

S32 ASSESSMENT REPORT

WAIHOEHOE PRIVATE PLAN CHANGE REQUEST

MAY 2020

B&A

Urban & Environmental

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1.0 THE APPLICANT AND PROPERTY DETAILS

To:	Auckland Council Attention Craig Cairncross and Michael Luong
Applicant's Name:	Oyster Capital
Address for Service:	Barker & Associates Ltd PO Box 1986 Shortland Street Auckland 1140 Attention: Nick Roberts / Rachel Morgan
Legal Description:	Refer to list of properties within Appendix 2
Plan Change Area:	48.9 hectares
AUP Zoning:	Future Urban zone
Brief Description of Proposal:	Private Plan Change request to rezone 48.9 hectares of land in Drury East from Future Urban to a mix of Residential zones, apply a precinct and the Stormwater Management Area Flow 1 to the Plan Change area.

2.0 EXECUTIVE SUMMARY

Oyster Capital (**Oyster**) is applying for a Plan Change to the Auckland Unitary Plan – Operative in Part to rezone 48.9 hectares of Future Urban land in Drury East to Terrace Housing and Apartment Building (THAB) zone consistent with the Council’s Drury-Opāheke Structure Plan. The rezoning proposal provides capacity for at least 1,133 dwellings.

The Plan Change also includes a precinct which details the indicative collector 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 Fulton Hogan Land Development Ltd (FHL) 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.
- Oyster Capital and the other entities seeking Plan Changes in Drury East (Kiwi Property & FHL) 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 projects¹ 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.

¹ <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 enabled within the THAB zone. The proposed zoning pattern applies the THAB zone close to public transport and Kiwi's proposed Metropolitan Centre.
- The adverse effects of urban development on the natural environment, including the Waihoehoe 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. 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.

3.0 INTRODUCTION

3.1 BACKGROUND

3.1.1 The Applicant

Oyster Capital (**Oyster**) are experienced residential and land developers in Auckland and are currently undertaking large scale and high-quality housing developments in Whenuapai and Beachlands.

Oyster has an interest in 18.4 hectares of land on the northern side of Waihoehoe Road as outlined in **Figure 1** below (refer to **Appendix 2** for list of properties). Oyster envisages that the Plan Change will provide quality, compact neighbourhoods

adjacent to business-zoned land to the south of the Plan Change area. The proposed zoning pattern will encourage a range of housing choice and intensive housing development in close proximity to the proposed Drury train station and Drury Centre.

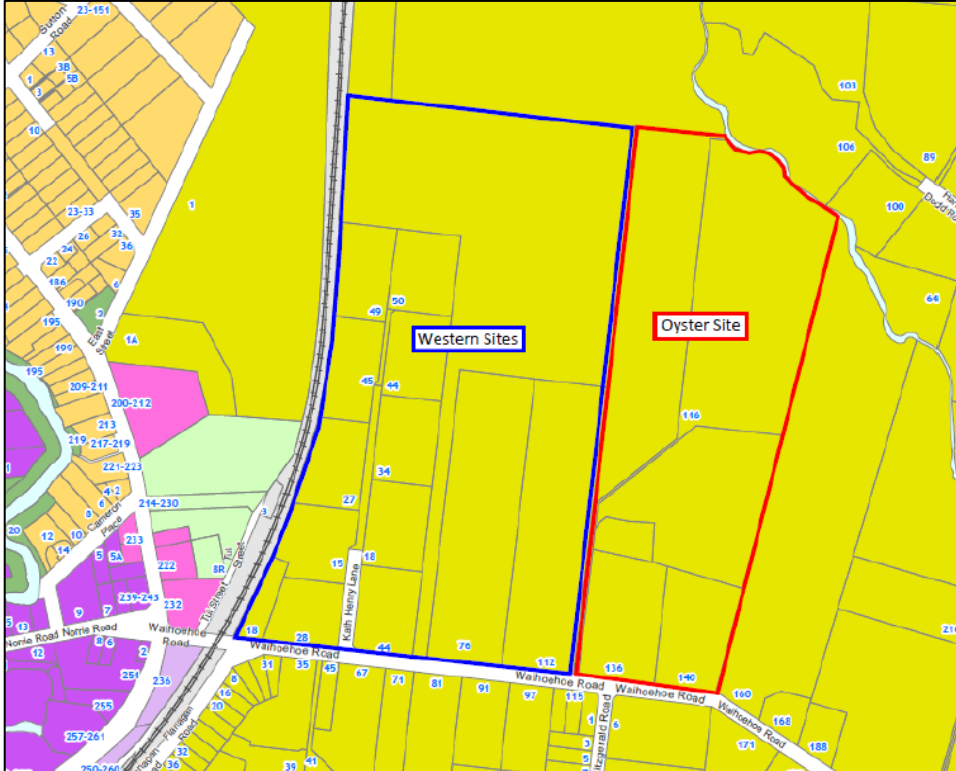


Figure 1: Showing the location of the land Oyster has an interest in, together with the adjoining sites to the west (Source: Auckland Unitary Plan maps)

4.0 SITE LOCATION AND DESCRIPTION

4.1 SITE DESCRIPTION

The Proposed Plan Change area applies to 48.9 hectares of land in Drury East (refer to **Figure 2**). The area includes the Future Urban zone land bounded by Waihoehoe Road to the south, North Auckland Line Railway Network to the west, Waihoehoi stream to the north-east and farmland to the north and east.

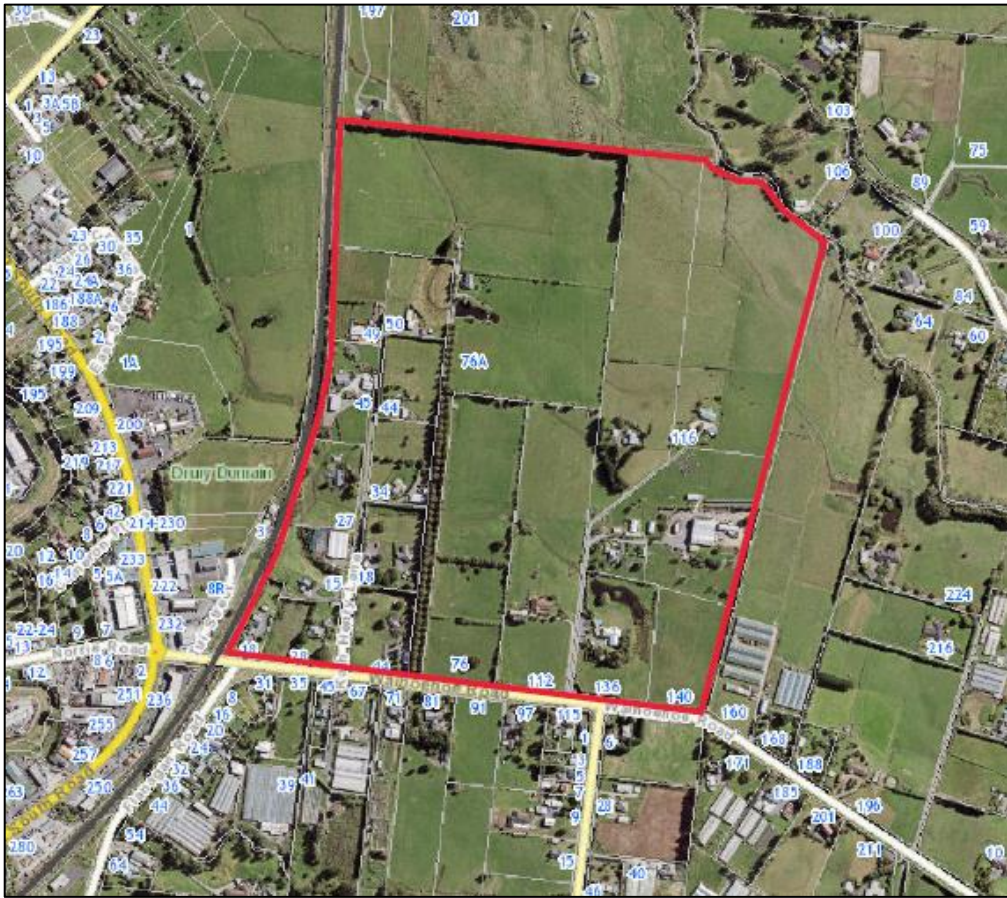


Figure 2: Aerial map showing the location of the plan change area (Source: Auckland Council Geomaps)

The overall topography of the Plan Change Area is relatively flat with a gentle cross fall from Waihoehoe Road towards the northern boundary (refer to **Figure 3**). There are modified watercourses that traverse the site and a short section of the mainstem of Waihoehoi Stream drains along the north-eastern boundary of the site.

Vegetation within the site is characterised by pasture used to graze sheep and cattle. There are some areas of existing native vegetation found within the site, although these are generally limited given the predominant farming use. Riparian vegetation along the watercourses are dominated by exotic trees and shrubs.



Figure 3: Showing the existing condition of the Plan Change area.

The Plan Change Area is currently used primarily for farming activities and a small number of dwellings and accessory buildings. The property at 116 Waihoehoe Road is currently used as a forging factory.

In terms of transport and accessibility, the site is situated in close proximity to the interchange between Great South Road and State Highway 1, which provides northern and southern on and off-ramps to the motorway. The railway line is located to the immediate west of the site. There is currently no train station at Drury however, the Government has now confirmed the funding for a train station at Drury East with the completed station expected to be delivered in 2024.

4.2 SURROUNDING LOCALITY

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 site 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 site and the surrounding locality is within the Future Urban zone under the Auckland Unitary Plan (Operative in Part). The Karaka and Opaheke / 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 Drury Quarry – consented quarry with a 100-year projected supply of roading metal for Auckland.
- 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), including:
 - Quarry Road – (Drury South Residential Precinct) is a joint Stevenson and Goodman venture which have obtained operative residential zoning to enable 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

5.1 DESCRIPTION OF THE PROPOSAL

5.1.1 Approach to the Planning Framework for Waihoehoe Road Precinct

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”². 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.

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.

² Refer A1.6.5 of the AUP.

5.1.2 Overview of the Proposed Zoning

Proposed Zoning

The Proposed Plan Change seeks to rezone 48.9 hectares of Future Urban zoned land to Terraced Housing and Apartment Buildings Zone (THAB) to enable urban residential development.

The proposed zoning pattern is shown in **Figure 4** below.

