

AUCKLAND UNITARY PLAN OPERATIVE IN PART

PROPOSED PLAN CHANGE 51

Drury 2 Precinct

SUMMARY OF DECISIONS REQUESTED

Enclosed:

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

Explanation

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

Summary of Decisions Requested

Plan Change 51 - Drury 2 Precinct					
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#	Point	Submitter Name	Address for Service	Theme	Summary
1	1.1	Jennifer Catherine Joyce	tjjoyce@xtra.co.nz	Support the plan change	Approve the plan change.
2	2.1	Yu Wang	ppbb6606@gmail.com	Support the plan change with amendments	Reconsider the boundary of the PPC51 precinct so it follows the edge of the boundary rather than separate the property into two.
3	3.1	Fire and Emergency New Zealand c/ Beca Ltd Eloise Taylforth	eloise.taylforth@beca.com	Support the plan change with amendments	Add new Policy to the Precinct provisions as follows: • Policy xx: Ensure that development in Drury Centre is coordinated with supporting stormwater, wastewater and water supply infrastructure.
4	4.1	God Save The Flag Ltd c/ Wendy Hannah	hannahshouse87@gmail.com	Support the plan change with amendments	Approve the plan change conditional on existing access rights to 228 Flanagan Road being maintained and access being provided to services and utilities to develop the property in future (note: property is outside PC48 area).
5	5.1	Rachel and Michael Gilmore	mikejamesgilmore@gmail.com	Support the plan change	Approve the plan change.
6	6.1	Britmat Holdings Ltd c/ Integrated Planning Solutions Ltd c/- Paul Sousa	paulsousa@xtra.co.nz	Decline the plan change, but if approved make the amendment	Include the property at 1A East Street Drury, currently zoned Future Urban Zone, in the plan change with a zoning of Business - Local Centre Zone to match that of the land adjoining at 200 - 212 Great South Road.
7	7.1	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Enable the Gas Transmission Network to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed (i.e. recognised and provided for) through an enabling activity status.
7	7.2	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Recognise the Gas Transmission Network as having functional and operational requirements and constraints, including in respect of its location.
7	7.3	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	That the adverse effects of third-party development or activities in close proximity to the Gas Transmission Network are managed to the extent that adverse effects on the network are avoided or appropriately mitigated;
7	7.4	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Identify Firstgas as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by Firstgas especially land use changes and subdivision, or alternatively the matters of discretion or assessment criteria include technical advice from Firstgas.
7	7.5	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Identify the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users.
7	7.6	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Add new Objective to the Precinct provisions as follows: <u>The Drury 2 Precinct recognises the importance of the existing pipeline infrastructure as assets which are regionally and nationally significant and will ensure that they are protected and enabled.</u>
7	7.7	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Add new Policy to the Precinct provisions as follows: <u>The Drury 2 Precinct is planned, designed and constructed so that adverse effects on existing infrastructure are avoided or mitigated.</u>
7	7.8	First Gas Limited c/- Zane Wood	zane.wood@firstgas.co.nz	Decline the plan change, but if approved make the amendment	Add new Provision to IX.4-6 Activity Table, Notification and Standards requiring the following: • Any subdivision of land containing a Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner; and • Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner.
8	8.1	The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Decline the plan change	In its current form decline the plan change in its entirety.
8	8.2	The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Decline the plan change, but if approved make the amendment	Amend the plan change so that the Town Centre is reduced in scale and activity to a Local or Neighbourhood Centre.

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8	8.3	The Catholic Diocese of Auckland c/- Matt Feary	matt@rms.co.nz	Decline the plan change, but if approved make the amendment	Amend to the scale and location of the Terraced Housing and Apartment Zone to the extent that development can properly support, and be supported by, a Local or neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option 'A'.
9	9.1	Adam Yates	adam@yatez.co.nz	Support the plan change	Approve the plan change.
10	10.1	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change	Consult Spark and the other telecommunication network providers throughout the plan change process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD.
10	10.2	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change	Consult Spark and the other telecommunication network providers to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development proposed.
10	10.3	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change	Consult Spark and the other telecommunication network providers to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development.
10	10.4	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change	Consult with Spark and the other telecommunication network providers to ensure funding is available through the infrastructure funding agreements.
10	10.5	Spark New Zealand Trading Limited c/- Fiona Matthews	fiona.matthews@spark.co.nz	Support the plan change	Include telecommunications infrastructure within the triggers for the staged release of development.
11	11.1	Lomai Properties Limited c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Support the plan change with amendments	Accept the plan change, subject to receiving confirmation that potential traffic effects will be acceptable within the surrounding road network, and that the plan change manages its other infrastructure requirements and will not prevent or hinder the development potential envisaged within the remainder of the Drury-Opāheke Structure Plan Area (in particular Stage 1 of the Drury-Opāheke Structure Plan) from being given effect to.
12	12.1	Karaka & Drury Consultant Ltd c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change	Approve the plan change.
13	13.1	Barfilon Investment Ltd c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change	Approve the plan change.
14	14.1	DL & WJ Ltd c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change	Approve the plan change.
15	15.1	Noah Eastern Limited c/- Wendy Jao	jaowendy01@gmail.com	Support the plan change	Approve the plan change.
16	16.1	Wendy Jao	jaowendy01@gmail.com	Support the plan change	Approve the plan change.
17	17.1	L & W Rising Ltd	yinsangsu@gmail.com	Support the plan change	Approve the plan change.
18	18.1	New Elite Investment Ltd c/- Jing Chen	neliteinv@gmail.com	Support the plan change	Approve the plan change.
19	19.1	Wang wensheng	13801601535@163.com	Support the plan change	Approve the plan change.
20	20.1	Huawei Development Ltd c/- Wei Pan	wpan008@gmail.com	Support the plan change	Approve the plan change.
21	21.1	Edison Yi	Logicicg@gmail.com	Support the plan change	Approve the plan change.
22	22.1	Xibiny Chen	gdszxcb@gmail.com	Support the plan change	Approve the plan change.
23	23.1	Jal Glory investment ltd c/- Hongyan zhao	hongyan-zhao@hotmail.com	Support the plan change	Approve the plan change.
24	24.1	Jia Liu	frankyluijia@hotmail.com	Support the plan change	Approve the plan change.
25	25.1	Bremner Estates Development Limited c/- William Zhang	wenyuhliou@msn.com	Support the plan change	Approve the plan change.
26	26.1	Auranga Resident's Association	ara@auranga.co.nz	Support the plan change	Approve the plan change.
27	27.1	Jonxiang Chen	brucechen.stc@gmail.com	Support the plan change	Approve the plan change.
28	28.1	Charles Ma	charles@made.co.nz	Support the plan change	Approve the plan change as notified if the proposed Town Centre is to be supported by a Drury West train station located as shown in the Drury-Opāheke Structure Plan Area.

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28	28.2	Charles Ma	charles@made.co.nz	Support the plan change with amendments	If the Drury West train station is to be located west of the location shown in the Drury-Opāheke Structure Plan (particularly west of Oira Road), support any amendments to the change that may be sought by the applicant to address that change. This would include (but is not limited to) rezoning all of the plan change area for residential purposes, by removing the proposed Town Centre zone and decreasing the density of some of the proposed residential zones.
28	28.3	Charles Ma	charles@made.co.nz	Support the plan change with amendments	Does not support any changes being made to the plan change as notified, except where those changes are agreed to and supported by the applicant.
29	29.1	Andrew Daken	andrew.daken243@gmail.com	Not specified	<p>Would like to highlight the below key feedback points along with being able to be involved as the plan change develops.</p> <ul style="list-style-type: none"> • Should be a Council lead plan change for consistency, infrastructural changes including roading loadings as existing infrastructure has only just been improved and will very quickly be outdated. Currently the motorway system is not able to cope with the existing loading. • Future urban zone change is expected from Council within 2 years, so why push this through now as a Private Change? • PC6 work doesn't appear to have started, so seems odd that another PC is being started • Need to be involved with the PC51 as plan changes will directly impact our property in the future from decisions being made now. • With the increase in the number of new houses and therefore more water usage, water storage tanks should be considered to minimise water supply issues for Auckland as already seen in 2020.
30	30.1	Soco Homes Limited c/- Isobel Lee	isobel@topland.co.nz	Support the plan change with amendments	Proper consideration should be given to the wider context of the Drury Structure Plan area, including transport grid links and servicing infrastructure connections.
31	31.1	Marmitmor Limited	darren@myharveys.co.nz	Support the plan change	Approve the plan change.
32	32.1	Watercare Services Limited c/- Ilze Goteli	ilze.gotelli@water.co.nz	Neither supports nor opposes the plan change	<p>Amend Policy 5 (Infrastructure) to the Precinct provisions as follows:</p> <p>(5) Require subdivision and development to:</p> <p>(a) Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including <u>water, wastewater and</u> transport upgrades;</p> <p>(b) Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections;</p> <p>(c) Be managed so that it does not adversely affect the safe and efficient operation or capacity of the <u>existing or planned</u> transport, <u>water or wastewater</u> networks; and</p> <p>(d) Promote and develop connections to the future planned public transport facilities.</p>
33	33.1	Ngāti Te Ata Waiohū c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Confirm ongoing iwi participation, consultation and engagement in the project.
33	33.2	Ngāti Te Ata Waiohū c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Acknowledge within the project design the history of Mana Whenua in the PPC51 area.
33	33.3	Ngāti Te Ata Waiohū c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Incorporate Te Aranga Principles in design concepts.
33	33.4	Ngāti Te Ata Waiohū c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Confirm iwi monitoring of the project.
33	33.5	Ngāti Te Ata Waiohū c/- Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Account for natural and cultural landscaping in the project design.

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33	33.6	Ngāti Te Ata Waiohū c/-Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Apply a minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways.
33	33.7	Ngāti Te Ata Waiohū c/-Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.
33	33.8	Ngāti Te Ata Waiohū c/-Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Require roof capture for reuse and groundwater recharge.
33	33.9	Ngāti Te Ata Waiohū c/-Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Confirm park edge design adjacent to all waterways.
33	33.10	Ngāti Te Ata Waiohū c/-Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Use native trees and plants only within the precinct.
33	33.11	Ngāti Te Ata Waiohū c/-Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Protect ridgelines, hilltops and wetlands.
33	33.12	Ngāti Te Ata Waiohū c/-Bill Loutit & Simpson Grierson	bill.loutit@simpsongrierson.com	Decline the plan change, but if approved make the amendment	Reflect sustainable development in the design and outcomes.
34	34.1	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opaheke Structure Plan.
34	34.2	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Replace all references to “Town Centre” with ‘Local Centre’ Replace all references to Business – Town Centre Zone with Business – Local Centre Zone.
34	34.3	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Reduce the height variation control from 27m to 19.5m.
34	34.4	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Amend IX.3 Policies 1 & 2 to the Precinct provisions as follows: (1)(b) [second (b)] Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity.
34	34.5	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Add new activity to Table IX.4.1 to the Precinct provisions as follows: (A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity.
34	34.6	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	That amended detailed traffic and urban design assessments are completed, which include analysis of trip generation from the proposed centre, and assessments of how each proposed access/intersection fits with: the current and future urban arterial • form and function of State Highway 22 and; the bulk and location that would • support a well-functioning urban arterial.
34	34.7	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including that west of Jesmond Road. Update provisions based on updated assessments if required.
34	34.8	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Amend IX.2 Policy 5(a) to the Precinct provisions as follows: “Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within <u>Standard IX.6.2 necessary to support development within the precinct</u> ”.
34	34.9	Ministry of Housing and Urban Development c/- Ernst Zollner	Ernst.Zollner@hud.govt.nz	Decline the plan change, but if approved make the amendment	Amend IX.2 Policy 5(b) to the Precinct provisions as follows: “Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections. ”.

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35	35.1	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Decline the plan change in its entirety until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region.
35	35.2	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Ensure that the council's concerns about bulk infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <ul style="list-style-type: none"> a. Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded. b. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects. c. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include: <ul style="list-style-type: none"> • Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. • Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). • Threshold rules are not used for works to be funded privately but there is no funding agreement in place. • Threshold rules are not used for works which would require a funding contribution from multiple landowners or developers and there is no agreement to apportion costs and benefits in place. • Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). • Use of prohibited activity status for infringement could be considered. d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.
35	35.3	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Include more policies and rules to give full effect to the direction the NPS-FM, including but not limited to Te mana o te wai.
35	35.4	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend Objective IX.2(5) to read:</p> <p>Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to <u>avoid or otherwise</u> mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.</p>
35	35.5	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<ol style="list-style-type: none"> 1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngakoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct.
35	35.6	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Retain policy IX.3(6)(a) and amend IX.6.1 Compliance with Drury X Precinct Plan to read:</p> <p>(1) Activities and subdivision must comply with the Drury X Precinct Plan.</p>

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35	35.7	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Amend policy IX.3 (6)(b) to the Precinct provisions as follows: Incorporate <u>biodiversity</u> enhancement planting of riparian margins of streams (including the Ngakoroa Stream) and the lake feature.
35	35.8	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Amend precinct to include additional policies and rules to manage the effects of stormwater as described in an approved SMP.
35	35.9	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Add new policies to the Precinct provisions as follows: <u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u> <u>Require on-site management, or for higher density development private communal management of stormwater runoff from impervious areas.</u> <u>Reduce contaminants at source through the use of inert building materials and treatment at source where possible.</u> <u>Provide hydrology mitigation through retention, near source or communal detention to manage effects on streams.</u> <u>Ensure the effective operation of private at source devices over time by providing for their management such as through consent notices on titles.</u> <u>Ensure adequate infrastructure downstream of the precinct to convey runoff from additional impervious area and to manage flood effects.</u>
35	35.10	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Add a new standard to provide for stormwater quality treatment.
35	35.11	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Add a new standard to the Precinct provisions as follows: <u>Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.</u>
35	35.12	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Include indicative permanent and intermittent streams and wetlands on the precinct plan.
35	35.13	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Include the indicative blue-green corridor within the precinct plan based on the urban concept in the Urban Design Assessment.
35	35.14	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Retain and amend IX.6.3 (2) to the Precinct provisions by including a cross reference to the matters in Appendix 15.6(3)(b-f) and (4) of the Auckland Unitary Plan.
35	35.15	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Amend the precinct plan "Future esplanade reserve" to read " <u>Indicative</u> future esplanade reserve".
35	35.16	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Include indicative open spaces in the precinct plan as shown in Attachment 1 to this submission.
35	35.17	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Ensure that the consent categories in IX.4.1 Activity table, matters of discretion in IX.8.1, and assessment criteria in IX.8.2 are the most appropriate to give effect to: matters raised in this submission, the objectives and policies of the precinct, the RPS and any national policy statement.
35	35.18	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Extend the operative urban zoning to adjoin the eastern edge of Jesmond Road. This should be comprised of Terrace Housing and Apartment Buildings Zone. Make any consequential amendments to the precinct plan including any necessary to give effect to other points in this submission. Other supporting technical documents may need to be updated to include this change.

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35	35.19	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Add a policy and standard to provide for increased density near RTN stations including:</p> <p>a. Adding a policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u></p> <p>b. Building height standards, enabling at least the metro centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7-8 storey building height within about an extended walkable radius of the RTN station.</p> <p>c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone;</p> <p>d. Any alterations to other building standards to respond to increased building height.</p> <p>e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.</p>
35	35.20	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.
35	35.21	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	<p>Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan. Also provide a risk assessment that addresses whether any additional physical pipeline protection or upgrade work is necessary for an intensive urban environment risk level.</p> <p>The following assessment is sought as well as any consequential amendments to the Precinct plan:</p> <p>1. Why the approach adopted within the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed;</p> <p>2. The impacts of the gas transmission line on the proposed network and associated development patterns;</p> <p>3. The identification of a local network design that can practically accommodate the gas transmission line; and</p> <p>4. Any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line.</p>
35	35.22	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Include provisions that require mana whenua culture and traditions to be explicitly incorporated into the new development.
35	35.23	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Provide a notable tree assessment and scheduling of any notable trees identified in that assessment. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.
35	35.24	Auckland Council c/- Christopher Turbott	christopher.turbott@aucklandcouncil.govt.nz	Decline the plan change, but if approved make the amendment	Enable and provide for accessible and affordable social housing for Māori.
36	36.1	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury - Opaheke Structure Plan.
36	36.2	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including those west of Jesmond Road. Update provisions based on updated assessments if required.
36	36.3	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Amend the whole Plan Change (including Precinct Plans) to replace references to 'pedestrians and cyclists' with 'active transport' (as defined within the National Policy Statement on Urban Development 2020).
36	36.4	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	That an amended detailed traffic assessment is completed, which includes an analysis of trip generation from the proposed centre along with an assessment of how each proposed access/intersection fits with the current and future form and function of State Highway 22.

Plan Change 51 - Drury 2 Precinct					
Summary of Decisions Requested					
#	Point	Submitter Name	Address for Service	Theme	Summary
36	36.5	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Replace all references within this precinct description from "Town Centre" to 'Local Centre'.
36	36.6	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Add a new Objective to the Precinct provisions as follows: <u>Protect sensitive activities from potential health and amenity effects that may arise from noise and vibration associated the operation of the transport network.</u>
36	36.7	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Retain other IX.2 objectives.
36	36.8	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Insert new Policies to the Precinct provisions as follows; Policy X <u>Locate and design new and altered buildings, and activities sensitive to noise to minimise potential effects of the transport network</u> Policy XX <u>Manage the location of sensitive activities (including subdivision) through set-backs, physical barriers and design controls.</u>
36	36.9	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Amend IX.3 Policy 2 to the Precinct provisions as follows: (2)(b) Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity.
36	36.10	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Retain IX.3 Policies 3 & 4 to the Precinct provisions.
36	36.11	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Retain IX.3 Policy 5 to the Precinct provisions.
36	36.12	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Replace reference to Business – Town Centre Zone with Business – Local Centre Zone in the precinct rules.
36	36.13	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Add a new Activity to Table IX.4.1 to the Precinct provisions as follows: (A8) <u>Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity.</u>
36	36.14	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Add a new rule to IX.6.2 Transport Infrastructure Requirements to the Precinct provisions as follows: <u>State Highway 22, from the extent of the current Future Urban Zone to State Highway 1, be upgraded to four lanes, including the construction of associated walking, cycling and public transport infrastructure.</u>
36	36.15	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Retain IX.6.4 Site Access.
36	36.16	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Insert activity controls as per attachment 1 to the submission.
36	36.17	New Zealand Transport Agency c/- Brendan Clarke	brendan.clarke@nzta.govt.nz	Support the plan change with amendments	Insert matter of discretion and assessment criteria as per attachment 1 below to the submission.

