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Cr. Chris Darby, Chairperson, Auckland Council Planning Committee

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CC: Southern Structure Plan

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Tēnā koe Chris

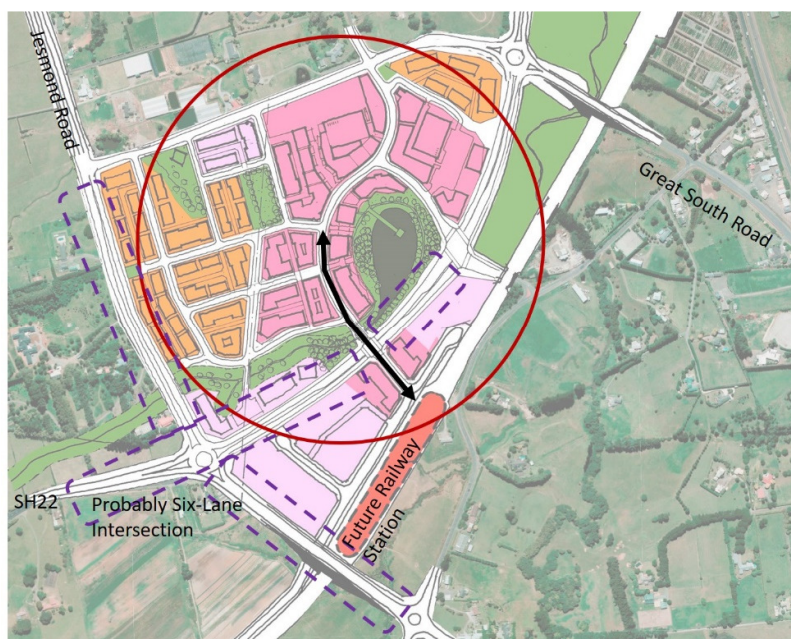
**SUBMISSION BY NGĀTI TAMAHOHO AND NGĀTI TE ATA ON THE DRAFT DRURY
STRUCTURE PLAN**

1. This is a combined submission on the Draft Drury Structure Plan 2019 by Ngāti Tamaoho and Ngāti Te Ata. The purpose of the combined submission is to reflect the views of two partner iwi on the proposal by Council for Drury West.
2. Please accept this late submission, although we note that only 14 working days were provided to the community over a school holiday and Easter period to submit. This very short window has made it difficult to provide the submission by 30 April given our own internal Tikanga.
3. The essence of this submission is that after reflection on the Council's proposal, and ongoing discussions with Charles Ma and his team at Auranga / MADE, Ngāti Tamaoho and Ngāti Te Ata continue support Charles' vision for a Town Centre design and location for Drury West in preference to Council's proposed Local Centre and its location. Ngāti Tamaoho and Ngāti Te Ata consider that the proposal which Charles has developed is fundamentally better than the proposal by the Council officers in the Draft Drury Structure Plan 2019.
4. In saying the above, Ngāti Tamaoho and Ngāti Te Ata wish to reflect on the process and reasons for reaching this conclusion. Both iwi, along with Te Ākitai Waiohua have been engaged in long term discussions with Charles and Council officers on the vision for Drury, and particularly as it relates to Drury West and the Auranga development. For Charles' developments, we have participated in over 30 hui with his consultant team as the vision for Auranga A, Auranga B, the Drury Creek Islands and the Auranga Town Centre have developed. Likewise we have met regularly with Council officers. This continued dialogue is important to our exercise of kaitiakitanga associated with the lands and the statutory acknowledgements held by iwi over the receiving environment (Ngakaroa, Drury Creek, Manukau Harbour).
5. In consultations with officers prior to the request for submissions on the Draft Drury Structure Plan 2019, we were led to believe that a Town Centre was to be located at 6 Burberry Road to serve Drury West. In what we understand to be a last minute change of mind by Council officers which we were not consulted on, Drury West is now proposed to only be served by a small Local Centre and this is to be located at 41 Jesmond Road and 110 Karaka Road, being split in half by what will likely be a six lane SH22 at the intersection of Jesmond Road and the State Highway. It will also have a stream that, in our opinion, should be protected, and which runs parallel to and slightly north of SH22. We do not understand how the Council staff consider a high-amenity centre that conveniently links to a proposed future rail station could be successful in this constraint-heavy location. We strongly prefer Charles' vision, which takes the

essence of the Council staff preference and locates it only slightly eastwards but to a much more feasible location.