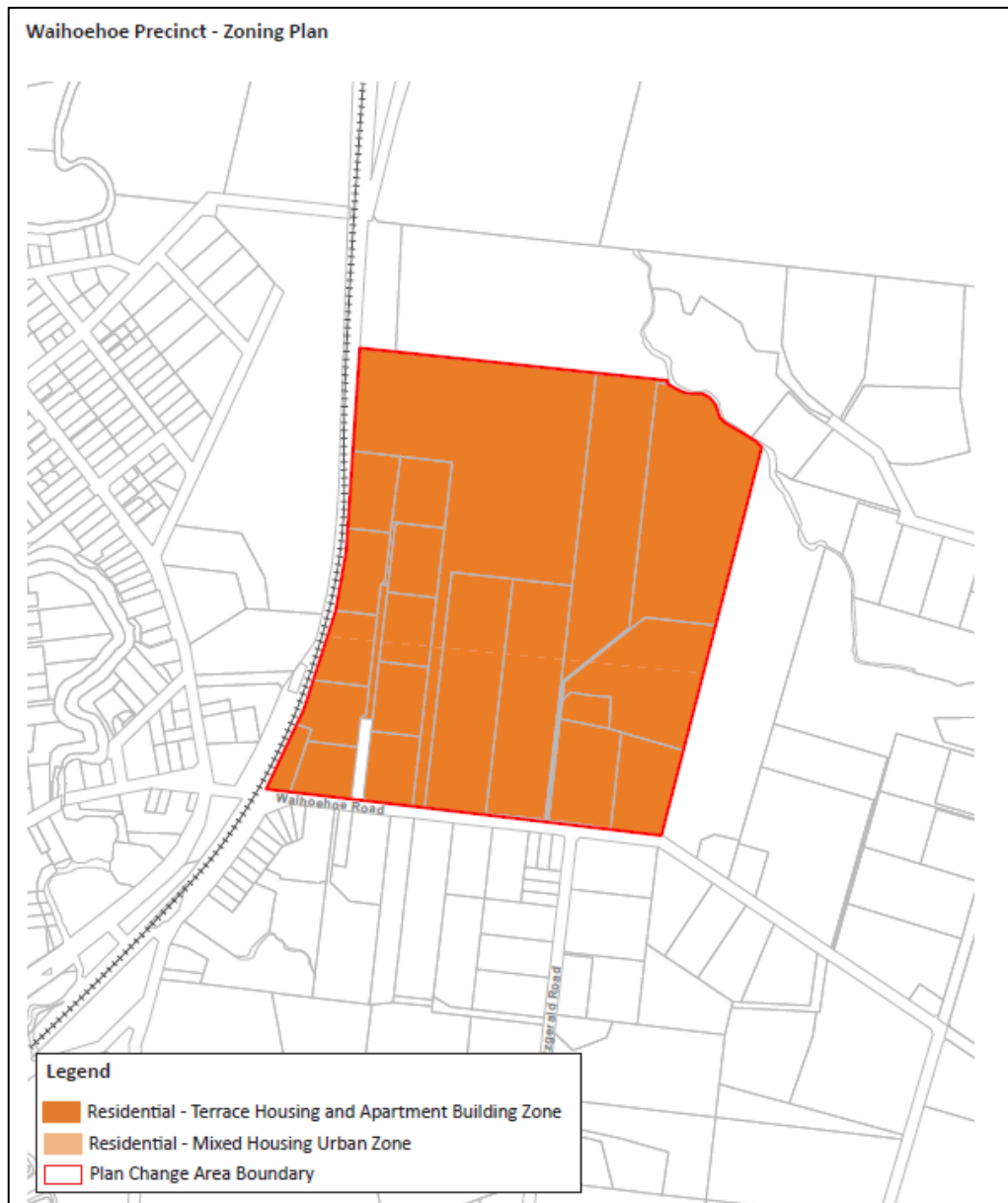


Figure 4: Proposed zoning plan

The intention of the proposed zoning is to provide for the establishment of a new residential area as part of the wider development of Drury East, offering a range of

housing types. The new residential area will be integrally linked to 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 provide for higher density residential development on the land in close proximity to the proposed Metropolitan Centre including the proposed Drury train station.

With the zoning proposed, the land will have capacity to accommodate up to approximately 1,133 dwellings.

Indicative drainage reserve areas have been located to follow and expand the existing stream network on the site. Additional drainage reserve located to the north of the Plan Change area have been incorporated as this is deemed to be undevelopable area due to the extent of the Slippery Creek floodplain.

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, and consenting requirements under the SMAF 1 controls will be triggered as part of future consent processes.

Proposed Precinct Provisions

Oyster propose to apply a precinct to the Plan Change area to manage the effects of urbanisation on the local environment and to ensure that a quality built environment is achieved. Oyster 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 enhance water quality consistent with other greenfield precincts within the AUP;
- The precinct applies the subdivision standards of the Mixed Housing Urban zone in order to provide flexibility for subdivision to occur ahead of land use and to

enable a wide range of housing, including apartments, terraces and compact stand-alone dwellings;

- The precinct applies the maximum impervious area standard which applies within the Mixed Housing Urban zone to manage the volume of stormwater runoff; and
- Additional assessment criteria and indicative cross sections for roads to ensure a highly connected street layout is achieved that integrates with the wider Drury East area.

5.1.2.1 Street Network

The Urban Design Report prepared by HUE sets out a structure plan for the Plan Change area which depicts 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. This will allow key elements of the proposed integrated movement network to be incorporated into the final layout, while allowing flexibility to finalise design and location when undertaking detailed design.

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.7.2 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.

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

The Urban Design Report prepared by HUE in support of the Plan Changes 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.

To ensure that the pedestrian and cycle paths which will provide connectivity with the Drury Central train station are staged with development, 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 the walking catchment of the station

5.1.2.2 Open Space Network and Ecological Enhancement

The Urban Design Report prepared by HUE identifies an opportunity to develop open space around existing intermittent streams and flood sensitive/prone areas. The approach to delivering these open spaces within the Plan Change area involves relying on the Auckland-wide provisions and also incorporating place-based provisions into the precinct.

There is a policy direction included within the Waihoehoe 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.

E38 Subdivision – Urban provisions applies within the Plan Change area and includes policies and assessment criteria to guide the provision and design 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.

Tailored rules are proposed to apply with the Waihoehoe 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.

5.1.2.3 Provisions for Mana Whenua Values

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 Waihoehoe Precinct Provisions that relate to Outcomes Sought by Mana Whenua

Overview of Outcomes Sought by Mana Whenua	Developer Actions
Streams and wetlands	
Protection of the identified permanent and intermittent stream tributaries of Waihoihoi Stream and two wetlands which have been identified.	<ul style="list-style-type: none"> 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 stream works that may be required. Oyster’s masterplan shows that the Waihoihoi Stream, intermittent streams and wetlands identified within the Plan Change will be retained

	and enhanced. The masterplan also shows the four artificial ponds removed and incorporated as part of the natural stream environment.
Tree/Vegetation Planting	
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"> • A rule is included within the Plan Change requiring riparian planting to a minimum width of 10m measured from the bank of the stream. • It is not proposed to amend the esplanade reserve and riparian yard requirements of the AUP. These are: <ul style="list-style-type: none"> - 20m esplanade reserve for streams greater than 3m in width (E38.7.3.2); - 10m riparian yard i.e. no buildings from the edge of all permanent and intermittent streams (required in all zones).
The use of native trees/plants	<ul style="list-style-type: none"> • 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.
Stormwater Management	
“Treatment Train” approach for dealing with stormwater	<ul style="list-style-type: none"> • A treatment train approach forms part of the approach to stormwater management set out in the Tonkin & Taylor Stormwater Management Plan.
Roof water for reuse and groundwater recharge	<ul style="list-style-type: none"> • In suitable locations roof water will be retained for use as grey water as set out in the Tonkin & Taylor Stormwater Management Plan. • In addition to this, the Plan Change proposes to apply the SMAF1 control.
Heritage and Archaeology	
Potential for cultural sites within the Plan Change area	<ul style="list-style-type: none"> • 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.
Cultural Monitoring	

<p>Cultural monitoring of earthworks in case of the potential discovery of kōiwi, Māori artefacts or archaeological features</p>	<ul style="list-style-type: none"> • If any sensitive material is discovered the accidental discovery rules under the AUP will apply. • Conditions for undertaking earthworks including any cultural monitoring will be determined at a resource consent stage and in discussion with iwi.
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5.2 PLAN CHANGE APPROACH FOR DRURY

Kiwi Property, Fulton Hogan Land Development Limited (FHLDL), and Oyster Capital (“the Drury East developers”), collectively have an interest in land within Drury East. Their areas of interest are shown on the plan in **Figure 5**. The Drury East developers have an established track record in commercial and residential development and want to progress development in ‘Decade 1’ (2018-2027).

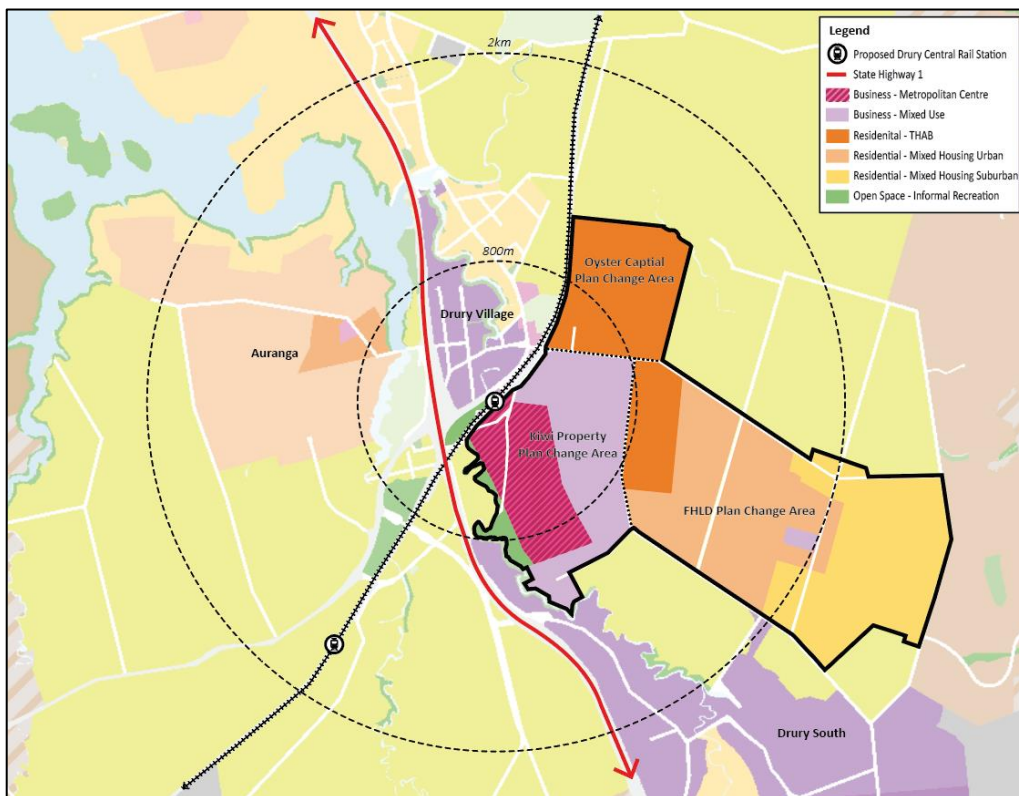


Figure 5: Areas of interest for Drury East developers and proposed zoning pattern across Drury East

Between 2017-2019, Oyster has worked together with Kiwi Property and FHLDL to develop a common vision for Drury East in the form of an agreed Structure Plan. This was used to inform Council’s Structure Plan process that has already 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 Plan Changes will bring forward the staged release of land at Drury East from what is proposed in the FULSS³. 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 for additional housing within Drury, consistent with the Council's draft Drury-Opāheke Structure Plan. Oyster is an experienced greenfield 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.