Plan Change 51 - Drury 2 Precinct					
Summary of Decisions Requested					
#	Point	Submitter Name	Address for Service	Theme	Summary
37	37.1	Elly S Pan c/- Nigel Hosken	nigel@hosken.co.nz	Support the plan change with amendments	That the Plan be amended by: (i) A provision limiting development until required infrastructure upgrades and linkages are in place and not limited to upgrades of SH 1 and SH 2, water, wastewater, stormwater and other methods of transport. (ii) That Burberry Road not be stopped until an alternative route is in place. (iii) That the alternative access to Burberry Road be of a standard not less than that currently exists.
37	37.2	Elly S Pan c/- Nigel Hosken	nigel@hosken.co.nz	Support the plan change with amendments	That any objectives, policies or explanatory passages on which the rules identified above are reliant or based are deleted or amended to the extent necessary in order for Council to appropriately make the amendments sought above.
38	38.1	Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments	Retain Objective IX.2(4) to the Precinct provisions.
38	38.2	Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change	Retain Policy IX.3(1)(b) to the Precinct provisions.
38	38.3	Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments	Retain Policy IX.3(5)(a).
38	38.4	Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments	Add new policy IX.3(5)(e) to the Precinct provisions as follows: Require subdivision and development to: ... <u>(e) Enable the reduction of CO2 emissions by promoting the use of renewable energy.</u>
38	38.5	Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments	Add new policy IX.3(5)(f) to the Precinct provisions as follows: Require subdivision and development to: ... <u>(f) Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.</u>
38	38.6	Counties Power Limited c/- Jeremy Brydon	jbrydon@align.net.nz	Support the plan change with amendments	Retain Rules IX.4.1(A1)-(A7).
39	39.1	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline plan change unless submitter's concerns are addressed including about the funding, financing and delivery of required transport infrastructure and network improvements and services to support the 'out of sequence' development proposed.
39	39.2	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Decline plan change, or amend the plan change to incorporate provisions and / or identify appropriate mechanisms to provide for the upgrade of Karaka Road and Burberry Road to an urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable Karaka Road to become a future Urban Arterial.
39	39.3	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Support the Plan Change with amendments	Auckland Transport supports the proposed centre zoning and residential zoning mix provided that the proposed network can accommodate this.

Plan Change 51 - Drury 2 Precinct					
Summary of Decisions Requested					
#	Point	Submitter Name	Address for Service	Theme	Summary
39	39.4	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend the plan change to incorporate provisions and / or mechanisms which address the following in relation to the upgrade of Karaka Road and Burberry Road:</p> <ul style="list-style-type: none"> • Vesting and formation of frontage, drainage and carriageway upgrades • Timing of upgrade requirements • Funding and delivery of the above work.
39	39.5	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend the plan change to incorporate provisions enabling the interim effects of development proceeding ahead of the ultimate planned network to be assessed and addressed, including appropriate additional staging requirements relating to:</p> <ul style="list-style-type: none"> • Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the closing of Burberry Road (if confirmed) or work to prevent through traffic using it; • Early active mode access to the proposed new train station; • Any interim improvements to Karaka Road; • Introduction of passenger transport services to the Precinct Plan area • Updating the proposed staging provisions to reflect the fact that interim works at the intersection of Jesmond Road and Karaka Road have been undertaken. • Any other transport improvements identified as being required to support proposed development.
39	39.6	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to incorporate provisions allowing the staging of subdivision and any associated mitigation related works to be a matter for discretion accompanied by appropriate assessment criteria.
39	39.7	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	<p>Amend the plan change to include provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards including but not limited to:</p> <ul style="list-style-type: none"> • Carriageway • Footpaths • Cycleways Public Transport (dedicated lanes, geometry etc) • Ancillary Zone (Parking, Public Transport stops, street trees) • Berm • Frontage • Building Setback • Design Speed.
39	39.8	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to incorporate policies and provisions addressing the need for the future road network to provide for future passenger transport routes including a standard that all collector roads and the town centre road providing access to the west, as well as associated intersections, be designed with a geometry that can accommodate passenger transport vehicles.
39	39.9	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the plan change to incorporate policies, standards and assessment criteria which provide for efficient and effective active mode routes from the Precinct Plan area to future rail stations and FTN routes.

Plan Change 51 - Drury 2 Precinct					
Summary of Decisions Requested					
#	Point	Submitter Name	Address for Service	Theme	Summary
39	39.10	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Replace the references to cycle and 3m shared paths with a reference to "separated cycle paths on both sides". Apply the requirement to provide separated cycle facilities to the proposed town centre roads and Karaka Road or, as appropriate, to any additional reserve networks arising from submissions.
39	39.11	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	a) That feasible and optimal future network link alignments to the west be confirmed and integrated with wider network requirements. b) That these be identified within the Precinct Plan or by other means where they continue beyond it. c) That the Precinct Plan provides for a direct link from Jesmond Road to the town centre and north south collector road which is capable of accommodating buses.
39	39.12	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	a) That an assessment of the trip generation impacts from the proposed town centre be undertaken to assess its impact on the operation of Karaka Road and any implications for the design of the proposed collector road intersection with Karaka Road opposite McPherson Road. b) That the Precinct Plan and zoning be amended as required to address any issues arising from this exercise. c) That an assessment of the feasibility of the proposed collector road intersection with Karaka Road opposite McPherson Road be undertaken and that an alternative location be identified within the Precinct Plan in the event that there are unresolved issues associated with it or a better location is identified through the submission process.
39	39.13	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the Precinct Plan to remove reference to future traffic signals at the intersection of the proposed town centre road and Karaka Road.
39	39.14	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the Precinct Plan to remove reference to the provision of future intersection improvements by "others".
39	39.15	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the Precinct Plan and zoning as required to address the issue raised.
39	39.16	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	The following assessment is sought along with any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line. a) Why the approach adopted for the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed. b) The impacts of the gas transmission line on the proposed network and associated development patterns. c) The identification of a local road and reserve network design that can practically accommodate the gas transmission line.
39	39.17	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Amend the Precinct Plan to include criteria around the need for new access to State Highway 22 Karaka Road or development alongside it to avoid adverse effects on its operation.
39	39.18	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	That the western boundary of the Precinct Plan and the north south local road location be assessed as to its appropriateness and the zone boundary and Precinct Plan be amended as required to address any issues.
39	39.19	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Make necessary amendments to the plan change as required to achieve a consistency in approach, including in relation to objectives, policies, rules, methods and maps, across the private plan changes within the Drury growth area.

Plan Change 51 - Drury 2 Precinct					
Summary of Decisions Requested					
#	Point	Submitter Name	Address for Service	Theme	Summary
39	39.20	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Add a new Policy to the Precinct provisions as follows: <u>Ensure that new activities sensitive to noise adjacent to arterial roads are located, designed and constructed to mitigate adverse effects of road noise on occupants.</u>
39	39.21	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Add a new standard to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level). As a consequential amendment, add a new rule as follows: <u>(X) Development that does not comply with IX.6.X Noise Mitigation.</u>
39	39.22	Auckland Transport c/- Chris Freke	Chris.Freke@at.govt.nz	Decline the plan change, but if approved make the amendment	Add a new assessment criterion to the Precinct provision as follows: <u>The extent to which noise sensitive activities in proximity to arterial roads are managed.</u>
40	40.1	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Amend Policy IX.3 (2) to the Precinct provision as follows: <u>Incorporate the following elements of the Precinct Plan in the design of any subdivision and development:</u> (a) The pattern, hierarchy and function of roads, including the town centre's main street and links to the State Highway network, and future rail station <u>and schools</u> ; (b) Public open spaces and Pedestrian and cycle linkages <u>to public open spaces and schools</u> ; (c) Linkages within the Precinct and to adjacent land including the Drury 1 Precinct; (d) Key intersections; (e) The amenity feature of the lake associated with the Town Centre; (f) Open space areas; and (g) Key retail and commercial frontages.
40	40.2	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Amend plan change to ensure there is provision of appropriate public open space to support the surrounding community.
40	40.3	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Retain Standard IX.6.2 Staging of Development with Transport Upgrades.
40	40.4	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Retain Standard IX.6.4 Site Access.
40	40.5	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Retain objectives and policies relating to the provision of safe and legible walking and cycling connections through communities.
40	40.6	Ministry of Education c/- Jess Rose	jess.rose@beca.com	Support the plan change with amendments	Confirm ongoing engagement with Auckland Council and Karaka and Drury Ltd with housing typologies, staging and timing for the project.
41	41.1	Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Include provisions within the precinct plan to require archaeological assesment of the area are undertaken by a suitably qualified professional including an evaluation, by a suitably qualified heritage consultant of the wider heritage landscape through the resource consenting process.

Plan Change 51 - Drury 2 Precinct					
Summary of Decisions Requested					
#	Point	Submitter Name	Address for Service	Theme	Summary
41	41.2	Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to ensure exclusion of impacts on archaeological site extents, as assessed by a professionally qualified archaeologist.
41	41.3	Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Include appropriate provisions within the precinct plan to address any Māori cultural heritage values identified.
41	41.4	Heritage New Zealand Pouhere Taonga c/- Susan Andrews	sandrews@heritage.org.nz	Support the plan change with amendments	Explore the potential of commissioning a heritage interpretation plan for the wider Drury area subject to the four jointly notified plan changes.
42	42.1	Drury South Limited c/- Lauren Eaton	lauren.eaton@russellmcveagh.com	Support the plan change with amendments	Amend Table IX.6.2.1 to the Precinct provisions to include the following additional upgrades: (a) The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection. (b) Such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.
43	43.1	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	Approve the plan change, subject to: • The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opāheke Structure Plan 2019; • The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and • The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone.
43	43.2	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	Approve the plan change, subject to: • the inclusion and application of a 19.5m Height Variation Control in the proposed zoning area; • retaining the spatial extent of the precinct boundaries.
43	43.3	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	Amend Objective 3 to the Precinct provisions as follows: <i>"Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides pedestrian <u>multi-modal</u> linkages through and between the Precinct, adjoining Precincts and to future planned public transport facilities."</i>
43	43.4	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	Amend Policy 4(h) to the Precinct provisions as follows: "Be designed according to <u>incorporate</u> perimeter block principles where car parking is provided behind buildings except for kerbside parking."
43	43.5	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	Amend Policy 5(a) to the Precinct provisions as follows: "Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades within <u>Standard IX.6.2 necessary to support development within the precinct;</u> "
43	43.6	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	Retain Policy 5(b) to the Precinct provisions subject to the following amendment: "Implement the transport network connections and elements as shown on the Precinct Plan including by providing new roads and upgrades of existing roads and intersections; "

Plan Change 51 - Drury 2 Precinct					
Summary of Decisions Requested					
#	Point	Submitter Name	Address for Service	Theme	Summary
43	43.7	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	Retain IX.6.2 (1) Transport infrastructure Requirements provision to the Precinct provisions subject to clarification and/or amendment sought that the phrase "...OR must not precede the upgrades outlined in Table IX.6.2.1" be deleted.
43	43.8	Kāinga Ora Homes and Communities c/- Michael Campbell	michael@campbellbrown.co.nz	Support the plan change with amendments	Amended the IX.6.3 (2) Riparian Planting provision to the Precinct provisions as follows: “(2) The riparian planting plan (to give effect to compliance with Standard IX.6.3(1)) Any development or subdivision of land that contains a stream must: (a) include a plan identifying the location, species, planting bag size and density of the plants; [...].”
44	44.1	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Confirm ongoing iwi participation, consultation and engagement in the project.
44	44.2	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Acknowledge within the project design the history of Mana Whenua in the PPC51 area.
44	44.3	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Incorporate Te Aranga Principles in design concepts.
44	44.4	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Confirm iwi monitoring of the project.
44	44.5	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Account for natural and cultural landscaping in the project design.
44	44.6	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Apply a minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways.
44	44.7	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Apply a minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway.
44	44.8	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Require roof capture for reuse and groundwater recharge.
44	44.9	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Confirm park edge design adjacent to all waterways.
44	44.10	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Use native trees and plants only within the precinct.
44	44.11	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Protect ridgelines hilltops and wetlands.
44	44.12	Ngāti Tamaoho c/- Lucie Rutherford	rmaofficer@tamaoho.maori.nz	Decline the plan change, but if approved make the amendment	Reflect sustainable development in the design and outcomes.

Submissions

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Jennifer Catherine Joyce

Organisation name:

Agent's full name:

Email address: tjjoyce@xtra.co.nz

Contact phone number:

Postal address:
15 Burberry road
RD 2
Drury
Drury 2578

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:

Property address: 15 Burberry road, Drury

Map or maps:

Other provisions:
We generally support the provisions as notified

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

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

The reason for my or our views are:
We support growth in the area

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

1.1

Details of amendments:

Submission date: 22 September 2020

Attend a hearing

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

Declaration

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

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

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

Yes

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

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Yu Wang

Organisation name:

Agent's full name:

Email address: ppbb6606@gmail.com

Contact phone number:

Postal address:
18 Brian Slater Way
stonefields
Auckland 1072

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:
Drury 2 precinct

Property address: 20 burberry road, Drury west

Map or maps: pc51-attachment 3 precinct plan

Other provisions:

we are happy to the plan change rezone to Terrance and apartment zone for our section , but only concern is about in pc51-attachment 3 precinct plan there is a light blue line indicate will be a local road with cycle and 3 meter shared path from my neighbour 24 burberry road cross 20 buberry road to 16A burberry road.

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

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

The reason for my or our views are:

Would you be able to reconsidering it, like to go along the edge of boundary of my section rather than cross it and separate our section into two, we think it is not a practical thoughts. Except it, everything looks good to us. we are happy to approve it.

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

Details of amendments: Would you be able to reconsidering it, like to go along the edge of boundary of my section rather than cross it and separate our section into two, we think it is not a practical thoughts. Except it, everything looks good to us. we are happy to approve it. | 2.1

Submission date: 22 September 2020

Attend a hearing

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

Declaration

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

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

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

No

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

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

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

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

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

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

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

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



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

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

For office use only

Submission No:

Receipt Date:

Submitter details

Full Name or Name of Agent (if applicable)

Mr/Mrs/Miss/Ms(Full
Name)

Eloise Taylforth, Planner - Beca

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

Fire and Emergency New Zealand

Address for service of Submitter

PO Box 6345 Victoria Street West, Auckland 1142

Telephone:

93009044

Fax/Email:

eloise.taylforth@beca.com

Contact Person: (Name and designation, if applicable)

Scope of submission

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

Plan Change/Variation Number

PC 51 (Private)

Plan Change/Variation Name

Drury 2 Precinct

The specific provisions that my submission relates to are:

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

Plan provision(s)

addition of policy to ensure all future development to be supported by water supply infrastructure

Or

Property Address

Or

Map

Or

Other (specify)

Submission

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

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

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

I wish to have the provisions identified above amended

Yes ☒

No ☐

The reasons for my views are:

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

(continue on a separate sheet if necessary)

I seek the following decision by Council:

Accept the proposed plan change / variation ☐

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

Decline the proposed plan change / variation ☐

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

Please refer to submission letter attached

I wish to be heard in support of my submission ☐

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

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

Etayl South

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

12.10.2021

Date

Notes to person making submission:

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

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

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

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

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

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

(a) adversely affects the environment; and

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

Form 13

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

To: Auckland Council

Submission on: Private Plan Change 51

Name of submitter: Fire and Emergency New Zealand

Address for service: c/o Beca Ltd

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

This is a submission on the proposed private plan change 51 (PPC 51) at Drury East, Auckland by Tollemache Consultants Limited on behalf of Karaka and Drury Limited (the Applicant) to Auckland Council. The applicant requests to change the zoning of the plan change area (approximately 33.65 hectares) from Future Urban to a mix of Business – Town Centre, Residential – Mixed Housing Urban and Terraced Housing and Apartment zones. This submission is written on behalf of Fire and Emergency New Zealand (FENZ).

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

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

Background:

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

The Fire and Emergency submission is:

The plan change area is located along Burberry Road adjoining State Highway 22 to the south and south east, Drury 1 precinct to the north and land zoned Future Urban to the west. The plan change area is currently zoned as Future Urban under the Auckland Unitary Plan: Operative in Part (AUP: OP). The Applicant seeks to rezone the plan change area to accommodate the following zones in accordance with the Drury-Opāheke Structure Plan:

- 15.29 ha as Business – Town Centre zone;
- 4.61 ha as Residential – Mixed Housing Urban zone;
- 13.75 ha as Residential – Terraced Housing and Apartment zone.

The plan change area is not currently connected to the reticulated network, however Watercare Services Limited has confirmed that there is a 450mm Bulk Supply Point (BSP) off the existing 1200mm diameter Watercare Services Limited watermain located at 103 Flanagan Road, Drury. An extension can be made from the Drury 1 Precinct into the proposed plan change area. The Applicant has acknowledged that the water supply infrastructure will extend into the plan change area and will need to be sized during Resource Consent and Engineering Plan Approval stage as part of the consenting process. This will be required to provide for adequate flow rates and pressures to service any future development in accordance with the New Zealand Fire Service Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.

Fire and Emergency supports the proposal to construct a reticulated network throughout PPC51 to service development.

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

Fire and Emergency seeks the following Policy be added to the Precinct; which is consistent with the wording proposed for adjacent precincts in Drury¹:

3.1

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

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

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

Fire and Emergency is not a trade competitor.

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



Eloise Taylforth
Planner
Beca

Date: 12/10/2020

¹ As proposed by Private Plan Change 49.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Wendy Hannah

Organisation name: God Save The Flag Ltd

Agent's full name:

Email address: hannahshouse87@gmail.com

Contact phone number: 0273342444

Postal address:
PO Box 38513

Howick
Auckland
Auckland 2012

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:

Property address: 228 Flanagan Road Drury 2113

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

Other provisions:

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

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

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

The reason for my or our views are:

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

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

4.1

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

Submission date: 19 October 2020

Supporting documents
228 Flanagan Road Map_20201019182544.072.pdf

Attend a hearing

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

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

Declaration

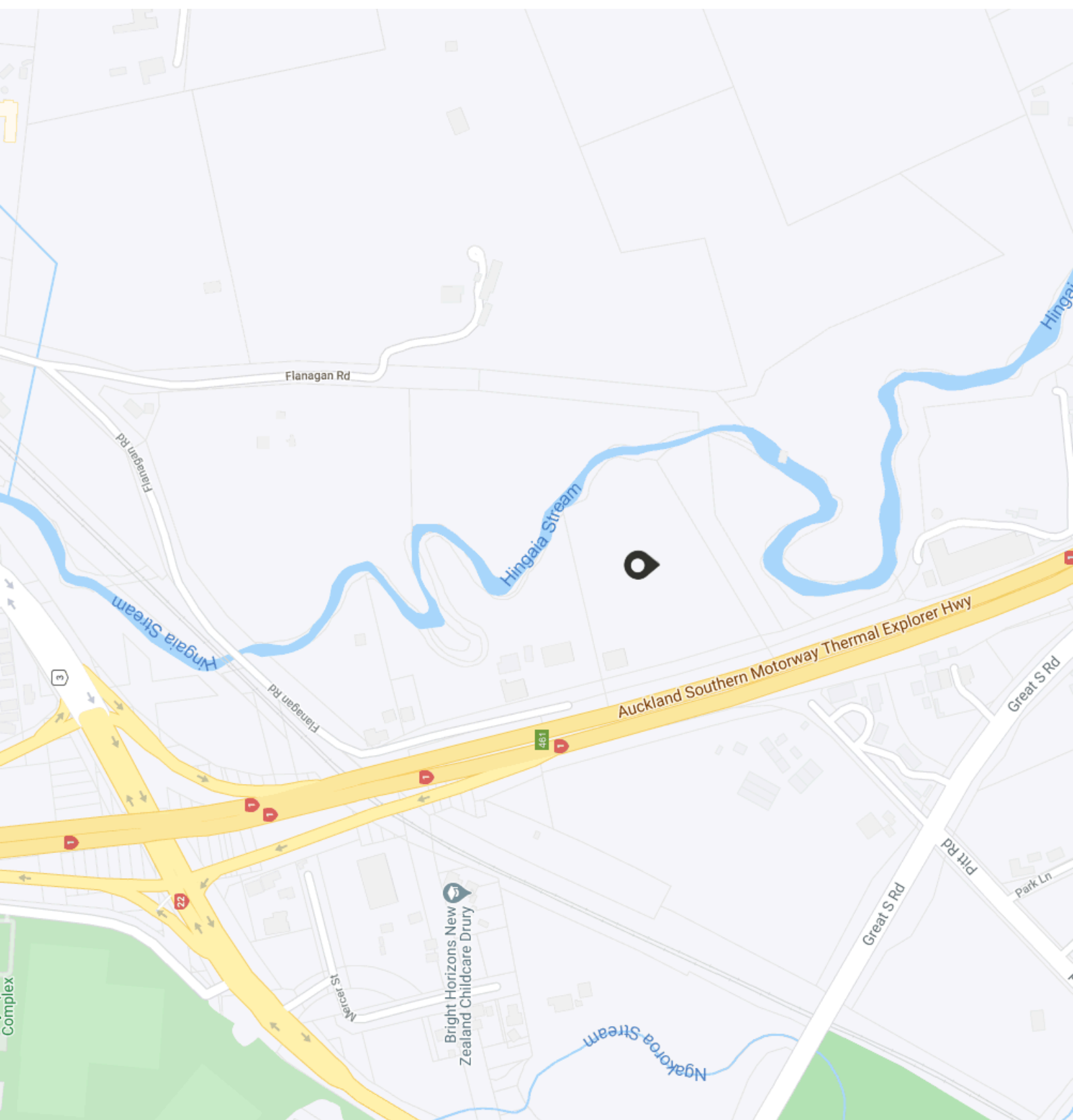
Could you gain an advantage in trade competition through this submission? No

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

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

Yes

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



The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Rachel and Michael Gilmore

Organisation name:

Agent's full name:

Email address: mikejamesgilmore@gmail.com

Contact phone number:

Postal address:
20 Flanagan Rd
Drury
Auckland 2113

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:

Property address:

Map or maps: Precinct plan

Other provisions:

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

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

The reason for my or our views are:

We generally agree and support the plan change proposed by Karaka and Drury Ltd along with recommendations given by local iwi.