6. Ngāti Tamaoho and Ngāti Te Ata agreed with and supported Charles' vision that Drury West needs a Transit Oriented Development, underpinned by a Town Centre in proximity to a train station. We support the train station being brought forward in its development and funding, and this being linked to a feeder bus service. We support approaches that maximise the benefits to the region and future community from this planning exercise, which we believe must ensure that land is used to its best efficiency so that growth is compact and contained. We believe the Council staff proposal is not likely to be a successful TOD.
7. We consider that a Local Centre will not support the retail, services and employment needs of a community of 6000 to 8000 houses in Drury West (plus several thousand additional jobs), and having these residents and workers travelling through the Drury Interchange, or in the alternative, through industrial areas, to access the Drury East Town Centre for a supermarket and other services would add significant traffic to an already extremely congested network. This is not efficient, and will only add to the significant transport woes of this area. Likewise, investing in the rail and train station, and then not locating high density employment, residential and town centre activities around it does not fulfil the potential that can be delivered through this Structure Plan process.
8. In saying this, we acknowledge and support a centre being in Stage 1 of the land release in Drury West as identified within the current Council FULSS. Consequently, a town centre east of Jesmond Road is important to service the existing planned and approved growth in this area. In reference to earlier Council staff thinking that there could be a solution including a station and centre on the western side of Jesmond Road (possibly even as far West as Oira Road alignment), we feel that Charles' vision on the eastern side is by far the most likely to deliver on the potential of a TOD-based urban form rather than another suburban expansion at the edge of Auckland. In that respect, we do acknowledge that the Council staff are at least now 'on the right track'.
9. We agree with Charles' vision that a Town Centre is required in the West, and its scale can be addressed through the size of land identified compared with the Kiwi Drury West Centre. We consider that a Town Centre needs to be more than a focus on the retail opportunity, and that only Charles' vision and its amenity-providing lake has sought to identify and provide for this in a way that respects the land's inherent qualities. While both Drury East and West need supermarkets and retail, where we share a vision with Charles is that a centre should be a focus of exchange, services, civic functions and employment. A Town Centre, with the potential for 8 storey buildings (including offices and apartments), is far superior to a 3 storey Local Centre that includes significant limitations on activities and employment.
10. Ngāti Tamaoho and Ngāti Te Ata consider that Auckland cannot continue with business-as-usual planning, which is what we feel has been recommended in the Draft Structure Plan, whereby commuter suburbs and industrial areas are established and which make residents reliant on travelling long distances on congested motorways and highways to employment and services (including car-based retail malls). We support Charles' vision of providing 100% local employment for the residents of Drury West locally, and having a TOD underpinned by an intensive Town Centre. We consider this would be game changer, and have continued to support Charles in his leadership on these matters, along with the environmental and stormwater approaches we have agreed through Auranga A and B.

11. We recently met with Charles' planner who has indicated there has been reflection on the best location of the Town Centre now that the Council has confirmed its preferred train station would be located immediately east of Jesmond Road, and analysis has been undertaken of the Council's proposal. We are advised that Charles has now submitted for a Town Centre in Drury West to remain anchored on 6 Burberry Road, with additional town centre zoning west on 41 Jesmond Road and south across SH22 at 110 Karaka Road. Crossing SH22 with a centre zone so as to allow a direct connection with the rail station is a technique proposed in the Council staff option, and the revised proposal features a main-street running north around the Lake and also connecting south over SH22 to the eastern portal of the train station.
12. The drawing provided to us by Charles' team is below



Centre on the Lake

- Red circle shows 400m walkable catchment around Main Street
- Dotted areas show along Jesmond Road and SH22 are where no direct property access would be permitted
- Distance from Station to the heart of the Main Street is 330m
- There are direct links to the town centre via existing Burberry & McPherson Roads
- Intersection is 360m from Jesmond Road major intersection

Revised Charles Ma option

13. We agree that the protection of the stream and utilisation of the Lake as a significant amenity feature will be to the betterment of Drury West. The Council's draft local centre does not achieve this. Furthermore, linking a main street as close to the station as possible and also using the main street to link the station to the lake will allow the lake's amenity to better-relate to and become part of the story of the station. We strongly support this and feel Charles' vision is in this respect substantially better than the current Council staff option.
14. We agree that a Town Centre is necessary, and it should be sized not only for retail needs but for a long-sighted view on the provision of a wide range of services and employment opportunities for residents. And this is not just about low value retail jobs, but a broad spectrum of medium and high value jobs that could make Drury West a self sustaining community. We consider this best reflects our values in creating new places where people can thrive. It is substantially better than the current Council staff option.
15. We agree that the centre's main street should have the closest and most direct possible connection to a portal to the train station. Walking and cycling priority,

and the considerable effort we have put into ensuring this is achieved in Auranga, is important to the reflection of our place making values. Charles' Town Centre is substantially better than the current Council staff option in this regard.

16. Overall, we have watched a process over the past 4 years (for Charles), and 2-years (for Council staff) that has gradually brought into focus the area centred around the railway line and SH22 east of Jesmond Road. We agree that this is the right area to provide a station and town centre in Drury West. We recognise that for both Charles and the Council staff there appears to be a lot of common ground and agreed or accepted principles. In this regard we acknowledge Charles' efforts in seeking to find common ground with us and Council.
17. Ngāti Tamaoho and Ngāti Te Ata wish to speak to this submission at the Planning Committee. As a partner to this process, and kaitiaki of the area we seek that this be arranged.

Nāku iti noa, nā

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