³ The Future Urban Land Supply Strategy 2017 (FULSS) states that the Plan Change area will be 'development ready' in 2028-2032.

6.0 TIMING OF THE PLAN CHANGE

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.

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 these principles are broadly consistent with the policy intent of the Structure Plan guidelines at Appendix 1 of the AUP RPS. In our view, the culmination of these principles should inform the staging rather than focussing on infrastructure funding and delivery. 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 6 & 7** below:

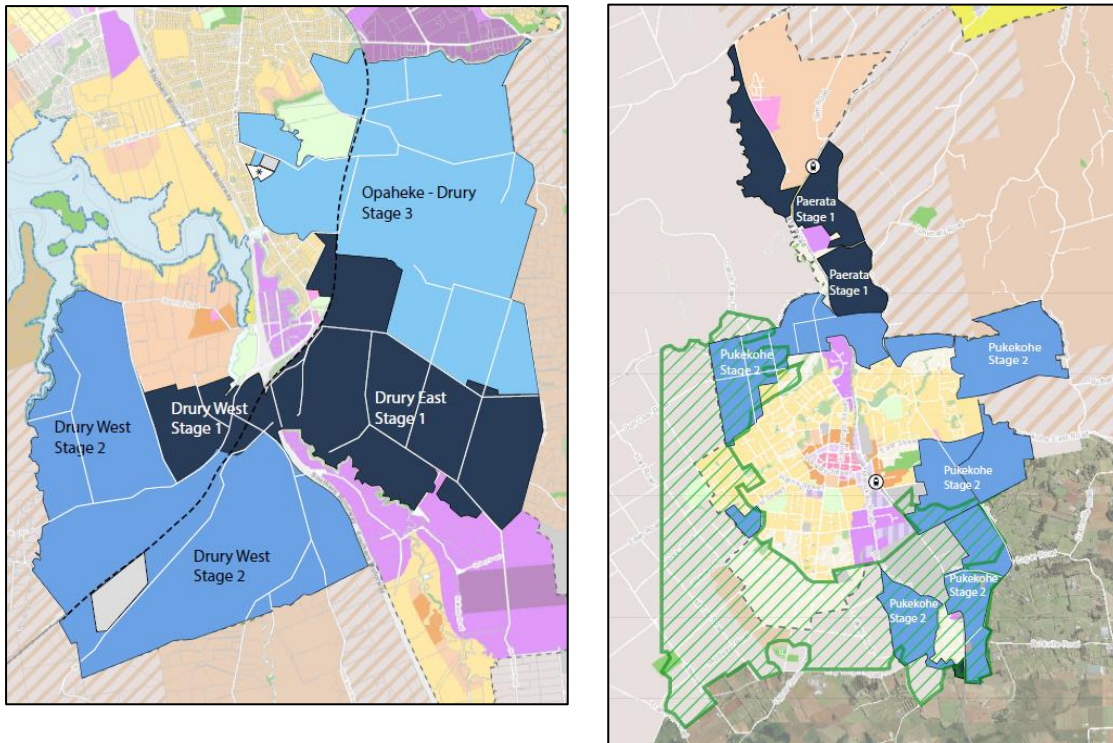


Figure 6 & 7: Alternative staging for Drury- Opāheke (left) and for Pukekohe-Paerata (right).

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, including Drury West;
- 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 area⁴;

⁴ Draft Stormwater Management Plan dated 12 April 2019 prepared by Mott MacDonald, page 7.

- Prioritises land for development where large holdings are in single ownership, which can be developed efficiently, which is not the case for the land to west of Jesmond Road, or Pukekohe;
- Recognises that developing on prime and elite soils at Pukekohe for low density housing (Single House) should not be prioritised and is contrary to policy B2.2.2(2)(j) of the Regional Policy Statement;
- 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 4**. 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.

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 success⁵. 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 documents⁶ 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).

⁵ MRCagney Technical Note dated 16 November 2018, 'Success factors for rapid transit network stations'.

⁶ Government Policy Statement on Land Transport, Auckland Plan 2050, Regional Land Transport Plan 2018.

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 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 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 of the RMA with supporting evidence, and consultation with interested iwi 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 Auckland Unitary Plan Regional Policy Statement (RPS) places a strong emphasis on delivering integrated urban development in Future Urban areas (B2.2.1(5) and B2.2.2(7)(c)). The Plan Change area can be serviced by planned infrastructure upgrades.

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 Oyster 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 Redhills⁷, Puhunui⁸ and Wainui⁹, and 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 consenting processes. Therefore, 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), given that the Plan Change area has been identified for residential use in the Council's own Structure Plan for Drury/ Opāheke, then the proposed zoning is not inconsistent with Part 5.

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

8.0 POLICY FRAMEWORK

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

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-

⁷ AUP Table I610.4.1(A15), I610.6.2 Infrastructure Upgrades and Location of Development - Transport

⁸ Include the reference here

⁹ AUP Table I544.4.1 (A1), I544.6.2 Infrastructure

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 Future Urban Land Supply Strategy (FULSS) is the key strategic document that gives effect to this National Policy Statement. 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 1,133 dwellings and a range of dwelling types for the increasing population. The analysis in Section 5 and 6 above explain the effect of bringing forward this capacity on existing urban areas.

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, this 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 10.6.2.

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 20** 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 Freshwater Solutions (refer to **Appendix 10**). 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 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

National Environmental Standards for Air Quality

The National Environmental Standards (NES) for Air Quality contains standards: banning activities that discharge significant quantities of toxins; ambient outdoor air quality; new wood burners in urban areas; and large landfills to collect greenhouse gas emissions. These standards are set to ensure a guaranteed minimum level of health protection for all New Zealanders. Due to the earthworks and cut and fill required to develop the land, the NES for Air Quality is considered to be relevant. Adequate mitigation measures will be proposed as part of future resource consent applications to ensure compliance with the standards for ambient outdoor air quality.

National Environmental Standards for Sources of Drinking Water

The NES for Sources of Drinking Water sets requirements for protecting sources of human drinking water from becoming contaminated. It is intended to reduce the risk of contaminants entering natural water bodies such as lake, river or ground water. For the purpose of this NES, the standards apply to the source water before it is treated and only sources used to supply human drinking water. Given the construction activities associated with developing the land and as such the potential for contaminants to enter drinking water supplies, the NES for Sources of Drinking Water is considered to be relevant. Erosion and sediment controls such as sediment detention ponds, clean water diversion channels and bunds and dirty water diversion bunds will be undertaken in accordance with industry best practices and resource consent requirements.

National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The NES for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCO) is a nationally consistent set of planning controls and soil contaminant values. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed – and if necessary, the land is remedied or the contaminants contained to make the land safe for human use. Given the previous and present use of the site for stock grazing, the potential ground contamination associated with underground fuel tanks, storage of waste oil and fuel, evidence of waste/refuse burial, the NESCO is considered to be relevant. Given the likely Hazardous Activities Industries List (HAIL) that have occurred and/or currently occurring within the Plan Change area, a Preliminary Site Investigation report has been prepared by Focus Environmental Services Ltd, and is included as **Appendix 13** to this report. Overall, subject to Detailed Site Investigations being prepared and appropriate Site Management Plans are implemented, it is considered that the Plan Change area is suitable for future residential development.

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 as¹⁰:

- 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

¹⁰ Auckland Plan 2050, pg. 206.

- Delivery of necessary infrastructure is coordinated to support growth in the right place at the right time.

The proposed application of the THAB zone within the Plan Change area will provide quality, compact neighbourhoods adjacent to Kiwi's proposed Metropolitan Centre and the future Drury Train Station.

The Plan Change area will be well serviced by public transport. The railway lines will be electrified to Pukekohe allowing for additional rail capacity. The Government has now confirmed the funding of two new train stations to be constructed at Drury East and Drury West. There is also proposed to be a high frequency bus corridor between Manukau and Drury West. The proposed THAB 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 drainage reserves/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 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:

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

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

8.3 REGIONAL POLICY STATEMENT AND PLANS

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

A comprehensive assessment of the proposed rezoning against the relevant objectives and policies of the RPS are provided at **Appendix 5**. 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 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 generally 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.

8.4 OTHER PLANS

8.4.1 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 Waiohua, 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 at **Attachment 15**.

9.0 DEVELOPMENT OF THE STRUCTURE PLAN AND PLAN CHANGE

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 8**. 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**.

With respect to the Plan Change area, the Structure Plan identifies THAB zoning with centre zoning towards the south western corner in close proximity to the proposed train station.

B&A

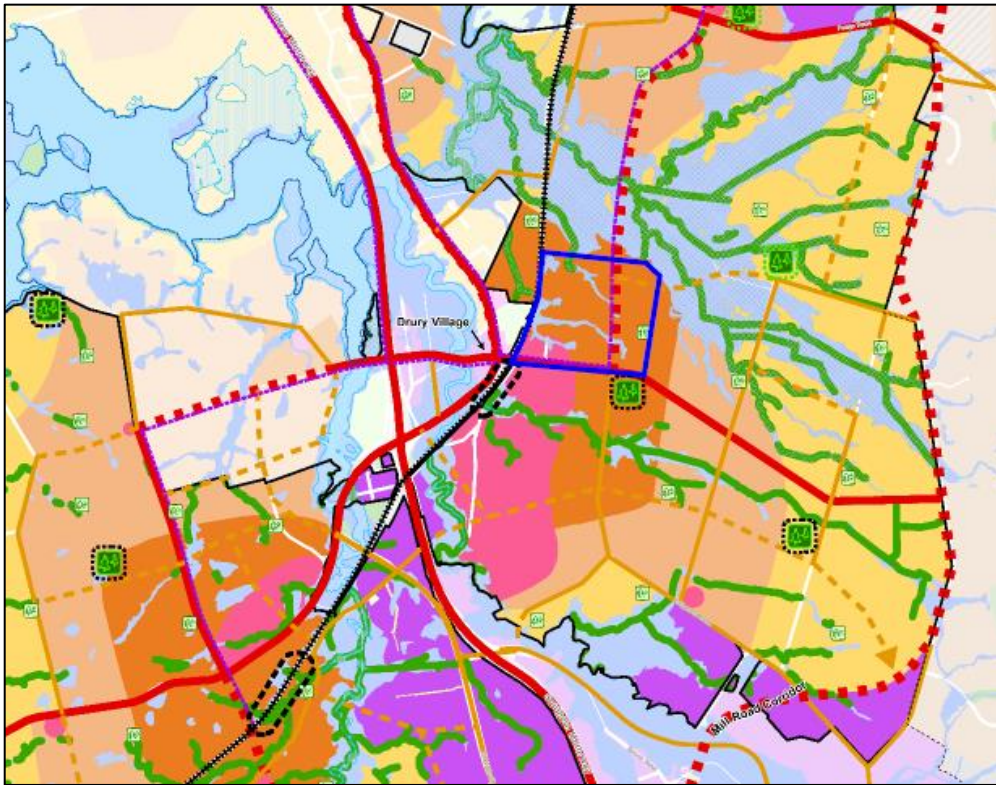


Figure 8: Plan Change area (outlined in blue) in relation to the Auckland Council Drury-Opāheke Structure Plan.