The quality and layout of the existing development in Auranga has enhanced the local environment and we support further extension of the area.

I or we seek the following decision by council: Approve the plan change without any amendments | 5.1

Details of amendments:

Submission date: 19 October 2020

Attend a hearing

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

Declaration

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

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

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

No

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

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Phil Hogan

Organisation name: Britmat Holdings Ltd

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

Email address: paulsousa@xtra.co.nz

Contact phone number: 0272595070

Postal address:
12A Mace Terrace
Oakura
New Plymouth 4314

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:

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

Property address: 1A East Street, Drury

Map or maps: Attachment 3 to the Plan Change - Zone Map and its exclusion of the centre of Drury, particularly 1A East Street.

Other provisions:

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

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

The reason for my or our views are:

Parcels of land exist within or adjoin the existing centre of Drury that have not been considered for inclusion in the plan change and in so doing result in an incoherent land use pattern within the existing urban area and PC51 serves to extinguish other land being able to be zoned/used for businesses purposes, despite being the most suited land use in certain instances, due to an over supply of business land arising from the proposed plan change.

The proposed plan change in conjunction with the taking of land at 236 - 250 Great South Road,

Drury for the Drury Train Station result in the loss of opportunities for smaller businesses to remain in proximity to the traditional centre of Drury and the Great South Road when opportunities remain within the existing urban environment, namely at 1A East Street.

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

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

Therefore, the inclusion of 1A East Street in Plan Change 48 would assist the transition of the area from its current local business hub to a larger metropolitan hub by providing immediate options for those small scale businesses being displaced by the changes occurring in this established environment.

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

6.1

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

Submission date: 20 October 2020

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

Attend a hearing

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

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

Declaration

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

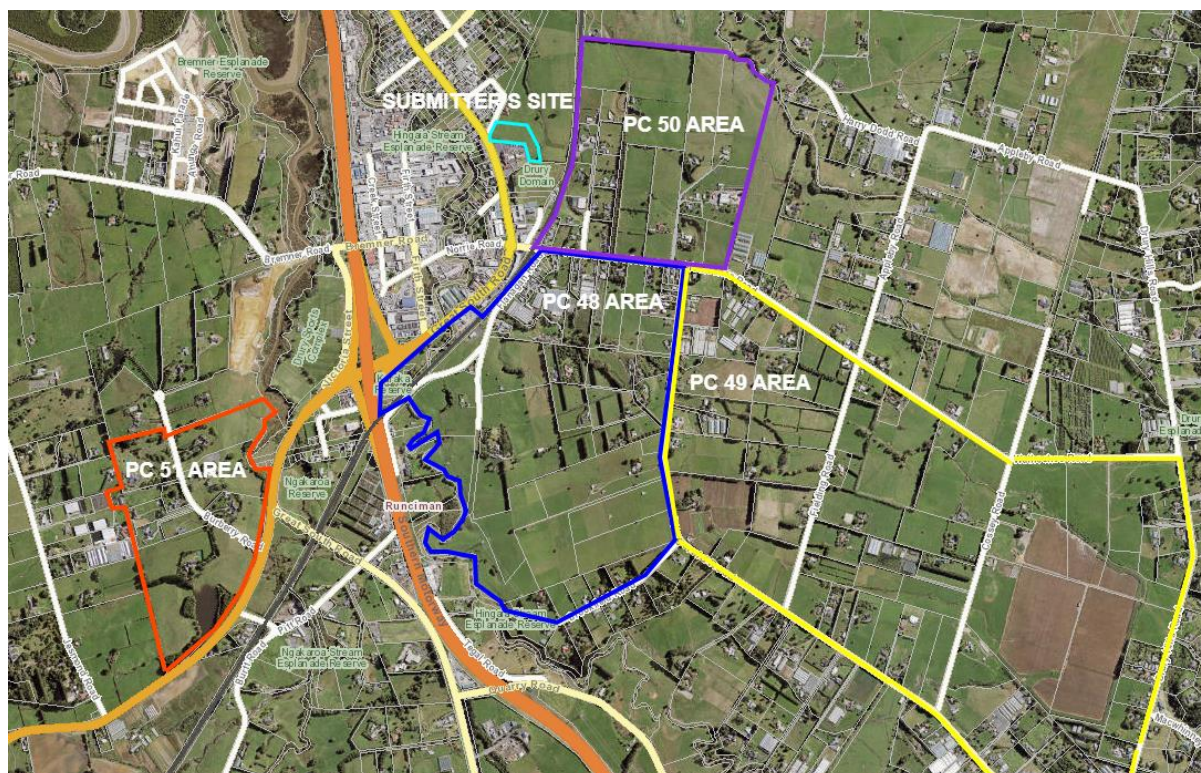
Are you directly affected by an effect of the subject matter of this submission that:

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

Yes

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

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



The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Zane Wood

Organisation name: First Gas Limited

Agent's full name: Zane Wood

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

Contact phone number: 027 287 7248

Postal address:
42 Connett Road
Merrilands
New Plymouth 4312

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:

Property address: Multiple addresses

Map or maps:

Other provisions:
As identified in the submission.

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

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

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

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

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

Submission date: 21 October 2020

Supporting documents
Plan Change 51.pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

First Gas Limited

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

P +64 6 755 0861

F +64 6 759 6509

Submission on Private Plan Change 51 Drury 2 Precinct to Auckland Council by First Gas Limited

1. Introduction to Submitter:

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

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

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

2. Understanding the Plan Change:

Karaka and Drury Consultant Limited are seeking a (private) Plan Change to include a new precinct within the Auckland Unitary Plan, being the Drury 2 Precinct. The Drury 2 Precinct would be identified on the planning maps and would fundamentally rezone 33.65 Hectares of land in Drury West from Future Urban zone to 15.29 hectares of Business: Town Centre, 13.75 hectares of Residential: Terrace Housing and Apartment Buildings zone and 4.61 hectares of Residential: Residential: Mixed Housing Urban zone.

3. Firstgas assets within the Plan Change area:

Firstgas owns and operates the Kapuni to Papakura '200Line' High Pressure Transmission Gas Pipeline which is located (in part) within the Precinct Boundary. This pipeline is part of a network which conveys natural gas between New Plymouth and Auckland. The pipeline operates under high-pressure and is a transmission asset.

First Gas' legal interests in the '200Line' Transmission Pipeline are protected by way of a 12m wide easements, on land where a title(s) are held. The easements clarify the rights and obligations of both Firstgas and the landowner and affords Firstgas a level of protection for the pipeline and the land immediately surrounding it.

4. Overview of Policy Framework Relating to Gas Infrastructure within Extent of Private Plan Change 51:

Matters for the Council to consider in respect of Private Plan Change 51, include consistency with the Auckland Unitary Plan's direction and framework and the Regional Policy Statement. In the context of existing gas infrastructure, the provisions of note within the Regional Policy Statement for Auckland contained within Chapter B3 of the Unitary plan are:

B3.2.1 Objectives

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

B3.2.2 Policies

Provision of infrastructure

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

Reverse sensitivity

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

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

E26.2.1. Objectives

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

E26.2.2 Policies

Adverse effects on infrastructure

- (3) Avoid where practicable, or otherwise, remedy or mitigate adverse effects on infrastructure from subdivision, use and development, including reverse sensitivity effects, which may compromise the operation and capacity of existing, consented and planned infrastructure.*

5. Firstgas operating standards and codes:

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

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

6. Submission Statement:

Upon notification of this private plan change, Firstgas contacted McKenzie and Co Consultants Limited whom were noted under Section 6.7 and 6.13 of the Assessment of Environmental Effects to have assessed infrastructure availability and discussed the requirements of existing infrastructure providers in relation to the development. Based on these statements Firstgas requested confirmation of the agreements reached to date for the proposed development.

At the time of lodging this submission, confirmation of the agreements reached between the developers and Firstgas were yet to be confirmed by McKenzie and Co Consultants Limited.

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

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

- The Gas Transmission Network is enabled to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed (i.e. recognised and provided for) through an enabling activity status; | 7.1
- The Gas Transmission Network is recognised as having functional and operational requirements and constraints, including in respect of its location; | 7.2
- There may be some occasions where works undertaken by Firstgas generate adverse environmental effects;
- That the adverse effects of third-party development or activities in close proximity to the Gas Transmission Network are managed to the extent that adverse effects on the network are avoided or appropriately mitigated; | 7.3
- Firstgas is identified as an affected party in the event resource consent is required in respect of potential effects on assets owned and operated by Firstgas especially land use changes and subdivision, or alternatively the matters of discretion or assessment criteria include technical advice from Firstgas; and | 7.4
- The identification of the Gas Transmission Network on the District Plan Maps to ensure visibility of the network for plan users. | 7.5

7. Specific Submission Points to Applicant's Proposed 'Drury 2 Precinct (IX)'

Proposed Objectives IX.2

Firstgas request the inclusion of a new objective which states 'The Drury 2 Precinct recognises the importance of the existing pipeline infrastructure as assets which are regionally and nationally significant and will ensure that they are protected and enabled'. | 7.6

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

Proposed Policies IX.3

Firstgas requests the inclusion of a new policy which states 'The Drury 2 Precinct is planned, designed and constructed so that adverse effects on existing infrastructure are avoided or mitigated'. | 7.7

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

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

Firstgas seek the following provision to be included within the applicant's proposed framework in relation to resource consent processes;

7.8

- Any subdivision of land containing a Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner; and
- Any activity within 20 metres of existing Gas Transmission Pipeline shall require the written authorisation from the infrastructure asset owner.

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

8. Conclusion

Firstgas welcomes the opportunity to discuss the content of this submission with the applicant, Karaka and Drury Consultant Limited with the aim of reaching an amicable solution whereby the considerations identified above are included in Plan Change 51.



CATHOLIC DIOCESE OF AUCKLAND

19 October 2020

Auckland Council

Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142

Attention: Planning Technician

By email: unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Private Plan Change 51

FROM: The Catholic Diocese of Auckland

ADDRESS FOR SERVICE: Resource Management Solutions Limited
P.O. Box 68954, Victoria Street West
Auckland 1142
Attention: Matt Feary 021638803
Email: matt@rms.co.nz

DATE: 19 October 2020

The following addresses matters of Resource Management Act Form 5 – Clause 6 of Schedule 1 – Submission on a notified proposal for a Plan Change.

NOTE:

The Catholic Diocese of Auckland will not gain an advantage in trade competition through this submission.

INTRODUCTION

The Catholic Diocese of Auckland (CDA) provides State integrated education throughout Auckland through a network of schools located to serve the Auckland Catholic community.

The CDA has purchased 485 Burt Road for the development of a Church, Secondary College, Primary School and Early learning facility in order to provide for the Catholic education requirements of the developing residential catchments associated with Pukekohe, Pokeno, Papakura and the emerging West Drury area. The appropriateness of the site and associated development of the Secondary College has been reinforced by the Environment and High Courts with resource consents issued.

The CDA has consulted with Auckland Council and Te Tupu Ngatahi – Supporting Growth regarding the future development of the West Drury area and specifically the location of the Town Centre and the West Drury Train



CATHOLIC DIOCESE OF AUCKLAND

Station. The purpose of this consultation has, and is, to facilitate development of 485 Burt Road as an education hub that best serves the West Drury community as well as the wider Catholic community and in a manner where use of public transport is supported and maximised by students. Recent redesign of the site for the Secondary College has also taken into consideration the preferred Option A rail station location and potentially increased rail corridor requirements.

CDA studies have confirmed, based on Councils stated Structure Planning criteria for West Drury, the appropriateness of a Town Centre located to the immediate west of a Jesmond Road extension, i.e. bounded by SH22 to the north, Jesmond Road to the east and the preferred (Option A) rail station to the south.

Supporting this, studies also reinforce the significant influence of the Ngakaroa Stream and associated flood plain with resultant limitations in achieving optimum Town Centre supporting residential densities and ancillary land uses. There are resultant advantages in terms of all measures and indicators in locating the Town Centre westward to that proposed within Plan Change 51.

The Council Drury Opaheke Structure Plan 2019 identified a broad area as potentially appropriate for a Centre on the northern side of SH 22 and east of Jesmond Road. That Structure Plan also identified a train station as potentially east of the Jesmond Road extension.

There is an accepted relationship between the future West Drury Train station and Town Centre, or should be. Most recently KiwiRail has identified, in association with regional partners, a preferred station location 'Option A' west of the Jesmond Road extension and therefore well removed from the Structure Plan centre. That reinforces the westward location of the future West Drury Town Centre and delegates, in terms of a supporting residential catchment, the proposed Plan Change 51 Town Centre to a small Local or Neighbourhood Centre.

SUBMISSION

This is a Submission to Auckland Unitary Plan Proposed Private Plan Change 51. Plan Change 51 proposes zoning 15.29 hectares of land as Town Centre, 4.61 hectares as Mixed Housing Urban and 13.75 hectares as Terraced Housing and Apartment as set out in documents referenced by Auckland Council as Plan Change 51.

This submission opposes the zoning of land as 'Town Centre', including associated uses and scale of activities, and opposes the Terrace Housing and Apartment Building Zone to the extent that it is inconsistent with a Local or Neighbourhood Centre that would undermine a long term Town Centre/Local Centre planning and resource management hierarchy. This submission does not oppose the Mixed Housing Urban Zone.

The basis for the submission is as follows:

- The Town Centre is not appropriately located relative to optimum potential residential densities.
- The Town Centre location does not properly take account of long-term residential development within the wider West Drury area, including all areas within the Future Urban Zone.
- The Town Centre location does not optimise public transport and particularly the rail network and the future West Drury rail station.



CATHOLIC DIOCESE OF AUCKLAND

- The Plan Change does not sufficiently consider the effects of the Town Centre location, and associated proposed residential zones, relative to the preferred rail station location 'Option A' and increasing importance of the rail network generally.
- The Plan Change is inconsistent with the objectives of the Auckland Council Drury-Opaheke Structure plan when considering post Structure Plan infrastructure initiatives including the preferred 'Option A' West Drury rail station location.
- The Plan Change does not sufficiently address the requirements of RMA Section 32 and arrives at inappropriate conclusions.
- The Plan Change does not properly or optimally ensure future land development that will best fulfill regional objectives of the Unitary Plan.
- The Plan Change is inconsistent with Part 2 of the Act.

DECISION SOUGHT

- In its current form the Plan Change is declined in its entirety, or | 8.1
- The Plan Change is amended so that the Town Centre is reduced in scale and activity to a Local or Neighbourhood Centre, with | 8.2
- Amendments to the scale and location of the Terraced Housing and Apartment Zone to the extent that development can properly support, and be supported by, a Local or neighbourhood Centre without compromising a subregional Local Centre / Town Centre hierarchy that places the Town Centre westwards of Jesmond Road and aligned with Rail Station Option 'A'. | 8.3

HEARING

The Catholic Diocese of Auckland wishes to be heard in support of its submission.

Michael Butler
Portfolio and Development Manager
Catholic Diocese of Auckland

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Introduction:

1. This is a submission on Private Plan Change 51 (Drury 2 Precinct, "PPC 51") to the partly operative Auckland Unitary Plan ("AUP").
2. The submitter could not gain an advantage in trade competition through this submission.
3. The submitter has an interest in PPC 51 as a whole and this submission relates to PPC 51 in its entirety.
4. The submitter owns the property at 291-333 Bremner Road, within Drury West.
5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

6. The submitter supports PPC 51 being approved in its current form on the basis that the PPC:
 - (a) Will promote the sustainable management of natural and physical resources, will achieve the purpose of the RMA and is not contrary to Part 2 or any other provisions of the Resource Management Act 1991 ("RMA").
 - (b) Will enable the social, economic and cultural well-being of the community in the Auckland region.
 - (c) Will meet the reasonably foreseeable needs of future generations.
 - (d) Appropriately gives effect or has regard to all applicable higher order planning instruments, including the New Zealand Coastal Policy Statement and the Regional Policy Statement provisions of the AUP.
 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.



7. Without limiting the generality of the foregoing, the submitter's grounds for supporting PPC 51 are that the PPC:
- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 9.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature



Name

Adam Yates.

Title

CEO

Date

22/10/20

Address

151 Pillans Road, Otumotai, Tauranga 3110.

Phone number

0275 349913.

e-mail

adam@yates.co.nz.

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Fiona Matthews

Organisation name: Spark New Zealand Trading Limited

Agent's full name:

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

Contact phone number: 021772005

Postal address:
Private Bag 92028

Auckland 1010

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:
Refer to the attached submission

Property address:

Map or maps:

Other provisions:
Refer to the attached submission

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

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

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

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

Details of amendments: Refer to the attached submission

Submission date: 22 October 2020

Supporting documents
Spark submission PPC51.pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

Form 5

**Submission on publicly notified Plan Change (Private) 51.
Clause 6 of Schedule 1, Resource Management Act 1991**

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

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

This is a submission on the following proposed private plan change 51: **Drury 2 Precinct.**

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

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

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



Signed:

On behalf of Spark New Zealand Trading Limited

Dated at Auckland this 22 day of October 2020.

Address for Service:

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

Contact Details:

Attention: Fiona Matthews

Telephone: 021772005

E-mail: fiona.matthews@spark.co.nz

Alternate contact details

Graeme McCarrison

027 4811 816

graeme.mccarrison@spark.co.nz



Introduction

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

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

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

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

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

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

¹ Commerce Commission Annual Telecommunications Monitoring Report 2019

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

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

Development Planning

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

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

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

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

Plan Change 51.

The private Plan Change requests next stage (Stage B2) of the “Auranga” development in Drury West, Auckland. Purpose of the plan change is outlined as:

Plan Change 51 - Rezone the Stage B2 land from Future Urban under the AUP to a mix of Town Centre, Terrace Housing and Apartment Building and Mixed Housing Urban, in order to facilitate and support commercial and residential development on that land.

The plan change incorporates the following objective:

- Establish the infrastructure necessary to service development within the Precinct in a coordinated and timely way.

The Section 32 report does not mention telecommunications infrastructure. However, the Engineering Infrastructure report notes that in “Auranga A” Chorus telecommunication networks (we are assuming this refers a fibre network) has been installed and can be further extended to service this Private Plan Change. The report indicates the extension of the network will be confirmed at each subdivision stage once detailed design has been commissioned. Engagement with Spark and other telecommunications providers at the early planning stages of development is vital to ensure new growth areas receive the level of telecommunications including wireless/mobile services that a property or business owner purchasing within new development would expect. It is normal for customers to have the option to connect either fixed line or wireless services or both services in a urban environment.

