Increased aesthetic and amenity values for communities as a result of riparian planting along streams.</p>	<p>This option aligns with guidance within the TP148<sup>24</sup> which recommends a 10m riparian buffer width based on research undertaken into what constitutes a sustainable riparian zone that is self-seeding and able to minimise weed growth and the Auckland Design Manual.</p> <p>This option will enhance the ecological values of streams through requiring planted riparian margins along both sides of permanent and intermittent streams and is consistent with the rule included in other greenfield precincts within the AUP<sup>25</sup>.</p> <p>The proposed rule does not stop a greater riparian margin being planted but it does allow more flexibility.</p> <p>As there is a 20m esplanade reserve requirement development effectively has to be setback 20m from streams however, by only requiring a portion of this to be planted this allows flexibility to provide cycle paths and footpaths along permanent</p>

<sup>24</sup> Auckland Regional Council Technical Publication TP148 Riparian Management Guideline (Becker et al., 2001)

<sup>25</sup> Birdwood 2, Clarks Beach, Drury 1, Drury South, Flat Bush, Franklin 2, Glenbrook 3, Hingaia 1,2 & 3, Long Bay, Redhills and Whenupai 3 (Proposed)

	Option 1: Status Quo	Option 2: Require 20m of Riparian Planting along Streams and Wetlands	Option 3: Proposed Plan Change
			streams outside of the riparian planted margin.  Increased aesthetic and amenity values for communities as a result of riparian planting along streams compared with Option 1.
<b>Costs</b>	No requirements to provide riparian planting along streams within the Plan Change area and therefore the ecological values of streams will not be enhanced.  Reduced aesthetic and amenity values for communities from a lack of riparian planting along streams.	In requiring greater riparian margins along permanent streams than what is recommended within TP148 <sup>26</sup> and the Auckland Design, this option provides less flexibility for the provision of pedestrian and cycle paths along streams.  This requirement for riparian planting will increase the costs when developing along streams.	This requirement for riparian planting will increase the costs when developing along streams.
<b>Efficiency &amp; Effectiveness</b>	This option is not efficient or effective and will not achieve B7.2.1(2), E3.2(2) and E15.2 (2) as there is no requirement to plant riparian margins along streams and therefore there is no assurance that indigenous biodiversity along streams will be restored to enhance the ecological values of streams.	While this option may appear to be the most efficient at achieving B7.2.1(2), E3.2(2) and E15.2 (2) as it requires a greater width of riparian planting along permanent streams, it creates inflexibility for the layout of cycle and pedestrian paths.	This option is efficient at achieving B7.2.1(2), E3.2(2) and E15.2 (2) as they ensure that indigenous biodiversity along streams is restored to enhance the ecological values of streams while maintaining flexibility for appropriate development of cycle and pedestrian paths.

<sup>26</sup> Auckland Regional Council Technical Publication TP148 Riparian Management Guideline (Becker et al., 2001)

### 11.3.4.3 Summary of Reasons for Deciding on the Provisions

Option 3 is preferred. The inclusion of a riparian planting rule which requires 10m of planting along both permanent and intermittent streams, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed precinct provisions are consistent with B7.2.1(2), E3.2(2) and E15.2 (2) as they ensures that indigenous biodiversity along streams is restored to enhance the ecological values of streams, while maintaining flexibility for appropriate development of cycle and pedestrian paths.

## 11.4 RISK OF ACTING OR NOT ACTING

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

## 12.0 CONCLUSION

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This report has been prepared in support of FHLD's request for a Plan Change to the provisions of the AUP to rezone 184 hectares of Future Urban land in Drury East for urban activities.

The request has been made in accordance with the provisions of Schedule 1; Section 32 of the Resource Management Act 1991, and the preparatory work has followed Appendix 1 of the AUP – Structure Plan Guidelines.

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

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

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