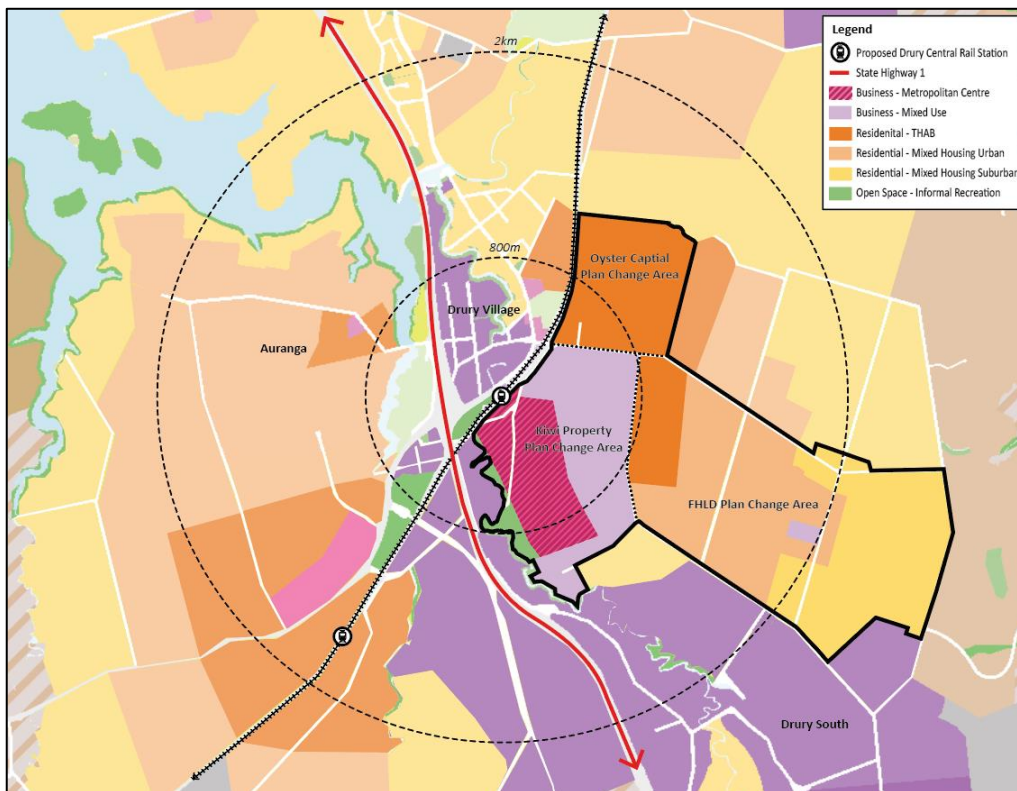


Figure 9: Drury East developers proposed zoning pattern and the Auckland Council Drury-Opāheke Structure Plan land use pattern.

9.2 OYSTERS'S MASTERPLAN

Following an iterative and consultative process with the Council and local Drury stakeholders, Oyster engaged Holistic Urban Environments (HUE) to undertake a broad masterplanning exercise for the Waihoehoe Plan Change area. As part of the masterplanning 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.

The masterplanning 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 drainage reserves/public open spaces, and general block layout. The proposed zoning pattern for the Plan Change area and the Waihoehoe 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. Oyster 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 Oyster 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 and protection of waterways

A summary of the consultation and meeting minutes are attached in **Appendix 15**.

In terms of wider community views, Oyster 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 Statement prepared by HUE has informed the structure plan (refer to **Figure 10**) and Plan Change (refer to **Appendix 6**). The Urban Design Statement identifies opportunities and constraints presented by the Plan Change area and develops three key elements based on best practice urban design to deliver a zoning pattern that is rationale, legible and achievable. Three key elements are as follows:

- *Provide a logical movement network that creates a connected urban framework that offers transport choice.*
- *Create an open space network, based around the existing stream and ecological environment.*
- *Provide for different housing density and distribution that is appropriate for the Plan Change Area's location and site features.*

These key elements and design principles directly underpin the proposed design response for Waihoehoe, including the zoning, the location of roads and connections, and the drainage reserve/open space network. They respond to the key characteristics and features of the Plan Change area and build on the urban design and place making objectives of the AUP and Auckland Design Manual.



Figure 10: Structure Plan for Waihoehoe Plan Change

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 Statement sets out the environmental conditions of the Plan Change area in detail and the masterplan at **Appendix 6** and shown in **Figure 10** demonstrates how future development within the Plan Change area is able to respond to these conditions effectively. This includes concentrating densities to the south to integrate with Kiwi's proposed Metropolitan Centre and Drury train station, retaining the existing stream network and optimising the location of roads to achieved a permeable, connected grid.
- **Hierarchy of centres:** The proposed application of the THAB zone encourages higher residential intensity in areas within close proximity to Kiwi's proposed Metropolitan Centre and Drury train station to create a compact urban form and ensure vibrancy within the centre.
- **Housing Choice:** There is a level of flexibility in the THAB 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 proposes to apply the THAB zone to ensure infrastructure is used efficiently. Specifically, the application of the THAB zone will enable a higher intensity of development within close proximity to services, the rapid and frequent transport network, opens space amenity, site topography and interface conditions.
- **Safety of site, street & neighbourhood:** Applying the THAB zone 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 it¹¹. 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 structure plan for the Plan Change area clearly illustrates that future development can deliver a roading pattern creates a permeable, connected grid for movement, sets the block structure for the graduated density envisaged by the different residential zones and provides defined boundaries for the changes between zones.
- **Pedestrian and cyclist safety:** The proposal will result in a strong and logical movement network that offers multi-modal transport options and a connected pedestrian and cycle network to help reduce dependency on cars for travel. The cycleways and paths will provide connectivity between residential neighbourhoods to the existing and proposed Drury centres and the proposed Rapid and Frequent public transport networks.
- **Health and safety of people and communities:** The proposed zoning layout promotes the health and safety of people and communities by positioning a local service and convenience retail for residents and food options for workers at nearby business zones to the south.

For the reasons outlined above, in our opinion, 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.

10.2 OPEN SPACE AND COMMUNITY FACILITIES

As Drury East is currently a working farmland. The closest recreational open spaces include the 2.77 ha Drury Domain, which is immediately west of the railway network,

¹¹ Refer to H6.8.2(2)(d) of the Terrace Housing and Apartment Building zone and H5.8.2(2)(c) of the Mixed Housing Urban zone.

and the Drury Sports Complex, which is approximately 750m from the Waihoehoe Road rail overbridge. Both of these parks are deemed Suburb Parks in the 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 that:

- 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.

Open space within the Plan Change area has been developed around the existing intermittent streams and flood sensitive prone areas associated with the Slippery Creek. In particular, the indicative open spaces within the Urban Design report include:

- Drainage reserves are proposed along the streams which will provide access to the existing natural watercourses. These drainage reserves are multi-purpose linear parks that provide recreational and passive open space, visual amenity and areas for stormwater management.
- A larger drainage reserve is shown north of the Plan Change area over the Slippery Creek floodplain. Due to the size of this drainage reserve, this has the potential to be converted to a neighbourhood park subject to consultation with Auckland Council.
- Opportunities for playgrounds, small pocket park spaces and other similarly scaled recreational activities are also anticipated to be accommodated along the edges of, and within these drainage reserve corridors, adding to and enhancing the stream-based amenity of the development.

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 consistent with the Council's Open Space Provision Policy, 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 in close proximity to the existing Drury Centre and Kiwi's proposed Metropolitan Centre. 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 LANDSCAPE AND VISUAL AMENITY

A landscape and visual effects assessment has been undertaken by LA4 Landscape Architect (LA4) to support the Private Plan Change and is included in **Appendix 7**.

In the context of the existing rural environment, it is important to note that any urban development will alter the existing landform. However, in our view, this is generally anticipated given that the area has a Future Urban zoning and identified for residential development in the Draft Council Structure Plan therefore envisages urban activities occurring on the land.

Following a detailed review of the existing site and context, LA4 considered the key landscape attributes that influence the character, quality and visual amenity of the site and these include:

- *The wide open areas of pasture;*
- *The more prominent vegetation which provides a sense of scale and enclosure, establishment and connection to the historic rural land use;*
- *Distant views to the surrounding rural landscape and the nearby Hunua foothills; and*
- *The landform, in particular, the natural drainage pattern*

Overall though, LA4 considered that there are relatively low landscape values and sensitivity associated with the site and the surrounding area. Although the proposal will result in a loss of semi-rural character, the proposed zoning respond to these key landscape attributes as follows:

- As the topography of the site is relatively flat, it is considered that any future earthworks will have limited implications on the existing landform.
- Protection and enhancement of the natural waterways and drainage network.

- The site will be comprehensively planted with street trees, rain gardens and extensive riparian planting which will enhance the overall amenity of the site and assist in integrating the site with the wider area as it becomes more urban over the next 30 years.
- Retention of at least one row of Oak trees, however, the extent of this retention will be confirmed as part of a future resource consent application.

Based on this analysis, it is considered that the proposed zoning will appropriately respond to the existing landform in the context of a Future Urban zoning and the effects on landscape character will be acceptable.

LA4 has also undertaken a detailed assessment of the potential visual amenity effects of the rezoning from identified viewpoints around the development for various audiences such as the immediate adjoining areas, surrounding road network and wider surrounding area. From some vantage points there will naturally be a significant change from the existing view given that the area will change from an open semi-rural to urban activities. These effects will be mitigated as far as practicable through the extensive drainage reserve and planting proposed.

Within the context of the Future Urban zone contemplating urban activities and taking into account the proposed land uses and zoning pattern in accordance with Council's Structure Plan, it is considered that the potential landscape and visual amenity effects of the proposed rezoning on the environment will be acceptable.

10.4 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 Oyster is proposing to undertake development in stages, an ITA has been prepared by Stantec for the Plan Change application and is included at **Appendix 8** to this report.

The Stantec ITA builds on the findings of the SGA ITA and considers that the existing road and rail network as well as future land uses and transport network that will be developed through committed infrastructure upgrades 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 detail below.