Funding

The developer is proposing the use of Development agreements between Developers/ Operators, for the funding of the infrastructure to extent the networks as needed. Ensuring telecommunications facilities are included in a funding agreement between the developer and Spark will ensure infrastructure can be incorporated in an efficient and sustainable manner.

Planning

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

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

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

NPSUD Objective 1 seeks to ensure:

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

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

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

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

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

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

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

10.5

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

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

There is no evidence of engagement with telecommunication providers to determine what services are currently available or in future planning, and if the existing networks have capacity to meet the demand created by the development. Overall telecommunications facilities need to be incorporated at the early stages of development, to ensure staging of infrastructure and network capacity is appropriate and delivered within the development.

Overall, the Auranga B2 Plan Change comprises 33.65 ha of land proposed to be zoned for urban activities specifically including 15.29 hectares is proposed as a Town Centre zone; 4.61 hectares is proposed as a Mixed Housing Urban zone; and 13.75 hectares is proposed as Terraced Housing and Apartment zone. Auranga A & B1 has already rezoned 167.6 hectares urban. A comprehensive evaluation of the telecommunication requires has not been undertaken.

The NESTF whilst allowing for telecommunications infrastructure to be lawfully established in roads and other areas becomes complex and difficult when areas that are zoned for high intensity residential uses such as the THAB zoning, which permits taller housing developments and adds complexity to develop mobile sites. The plan changes as proposed, do not adequately cater for telecommunications infrastructure. As proposed in the Plan Changes there is risk that the developments will not have adequate access to a range of telecommunication services that customers expect. We consider that it is in the interest of the developments to fund and integrate telecommunications into the layout and potentially buildings to ensure customers have access to the services to achieve a well-functioning community. It is our experience that

future customers expect to know what telecommunications are or will be available and where they are located when purchase or lease a property. The NESTF and Unitary Plan within provide reasonable opportunity to build new infrastructure, especially in the road reserve, however new owners of properties are unlikely to be accepting of such facilities even if permitted, hence identifying where infrastructure will be located in development planning is crucial.

Current Spark Assets

There is currently only 1 mobile site provided for in the Drury vicinity (as shown in Figure 1). Spark undertakes regional planning throughout the year but requires developers to work with our engineers to ensure sufficient coverage and capacity demands can be met within new developments. The significant development proposed by Plan Changes 48-51 create a need for a comprehensive evaluation of the telecommunications needs with the Drury area as the existing facilities do not have capacity to provide the demand for service that will be expected and generated as a result of Plan Change 51 but also Plan Changes 48-50. By way of reference for an area that will roughly accommodate or will allow for what the Drury East Development proposes; approximately 19,000 residents, 3 schools and a rail and bus station, we could compare that to an area like Takapuna in Auckland's North Shore, which has 8 mobile sites, and/or Westgate and Massey which has 7 mobile sites.

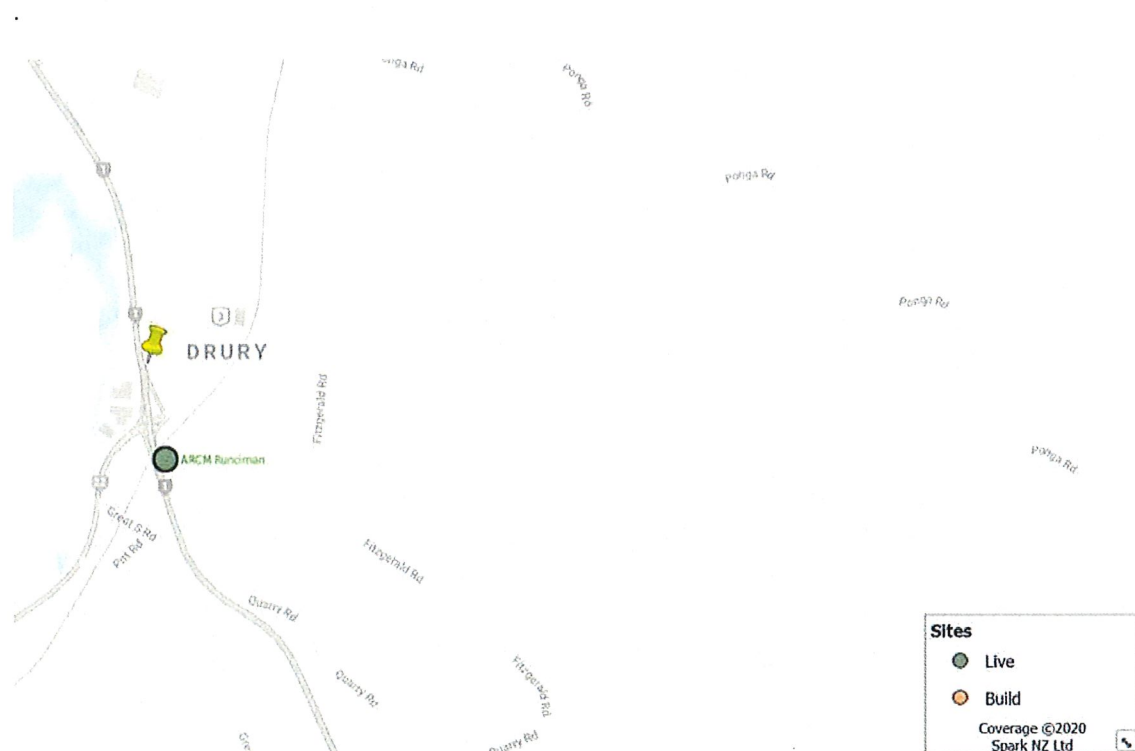


Figure 1. Drury Mobile site (Spark) (Source: Ventura GIS Mapping)

Future Development Strategy

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

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

Submission

- | | |
|---|------|
| 1. Spark supports the Plan Change but is concerned that telecommunication infrastructure has not been adequately considered and planned for within the development. | |
| 2. Spark and the other telecommunication network providers are consulted with throughout the Plan Change Process and any resource consents to enable development including infrastructure to ensure that telecommunications are recognised as essential infrastructure and additional infrastructure under the NPSUD. | 10.1 |
| 3. Spark and the other telecommunication network providers are consulted to ensure that there is adequate infrastructure to support the demand for telecommunication services generated by the development/s proposed in Plan Change. | 10.3 |
| 4. Spark and the other telecommunication network providers are consulted to ensure staging of infrastructure is appropriate and underground ducting, above ground mobile sites/facilities are provided for and designed into the development/s. | 10.3 |
| 5. Spark and the other telecommunication network providers are consulted with to ensure funding is available through the infrastructure funding agreements. | 10.4 |

Conclusion

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

Currently Plan Change 51 and the other three private plan changes (Plan Change 48,49 & 50) in the vicinity of Drury do not adequately provide for telecommunications infrastructure. Including

Spark and other telecommunications providers into the early stages of development will result in positive outcomes for the community and developer, ensuring telecommunications infrastructure is appropriate for the setting it is designed to serve.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Fiona Matthews', with a stylized, cursive script.

Fiona Matthews
Senior Environmental Planner

The address for service and contact details are:

Fiona Matthews
Spark New Zealand Trading Limited
Private Bag 92028
Auckland 1010

Fiona.matthews@spark.co.nz
021772005

SUBMISSION ON PLAN CHANGE 51 (PRIVATE): DRURY 2 PRECINCT

To: Auckland Council

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

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 51: Drury 2 Precinct (**PPC51** or **Auranga B2**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. Lomai could not gain an advantage in trade competition through this submission.
3. This submission relates to PPC51 in its entirety; however, the Submitter is particularly interested in the potential traffic and transport effects arising from PPC51.
4. Lomai supports PPC51, subject to receiving confirmation that potential traffic effects arising from PPC51 will be acceptable within the surrounding road network, and that PPC51 manages its other infrastructure requirements and will not prevent or hinder the development potential envisaged within the remainder of the Drury-Opāheke Structure Plan Area (in particular Stage 1 of the Drury-Opāheke Structure Plan) from being given effect to.

BACKGROUND

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

Proposed Plan Change 51 (Auranga B2)

7. PPC51 seeks to rezone 33.65 hectares of land in Drury West from Future Urban Zoned land to a mixture of Business: Town Centre zone (15.29ha), Residential: Terrace Housing and Apartment Buildings zone (13.75ha) and Residential: Mixed Housing Urban zone (4.61ha).
8. PPC51 also seeks to create a new precinct to be called Drury 2 Precinct. This is intended to expand the existing Drury 1 Precinct that was introduced through Plan Variation 15 (Auranga A) and Plan Change 6 (Auranga B1). The Drury 1 precinct provides for 2,650+ houses at a variety of densities.

9. The Drury 2 precinct is proposed to:
 - (a) Create a new town centre designed to cater for a community of between 18,000-25,000 persons (including facilities such as supermarkets, department stores and large offices).
 - (b) Enable more medium and high density housing. The AEE does not contain estimates of the number of dwellings expected as a result of PPC51. The Transport Assessment states that PPC51 will enable approximately 890 dwellings.

REASONS FOR SUBMISSION

10. Lomai does not, in principle, oppose development of the PPC51 area. Lomai supports development of this land in general accordance with the Drury-Opāheke Structure Plan, where adverse effects can be appropriately managed.
11. Lomai's key concern is to ensure that PPC51 appropriately manages its infrastructure requirements and does not compromise the ability for the remainder of the Structure Plan area (in particular the stage 1 area) to be developed.

DECISION SOUGHT

12. Lomai seeks the following decision from Auckland Council:
 - (a) Accept the plan change, subject to receiving confirmation that potential traffic effects arising from PPC51 will be acceptable within the surrounding road network, and that PPC51 manages its other infrastructure requirements and will not prevent or hinder the development potential envisaged within the remainder of the Drury-Opāheke Structure Plan Area (in particular Stage 1 of the Drury-Opāheke Structure Plan) from being given effect to.
13. Lomai wishes to be heard in support of its submission.
14. Lomai would consider presenting a joint case if others make similar submissions.

11.1

22 October 2020



Bill Loutit / Rachel Abraham
On behalf of Lomai Properties Limited

Electronic address for service of submitter: bill.loutit@simpsongrierson.com
Telephone: +64 21 839 422
Postal address: Private Bag 92518, Auckland 1141, New Zealand
Contact person: Bill Loutit, Simpson Grierson

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Introduction:

1. This is a submission on Private Plan Change 51 (Drury 2 Precinct, "PPC 51") to the partly operative Auckland Unitary Plan ("AUP").
2. The submitter could not gain an advantage in trade competition through this submission.
3. The submitter has an interest in PPC 51 as a whole and this submission relates to PPC 51 in its entirety.
4. The submitter owns the property within Drury West.
5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

6. The submitter supports PPC 51 being approved in its current form on the basis that the PPC:
 - (a) Will promote the sustainable management of natural and physical resources, will achieve the purpose of the RMA and is not contrary to Part 2 or any other provisions of the Resource Management Act 1991 ("RMA").
 - (b) Will enable the social, economic and cultural well-being of the community in the Auckland region.
 - (c) Will meet the reasonably foreseeable needs of future generations.
 - (d) Appropriately gives effect or has regard to all applicable higher order planning instruments, including the New Zealand Coastal Policy Statement and the Regional Policy Statement provisions of the AUP.
 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

7. Without limiting the generality of the foregoing, the submitter's grounds for supporting PPC 51 are that the PPC:
- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.


Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 12.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature

 WENDY JAO

Name KARAKA & DRURY CONSULTANT LTD

Title DIRECTOR

Date 21 / 10 / 2020

Address

121 BRENNER RD, DRURY

Phone number 021-402-988

e-mail jaowendy 01@GMAIL.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
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 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

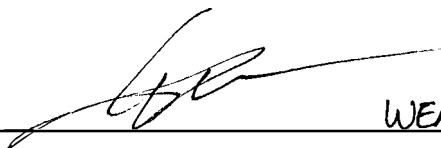
Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 13.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature

 WENDY JAO

Name BARFILON INVESTMENT LTD

Title DIRECTOR

Date 21/10/2020

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132 BREMNER RD, DRURY

Phone number 021-402-988

e-mail JADWENDY01@GMAIL.COM

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Introduction:

1. This is a submission on Private Plan Change 51 (Drury 2 Precinct, "PPC 51") to the partly operative Auckland Unitary Plan ("AUP").
2. The submitter could not gain an advantage in trade competition through this submission.
3. The submitter has an interest in PPC 51 as a whole and this submission relates to PPC 51 in its entirety.
4. The submitter owns the property within Drury West.
5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

6. The submitter supports PPC 51 being approved in its current form on the basis that the PPC:
 - (a) Will promote the sustainable management of natural and physical resources, will achieve the purpose of the RMA and is not contrary to Part 2 or any other provisions of the Resource Management Act 1991 ("RMA").
 - (b) Will enable the social, economic and cultural well-being of the community in the Auckland region.
 - (c) Will meet the reasonably foreseeable needs of future generations.
 - (d) Appropriately gives effect or has regard to all applicable higher order planning instruments, including the New Zealand Coastal Policy Statement and the Regional Policy Statement provisions of the AUP.
 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

7. Without limiting the generality of the foregoing, the submitter's grounds for supporting PPC 51 are that the PPC:
- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.


Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 14.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature

 WENDY JAO

Name DL & WJ LTD

Title DIRECTOR

Date 21/10/2020

Address

160 BREMNER RD, DRURY

Phone number 021-402-988

e-mail JAO WENDY 01 @ GMAIL.COM

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Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 15.1

Hearing:

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

Signature

 WENDY JAO

Name NOAH EASTERN LTD

Title DIRECTOR

Date 21/10/2020

Address

322 BREMMER RD, DRURY

Phone number 021-402-988

e-mail jaowendy01@GMAIL.com

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Relief sought:

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Address

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Relief sought:

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Hearing:

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Relief sought:

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Hearing:

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Hearing:

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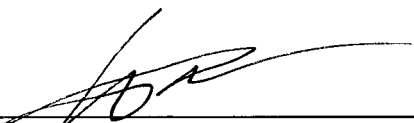
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Title _____

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5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

6. The submitter supports PPC 51 being approved in its current form on the basis that the PPC:
 - (a) Will promote the sustainable management of natural and physical resources, will achieve the purpose of the RMA and is not contrary to Part 2 or any other provisions of the Resource Management Act 1991 ("RMA").
 - (b) Will enable the social, economic and cultural well-being of the community in the Auckland region.
 - (c) Will meet the reasonably foreseeable needs of future generations.
 - (d) Appropriately gives effect or has regard to all applicable higher order planning instruments, including the New Zealand Coastal Policy Statement and the Regional Policy Statement provisions of the AUP.
 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.

7. Without limiting the generality of the foregoing, the submitter's grounds for supporting PPC 51 are that the PPC:
- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 17.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature


Name L & W Rising Ltd

Title _____

Date 21/10/2020

Address

138 Bremner Rd , DruryPhone number 0221033774e-mail yinsangsu@gmail.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Introduction:

1. This is a submission on Private Plan Change 51 (Drury 2 Precinct, "PPC 51") to the partly operative Auckland Unitary Plan ("AUP").
2. The submitter could not gain an advantage in trade competition through this submission.
3. The submitter has an interest in PPC 51 as a whole and this submission relates to PPC 51 in its entirety.
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5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

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 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 18.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature


Name Jing ChenTitle Director of New Elite Investment LtdDate 21/10/2020

Address

169 Bremner Road, KarakaPhone number 027-6633-688e-mail neliteinv@gmail.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

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5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

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 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 19.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature


Name Wang wenshengTitle ArchitectDate 2020-10-21Address No.245&No.253 .Bremner RoacPhone number 0086-13801601535e-mail 13801601535@163.con

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Introduction:

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Reasons for submission:

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 - (c) Will meet the reasonably foreseeable needs of future generations.
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 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
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 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 20.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature

Wei Pan


Name HUAWEI DEVELOPMENT LTDTitle DirectorDate 21/10/2020

Address

3 Andy Crescent, Flat Bush, AucklandPhone number 021731858e-mail wpan008@gmail.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Introduction:

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4. The submitter owns the property within Drury West.
5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

6. The submitter supports PPC 51 being approved in its current form on the basis that the PPC:
 - (a) Will promote the sustainable management of natural and physical resources, will achieve the purpose of the RMA and is not contrary to Part 2 or any other provisions of the Resource Management Act 1991 ("RMA").
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 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
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 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 21.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature

Name Edison YiTitle DirectorDate 20/10/2020

Address

251 Bremner RoadPhone number 021360998e-mail Logicicg@gmail.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
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unitaryplan@aucklandcouncil.govt.nz

Introduction:

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5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

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 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 22.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature

Cxb

Name Xibing Chen

Title Director

Date 21/10/2020

Address

259 Bremner Rd, Drury

Phone number 021-0226-0889

e-mail gds2cxb@gmail.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
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To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
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unitaryplan@aucklandcouncil.govt.nz

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 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 23.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature


Name Hongyan zhaoTitle Jal Glory investment ltdDate 21/10/2020Address 263 bremner rd druryPhone number 021858626e-mail hongyan-zhao@hotmail.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
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Private Bag 92300
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unitaryplan@aucklandcouncil.govt.nz

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 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 24.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature


Name Jia Liu

Title _____

Date 21/10/2020

Address

312 Bremner Rd, DruryPhone number 021816588e-mail frankyliujia@hotmail.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
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To: The Chief Executive

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Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 25.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature



Name William Zhang Bremner Estates Development Limited

Title Director

Date 21/10/2020

Address 330 Bremner Road

Phone number 0274335938

e-mail wenyuhliou@msn.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

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 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 26.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature


Name Auranga Resident's AssociationTitle Committee MembersDate 22/10/2020

Address

Lot 116, 259 Bremner RoadPhone number 0211597165e-mail ara@auranga.co.nz

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
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 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 27.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature



Name

JUNXIANG CHEN

Title

Director

Date

28/10/2020

Address

31 Burberry Road, Drury

Phone number

022-6666 383

e-mail

Brucechen.stc@gmail.com

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly
operative Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Name of submitter: 415 Bremner Road Limited ("the submitter")

Introduction

1. This is a submission on Private Plan Change 51 (Drury 2 Precinct, "PPC 51") to the partly operative Auckland Unitary Plan ("AUP").
2. The submitter could not gain an advantage in trade competition through this submission.
3. The submitter has an interest in PPC 51 as a whole and this submission relates to PPC 51 in its entirety.
4. The submitter owns the property at 415 Bremner Road, Drury, which is to the north-west of the PPC 51 area and within the existing Drury 1 Precinct under the AUP. The submitter accordingly has a particular interest in the quality of planning and development outcomes to be achieved within Drury West, including the area that is the subject to PPC 51.
5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified, provided the proposed Town Centre is to be supported by a Drury West train station located as shown in the Drury-Opaheke Structure Plan ("DOSP") that has been adopted by Auckland Council ("the Council").
6. If, contrary to the DOSP, the Drury West train station is to be located further to the west (particularly west of Oira Road), the submitter submits that PPC 51 should be amended, to rezone all of the PPC 51 land for residential purposes, i.e., removing the 15.29 hectares of Town Centre zone currently proposed in the PPC, together with decreasing the density of some of the proposed residential zonings.