10.4.1 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. Within the Plan Change area, the internal road network is proposed to be arranged in six key streets and includes consideration of active transportation such as cycling and walking amenities as shown in **Figure 11** below.



Figure 11: Proposed internal road network

10.4.2 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:

- 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 10.5.2.1 and 10.5.2.2 below**, until such time that the identified infrastructure upgrades are constructed.

Table 10.4.2.1: Threshold for Development with 'Access A as shown on IX.10.2 Waihoehoe: Precinct Plan 2 (refer Appendix 1) not constructed

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

3,406	62,430m ²	34,800m ²	<ul style="list-style-type: none"> Upgrade of the Waihoehoe / Great South Road intersection to signals.
4,640	83,960m ²	46,800m ²	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South road interection (western arm only).
6,428	107,650m ²	60,000m ²	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South road interection (on all approaches).

Table 10.4.2.2: Threshold for Development with 'Access A as shown on IX.10.2 Waihoehoe: Precinct Plan 2 (refer Appendix 1) constructed

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

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.

10.4.3 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 Fitzgerald Road extension and where this will intersect with the existing road network is shown indicatively on proposed Precinct Plan 2. The location of this road 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.

Fitzgerald Road was classified in the SGA ITA as an arterial road. It is proposed to change the planned status of Fitzgerald Road to a collector road due to the extension primarily serving a residential area, the difficulty in providing a link to the north, and in order to provide an enhanced urban outcome.

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 precinct integrates with the surrounding development within the Kiwi and FHLD 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 walking catchment of the station. This will ensure that there is safe and convenient access to rapid transport from the outset of development.

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.

10.4.4 Proposed Transport Network – Public Transport

The ITA identifies the Drury Central train station and public transport hub as a critical component to the Plan Change area. 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 Metropolitan Centre as part of Kiwi's Plan Change.

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

10.4.5 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 and integrated road network which provides for cyclists and pedestrians and creates linkages to the new Drury Central train station.

10.5 VEGETATION AND ECOLOGY

An ecological assessment prepared by Freshwater Solutions Environmental Consultants has been undertaken to support the Plan Change and is included as **Appendix 10** to this report. This includes an assessment of ecological values of freshwater and terrestrial ecosystems.

10.5.1 Aquatic and Freshwater Ecology

The Plan Change area falls within the downstream end of the Slippery Creek catchment. The Slippery Creek catchment drains to the Manukau Harbour, by subsequently flowing into Drury Creek. The wetlands and watercourses within the site are shown in **Figure 12** below.

With the exception of a short section of the Waihoihoi Stream that drains along the north-eastern boundary of the site, all streams within the site have low ecological value due to vegetation clearance and grazing damage. The Waihoihoi Stream on the other hand has a good baseflow and are able to support aquatic habit for shortfin eel, inanga and banded kokopu. The ponds and wetlands identified within the site are highly modified and degraded, dominated by exotic species, artificially drained in some places and are open to stock trampling such that they are considered to have low ecological value.

It is intended that the Waihoihoi Stream, intermittent streams and wetlands identified within the Plan Change will be retained and enhanced. Retained streams and wetlands across the site will be planted to have riparian margins of no less than 10m on average on either side of the streams. The proposal will also remove the artificial ponds in order to improve the downstream water quality and fish passage.

To facilitate urban development of the land, some stream culverting may be necessary to establish road crossings in accordance with the Precinct plan and it is anticipated that any culverts will meet the permitted standards under Chapter E3 of the AUP. Should the stream culverting require resource consent, the effects of this and the adequacy of the mitigation proposed will be considered as part of the resource consent process under the standard AUP provisions.

Earthworks within the Plan Change area has 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.

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.

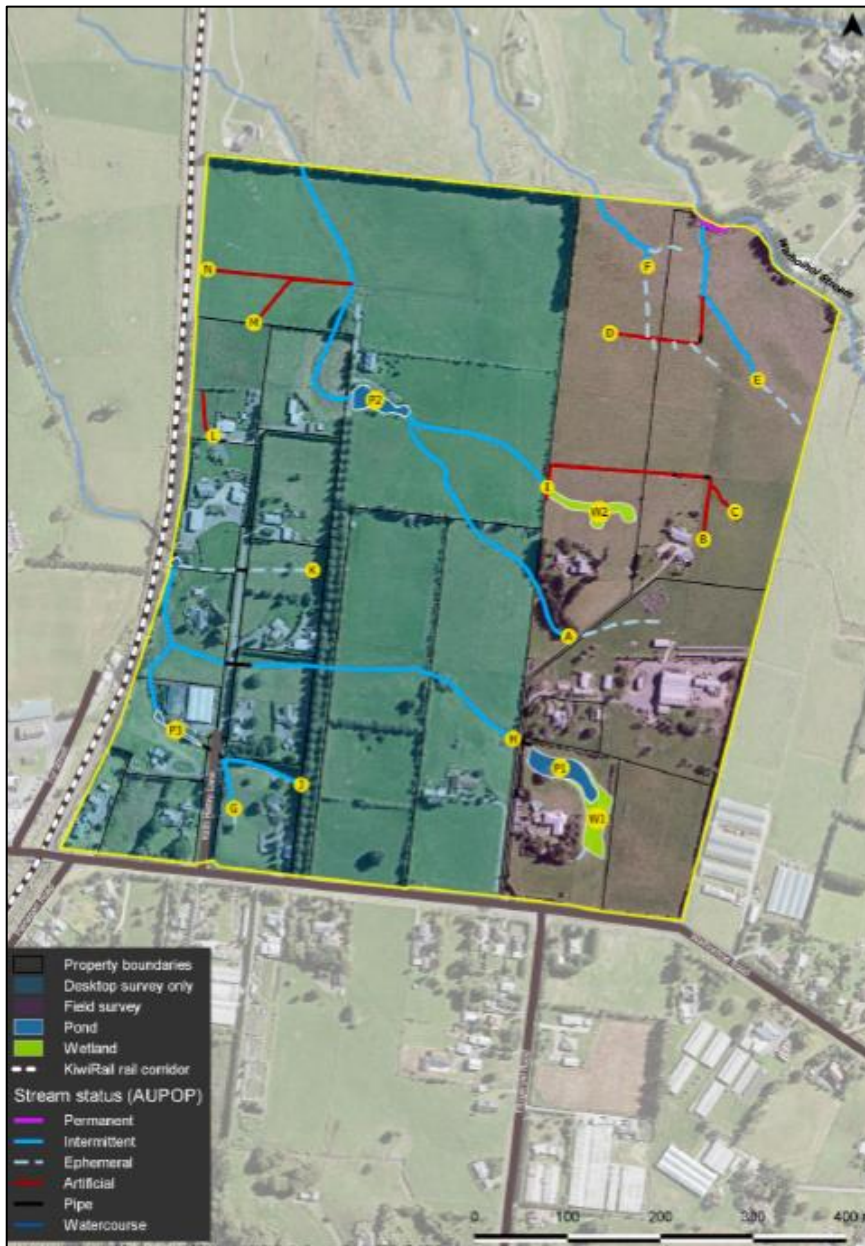


Figure 12: Stream status (AUP) and wetlands identified within the Plan Change area

10.5.2 Terrestrial Ecology

Vegetation within the Plan Change area is characterised by pasture, exotic shelterbelts, weeds, and a mixture of native and exotic species as part of gardens. No Significant Ecological Areas (SEA) or notable trees are identified within the Plan Change area. Riparian vegetation along identified streams comprised mainly grasses and weed species, with little continuity. Overall, the vegetation within the site is of low value.

Bird species identified within the site and within the local area comprise of common species typical of rural and urban areas. Native tree dwelling gecko species are unlikely to be present within the site due to absences of suitable habitat however it is noted that native copper skink and ornate skink may be present within the site in wood piles. It is also possible that low numbers of bats may frequent mature exotic trees.

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 Plan Change through the proposed drainage reserves.

On the basis of the above, it is considered that the potential effects of the rezoning proposal on the terrestrial ecological values of the environment related to vegetation will be acceptable, and are appropriately managed through the Plan Change and Auckland Wide provisions.

10.6 FLOODING AND STORMWATER MANAGEMENT

10.6.1 Flooding

The Plan Change area is identified on Council's GIS as being subject to overland flow paths, floodplains and flood prone areas as shown in (see **Figure 13**) below.

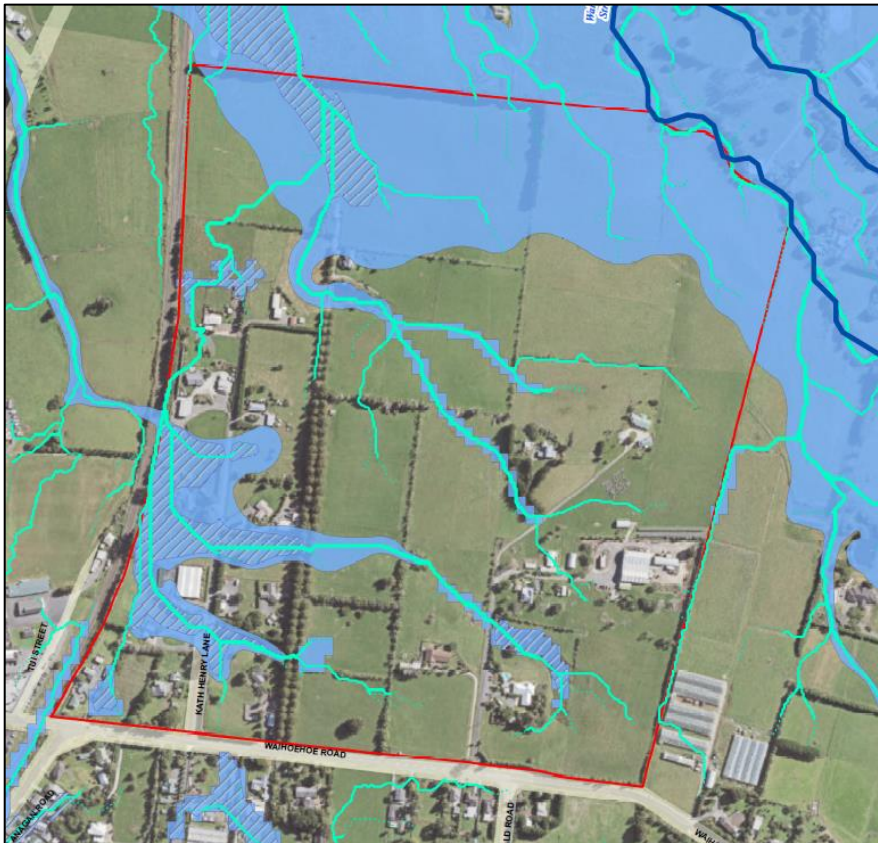


Figure 13: Flooding hazard affecting the Plan Change area (Source: T+T SMP report)

Tonkin + Taylor (T+T) has undertaken a flood hazard assessment to confirm flood levels and hydrological behaviour of the Plan Change area and the upstream catchment that drains into the Slippery Creek. The results of the flood modelling show that in the maximum probable development scenario¹², there would be an increase in flood levels within the site of up to 0.2m for a 1 in 100-year ARI storm event.