Reasons for submission:

7. In summary (and subject to the proviso regarding the location of the Drury West train station), the submitter supports PPC 51 being approved in its current form on the basis that the PPC:

- (a) Will promote the sustainable management of natural and physical resources, will achieve the purpose of the RMA and is not contrary to Part 2 or any other provisions of the Resource Management Act 1991 ("RMA").
 - (b) Will enable the social, economic and cultural well-being of the community in the Auckland region.
 - (c) Will meet the reasonably foreseeable needs of future generations.
 - (d) Appropriately gives effect or has regard to all applicable higher order planning instruments, including the New Zealand Coastal Policy Statement and the Regional Policy Statement provisions of the AUP.
 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.
8. Without limiting the generality of the foregoing, the submitter's grounds for supporting PPC 51 are that the PPC:
- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Does not rely on (or need to await) the construction of any significant infrastructure, as it will largely use (and help fund) the infrastructure that has already been constructed to service the existing Drury 1 Precinct, which has been sized to also accommodate development of the PPC 51 area.
 - (e) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (f) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

9. The submitter seeks the following relief:
- (a) PPC 51 be approved as notified, if the proposed Town Centre is to be supported by a Drury West train station located as shown in the DOSP.

28.1

- (b) In the alternative, if the Drury West train station is to be located west of the location shown in the DOSP (particularly west of Oira Road), the submitter supports any amendments to PPC 51 that may be sought by the PPC applicant, Karaka and Drury Limited ("KDL"), to address that change. This would include (but is not limited to) rezoning all of the PPC 51 land for residential purposes, by removing the proposed Town Centre zone and decreasing the density of some of the proposed residential zones. 28.2
10. For the avoidance of doubt, the submitter does not support any changes being made to PPC 51 as notified, except where those changes are agreed to and supported by KDL. 28.3

Hearing:

11. The submitter wishes to be heard in support of its submission.
12. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature


Name Charles MaTitle DirectorDate 22/10/20

Address

415 Bremner Road, KarakaPhone number 0211597165e-mail charles@made.co.nz

Hi there,

I realise I am outside of the boundary of the PC51, however I am also aware of decisions that could impact our property at 169 Jesmond Road, Karaka 2578 and therefore would like to highlight the below key feedback points along with being able to be involved as the PC51 develops.

Key points being:

- Should be a Council lead plan change for consistency, infrastructural changes including roading loadings as existing infrastructure has only just been improved and will very quickly be outdated. Currently the motorway system is not able to cope with the existing loading.
- Future urban zone change is expected from Council within 2 years, so why push this through now as a Private Change?
- PC6 work doesn't appear to have started, so seems odd that another PC is being started
- Need to be involved with the PC51 as plan changes will directly impact our property in the future from decisions being made now.
- With the increase in the number of new houses and therefore more water usage, water storage tanks should be considered to minimise water supply issues for Auckland as already seen in 2020.

29.1

Thanks

Andrew

andrew.daken243@gmail.com

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: John Duan

Organisation name: Soco Homes Limited.

Agent's full name: Isobel Lee

Email address: isobel@topland.co.nz

Contact phone number: 092651356

Postal address:
9/42 Ormiston Road
East Tamaki
Auckland 2019

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:
Transportation, stormwater management, water quality, infrastructure protection and consultation.

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
We believe proper consideration has not been given to the wider context of the Drury Structure Plan, in particular for aspects such as the future transport grid and infrastructure connections. Please see the attached submission for the full details.

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

Details of amendments: Please see the attached submission.

Submission date: 22 October 2020

Supporting documents
Soco Homes Submission _20201022130222.886.pdf

Attend a hearing

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

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

Declaration

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

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

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

Yes

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

22 Oct 2020

Planning Technician

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Via email: unitaryplan@aucklandcouncil.govt.nz

**Soco Homes Limited Submission on a Publicly Notified Proposal for Private Plan Change
No. 51 (PC51) Drury Precinct to the Auckland Unitary Plan (Notification Date: Friday 27
August 2020)**

Please find attached the Soco Homes Limited's submission on the proposed Private Plan Change No 51 Drury Precinct.

Please contact Isobel Lee on (09) 265 1356, email isobel@topland.co.nz, if you have any questions regarding this submission.

Kind regards,



John Duan

Director

Soco Homes Limited

Form 5

Submission on publicly notified Plan Change
Clause 6 First Schedule, Resource Management Act 1991 (RMA)

To: Celia Davison / Craig Cairncross
Managers – Planning Central and South
Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1142

Submitter: Soco Homes Limited ("**Soco Homes**")
C/O Topland New Zealand Limited
9/42 Ormiston Road, East Tamaki
Auckland 2019

This is a submission by Soco Homes on Private Plan Change No. 51 ("**PC51**") Drury Precinct to the Auckland Unitary Plan.

Introduction

1. Soco Homes is a land development company, which has successfully developed approximately 100 dwellings in Flat Bush and Karaka area over the last 5-10 years.
2. Soco Homes owns the property of 54 Jesmond Road, Drury. Soco Homes will develop this asset and is currently planning residential development, which is estimated to submit a private plan change in late 2021.
3. PC51 seeks to rezone approximately 33.65ha of land in Drury West ("PC51 land") from its existing Future Urban Zoned land to a combination of Business: Town Centre zone, Residential: Terrace Housing and Apartment Buildings zone and Residential: Mixed Housing Urban zone. This is to allow for residential and commercial activities to be supported and facilitated on the land.
4. Soco Homes acknowledges that the rezoning of the land contributes to the vision of the Drury Structure Plan, and the applicant's planning does reflect the context of the high-level of urbanisation growth anticipated for the greater Drury area and will also provide employment opportunities.

5. However, Soco Homes considers that PC51 did not provide careful and broad master planning assessment to the Drury Structure Plan catchment. Particularly,
 - There is significant public funding investment on the land, rail transport and other servicing infrastructure. This is critical for the entire Drury Structure Plan area. PC51 is one of the pioneer developments to be supported and serviced by these public investments. This should also enable the effectiveness and efficiency of these public investments continuing to be connected and servicing the wider area. Any potential conflict for grid connectivity will create significant consequences for the entire Structure Plan area.
 - According to the Drury Structure Plan, there is another 50% of the town centre zone located adjacent to the PC51 area towards the west, PC 51 should consider the broad master planning, and provide an opportunity to avoid any potential isolation or blockage of access and connectivity.
 - Soco Homes is planning to deliver planned, high-density residential units in accordance with the structure plan. The future residents of these units will rely on the living, working, leisure function of the town centre. It is likely that the planned Jesmond Road and Karaka Road upgrade will become a limited access road. As part of the town centre edge residential environment, multi-points, inclusive, safe and convenient access links are critical for future residence in order to utilise the amenities. Any potential isolated, high-density living environment will be a very bad outcome. This should be avoided at the planning stage.
6. Soco Homes seeks that PC51 is not to be approved, unless proper consideration is given to the wider context of the Drury Structure Plan area, including transport grid links and servicing infrastructure connections. Therefore, Auckland Council can achieve, as is required by Section 31 of the Resource Management Act, integrated management of the effects of the use, development or protection of land and associated resources of the locality. 30.1
7. To summarise, the following states the specific concerns regarding PC51:
 - a) Transportation effects;
 - b) Stormwater management and water quality;
 - c) Serving infrastructure routine protection;
 - d) Lack of consultation.
8. These matters are discussed in further detail below.

Scope of submission

9. This submission relates to the whole of PC51.

Reasons for submission

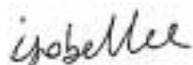
10. It is unsure whether PC51 will or will not:
- Enable the efficient use and development of resources in the area.
 - Achieve integrated management of the effects of the use, development or protection of land and associated resources of the region.
 - Meet the reasonably foreseeable needs of future generations.
 - Enable social, economic and cultural wellbeing.
11. More information required on the road layout and infrastructure connections impact on the surrounding area.
12. Sufficient information has not been provided on how the proposed road layout and infrastructure connections will impact the wider area. It has also been noted that as part of the PC51 application, an urban design document was provided that shows the master planning for the greater Drury area commissioned by KDL. However, the future impact of the proposed road layout and infrastructure connections on the surrounding area remains unclear.
13. The impact of the road layout and infrastructure connections for PC51 is not limited purely to the PC51 land area and will form and contribute to the surrounding road and infrastructure networks in order to provide a sufficiently connected area. Therefore, any new roads and infrastructure connections are considered to impact the greater area and will impact the potential development options for the surrounding area.
14. In order to enable the development of 54 Jesmond Road, to meet the Drury Structure Plan outcome, and to understand how the sites connectivity may be affected, additional information is sought on how the future road layout and infrastructure connections will impact the site. This will create development consequence of all the site along both sides of Jesmond Road (Future Urban zone).

Relief Sought

15. For the reasons stated above, Soco Homes seeks that PC51 to be amended to address the issues outline in this submission, or other relief as may be required to address the matters raised in this submission.

16. Soco Homes wishes to be heard in support of this submission.

Signature: Soco Homes Limited by its authorised agents Topland New Zealand Limited:



Isobel Lee

Date: 21 October 2020

Address for Service: C/O Isobel Lee
Topland New Zealand
Unit 9, Level 1
Laidlaw Business Park
42 Ormiston Road
East Tamaki
Auckland, 2019

Phone: 09 265 1356

**Submission on Private Plan Change 51 (Drury 2 Precinct) to the partly operative
Auckland Unitary Plan**

To: The Chief Executive

Attn: Planning Technician
Auckland Council
Level 24, 135 Albert Street
Private Bag 92300
Auckland 1142
unitaryplan@aucklandcouncil.govt.nz

Introduction:

1. This is a submission on Private Plan Change 51 (Drury 2 Precinct, "PPC 51") to the partly operative Auckland Unitary Plan ("AUP").
2. The submitter could not gain an advantage in trade competition through this submission.
3. The submitter has an interest in PPC 51 as a whole and this submission relates to PPC 51 in its entirety.
4. The submitter owns the property within Drury West.
5. The submitter supports PPC 51 in its entirety and seeks that it be approved as notified.

Reasons for submission:

6. The submitter supports PPC 51 being approved in its current form on the basis that the PPC:
 - (a) Will promote the sustainable management of natural and physical resources, will achieve the purpose of the RMA and is not contrary to Part 2 or any other provisions of the Resource Management Act 1991 ("RMA").
 - (b) Will enable the social, economic and cultural well-being of the community in the Auckland region.
 - (c) Will meet the reasonably foreseeable needs of future generations.
 - (d) Appropriately gives effect or has regard to all applicable higher order planning instruments, including the New Zealand Coastal Policy Statement and the Regional Policy Statement provisions of the AUP.
 - (e) Is not inconsistent with any directive policies or constraints from such higher order planning instruments.
 - (f) Accords with and will assist the Council in carrying out its functions under the RMA, having regard to the efficiency and effectiveness of the PPC 51 provisions relative to other means.



7. Without limiting the generality of the foregoing, the submitter's grounds for supporting PPC 51 are that the PPC:
- (a) Is consistent with and reflects the outcomes sought by the DOSP, which indicates a "Centre" for the Drury West area, in order to service the Drury West residential catchment and generate high value employment opportunities for those residents.
 - (b) Will enable quality outcomes to be achieved for Drury West as a whole in a timely manner, consistent with the time frames indicated for development of the land in the Council's Future Urban Land Supply Strategy.
 - (c) Is necessary to achieve and implement all relevant objectives and policies from the AUP.
 - (d) Is based on and utilises the existing AUP zonings, as sought by the Council.
 - (e) Will enable the most integrated and efficient possible urban form between the PPC 51 area and the existing Drury 1 Precinct.

Relief sought:

8. The submitter seeks that PPC 51 be approved as notified. | 31.1

Hearing:

9. The submitter may wish to be heard in support of its submission.
10. If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature


Name Marmitmor LimitedTitle DirectorDate 22 October 2020

Address

37 Elliott StreetPhone number 021635583e-mail darren@myharveys.co.nz

Auckland Council

Level 24, 135 Albert Street

Private Bag 92300

Auckland 1142

Attn.: Planning Technician

unitaryplan@aucklandcouncil.govt.nz

TO: Auckland Council

SUBMISSION ON: Plan Change 51 (Private): Drury 2 Precinct

FROM: Watercare Services Limited

ADDRESS FOR SERVICE: ilze.gotelli@water.co.nz

DATE: 22 October 2020

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

1. INTRODUCTION

1.1. Watercare's purpose and mission

Watercare Services Limited ("**Watercare**") is New Zealand's largest provider of water and wastewater services. Watercare is a council-controlled organisation under the Local Government Act 2002 and is wholly owned by the Auckland Council ("**Council**").

Watercare provides integrated water and wastewater services to approximately 1.4 million people in Auckland. Watercare collects, treats and distributes drinking water from 11 dams, 26 bores and springs, and four river sources. A total of 330 million litres of water is treated each day at 15 water treatment plants and distributed via 89 reservoirs and 90 pump stations to 450,000 households, hospitals, schools, commercial and industrial properties.

Watercare's water distribution network includes more than 9,000 km of pipes. The wastewater network collects, treats and disposes of wastewater at 18 treatment plants and includes 7,900 km of sewers.

Watercare is required to manage its operations efficiently with a view to keeping overall costs of water supply and wastewater services to its customers (collectively) at minimum levels, consistent with effective conduct of the undertakings and maintenance of long-term integrity of the assets. Watercare must also give effect to relevant aspects of the Council's Long Term Plan, and act consistently with other plans and strategies of the Council, including the Auckland Unitary Plan (Operative in Part) and the Auckland Future Urban Land Supply Strategy.¹

2. SUBMISSION

2.1. General

This is a submission on a change proposed by Karaka and Drury Limited to the Auckland Unitary Plan (Operative in Part) that was publicly notified on 27 August 2020 ("**Plan Change**").

The applicant proposes to rezone 33.65 hectares of land in Drury West in the area generally bounded by Drury Creek to the east, Future Urban zoned land to the west and Karaka Road/State Highway 22 to the south and south east, from Future Urban zone to 15.29 hectares of Business: Town Centre zone, 13.75 hectares of Residential: Terrace Housing and Apartment Buildings zone and 4.61 hectares of Residential: Residential: Mixed Housing Urban zone ("**Plan Change Area**"). The Plan Change also introduces the Drury 2 Precinct to the Auckland Unitary Plan (Operative in Part).

Watercare neither supports nor opposes the Plan Change.

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

2.2. Specific parts of the Plan Change

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

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

Watercare has reviewed the Plan Change and considers that:

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

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

- (b) subject to development occurring in accordance with the proposed staging and infrastructure upgrades described further below:
 - (i) the proposed servicing arrangement is technically feasible; and
 - (ii) any adverse effects of the Plan Change on Watercare's existing and planned water and wastewater infrastructure network will be appropriately managed.

The Plan Change area falls within the area serviced by Veolia Water under a Franchise Agreement with Watercare. Watercare is responsible for constructing, operating, and maintaining bulk water and wastewater infrastructure to service the Veolia Service Area. Under the Franchise Agreement, Watercare owns the local water and wastewater network but Veolia is responsible for operating and maintaining the local network.

2.2.1. Water supply servicing for the Plan Change Area

Currently the Plan Change Area is not serviced by Watercare's water network.

Water supply for the Plan Change Area will require the extension of services from the Drury 1 Precinct.

To enable the development of the Drury 1 Precinct, Karaka and Drury Consultant Limited installed a 450mm diameter local network water main from a new Watercare constructed Bulk Supply Point ("BSP") at Flanagan Road. The 450mm water main runs up Victoria Street and along Bremner Road and will run north through the development, under Drury Creek and up through the Hingaia Peninsula to Park Estate Road. Eventually Watercare will connect the water main to the Hunua 4 water main BSP. This will provide a ring main to ensure security of supply for the Hingaia Peninsula and the Auranga development.

To service the southern portion of the Drury 1 Precinct, the applicant is currently installing the first sections of the ring main to service the area below Bremner Road. This ring main will initially connect to the water main in Bremner Road and extend south to Burberry Road.

The Drury 2 Precinct can be serviced from the southern end of the 400OD ring main down to SH 22. As this will be local network infrastructure, the proposed servicing plan must be agreed with Veolia as the operator under the Franchise Agreement.

All local network, including the water supply ring main, will be required to be provided by the developer at the developer's cost.

Design of all water supply infrastructure, including sizing for future reticulation, will be required to comply with Watercare's Code of Practice for Land Development and Subdivision.

Design and testing for firefighting pressure and provision for fire hydrants within the road reserve will be required to be addressed at resource consent stage.

2.2.2. Wastewater servicing for the Plan Change Area

Currently the Plan Change Area is not serviced by Watercare's wastewater network.

Provision has been made within the Drury 1 Precinct area to cater for future development of the Plan Change Area by construction of an 800mm diameter trunk wastewater sewer and the Bremner Road Pump Station. The Bremner Road Pump Station has been designed to meet a design flow range of 188L/s (or 6000 Dwelling Unit Equivalents).

The trunk sewer from Bremner Road will need to be extended to service the Plan Change Area, i.e. with the portions of trunk sewer labelled as T001 and T002 (in part) on the diagram included in **Appendix A**. These sections of pipe are in the concept development phase and have been included in Watercare's Asset Management Plan for construction in 2028.

The Plan Change Area will be serviced by local network gravity sewers connecting to the trunk wastewater sewer and then to a first stage interim wastewater pump station within the Drury 1 Precinct, located at Bremner Road.

This proposed infrastructure arrangement reflects the outcomes set out in Watercare's Water and Wastewater Servicing Plan, Drury – Opaheke Structure Plan.

Based on discussions held with the applicant, Watercare understands that there is a desire to fast track wastewater servicing to the Plan Change Area before the transmission main is constructed. There is a possibility to connect part of the Plan Change Area to the Drury 1 Precinct southern pump station. If that were to occur, the necessary infrastructure would be required to be fully funded by the developer.

All internal local reticulation will be required to be provided by the developer at the developer's cost.

All wastewater infrastructure, including local reticulation and pump station design, will be required to comply with Watercare's Code of Practice for Land Development and Subdivision.

3. DECISION SOUGHT

Watercare seeks a decision that ensures that the water and wastewater capacity and servicing requirements of the Plan Change will be adequately met, such that the water and wastewater related effects are appropriately managed.

To enable that decision to be made, Watercare requests the following amendments to the proposed Drury 2 Precinct provisions:

- (a) Amend Policy 5 (Infrastructure) as follows:
 - (5) Require subdivision and development to:
 - (a) Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including water, wastewater and transport upgrades;
 - (b) Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections;

32.1

(c) Be managed so that it does not adversely affect the safe and efficient operation or capacity of the existing or planned transport, water or wastewater networks; and

32.1

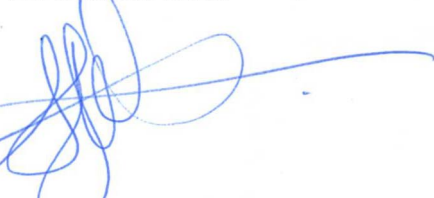
(d) Promote and develop connections to the future planned public transport facilities.

(b) Such other alternative or consequential relief as required to give effect to the matters raised in this submission.

4. HEARING

Watercare wishes to be heard in support of its submission.