In order to address increased peak flows and depth of flooding in the Plan Change area and the wider Slippery Creek floodplain, the following flood hazard management is proposed. Please note that this approach is based on the site topography and proximity to appropriate receiving environment.

- The northern sub-catchment is in close proximity to the Waihoihoi Stream and therefore “pass forward peak flows” is proposed.
- For the southern sub-catchment, it is proposed to attenuate peak flows and control discharge as the downstream properties and the railway culvert will be sensitive to changes in flow.

¹² Maximum Probable Development (MPD) assumes an impervious coverage of 60% with the FUZ and 20% impervious coverage in the rural area to the east of the catchment (section 5.1, page 23, Stormwater Management Plan prepared by T+T).

In addition to the flood hazard management strategy set out above, drainage reserves are proposed on part of the land subject to floodplains to avoid future development in this area. The standard provisions in Chapter E36 of the AUP would also apply to any development within the identified flood hazard, which would sufficiently manage the impact of flood risk in the Plan Change area and the wider receiving environment.

10.6.2 Stormwater Management

A Stormwater Management Plan has been prepared by T+T, and is included as **Appendix 9**. The SMP aims to align the proposed stormwater management approach for the Plan Change area with the requirements of the AUP, taking into account the catchment specific issues, constraints and opportunities.

Discharge to Receiving Environment

With respect to the stormwater management approaches for discharge to the receiving environment, the Plan Change area has been split into two sub-catchments as follows (refer to **Figure 14**):

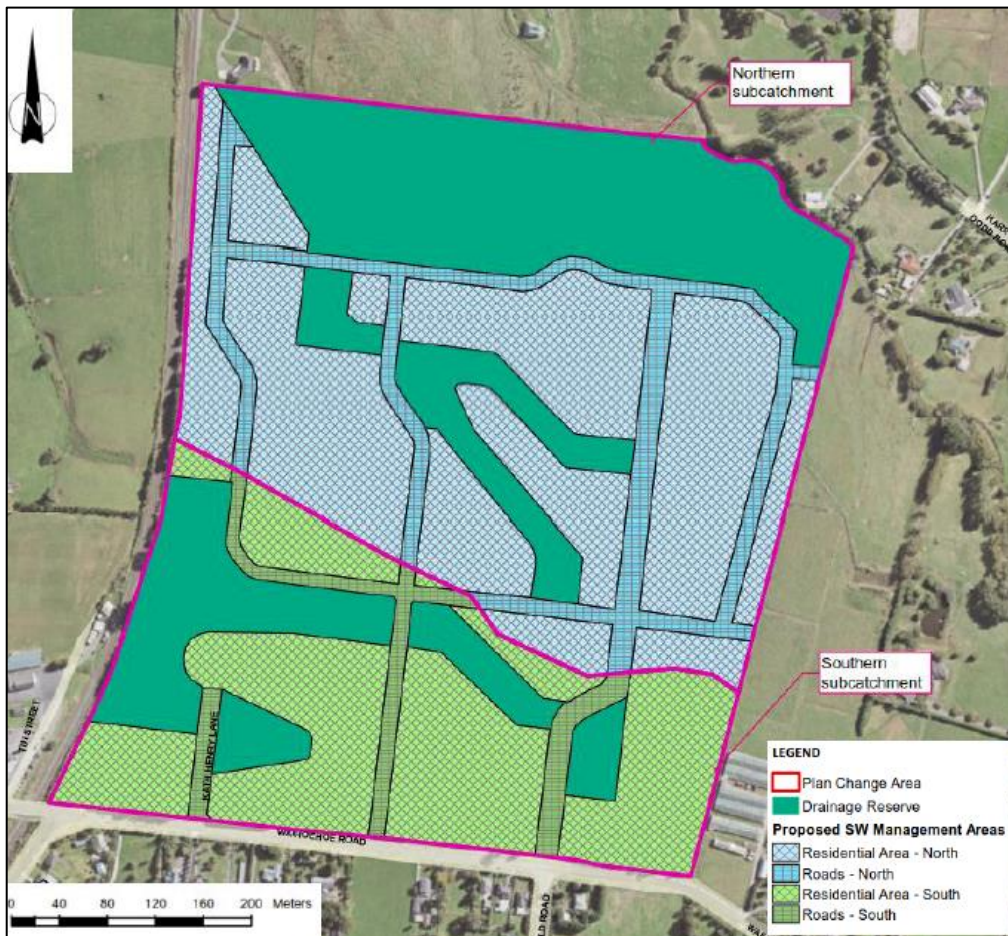


Figure 14: Proposed stormwater management areas for the discharge to receiving environments

- Northern sub-catchment: “passing flows forward” approach strategy to discharge peak flows to receiving stream environment. The downstream receiving environment will be protected from erosion through the use of green outfalls and vegetated channels.
- Southern sub-catchment: detain flood flows on site for up to 100-year storm event to mitigate flooding in the western parts of the plan change area and further downstream. Conveyance systems will discharge into the detention basins through green outfalls.

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 use of green infrastructure to treat contaminants at source. This will include the following:

- Vegetated bio-retention devices comprising of a combination of swales, tree pits and raingardens to treat runoff from all roads and car parks. Water quality treatment to target sediment, metals and gross pollutants should also be provided;
- The generation of contaminants will be minimised by requiring inert building materials on residential lots and roof areas. If building materials such as unpainted zinc are used on buildings, further site-specific water quality treatment measures will be required;
- Erosion protection will be provided if required in the stormwater system including discharges to streams. This could include green outfalls and vegetated channels for discharging to streams.

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 green infrastructure 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.

Stormwater Management – Flow

The findings of the SMP are that the impacts on stormwater management – quantity, 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 stormwater management strategy for providing hydrological mitigation in accordance with the Stormwater Management Area Flow 1 (SMAF1) requirements set out in Table E10.6.3.1.1 of the AUP.

- Utilise rainfall harvesting for retention for residential where there is re-use demand and infiltration is not possible;
- Permeable pavements will be used for private or shared driveways on residential lots, or within the public realm where necessary, to mitigate runoff from other impervious areas;
- Three detention basins located within the southern sub-catchment will be provided to provide detention for the 1 in 100-year ARI stormwater events. The outfall rate from these detention basins is restricted to mimic discharge rates as close to the existing discharge rates from the sub-catchment; and
- Bio-retention devices such as raingardens and vegetated swales are proposed to be used for roads, carparks and public spaces where practicable for hydrological mitigation.

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.

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 piped network will collect the developed catchment and convey rainfall events up to and including the 10-year ARI rainfall event which will discharge to the downstream receiving environment. Any excess flows or secondary flows will be conveyed using roads and overland flow paths. Vegetated swales will be used on roads as they provide an alternative conveyance route and visual amenity, when compared to a piped network.

10.7 SERVICING

An infrastructure report prepared by Crang Civil Consulting Engineers (Crang Civil) details how the Plan Change area can be serviced and is included at **Appendix 11** to this report. The specific servicing requirements are detailed below.

10.7.1 Wastewater

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 Drury East developers. Watercare Services Limited have confirmed that the development enabled by the Plan Change can be serviced in the future through planned upgrades.

Watercare Services Limited has proposed an interim solution for wastewater discharge through the construction of two temporary pump stations on the northern periphery of the site. The permanent solution requires decommissioning of the temporary pump stations and the construction of permanent gravity sewers to be installed to the new trunk sewer on the northern perimeter of the site. It is anticipated that the permanent solution is scheduled to be installed by Watercare post 2028. Overall, the Plan Change area can be serviced by the agreed interim solution and planned wastewater infrastructure upgrades.

10.7.2 Water Supply

The land within the Plan Change area is not currently serviced by any piped water supply network. It is proposed to install a new watermain between Flanagan Road Bulk Supply Point and the intersection of the proposed indicative roads and Waihoehoe Road where connections will be made. The watermains within the development will be sized during the resource consent and engineering plan approval stage however it is confirmed that the watermains will provide adequate

flow rates and pressures for domestic use and firefighting include the provision for hydrants. Crang Civil has confirmed that the proposal is consistent with the watermain strategy in Council's Structure Plan for Drury.

10.7.3 Other Utilities

The Plan Change area can be serviced with existing overhead power and telecommunication infrastructure that exists on Waihoehoe Road. Network upgrades will be required to fully service development within the Plan Change area, and Vector and Chorus will be consulted as design detail stage. There should be no constraints or issues with undertaking these upgrades progressively as development occurs.

10.8 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 14** of this report. This assessment involved a desktop review of the Plan Change area, and a visual inspection and ground surface examination during a site visit.

There are no recorded archaeological sites within the Plan Change area with the exception of part of the route of the Drury tramway/mineral railway (identified as R12/122) 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. **Figure 15** below shows the estimated route and shows that the tramway crossed from the southeast corner of 44 Waihoehoe Road, across Kath Henry Lan and through 15 and 27 Kath Henry Lan to meet the railway line opposite the property at 3 Tui Street. Recent aerial view in **Figure 16** below shows the likely former route of the Drury tramway/mineral railway within 27 Kath Henry Lane.

B&A

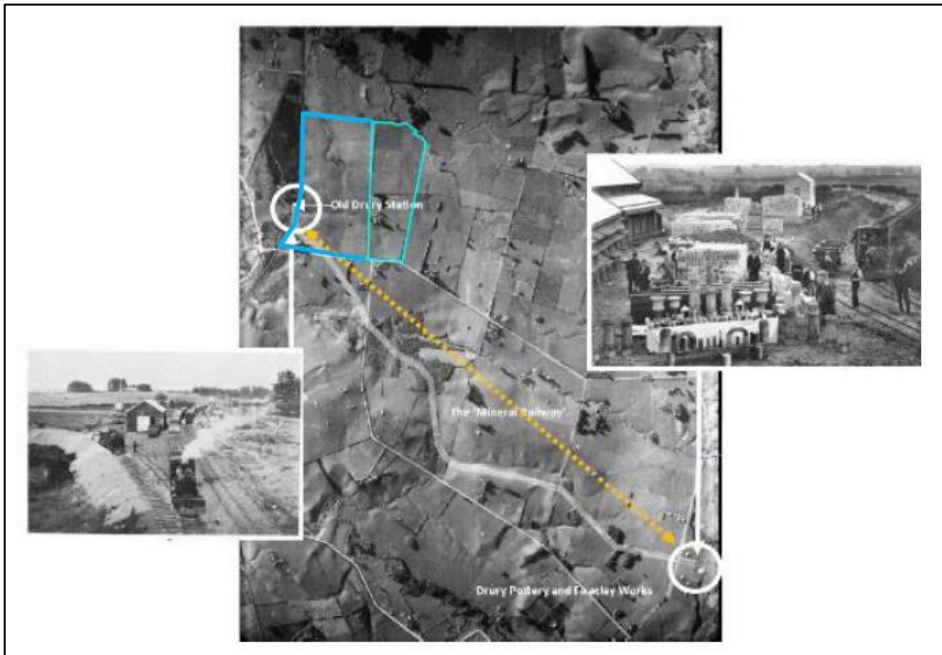


Figure 15: Estimated route of the Drury tramway

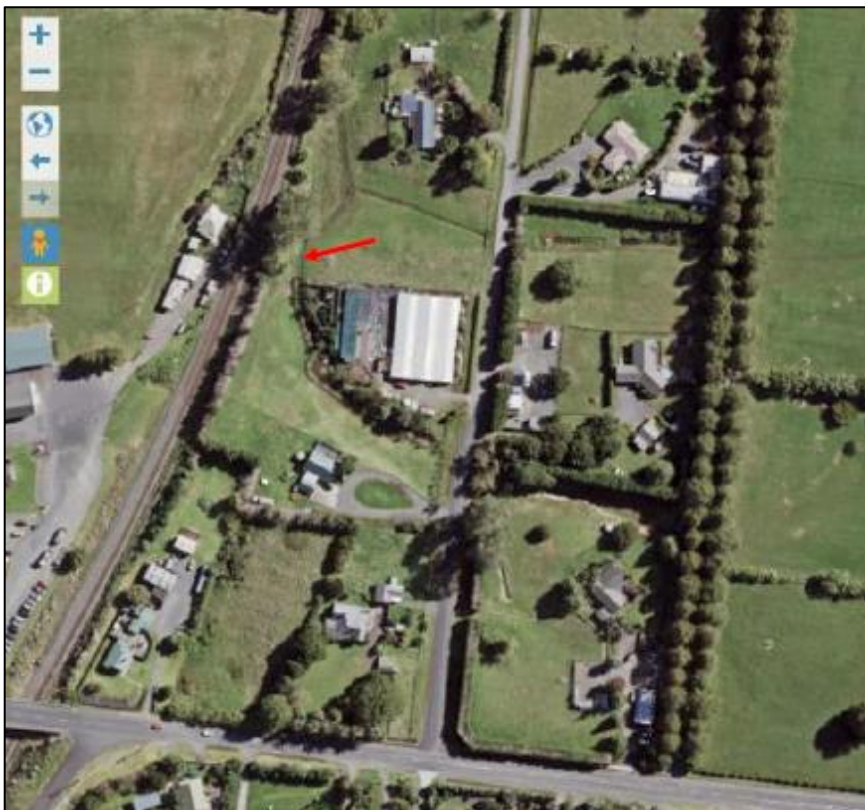


Figure 16: Aerial map showing the likely former route of the Drury tramway/mineral railway within 27 Kath Henry Lane

An evaluation was undertaken by Auckland Council to assess whether the tramway/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 land¹³.

The 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.

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.

10.9 CULTURAL VALUES

Engagement has been undertaken with all Mana Whenua groups with known customary interests in the Plan Change. The consultation report included as **Appendix 15** 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 Waiohua and Ngāti Tamaoho Trust have prepared Cultural Valuation Assessments which are appended to this report **Appendix 16 - 19**.

In summary these assessments identified the following areas of interest/concern:

¹³ Brassey 2017, page 18-19

- 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 methods for ensuring that the intrinsic values of the Waihoihoi Stream and its tributaries are respected include the protection and enhancement of streams on the sited.

10.10 LAND CONTAMINATION

A Preliminary Site Investigation report has been prepared by Focus Environmental Services Ltd, and is included as **Appendix 13** to this report. Overall, subject to Detailed Site Investigations being prepared and appropriate Site Management Plans are implemented, it is considered that the Plan Change area is suitable for future residential development.

The assessment found that Hazardous Activities Industries List (HAIL) has been, or is currently being carried out in a portion of the Plan Change area. In particular, the following potential ground contamination sources were observed:

- The use of lead-based paint and potential asbestos ground contamination associated with former demolition activities;
- Underground fuel storage tanks, storage of waste oil and fuel/oil leaks;
- Activities associated with the Engineering Workshop and Foundry development;

- Evidence of waste/refuse burial, burning, and potential race operations; and
- Historic and current horticultural activities.

Further investigation is required on the properties where access was restricted during the site walkover to confirm other potential ground contamination.

Notwithstanding the above, it is considered that based on the information available, the Plan Change will be generally suitable for future residential development, with some targeted remediation likely required. Consent will likely 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.

10.11 GEOTECHNICAL

A preliminary Geotechnical Report has been prepared by Lander Geotechnical Consultants Limited to inform the Plan Change and a copy is included as **Appendix 12** of this report.

Based on the assessment undertaken, the report concludes that the ground conditions are suitable for the type of residential development proposed, with no obvious significant geotechnical hazards observed. The report does however identify pockets of weaker ground and/or lenses of organics which will require specific foundation design for future building platforms. The report also confirms that liquefaction induced settlements are unlikely to occur however the potential for settlements will need to be designed with regards to the flooding hazard affecting the Plan Change area.

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.

10.12 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, 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 and

the development can be serviced by existing infrastructure with appropriate upgrades in place.

11.0 SECTION 32 ANALYSIS

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 for additional housing within Drury, consistent with the Council's draft Drury-Opāheke Structure Plan.

The proposed precinct incorporates the following objectives to guide development within the Plan Change area, in addition to the objectives in the Auckland-wide and zone provisions:

- (1) Waihoehoe Precinct 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 Waihoehoe 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 Waihoehoe Stream, its tributaries will be maintained and enhanced, such that they will be sustained for future generations.
- Where stream reclamation is 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.
- 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 hazard given that development is not anticipated within the floodplain at the northern end of the site.

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 the THAB zone to provide for more intensive residential 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 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 effect¹⁴.

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:

¹⁴ RMA s32(3)

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-density urban living that increases housing capacity and choice and access to centres and public transport.
- Ensure land is used efficiently in areas close to centres and public transport;

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 AUP 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.
- 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.

11.3.1.1 *Theme 1.1: Land use Pattern*

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: Rezone the Plan Change Area in accordance with the indicative zoning layout in Council's Drury-Opāheke Structure Plan

This option involves rezoning the Plan Change area in accordance with the zoning framework proposed in Council's Drury-Opāheke Structure Plan (THAB zone and Centre zone).

Option 2: Rezone the Plan Change Area to a mix of Terrace Housing and Apartment Building zone and Mixed Housing Urban Zone

This option involves rezoning the southern section of the Plan Change area, in closest proximity to the Drury Centre and Drury Central train station, Terrace Housing and Apartment Building zone. The northern section of the Plan Change area which is more affected by flooding will be zoned Mixed Housing Urban. The zoning pattern is shown in Figure 17 below.

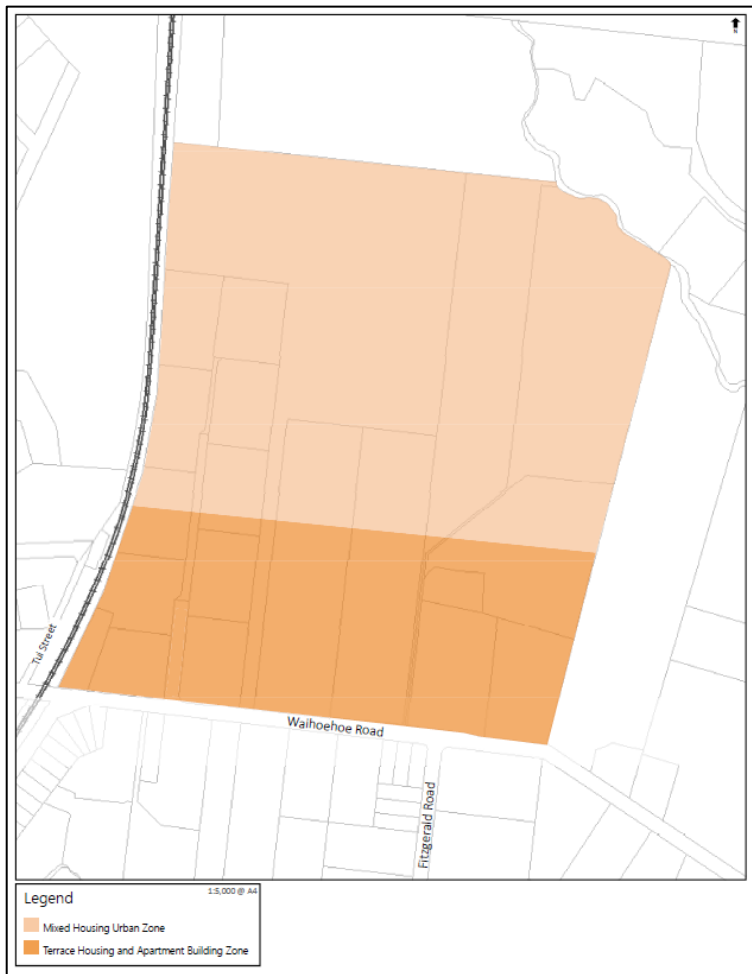


Figure 17: Alternative zoning layout for Waihoehoe Precinct.

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.

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

	Option 1: Proposed Plan Change - Rezone the Plan Change Area in accordance with the indicative zoning layout in Council's Drury-Opāheke Structure Plan	Option 2: Rezone the Plan Change Area to a Mix of Terrace Housing and Apartment Building and Mixed Housing Urban
Benefits	Applies a land use pattern that is consistent with the Drury-Opāheke Structure Plan and therefore the community's expectations.	This option applies a less intensive residential zone to land subject to flooding hazard however, this is potentially inconsistent with the precedent in the AUP to apply an appropriate zone and rely on

	Option 1: Proposed Plan Change - Rezone the Plan Change Area in accordance with the indicative zoning layout in Council's Drury-Opāheke Structure Plan	Option 2: Rezone the Plan Change Area to a Mix of Terrace Housing and Apartment Building and Mixed Housing Urban
	Enables the entire Plan Change area to be developed for high density residential development to make efficient use of land in close proximity to the Drury Centre and Drury Central train station.	Auckland-wide provisions to ensure development appropriately responds to natural hazards ¹⁵ .
Costs	This option applies the highest density residential zone to land that is affected by flooding hazards however, this can be managed through the Auckland-wide provisions and the tailored impervious area standard.	Does not make the most efficient use of land in close proximity to the Drury Centre and Drury Central train station, compared with Option 1. Does not apply a land use pattern that is consistent with the Drury-Opāheke Structure Plan and therefore may not integrate well with future surrounding urban development.
Efficiency & Effectiveness	The application of the Terrace Housing and Apartment Building zone to the entire Plan Change area makes efficient use of land that is within walking distance to Drury Centre and Drury Central train station in accordance with B2.4.1(3) and H6.2(1). Will effectively achieve a quality built environment as the zoning will effectively integrate with future development in the wider neighbourhood, as the land use pattern is consistent with the land use pattern proposed within the Drury-Opāheke Structure Plan.	This option does not make as efficient use of land within walking distance to Drury Centre and Drury Central train station as Option 1 and therefore is less in keeping with B2.4.1(3) and H6.2(1).