22 October 2020

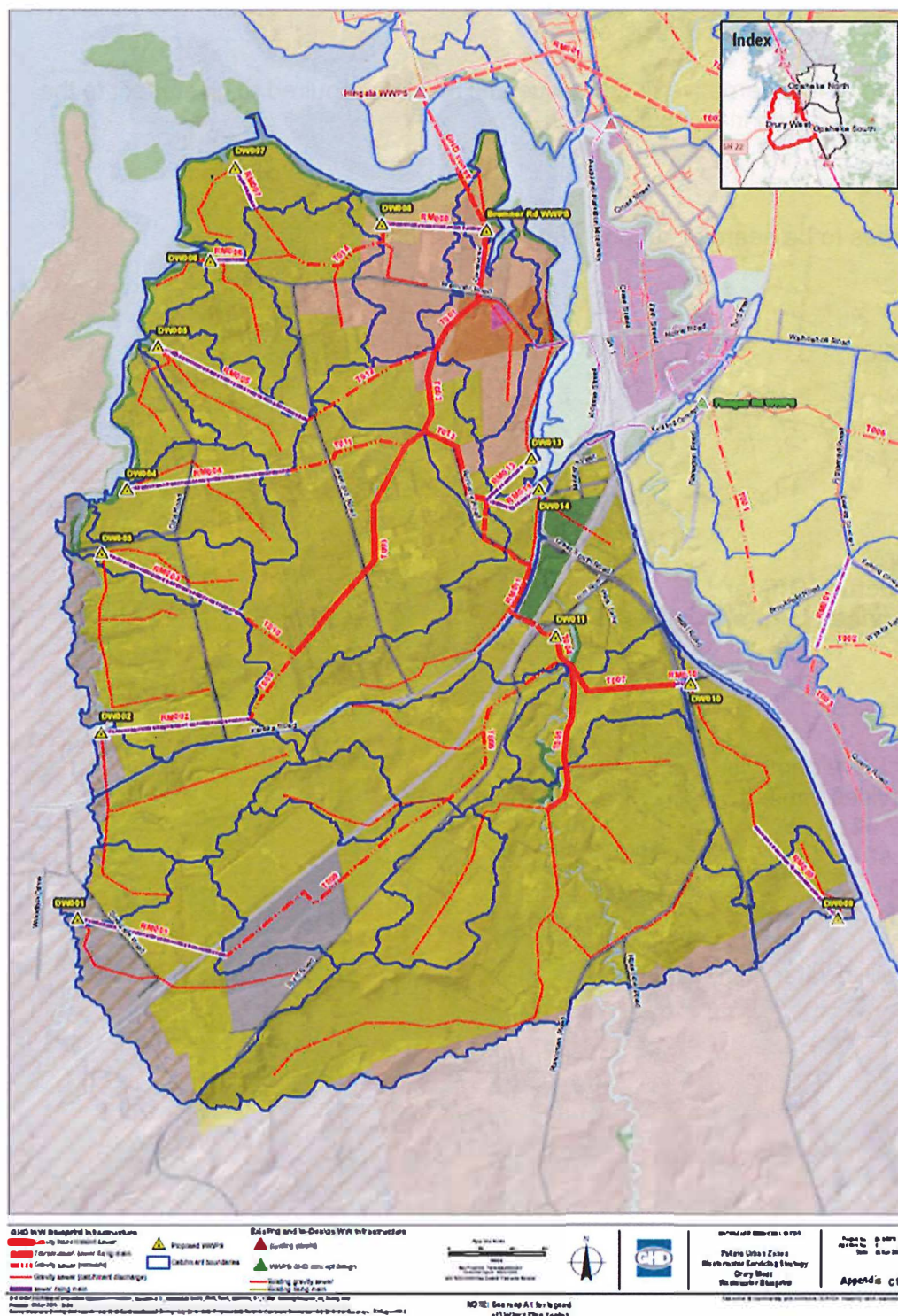


Steve Webster
Chief Infrastructure Officer
Watercare Services Limited

Address for Service:
Ilze Gotelli
Head of Major Developments
Watercare Services Limited
Private Bag 92 521
Wellesley Street
Auckland 1141
Phone: 021 831 470

Email: ilze.gotelli@water.co.nz

Appendix A: Drury West Wastewater Servicing Plan





SUBMISSION ON PLAN CHANGE 51 (PRIVATE): DRURY 2 PRECINCT

To: Auckland Council

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

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 51: Drury 2 Precinct (**PPC51**) by Karaka and Drury Limited (**applicant**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. PPC51 seeks to rezone 33.65 hectares of land in Drury West from Future Urban Zoned land to a mixture of Business: Town Centre zone, Residential: Terrace Housing and Apartment Buildings zone and Residential: Mixed Housing Urban zone. PPC51 also seeks to introduce a new precinct to the AUP which would see an expansion of urban development that is planned in the Drury 1 precinct.
3. The Submitter could not gain an advantage in trade competition through this submission.
4. This submission relates to the entire PPC51.
5. The Submitter's key interests are to ensure the protection, preservation and appropriate management of natural and cultural resources in a manner that recognises and provides for Mana Whenua interests and values and enables positive environmental, social and economic outcomes.
6. The Submitter **opposes** PPC51 on the basis that:
 - (a) There has, thus far, been no meaningful engagement with Mana Whenua on PPC51;
 - (b) Instead, the applicant attempts to rely on consultation with Mana Whenua that took place as part of the proposed Drury-Opāheke Structure Plan, and the submission that was prepared by Ngāti Te Ata and Ngāti Tamaho as part of that process;
 - (c) As a result, Mana Whenua have not had the opportunity to provide input into the design and detail of the proposal to ensure that their values are reflected in PPC51, and that adverse environmental, social and cultural effects are avoided, remedied or mitigated; and
 - (d) The Submitter considers that PPC51 will result in adverse cultural, social and environmental effects.

SUBMISSION

General

7. The Submitter considers that PPC51 is inconsistent with Part 2 of the RMA, including:

AUCKLAND: Level 27, Lumley Centre, 88 Shortland Street, Private Bag 92518, Auckland 1141, New Zealand. T+64 9 358 2222

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

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

www.simpsongrierson.com

- (a) The purpose of the RMA to promote the sustainable management of natural and physical resources, including by safeguarding the life-supporting capacity of air, water, soil and ecosystems;
 - (b) Section 6(a) the preservation of the natural character of the coastal environment, wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development;
 - (c) Section 6(e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other Taonga;
 - (d) Section 6(f) the protection of historic heritage from inappropriate subdivision, use and development;
 - (e) Section 6(g) the protection of protected customary rights;
 - (f) Section 7(a) which requires all persons exercising functions and powers under the RMA to have particular regard to kaitiakitanga; and
 - (g) Section 8 which requires all persons exercising functions and powers under the RMA to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
8. It is vital for the people of Ngāti Te Ata Waiohū that the mana of the land subject to PPC51 is upheld, acknowledged and respected and that their people have rangatiratanga (opportunity to participate and be involved in decision making) over their ancestral land and Taonga. In addition, the people of Ngāti Te Ata Waiohū (alongside other iwi also holding Mana Whenua in the area) have responsibility as kaitiaki to fulfil their obligation and responsibilities to the environment in accordance with customs passed down, and to be accountable to the people (current and future generations) in these roles as custodians.

Consultation

9. The Submitter considers that consultation undertaken by the applicant with Mana Whenua has been insufficient and disingenuous.
10. In response to a request from the Council for further information, the applicant states that they are under no obligation to consult with iwi. The applicant refers to hui that took place as part of the Drury-Opāheke Structure Plan process, and have attached a copy of a submission that Ngāti Tamaoho and Ngāti Te Ata prepared on the Drury Opāheke Structure Plan.
11. The Submitter co-authored the submission on the structure plan providing high level support for the location of a town centre in Drury West. The Submitter **does not accept** that this submission provides support for PPC51, or that it demonstrates meaningful consultation has taken place with Mana Whenua. We note the following in this regard:
- (a) The applicant has made no effort to continue a dialogue or partnership with Mana Whenua since Ngāti Te Ata signed the submission on 2 May 2019. Ngāti Te Ata consider that that applicant essentially considered that it “had what it needed” after we had signed the submission, and from then on all consultation ceased. The applicant has made no effort to consult with us since May 2019.

- (b) The Submitter signed the submission on the basis of good faith. Ngāti Te Ata took the applicant on his word that he would partner with Mana Whenua as the development progressed to a greater level of detail and planning. Unfortunately for Mana Whenua, this has not eventuated.
- (c) The submission and previous hui that took place between Mana Whenua and the applicant relate to the Drury-Opāheke Structure Plan. They do not relate to PPC51. There is unavoidably a much greater level of detail needed in a plan change application than a structure plan. This is precisely why the Council undertakes the rezoning in a two-step process. The submission therefore does not (and cannot) give support to PPC51.
- (d) Many of the concerns and issues that Ngati Te Ata raised with the applicant at the hui have not made their way into the PPC51 documentation and the detailed plans of the Drury 2 Precinct.

Adverse Cultural, Social and Environmental Effects

12. The Submitters are concerned that PPC51 will result in adverse environmental and cultural effects, as it is currently proposed by the applicant. Specifically:
- (a) Wai (Water): PPC51 does not give effect to Te Mana o te Wai and risks damaging the mauri of wai within the project area. This includes through PPC51's proposed treatment of waterways and its proposed stormwater and wastewater solutions. 33.6, 33.7, 33.8, 33.9
 - (b) Sustainable Management: The Submitter considers that PPC51 should in some, if not most ways, be self reliant and self sustainable. Sustainable management has not been adequately given effect to in PPC51. 33.12
 - (c) Native Trees and Plants: The Submitter supports whakapapa sourced trees and plants within the PPC51 site. 33.10
 - (d) Te Aranga Design Principles: These principles have been developed by Auckland Council and Tamaki Makaurau iwi over a number of projects. The principles include mana (treaty based relationships), whakapapa (naming), tohu (acknowledgement of wider cultural landscape), taiao (bringing natural landscape elements into urban environments), mauri tu (environmental health of the site including wai and whenua), mahi toi (inscribing Māori narratives into architecture and design), and ahi ka (living presences for iwi and hapu to undertake their kaitiaki roles). Te Aranga Design Principles have not been incorporated into PPC51. 33.3
 - (e) Landscapes: The Submitter seeks that PPC51 identifies and preserves landscapes, including view shafts, hilltops, tuff rings and ridge lines. 33.5

RELIEF

13. The Submitter requests a decision on PPC51 that confirms the following, at a minimum:
- (a) Ongoing participation, consultation and engagement in the project moving forward; 33.1
 - (b) Acknowledgement within the project design of the history of Mana Whenua in the PPC51 area; 33.2

- (c) Te Aranga Principles incorporated in design concepts; | 33.3
 - (d) Iwi monitoring; | 33.4
 - (e) Natural and cultural landscaping accounted for in the project design; | 33.5
 - (f) A minimum of 20 metre riparian margin for all waterways especially those to contain walkways / cycleways; | 33.6
 - (g) A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway; | 33.7
 - (h) Roof capture for reuse and groundwater recharge; | 33.8
 - (i) Park edge design adjacent to all waterways; | 33.9
 - (j) Native trees and plants only within the precinct; | 33.10
 - (k) Ridgelines hilltops and wetlands protected; and | 33.11
 - (l) Sustainable development reflected in the design and outcomes. | 33.12
14. The Submitter seeks the following decision from Auckland Council:
- (a) **Reject PPC51** unless the issues addressed in this submission can be adequately addressed.
15. The Submitter wishes to be heard in support of their submission.
16. The Submitter would consider presenting a joint case if others make similar submissions.

22 October 2020



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

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**Submission on a notified proposal for Private Plan Change 51 – Drury 2 Precinct under
Clause 6 of Schedule 1
Resource Management Act 1991**

22 October 2020

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

mail: unitaryplan@aucklandcouncil.govt.nz

Name of submitter: Ministry of Housing and Urban Development (HUD)

This is a submission on Private Plan Change 51 (**Plan Change**) to the Auckland Unitary Plan (operative in Part).

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

HUD's role and responsibilities

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

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

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

Wider Context

Auckland Housing and Urban Growth Programme

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

Drury is currently the largest urban development area in New Zealand, and its strategic location within the Hamilton-Auckland Corridor makes its successful development a matter of national importance. HUD wishes to ensure that all plan changes in Drury-Opāheke appropriately reflect the area's national and regional significance and its status as a joint priority development area for both the Government and Council.

The National Policy Statement on Urban Development

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

To implement the NPS-UD, local authorities must comply with specific policies within specified timeframes including changes to regional policy statements and district plans. Policy three and Subpart six of the NPS-UD directs Tier 1 local authorities to enable intensification. HUD has a co-lead role with the Ministry for the Environment in overseeing its successful national implementation and wishes to ensure that all plan changes in Drury-Opāheke (and elsewhere) appropriately implement the NPS-UD.

Transit-orientated development

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

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

Drury-Opāheke Structure Plan

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

NZ Upgrade Programme

The Government's NZ Upgrade Programme has allocated significant funding towards the extension and enhancement of bulk transport networks in and around the Drury-Opāheke area. Given the above context the most essential element of the programme (from an urban

development perspective) is the extension of Auckland rapid transit network from Papakura to Pukekohe, including new stations at Drury Central and Drury West.

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

Auckland Future Urban Land Supply Strategy

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

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

Scope of Submission

The submission relates to the Plan Change in its entirety.

The Submission is:

HUD **opposes** the plan change **in part**, which seeks to rezone land within the spatial extent of the Proposed Drury 2 Precinct ("**the Proposed Precinct**" or "**Precinct**") from Future Urban Zone ("**FUZ**") to a combination of Residential – Terrace Housing and Apartment Buildings Zone ("**THAB**"), Residential – Mixed Housing Urban Zone ("**MHU**") and Business – Town Centre Zone ("**TCZ**"). This is subject to HUD's relief being granted and matters raised in its submission being addressed.

HUD in principle supports the proposed rezoning to a mixture of residential and business centre zoning within the context of the Structure Plan and the NZ Upgrade Programme. However, HUD opposes the scale of activity proposed as it is over and above what was anticipated in the Structure Plan. The Plan Change furthermore assumes a future station location which is well to the east of what may be confirmed at the final location.

Taken together, the likely increased distance from the future station and the increased proposed scale of activity places at risk the achievement of a well-functioning future urban environment in Drury West, and in particular the need for highly transit-orientated development.

HUD therefore seeks several amendments to the Plan Change which are set out in further detail in Table 1 below.

Relief Sought

HUD seeks the following decision from Auckland Council on the Plan Change:

- That the matters raised in Table 1 be addressed to provide for the sustainable management of the Region's natural and physical resources and thereby achieve the purpose of the Resource Management Act 1991 ("**the Act**" or "**RMA**").
- Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.

In the absence of the relief sought, the Plan Change:

- is contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;
- will undermine the aim and spatial framework of the Drury-Opāheke Structure Plan for all intensive urban development at scale to be located within proximity of the future stations.
- will undermine the value of the NZ Upgrade Programme investment in the new railway stations; and
- will in these circumstances impact significantly and adversely on the ability of people and communities to support their social, economic, and cultural wellbeing.

Hearings

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

Signature of person authorized to sign on behalf of Submitter:



Brad Ward

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

Address for Service of person making submission:

Ministry of Housing and Urban Development

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Table 1: Requested Plan Change amendments

Provision Number	Reason for Submission	Relief Sought Base text is PC51 as notified, changes accepted. New text <u>underline</u> . Deleted text strike through	
Scale of the proposed activity			
Whole Plan Change (including Precinct Plan)	The proposed <i>Business – Town Centre Zone</i> is considered of a scale and intensity inappropriate to this area and is inconsistent with the transit-orientated framework of the Drury-Opāheke Structure Plan. It is critical that intensive and large-scale land uses are placed near the future railway stations, and the future station may now be some distance from the Plan Change Precinct.	Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opāheke Structure Plan.	34.1
Whole Plan Change (including Precinct Plans)	The Structure Plan did not anticipate a Town Centre in this location, and reference should instead be to 'Local Centre throughout the entire plan change precinct description and subsequent provisions.	Replace all references to "Town Centre" with 'Local Centre' Replace all references to Business – Town Centre Zone with Business – Local Centre Zone	34.2
Height Variation Control Plan	HUD considers that the intensity of the commercial centre needs to be lowered from what is sought in the plan change. Reducing the permitted height limit is part of this. Six storeys is recommended as this is the minimum required under the NPS-UD around a rapid transit stop. Enabling six storeys means that it will not have to be revisited for compliance with the NPS-UD if the centre is the walkable distance of the finalised station location.	Reduce the height variation control from 27m to 19.5m.	34.3
IX.3 Policies 1 & 2	Policies 1 and 2a need to be amended to reflect a lower intensity of commercial development than sought by the Plan Change.	Amend as follows: (1)(b) [second (b)] <i>Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity</i>	34.4
IX.4 Precinct Rules (new rule)	HUD holds significant concerns about the potential for large format (big box) retail developing in this area, which would be contrary to the desire for highly transit-orientated development. This type of retail activity could furthermore undermine the future role of SH22 as an attractive, public, and active transport focused urban arterial.	Add a new Activity to Table IX.4.1 as follows: (A8) Retail greater than 450m ² gross floor area per tenancy – Discretionary Activity.	34.5

Precinct plan	The Structure Plan specifies that SH22 through Drury West should over time be transformed to an attractive urban arterial. However, in the interim will continue to function as a rural highway. The risk is that development within the Precinct in the short and medium term will suit the current rather than the future function and form of the road. Accesses and intersection will need to be designed with consideration to both the current and future form and function of State Highway 22.	That amended detailed traffic and urban design assessments are completed, which include analysis of trip generation from the proposed centre, and assessments of how each proposed access/intersection fits with: <ul style="list-style-type: none"> the current and future urban arterial form and function of State Highway 22 and; the bulk and location that would support a well-functioning urban arterial. 	34.6
Likely increased distance from railway station			
Whole Plan Change (including Precinct Plans and supporting documents)	The Plan Change and supporting documents are drafted on the assumption that the proposed Drury West train station is located to the immediate south of the Plan Change area (south of State Highway 22). This location is not yet confirmed, and HUD understands that the preferred option is now further west than what has been considered as part of the Plan Change. This change will impact the scale and nature of effects associated with this Plan Change, and many of the technical assessments (for example the Integrated Traffic Assessment) should be updated to reflect this change.	Update all supporting technical documents to consider the current preferred option for the Drury West train station, including that west of Jesmond Road. Update provisions based on updated assessments if required.	34.7
Related matters			
IX.2 Policy 5 (a)	The policy as notified is vague in specifying what 'transport upgrades' are being referred to, as well as directive in implying that 'upgrades' will be needed. Temporary infrastructure-related effects can often be mitigated through network optimisation and other service level adjustments that are not typically considered to be 'upgrades'. Such effects-based measures ensure that developers do not face unreasonable development constraints and/or delays. As Standard IX.6.2 requires transport upgrades to occur, the policy should be amended to reflect this.	Amend as follows: <i>"Be sequenced to occur concurrently with and not precede required infrastructure provision, including transport upgrades within <u>Standard IX.6.2 necessary to support development within the precinct</u>;"</i>	34.8
IX.2 Policy 5 (b)	The policy predetermines that upgrades to existing roads will be required. Whether such upgrades are in fact required should be effects-based, taking into consideration the upgrades specifically identified within the precinct.	Amend as follows: <i>"Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections.</i>	34.9

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

A N D

IN THE MATTER of a submission under clause
6 of the First Schedule to the
RMA on Plan Change 51 –
Drury 2 Precinct

SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 51 – DRURY 2 PRECINCT (PC 51)

To: Auckland Council

Name of Submitter: **Auckland Council**

Address: 35 Albert Street
Private Bag 92300
Auckland 1142

Introduction

1. This is a submission on the following proposed private plan change by Karaka and Drury Limited ("**KDL**"):

Plan Change 51 – Drury 2 Precinct ("**PC 51**")
2. Auckland Council could not gain an advantage in trade competition through this submission.
3. This submission relates to PC 51 in its entirety and all provisions of PC 51 including:
 - a. the IX Drury 2 Precinct
 - b. the Auckland Unitary Plan Maps.
4. PC 51 has been notified contemporaneously with three other proposed private plan changes, Plan Change 48 (Drury Centre Precinct) by Kiwi Property No.2 Ltd, Plan Change 49 (Drury East Precinct) by Fulton Hogan Land Development Ltd and Plan Change 50 (Waihoehoe Precinct) by Oyster Capital Limited (together with PC 51 "**the Drury Plan Changes**"). Auckland Council has also made submissions on these plan changes.