¹⁵ Auckland Unitary Plan Independent Hearings Panel Report to Auckland Council – Changes to the Rural Urban Boundary, Rezoning and Precincts: Hearing topics 016, 017 Rural Urban Boundary, 080 Rezoning and precincts (General) and 081 Rezoning and precincts (Geographic areas) July 2016 pg 19

11.3.1.3 Summary of Reasons for Deciding on the Provisions

Option 3 is preferred. Rezoning the subject land from FUZ to THAB zone while bringing forward the release of land within Drury East in accordance with alternative staging plan outlined within Section 6, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed zoning pattern will ensure that sufficient development capacity is provided to support growth in accordance with B2.2.1(3).
- The proposed zoning pattern enables the land to create a quality built environment through effectively integrating with future surrounding development in accordance with B2.3.1(1).

11.3.1.4 Theme 1.2: Timing of Development

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 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 Council's 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 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 11.3.1.1.

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

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

	Option 1: Do nothing (wait for Council to rezone the land)	Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council's Structure Plan	Option 3: Preferred option – the proposed Plan Change
Benefits	<p>Removes the cost of initiating a plan change for the applicant.</p> <p>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.</p>	<p>Stages the release of land for development in a manner that is consistent with the Drury-Opāheke Structure Plan and therefore the community's expectations.</p>	<p>Enables the staged development of the Plan change area as infrastructure upgrades are complete, providing additional business and residential capacity from the short term.</p> <p>Provides greater certainty for the council, community, developers and landowners about the nature, extent and pace of development of Drury Centre.</p>
Costs	<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</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>

	Option 1: Do nothing (wait for Council to rezone the land)	Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council's Structure Plan	Option 3: Preferred option – the proposed Plan Change
	early funding for required upgrades if there are delays to zoning.		
Efficiency & Effectiveness	This option is not efficient or consistent with B2.2.1(3) and the 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.	This option is not efficient or in keeping with B2.2.1(3) and the 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.	This option is efficient as it brings forward the release of land that can 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. Bringing forward the release of land within Drury East in accordance with alternative staging plan outlined within Section 6, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- Evidence has been prepared that demonstrates that the Plan Change area can be adequately serviced with identified upgrades in place and therefore which achieves 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 2 include:

- B2.21(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.
- IX.2 (1) Waihoehoe Precinct is a transit orientated comprehensively developed residential environment that integrates with the Drury Centre enhances the natural environment and supports public transport use.

Where transport upgrades, or other infrastructure upgrades are required to support development, it is appropriate and efficient to stage development with the construction of supporting infrastructure. It would be highly inefficient in a greenfield environment to fully construct all required upgrades before land is zoned. This would require significant upfront investment from Government agencies, without any certainty that development will occur to ultimately pay for the infrastructure.

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 the transport signage rule requires resource consent as a full discretionary activity.

Compliance with Rule E27.6.1 Trip generation does not apply to any development within the Waihoehoe Precinct.

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.

Compliance with Rule E27.6.1 Trip generation does not apply to any development within the Waihoehoe Precinct.

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.

Compliance with Rule E27.6.1 Trip generation does not apply to any development within the Waihoehoe Precinct.

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 11.3.2.1

Table 11.3.2.1: Summary of Options Analysis Addressing S32(2) Matters

B&A

	Option 1: Do nothing – no staging provisions	Option 2: Deferred zoning – when all the local infrastructure upgrades are operational	Option 3: Deferred zoning – when Drury Central Train Station is operational	Option 4: Transport staging rule	Option 5: External trip cap	Option 6: Preferred option – Proposed Plan Change
Benefits	Removes the cost of developing rules for the applicant. Avoids the complexity in the planning provisions associated with Options 2-6.	The administration of this rule is less complex than options 4-7.	The administration of this rule is less complex than options 4-7.	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. Provides certainty of the timing of zoning, making securing funding for local upgrades more feasible.	The rule more closely aligns with the activity that generates effects on the transport network.	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. Provides an appropriate activity status for infringement where effects on the external network are within an acceptable level.
Costs	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	This option does not provide for interim development to increase housing capacity despite the traffic modelling	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	Requires greater monitoring by Council than Options 1-3. This is a blunt approach relative to Option 6	Requires greater monitoring by Council of Options 1-3. This option does not provide as much	This is a more complex set of provisions which will require greater monitoring by Council than the above options.

B&A

	Option 1: Do nothing – no staging provisions	Option 2: Deferred zoning – when all the local infrastructure upgrades are operational	Option 3: Deferred zoning – when Drury Central Train Station is operational	Option 4: Transport staging rule	Option 5: External trip cap	Option 6: Preferred option – Proposed Plan Change
	<p>development capacity with the delivery of transport infrastructure.</p> <p>However, if a funding agreement was in place this cost would be eliminated.</p>	<p>showing that a significant level of development can occur 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>general alignment between the delivery of the train station and 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 networks¹⁶.</p>	<p>which may unnecessarily limit development if the 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>certainty to landowners and developers.</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>It is recognised that to administer this permitted standard 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>

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	Option 1: Do nothing – no staging provisions	Option 2: Deferred zoning – when all the local infrastructure upgrades are operational	Option 3: Deferred zoning – when Drury Central Train Station is operational	Option 4: Transport staging rule	Option 5: External trip cap	Option 6: Preferred option – Proposed Plan Change
			<p>This option does not address traffic effects on the local road network. While the train offers an alternative travel mode 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>Although there are risks with this approach Council has the ability and technology to monitor this it will just be 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>
Efficiency & Effectiveness	This option is ineffective as there are no provisions within the plan to decline applications for development which	This option is highly inefficient as traffic modelling shows that a significant extent of development can occur prior to the signalisation	This option is ineffective as the start of development is already aligned with the delivery of the Drury Central Train Station and	This option is less effective at coordinating development with transport infrastructure and achieving B3.2.1(5) and E27.2(1) than	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	This option will efficiently coordinate development with transport infrastructure and achieve the policy direction of B2.21(5),

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	Option 1: Do nothing – no staging provisions	Option 2: Deferred zoning – when all the local infrastructure upgrades are operational	Option 3: Deferred zoning – when Drury Central Train Station is operational	Option 4: Transport staging rule	Option 5: External trip cap	Option 6: Preferred option – Proposed Plan Change
	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 funding agreement in place.	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 which is not in keeping with B3.2.1(5).	therefore plan provisions that seek to achieve this are not necessary. This option is not in keeping with E27.2(1) as it will not manage adverse effects on the local road network.	Option 4 because the thresholds are blunt and could unnecessarily limit development if residential or retail GFA is unrealised.	on the environment, rather than the activities themselves. This option is less efficient at coordinating 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.	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 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

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	Option 1: Do nothing – no staging provisions	Option 2: Deferred zoning – when all the local infrastructure upgrades are operational	Option 3: Deferred zoning – when Drury Central Train Station is operational	Option 4: Transport staging rule	Option 5: External trip cap	Option 6: Preferred option – Proposed Plan Change
						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. Coordinating development with the delivery of required transport infrastructure through the inclusion of a transport staging rule and a trip generation assessment within the Waihoehoe 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 AUP objectives which have particular relevance for Theme 3 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.

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

Development of public or private roads are restricted discretionary activities subject to matters of discretion and assessment criteria in the Waihoehoe Road precinct (refer to **Appendix 1**), in addition to those contained within the underlying Auckland-wide provisions (E38 Subdivision – Urban, E27 Transport).

Applications for resource consent for restricted discretionary activity for the development of the indicative collector road as shown in Precinct Plan 2 will be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991.

11.3.3.1 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 11.3.3.1.

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

	Option 1: Rely on the underlying Auckland-wide provisions	Option 2: Proposed Plan Change
Benefits	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.
Costs	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.
Efficiency & Effectiveness	Ineffective as the indicative primary road network is not shown in the plan so piecemeal and ad hoc development may occur. Less efficient resource consenting process as notification assessments will result in a lengthier and more costly process.	This option is the most effective option as the precinct provisions ensure that development will occur in an integrated and co-ordinated way. 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

	Option 1: Rely on the underlying Auckland-wide provisions	Option 2: Proposed Plan Change
	<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>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>

11.3.3.2 Summary of Reasons for Deciding on the Provisions

Option 2 is preferred. The implementation of a new Waihoehoe 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
Benefits	<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</p>	<p>This option aligns with guidance within the TP148¹⁷ 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>

¹⁷ Auckland Regional Council Technical Publication TP148 Riparian Management Guideline (Becker et al., 2001)

	Option 1: Status Quo	Option 2: Require 20m of Riparian Planting along Streams and Wetlands	Option 3: Proposed Plan Change
		communities as a result of riparian planting along streams.	<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 AUP¹⁸.</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 streams outside of the riparian planted margin.</p> <p>Increased aesthetic and amenity values for communities as a result of riparian planting along streams compared with Option 1.</p>
Costs	No requirements to provide riparian planting along streams within the Plan Change area and therefore the ecological	In requiring greater riparian margins along permanent streams than what is recommended	This requirement for riparian planting will increase the costs when developing along streams.

¹⁸ 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
	<p>values of streams will not be enhanced.</p> <p>Reduced aesthetic and amenity values for communities from a lack of riparian planting along streams.</p>	<p>within TP148¹⁹ and the Auckland Design, this option provides less flexibility for the provision of pedestrian and cycle paths along streams.</p> <p>This requirement for riparian planting will increase the costs when developing along streams.</p>	
Efficiency & Effectiveness	<p>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.</p>	<p>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.</p>	<p>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.</p>

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 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.

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

¹⁹ Auckland Regional Council Technical Publication TP148 Riparian Management Guideline (Becker et al., 2001)

Tables 1 to 3 above. For this reason, an assessment of the risk of acting or not acting is not required.

12.0 CONCLUSION

This report has been prepared in support of Oyster Capital's request for a Plan Change to the provisions of the AUP to rezone 48.9 hectares of Future Urban land in Drury East for urban activities.

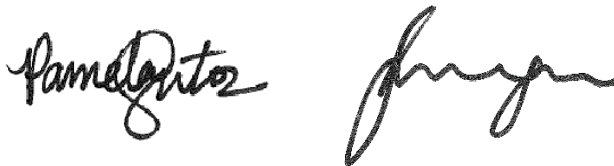
The request has been made in accordance with the provisions of Schedule 1; Section 32 of the Resource Management Act 1991, and the preparatory work has followed Appendix 1 of the AUP – Structure Plan Guidelines.

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 proposed Plan Change accords with the sustainable management principles outlined in Part 2 of the RMA and should be accepted and approved.

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