GENERAL REASONS FOR THE SUBMISSION

5. Future urban areas, such as the PC 51 land, play a critical role in Auckland's future growth. Auckland Council supports the future urbanisation of the land subject to the Drury Plan Changes, acknowledges the commitment made by the Government to the Drury area through the New Zealand Upgrade Programme, and is working with the Drury Plan Change applicants,

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

6. However, at this point in time, Auckland Council has significant concerns with the PC 51 in its entirety as it:
 - a. does not promote sustainable management of resources, will not achieve the purpose of the RMA, and is therefore inconsistent with Part 2 of the RMA;
 - b. does not manage or enable the efficient and integrated use, development and protection of natural and physical resources;
 - c. does not avoid, remedy or mitigate adverse effects;
 - d. is inconsistent with, or fails to give effect to, provisions of relevant planning instruments;
 - e. does not meet the requirements of section 32 of the RMA; and
 - f. does not meet the requirements of section 75 of the RMA.

SPECIFIC REASONS FOR THE SUBMISSION

7. In particular, but without limiting the generality of the above, Auckland Council has significant concerns with PC 51 in its entirety for the reasons stated below.

PC 51 fails to integrate infrastructure planning / funding with land use

8. A key concern for the Auckland Council is that PC 51 does not provide for the strategic integration of infrastructure (transport, three waters, and community infrastructure), and the planning and funding of such infrastructure, with land use. The provision of such infrastructure works – which are of course physical resources in terms of the RMA – will not be achieved at a rate with which the council (representing the community) can physically and economically cope. This concern is exacerbated by the combined infrastructure requirements of the Drury Plan Changes.
9. The council acknowledges the funding for Drury transport infrastructure made available by the Government through the New Zealand Upgrade Programme. However, there remains a significant infrastructure funding shortfall. In short, PC 51 is reliant on major infrastructure projects to service development which are not financed or funded (both capital and operating costs). At this point in time, there is no certainty as to the timing of delivery of these projects. PC 51 would thus enable urban development which will not be serviced by adequate infrastructure and would fail to ensure a quality built and transit-orientated environment.
10. Matters concerning the funding and timing of infrastructure are directly relevant to decisions on zoning, and it is poor resource management practice and contrary to the purpose of the RMA to zone land for an activity when the infrastructure necessary to allow that activity to occur without adverse effects on the environment does not exist, or there is a high degree of uncertainty as to whether that infrastructure will be provided in a timely and efficient way.¹ Discussions between the council, the applicant, other landowners in the Drury area and the Government on this fundamental issue are ongoing, and the council is hopeful that a solution to the infrastructure funding and financing issues can be found. However, at this stage such a solution is not in place.

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

PC 51 is inconsistent with relevant planning instruments

11. Until an infrastructure funding and financing solution is found, PC 51 is inconsistent with, and fails to give effect to, relevant RMA and council strategic planning instruments, including:
- a. the National Policy Statement on Urban Development 2020 (**NPS-UD**);
 - b. Regional Policy Statement (**RPS**) provisions of the Auckland Unitary Plan (**AUP**);
 - c. the Auckland Plan 2050 (**Auckland Plan**);
 - d. the Long Term Plan 2018-2028 (**LTP**); and
 - e. the Regional Land Transport Plan 2018-2028 (**RLTP**).

NPS-UD

12. PC 51 is inconsistent with, and fails to give effect to, Objective 6 of the NPS-UD which requires local authority decisions on urban development that affect urban environments to be *“Integrated with infrastructure planning and funding decisions”*.

AUP RPS

13. PC 51 is inconsistent with, and fails to give effect to, relevant provisions of the AUP RPS. This includes the following provisions of Chapter B2 – Urban Growth and Form, which require the integration of infrastructure provision with urbanisation on a timely and efficient basis:
- a. B2.2.1 Objective (1)(c): *“A quality compact urban form that enables ... (c) better use of existing infrastructure and efficient provision of new infrastructure”*;
 - b. B2.2.1 Objective (5): *“The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure”*;
 - c. B2.2.2. Policy 7(c), which requires rezoning of land within the Rural Urban Boundary to: *“integrate with the provision of infrastructure”*;
 - d. B2.4.2 Policy (6) in relation to urban intensification: *“Ensure development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as residential intensification”*;
 - e. B2.9. Explanation and Principal Reasons for Adoption, states:

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

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

[Emphasis added]

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

Auckland Plan

16. PC 51 is inconsistent with relevant provisions of the Auckland Plan, such as Our Development Strategy - Auckland’s Infrastructure, Coordinating investment and planning to enable growth:²

Ensuring that infrastructure networks have sufficient capacity to service growth is critical. The sequencing of future urban and development areas influences the timing of investment in the strategic networks needed to service these areas. Further investment in local infrastructure will be needed as these areas grow. This will require alignment between the expansion of strategic water and transport networks, and investment in local infrastructure, particularly to service development areas and future urban areas.

17. The Auckland Plan 2050: Development Strategy details the sequencing and timing of future urban land for development readiness. This recognises that sound resource management practice requires advanced planning and sequencing to ensure co-ordination between infrastructure providers and land release. The Opāheke Drury area is sequenced for development in from 2022. PC 51 is therefore 2 years early and out of step with the Development Strategy sequencing. It is therefore critical that a comprehensive infrastructure funding and financing solution is found before the PC 51 land is rezoned.

LTP

18. PC 51 is inconsistent with Council’s LTP. The LTP budgets for Council expenditure, including infrastructure investment, for the next 10 years through to 2028. The infrastructure required to service the development proposed by PC 51 is not budgeted for in the LTP.

RLTP

19. The RLTP is a 10-year investment programme for transport in Auckland, developed by Auckland Transport (AT) together with Waka Kotahi New Zealand Transport Agency (NZTA) and KiwiRail to respond to growth and challenges facing Auckland over the next decade. The infrastructure required to service the development proposed by PC 51 is not included in the RLTP.

² Auckland Plan, Our Development Strategy - Auckland’s Infrastructure, Coordinating investment and planning to enable growth, at page 238.

Effects of failure to integrate infrastructure and land use

20. The effects of the failure of PC 51 (and the Drury Plan Changes) to integrate with infrastructure provision are a strategic and whole of Auckland issue. Unless the infrastructure funding shortfall is resolved, supporting PC 51 would require infrastructure funding be removed / re-allocated from other parts of Auckland.
21. Auckland is highly constrained in its ability to finance and fund infrastructure across the region to support growth. With limited funding ability, scarce funding must be utilised in the most efficient way to enable region wide growth. Strategically, there is a need to open up land for development in a co-ordinated and joined up fashion when capacity is needed across Auckland, and where infrastructure delivery and funding is integrated.
22. At this point in time, PC 51 and the Drury Plan Changes are not consistent with the coordinated and integrated approach to infrastructure provision to support urban growth set out in the Auckland Plan, LTP and RLTP. As such, they will have major funding implications for infrastructure providers, will affect their ability to co-ordinate delivery and are likely to have major implications for the ability to service other areas. This in turn will undermine the ability to deliver infrastructure to support development capacity in other growth areas of Auckland.

Further specific reasons

23. Without derogating from the generality of the above and the submitter's opposition to PC 51, further specific reasons for this submission (and alternative relief) are set out in the **Schedule** to this submission.

RELIEF SOUGHT

24. Auckland Council seeks the following relief:
 - a. Auckland Council is engaged in discussions with KDL and the other Drury Plan Change developers in a concerted effort to find a solution to its concerns. However, at this point in time the fundamental issues raised in this submission remain unresolved. Accordingly, as matters stand, the primary relief sought by Auckland Council is to decline PC 51 in its entirety until there is a fully funded and appropriately staged solution for the integration of land use, infrastructure and development for the Precinct and Sub Region; or
 - b. In the alternative to the primary relief of declining PC 51, amend PC 51 and retain provisions as set out in the **Schedule** to this submission; and
 - c. Such further, other, or consequential relief, including in relation to PC 51's objectives, policies, rules, methods, and maps, that reflects or responds to the reasons for this submission.

35.1

Conclusion

25. Auckland Council wishes to be heard in support of its submission.
26. If others make a similar submission Auckland Council would be prepared to consider presenting a joint case with them at any hearing.

DATED 22nd October 2020

On behalf of Auckland Council:

Councillor Chris Darby, Chairperson of the Planning Committee



Councillor Josephine Bartley, Deputy Chairperson of the Planning Committee



Councillor Desley Simpson, Chairperson of the Finance and Performance Committee



Tau Henare, Independent Māori Statutory Board member



Signatures of persons authorised to sign on behalf of submitter

SCHEDULE – FURTHER SPECIFIC REASONS FOR THE SUBMISSION AND ALTERNATIVE RELIEFInfrastructure funding and timing

Row	Specific Reasons for the Submission	Relief Sought
1.	<p>PC 51 is reliant on major infrastructure projects to ensure the area can be developed. However, there is no clear indication of how the infrastructure would be financed and funded.</p> <p>There is a substantive amount of unfunded infrastructure required to service the anticipated development in the Drury Future Urban Zone Land. A lack of Auckland Council funding for infrastructure means that it is unlikely that the infrastructure (except for Government NZUP funded projects) required to support the development will be available when required. In the short term there is not adequate infrastructure to support the development and in the medium term the necessary infrastructure to support the development is not funded through the LTP or RLTP. Council is reviewing the Long-Term Plan which includes the 10-year budget. It is too early to predict any change to infrastructure funding.</p> <p>Sections of the existing transport network are heavily congested and cannot convey more traffic until upgraded, without causing high travel time delay, costs and safety risks.</p> <p>Even where proposed infrastructure is funded, it will take years to permit, design and construct.</p> <p>The location of some key transport infrastructure is still to be determined and is subject to notice of requirement</p>	<p>Ensure that the council's concerns about bulk infrastructure: funding deficit, timing and location uncertainty are resolved by the following or other means:</p> <ol style="list-style-type: none"> Evidence is presented at the hearing that a mechanism has been identified with the agreement of the council that unfunded infrastructure (as of October 2020) will be funded. Evidence is presented at the hearing that parts of the plan change area are not constrained by infrastructure funding, timing or location uncertainty and can proceed without significant adverse effects. Infrastructure development threshold or staging rules can be devised that are enforceable and effective, and supported by robust objective and policy provisions. This could for example include: <ul style="list-style-type: none"> Threshold rules are not used for infrastructure works to be supplied by third party, e.g. Auckland Transport or NZTA, if these agencies do not have funds allocated for the works. Threshold rules are not used for infrastructure works which are scheduled beyond the lifetime of the plan (2026). Threshold rules are not used for works to be funded privately but there is no funding agreement in place. Threshold rules are not used for works which would require a funding contribution from multiple landowners or

35.2

	<p>processes that are still to be initiated. This affects the ability to determine appropriate land uses and zoning.</p> <p>The proposed infrastructure threshold and staging rules are not adequate to address the issue.</p> <p>There is no co-ordinated plan to stage development and infrastructure.</p>	<p>developers and there is no agreement to apportion costs and benefits in place.</p> <ul style="list-style-type: none"> Threshold rules do not use gross floor area as a metric (the council may not be able to track this with current data systems). Use of prohibited activity status for infringement could be considered. <p>d. Notices of requirement have been lodged for the relevant infrastructure by the time of the hearing.</p>		35.2
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Stormwater, water quality streams, flooding and biodiversity

Row	Specific Reasons for the Submission	Relief Sought	
2.	The precinct is not fully consistent with the objectives and policies of the National Policy Statement for Freshwater Management 2020 (NPS-FM).	Include more policies and rules to give full effect to the direction the NPS-FM, including but not limited to Te mana o te wai.	35.3
3.	An amendment is requested to Objective IX.2(5) to better reflect the policy direction in AUP E1 for greenfield developments to avoid adverse effects as far as practicable or otherwise remedy or mitigate effects. It would also better reflect the hierarchy of principles for freshwater management in the NPS-FM to place the health of streams and wetlands as the first priority ahead of other uses and values.	Amend Objective IX.2(5) to read: Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to <u>avoid or otherwise</u> mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.	35.4
4.	Stormwater management area flow 1 (SMAF 1) as proposed in PC 51, is a control which provides a framework for hydrology mitigation where there will be discharges into a stream environment. SMAF 1 has both a retention and detention volume and the combination of these is intended to reduce erosive flows in streams, maintain stream baseflow and support the recharge of aquifers. It is the default minimum required under the region wide Network Discharge Consent (NDC) granted by the Environment Court on 30 October 2019 and based on current knowledge is the most practicable option in most catchments. However, the Drury 2 southern sub-catchment discharges to the Ngakoroa Stream at a point which is still tidally influenced (though not identified as CMA on AUP maps). Consequently, application of SMAF 1 over the entire	1. Retain application of SMAF 1 to the entire plan change area, or 2. Retain SMAF 1 but allow additional precinct provisions that exempt parts of the southern sub-catchment where the discharge is to the Ngakoroa Stream estuary, or 3. Mark on the precinct plan where the SMAF 1 control applies, or 4. Remove SMAF 1 and have a rule framework for determining hydrology mitigation, similar to that in the Drury 1 precinct.	35.5

	<p>precinct may not be the most efficient or effective option. Consequently, other options should be considered further. These are summarised below.</p> <ol style="list-style-type: none"> 1) Option 1 is consistent with other Drury east plan changes and is the simplest overall. However, it would require hydraulic mitigation in sub-catchments where this is not effective and would contribute to unnecessary additional stormwater devices. 2) Option 2 would allow customised precinct provisions for the southern sub-catchment, but these would require drafting. 3) Option 3 achieves a similar effect, but it may not be possible to map where SMAF 1 should not apply because bulk works shape sites and drainage and may result in different discharge points to the stream. 4) Option 4 allows for a more customised approach to suit the characteristics of the sub-catchment. 		
5.	Policy IX.3 (6)(a) is supported but this needs to be supported by rules in the precinct so that the policy applies for all subdivision and development activities.	<p>Retain policy IX.3(6)(a) and amend IX.6.1 Compliance with Drury X Precinct Plan to read:</p> <p>(1) Activities <u>and subdivision</u> must comply with the Drury X Precinct Plan.</p>	35.6
6.	It is important to focus on enhancing biodiversity as distinct from just enhancement planting.	<p>Amend policy IX.3 (6)(b) as follows:</p> <p>Incorporate <u>biodiversity</u> enhancement planting of riparian margins of streams (including the Ngakoroa Stream) and the lake feature.</p>	35.7

7.	Stormwater Management Plans (SMP(s)) identify effects of stormwater and how effects should be managed both to achieve the RPS, NPS-FM and regional plan and to be in accordance with the region wide NDC. Without an SMP approved by the Network Utility Operator there is uncertainty if the SMP adequately manages effects and if there are sufficient provisions to enact the direction that the SMP would provide.	Amend precinct to include additional policies and rules to manage the effects of stormwater as described in an approved SMP.	35.8
8.	<p>New policies are requested to protect the receiving environment of the Te-Manukanuka-O-Hoturoa (Manukau Harbour).</p> <p>Additional policies are required to achieve the stormwater outcomes that are outlined in the SMP and required by the AUP. Some Auckland-wide rules adequately address some aspects of stormwater management (such as SMAF) but there are significant gaps particularly with regard to water quality.</p> <p>These policies guide resource consent processing.</p>	<p>Insert new policies to the following effect:</p> <p><u>Ensure that all impervious services are treated through a treatment train approach to enhance water quality and protect the health of stream and marine environments.</u></p> <p><u>Require on-site management, or for higher density development private communal management of stormwater runoff from impervious areas.</u></p> <p><u>Reduce contaminants at source through the use of inert building materials and treatment at source where possible.</u></p> <p><u>Provide hydrology mitigation through retention, near source or communal detention to manage effects on streams.</u></p> <p><u>Ensure the effective operation of private at source devices over time by providing for their management such as through consent notices on titles.</u></p> <p><u>Ensure adequate infrastructure downstream of the precinct to convey runoff from additional impervious area and to manage flood effects.</u></p>	35.9
9.	Unlike PC 48 – PC 50, no stormwater quality standard is proposed in PC 51. A standard for stormwater quality treatment is proposed to protect the upper Te-	Include a new standard to provide for stormwater quality treatment.	35.10

	<p>Manukanuka-O-Hoturoa (Manukau Harbour) from contaminant accumulation from the combined contaminant discharges from all impervious surfaces including roads. This gives effect to the RPS B7.3 objectives and policies relating to freshwater systems, RPS B7.4 objectives and policies relating to coastal water and freshwater, the NPS-FM and the New Zealand Coastal Policy Statement 2010. The council would like to work with the applicant and other interested parties on the detail of the standard.</p>	
10.	<p>The receiving environments downstream of the plan change sites are highly sensitive to additional contaminants and are Significant Ecological Areas (SEAs). The NPS-FM requires that the health of freshwater receiving environments is prioritised above other uses and needs. This and other existing AUP objectives and policies direct that freshwater quality is maintained where it is good and enhanced where degraded. The existing provisions do not go far enough to achieve this.</p> <p>The SMP notes a mix of methods will be used including treatment of roads and use of inert building materials.</p> <p>A new standard relating to the exterior materials on buildings is requested.</p>	<p>Include a new standard to the effect that:</p> <p><u>Buildings cannot have exterior materials with exposed surfaces that are made from contaminants of concern to water quality including zinc, copper and lead.</u></p>
11.	<p>The council has found that maintenance and enhancement of permanent and intermittent streams is more likely to be achieved on development if indicative permanent and intermittent streams are shown on precinct plans. The Drury 1 precinct is an example of this practice. This helps to implement the RPS B7.3 and 7.4 and other regional provisions of the AUP. These streams can easily be mapped from the information in the applicant's technical</p>	<p>Include indicative permanent and intermittent streams and wetlands on the precinct plan.</p>

35.11

35.12

	reports, or alternatively, the water assessment technical reports prepared for the Drury – Opāheke Structure Plan.		
12.	Including the blue-green linkages from urban concept planning can help reinforce the importance of connections.	Include the indicative blue-green corridor within the precinct plan based on the urban concept in the Urban Design Assessment.	35.13
13.	Riparian planting is important to maintain and enhance the life-supporting capacity of freshwater systems and restore biodiversity. Cross-referencing to Appendix 15 in standard IX.6.3 (2) of the AUP will assist in ensuring good outcomes.	Retain and amend IX.6.3 (2) by including a cross reference to the matters in Appendix 15.6(3)(b-f) and (4) of the Auckland Unitary Plan.	35.14

Open Space

Row	Specific Reasons for the Submission	Relief Sought	
14.	The 'future esplanade' marked on the precinct plan is on an estuarine tributary. The dimensions and extent of the reserve needs to be determined during subdivision and developed. Therefore, its position should be 'indicative' in the precinct plan.	Amend the precinct plan "Future esplanade reserve" to read " <u>Indicative</u> future esplanade reserve".	35.15
15.	To provide a transparent starting point for discussion between the council and landowners/developers it is recommended that indicative public open spaces are shown on the precinct plan. The plan attached to this submission (Attachment 1) indicates approximate location, type and quantum of public open space for civic, neighbourhood and suburb scale parks consistent with Auckland Council open space policies and supportable for acquisition by the council (subject to political approval).	Include indicative open spaces in the precinct plan as shown in Attachment 1 to this submission.	35.16

Rules general

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

35.17

Land use

Row	Specific Reasons for the Submission	Relief Sought
17.	<p>RPS B2.4 and B3.3 seek to integrate land use and transport development with increased intensification around public transport. The NPS-UD prioritises increased densities in centres and near public transport as does the Drury – Opāheke Structure Plan.</p> <p>Jesmond Road is proposed³ to be upgraded to an arterial road. It will serve as the main north-south connection in Drury West and joining with SH22 which in turn connects to SH1. A new arterial extending Jesmond Road further to the south is also proposed. This in turn will connect to a proposed new railway station in Drury West.</p> <p>Collector and local roads also need to be developed that connect the new urban areas including the proposed town centre to this arterial.</p> <p>There is an interdependence between the upgrade of this key road and the development of adjoining land for urban purposes. Urban zoning is required for urban development. Therefore, extending the urban zoning to adjoin Jesmond Road is appropriate. The zoning should be Terrace Housing and Apartment Buildings to be consistent with proximity to proposed RTN public transport.</p>	<p>Extend the operative urban zoning to adjoin the eastern edge of Jesmond Road. This should be comprised of Terrace Housing and Apartment Buildings Zone.</p> <p>Make any consequential amendments to the precinct plan including any necessary to give effect to other points in this submission.</p> <p>Other supporting technical documents may need to be updated to include this change.</p>
18.	<p>The National Policy Statement on Urban Development 2020 (NPS-UD), the RPS and the Drury – Opāheke Structure Plan August 2019 aim to achieve high densities</p>	<p>Add a policy and standards to provide for increased density near RTN stations including:</p>

35.18

35.19

³ L. Winter, Figure 6-6, Drury-Opāheke and Pukekohe-Paerata Structure Plan Draft Integrated Transport Assessment, April 2019, Supporting Growth

<p>within walkable catchments of rapid transit network (RTN) stations.</p> <p>Walkable distances are not defined in the RMA or RMA documents. However, this matter was investigated in preparation of Drury – Opāheke Structure Plan August 2019 in relation to RTN train stations.</p> <p>The local road network does not fully exist yet in these greenfield locations so actual walking distances along road footpaths cannot be measured yet. Instead it is appropriate to use a walkable radius from the proposed train station as a proxy for median actual walkable distances. This is expressed as an 'extended walkable' distance in the requested provisions to enable further discussion of an appropriate distance as this is not an exact science.</p> <p>It is also appropriate to consider an additional shorter walkable radius as being an area where a much higher (above median) level of walkability can potentially be achieved. This is expressed as a 'short walkable' radius in the requested provisions to enable further discussion of the appropriate distance.</p> <p>The actual position of the Drury West station has not been confirmed at the time of writing. But it is likely that some of the PC 51 area will be within the station walkable catchment. Therefore, increased density should be enabled in this area.</p> <p>The NPS-UD prioritises increased densities within a walkable distance of RTN stations with a focus on use of tall buildings to achieve this. At least six storeys is to be enabled but more is preferred by the NPS-UD Policy 3.</p>	<ul style="list-style-type: none"> a. Adding a policy to the effect of: <u>Ensure a built form and walkable environment that will provide for a high density of people living, working or visiting within an extended walkable radius of a rapid transit network station.</u> b. Building height standards, enabling at least the metro centre equivalent 22-23 storey building height within a short walkable radius of the RTN train station, and 7-8 storey building height within about an extended walkable radius of the RTN station. c. In areas of more than 7-8 storeys, providing tower dimension and spacing, wind, and building set back at upper floors standards if they do not exist in the underlying zone; d. Any alterations to other building standards to respond to increased building height. e. An information standard for subdivision, building and road resource consents requiring information to demonstrate how the development will contribute to implementing the above density policy and provide for a safe and attractive walkable environment.
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	<p>It is considered that there is not a large difference in potential adverse effects of height between 6, 7, or 8 storeys. Therefore, it is recommended that a building height control that provides for 7 to 8 storeys be applied within an extended walkable distance of the RTN station to enable greater density. This can be given effect to by applying the AUP 27m height variation control within an extended walkable radius of the station. Some adjustment beyond this distance may be appropriate to better align with property boundaries.</p> <p>At still higher building heights, adverse effects can become more significant and a different range of standards are appropriate to address that. Overall, it is considered that with a short walkable radius of an RTN station, where high walkability is possible, taller buildings should be provided to enable higher density. This is subject to additional or amended standards that address the effects of towers. The building height standard of 72.5m (about 23 storeys) as used in the Metropolitan Centre Zone is considered an appropriate standard for land within a short walkable radius of an RTN Station to give effect to the NPS-UD.</p> <p>The requested information standard would ensure that resource consent applications provide sufficient information to assess whether the development is consistent with the policy.</p> <p>The requested amendments collectively provide for policy and standards to enable increased density and walkability near the RTN station.</p>	
19.	<p>The use of the retail frontage and commercial frontage controls is supported in principle. However, this control is usually mapped to an existing road. In this case if the</p>	<p>Amend the key retail frontage and general commercial frontage provisions to allow them to float with the indicative roads which may be located differently on development.</p>

35.20

	<p>proposed road ended up in a different location on development, then a plan change would be required to update the precinct plan. Some form of 'floating' control that achieves the same outcome but moves with the actual location of the road could address this problem.</p>	
20.	<p>A First Gas transmission pipeline traverses the northern section of PC 51. This pipeline is a long distance, large diameter, high pressure line. It was constructed from thin walled 'rural' specification steel and its subsequent enclosure with high density urban uses was not originally anticipated. There is a potential risk of loss of life, injury and property damage if the pipeline is punctured after urbanisation.</p> <p>The pipeline corridor cannot be built on. It must either have either a road or a linear park as the overlying land use. This corridor should be shown on the precinct plan partly to note potential risk but also because it has unavoidable effects on the way land uses are laid out.</p> <p>This is all the more important in the context of the higher densities anticipated in the PC 51 zoning. A risk assessment should be carried out by a professional with relevant expertise to determine if any additional works are required to manage risk in this high-density urban context.</p> <p>The road and reserve network within the Drury 1 Special Housing Area was designed to largely accommodate the alignment of the First gas Transmission line within the road reserve or local reserves.</p> <p>PC 51 does not address this issue but proposes a grid road network that crosses the line.</p>	<p>Include an indicative protection corridor or road or linear park over the First Gas transmission line in the precinct plan. Also provide a risk assessment that addresses whether any additional physical pipeline protection or upgrade work is necessary for an intensive urban environment risk level.</p> <p>The following assessment is sought as well as any consequential amendments to the Precinct plan:</p> <ol style="list-style-type: none"> 1. Why the approach adopted within the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed; 2. The impacts of the gas transmission line on the proposed network and associated development patterns; 3. The identification of a local network design that can practically accommodate the gas transmission line; and 4. Any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line.

35.21

Mana whenua

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

35.22

Natural heritage

Row	Specific Reasons for the Submission	Relief Sought
22.	Surveying for potential notable trees and scheduling of any trees that meet the criteria is standard practice for a plan change to urbanise land. This does not appear to have been done.	Provide a notable tree assessment and scheduling of any notable trees identified in that assessment. This could include but is not limited to actively working with mana whenua on relevant and appropriate design principles and options.
23.	It is important to ensure that Māori can benefit from the potential opportunities for housing and social services provided by the proposed developments. This gives effect to Directions 1-4 and Focus Area 7 of the Māori Identity and Wellbeing Section of the Auckland Plan.	Enable and provide for accessible and affordable social housing for Māori.

35.23

35.24

Attachment 1

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



FORM 5

**Submission on a notified proposal for Private Plan Change 51 – Drury 2 Precinct under Clause 6
of Schedule 1
Resource Management Act 1991**

22 October 2020

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

Email: unitaryplan@aucklandcouncil.govt.nz
CC: simon@berrysimons.co.nz

Name of submitter: The New Zealand Transport Agency

This is a submission on Private Plan Change 51 Drury 2 Precinct (**Plan Change**) to the Auckland Unitary Plan (operative in Part).

The New Zealand Transport Agency (**Waka Kotahi**) could not gain an advantage in trade competition through this submission.

Waka Kotahi role and responsibilities

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (**LTMA**). Waka Kotahi's objective is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Waka Kotahi's roles and responsibilities include:

- Managing the State Highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

The Plan Change relates to areas that are close to and potentially affect State Highway 1 and State Highway 22, both of which have plans for improvement and upgrading. Waka Kotahi's interest in this proposed Plan Change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.

- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.
- The manager of the State Highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.

Government Policy Statement on Land Transport.

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (GPS). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years.

The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections.

A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. Likewise, changes in transport can affect land use.

Transport Sector Outcomes Framework

Wider Context

In making this submission, Waka Kotahi is cognisant of the context of the Plan Change and ongoing planning processes and projects. These include:

- Te Tupu Ngātahi's planning work on the Drury transport network which includes a number of new and upgraded arterial roads in the wider Drury area, including the future upgrade of State Highway 22;
- The Council adopted Drury–Opaheke Structure Plan;
- The recent funding of rail network in Drury, including electrifying the line from Papakura to Pukekohe and constructing three new stations at Drury Central, Drury West and Paerata;
- Other private development proposals in the area including plan changes.

A high level of care is required to ensure integration between the projects in the area and the planning outcomes being sought, all of which have differing timeframes.

Decision sought

Waka Kotahi are generally supportive of the Plan Change as it promotes a mixture of residential and business centre zoning, as proposed in the Drury–Opaheke Structure Plan. However, we consider the scale of activity proposed to be over and above what was anticipated in the Structure Plan, and note that the application does not contain sufficient assessment to support such an increase in scale.

Waka Kotahi therefore seeks both amendments to the proposals and/or further information to provide greater certainty around the potential effects on existing and planned transport infrastructure.

Decisions that Waka Kotahi seeks on the Plan Change are set out in its submissions contained in **Table 1**. Waka Kotahi Agency also seeks any consequential changes to the Plan Change required to give effect to the relief described in **Table 1**.

Hearings

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

Signature of person authorised to sign on behalf of Submitter:

A handwritten signature in black ink, appearing to read 'Kim Harris Cottle', written in a cursive style.

Kim Harris Cottle

Team Lead – Transport Services

Waka Kotahi

Address for Service of person making submission:

NZ Transport Agency

Contact Person: Brendan Clarke

Email: Brendan.clarke@nzta.govt.nz

Table 1: NZ Transport Agency Submission on Auckland Unitary Plan (OIP) Plan Change 51 (Private) Drury 2 Precinct

Sub #	Provision Number	Reason for Submission	Relief Sought Base text is PC51 as notified.. New text <u>underline</u> Deleted text strikethrough	
1	Whole Plan Change (including Precinct Plan)	Business – Town Centre Zone is considered of a scale and intensity inappropriate to this area, as it would generate a level of traffic over and above what has been modelled as part of the Drury-Opaheke Structure Plan (which has been used as the basis for planning future infrastructure in the area). The Town Centre zone also allows for a greater mix of uses such as bulk retail which would generate additional traffic and associated effects than in a Local Centre zone. The Plan Change proposes a centre zone extent further north than what was shown in the Structure Plan, as well as a higher traffic generation per hectare which would generate greater levels of traffic.	Support with amendments. Relief sought: Replace Business – Town Centre Zone with Business – Local Centre Zone, and reduce extent of zone to align with Drury-Opaheke Structure Plan.	36.1
2	Whole Plan Change (including Precinct Plans and supporting documents)	The Plan Change and supporting documents are drafted on the assumption that the proposed Drury West train station is located to the immediate south of the Plan Change area (south of State Highway 22). This location is not yet confirmed, and Waka Kotahi understand that the preferred option may be further west than what has been considered as part of the Plan Change. This change will likely impact the scale and nature of effects associated with this Plan Change, and many of the technical assessments (for example the Integrated Traffic Assessment) should be updated to reflect this change.	Amend: Update all supporting technical documents to consider the current preferred option for the Drury West train station, including those west of Jesmond Road. Update provisions based on updated assessments if required.	36.2
3	Whole Plan Change (including Precinct Plans)	The terms <i>active transport</i> and <i>public transport</i> are utilised within the National policy statement urban development	Support with amendment. Relief sought:	36.3

		(2020). It is requested that references referring to <i>pedestrians and cyclists</i> is replaced with <i>active transport</i> . For clarity, where the individual term pedestrian or cyclist is used, these should remain.	Replace references to <i>pedestrians and cyclists</i> is with <i>active transport</i> (as defined within the National Policy Statement on Urban Development 2020).	36.3
4	Precinct plan	<p>Long term plans for State Highway 22 involve 4-laning the corridor (including a central median), and providing separated walking and cycling facilities on both sides of the corridor. The long term intended form and function is that of an urban arterial, however in the interim will continue to function as a rural highway.</p> <p>Accesses and intersections will need to be designed with consideration to both the current and future form and function of State Highway 22. Further, any proposed access or intersection needs to be supported by detailed traffic assessments, outlining the volume of traffic anticipated and issues such as sightlines, intersection geometry and likely access/intersection form (we also note that the proposed realigned Burberry Road has issues with geometry and intersects State Highway 22 at a sub-optimal angle).</p>	That an amended detailed traffic assessment is completed, which includes an analysis of trip generation from the proposed centre along with an assessment of how each proposed access/intersection fits with the current and future form and function of State Highway 22.	36.4
5	IX.1. Precinct description	Subject to other submission points (such as point 1 above), the Precinct Description is generally supported as it proposes a business centre in general accordance with the Drury-Opaheke Structure Plan. However, the Structure Plan did not anticipate a Town Centre in this location, and reference should instead be to 'Local Centre' throughout the precinct description and subsequent provisions.	<p>Retain with amendments.</p> <p>Replace all references within this precinct description from "Town Centre" to 'Local Centre'</p>	36.5
6	IX.2 objectives	<p>Waka Kotahi proposes to introduce a suite including an objective, policies and methods which will seek to limit effects on sensitive activities in locations where noise and vibration levels result in negative health and amenity outcomes.</p> <p>Waka Kotahi also seeks a gradual reduction in exposure as existing activities are altered or relocated. This outcome</p>	<p>Inset new provision:</p> <p><u>Protect sensitive activities from potential health and amenity effects that may arise from noise and vibration associated the operation of the transport network.</u></p>	36.6

		aligns with Waka Kotahi's Toitū Te Taiao – Our Sustainability Action Plan which in turn implements the Government Policy Statement on Land Transport 2018/2019-2027/2028 and the enduring Transport Outcomes: A framework for shaping our transport system: Enabling New Zealanders to flourish Transport outcomes and mode neutrality, Ministry of Transport, June 2018. The introduction of provisions to provide human health and amenity protection within District Plans is one of a number of methods employed by Waka Kotahi to achieve these outcomes.		
7	IX.2 Objectives	The objectives are generally supported as they provide for quality urban design, active and public transport, appropriate infrastructure and the safe and efficient operation of the transport network.	Retain.	36.7
8	IX.3 Policies	Refer to submission point 6 above	Insert new provisions: <u>Policy X</u> <u>Locate and design new and altered buildings, and activities sensitive to noise to minimise potential effects of the transport network</u> <u>Policy XX</u> <u>Manage the location of sensitive activities (including subdivision) through set-backs, physical barriers and design controls.</u>	36.8
9	IX.3 Policies 1 & 2	Policies 1 and 2 are generally supported in terms of intent, however need to be amended to reflect a lower intensity of commercial development than sought by the Plan Change	Retain with amendments: (2)(b) Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity	36.9
	IX.2 Policies 3 & 4	Policies 3 & 4 are supported due to their focus on quality built form and urban design.	Retain.	36.10
10	IX.2 Policy 5	Policy 5 is supported as it recognises the need for additional transport infrastructure prior to development proceeding, and seeks to ensure integrated planning.	Retain.	36.11

11	IX.4 Precinct Rules (A5)	As noted in submission point 1 above, the proposed town centre is not supported due to its potential adverse traffic effects. To give effect to this point, all references in the rules need to be updated	Replace reference to Business – Town Centre Zone with Business – Local Centre Zone	36.12
12	IX.4 Precinct Rules (new rule)	Waka Kotahi has particular concerns about the potential for large format retail developing in this locality. This particular form of retail could potentially serve not just Drury West, but a much wider catchment and consequently generate a larger amount of traffic than what has been assessed in the ITA and which SH22 can safely accommodate. As such, this particular activity has the potential to adversely impact the surrounding transport network, including State Highway 22 and the Drury interchange (SH1/22 intersection). Should large format retail be proposed in this location, the wider effects of any proposal need to be considered, including traffic effects.	Add a new Activity to Table IX.4.1 as follows: <u>(A8) Retail greater than 450m2 gross floor area per tenancy – Discretionary Activity.</u>	36.13
13	IX.6.2 Transport Infrastructure Requirements	As per the applicant's response to Auckland Councils Clause 23 request, no development should occur prior to State Highway 22 being upgraded to four lanes.	Add: <u>State Highway 22, from the extent of the current Future Urban Zone to State Highway 1, be upgraded to four lanes, including the construction of associated walking, cycling and public transport infrastructure.</u>	36.14
14	IX.6.4 Site Access	Support requirements that ensure the ongoing safety of pedestrians and cyclists	Retain as notified.	36.15
15	IX.6 Standards (new standard)	Insert technical standard to provide for human health protection adjacent to state highways for the reasons outlined in submission point (6).	Insert activity controls as per attachment 1 below	36.16
16	IX.8.2.	Matter of discretion and assessment criteria	Insert matter of discretion and assessment criteria as per attachment 1 below.	36.17

Attachment 1:

Permitted Activity Rule IX.6

36.16

At any point within 100 metres from the edge of a state highway carriageway:

Outdoor road noise

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

Indoor road noise

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

36.16

Table 1

Occupancy/activity	Maximum road noise level L _{Aeq} (_{24h})
<i>Building type: Residential</i>	
Sleeping spaces	40 dB
All other habitable rooms	40 dB
<i>Building type: Education</i>	
Lecture rooms/theatres, music studios, assembly halls	35 dB
Teaching areas, conference rooms, drama studios, sleeping areas	40 dB
Libraries	45 dB
<i>Building type: Health</i>	
Overnight medical care, wards	40 dB

Clinics, consulting rooms, theatres, nurses' stations	45 dB
<i>Building type: Cultural</i>	
Places of worship, marae	35 dB

Mechanical ventilation

3. If windows must be closed to achieve the design noise levels in clause 2(a), the building is designed, constructed and maintained with a mechanical ventilation system that:
 - a. For habitable rooms for a residential activity, achieves the following requirements:
 - i. Provides mechanical ventilation to satisfy clause G4 of the New Zealand Building Code; and
 - ii. is adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour; and
 - iii. provides relief for equivalent volumes of spill air; and
 - iv. provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18CC and 25CC; and
 - v. does not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser.
 - b. For other spaces, is as determined by a suitably qualified and experienced person.

36.16

Indoor road vibration

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

Design report

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

Restricted Discretionary Activity – Matters of Discretion IX.8.2

Discretion is restricted to:

36.17

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

Restricted Discretionary Activity – Assessment Criteria IX.8.2

Discretion is restricted to:

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

36.17

**Submission on Proposed Private Plan Change 51 – Drury 2 Precinct,
Auckland Unitary Plan Operative in Part**

Clause 6. Schedule 1 to the Resource Management Act 1991

To: **Attn: Planning Technician**
Auckland Council,
Level 24, 135 Albert Street
Private Bag 92300,
Auckland 1142
By Email:unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: Elly S Pan (“**Pan**”), c/- the address for service set out below.

1. This is a submission on the Proposed Plan Change 51 – Drury 2 Precinct (“**the Plan**”).
2. This is a submission in support of and in opposition to the Proposed Private Plan Change 51 – Drury 2 Precinct.
3. PAN could not gain an advantage in trade competition through this submission. In any event, PAN is directly affected by effects of the subject matter of the submission that:
 - (a) Adversely affect the environment; and
 - (b) Do not relate to trade competition or the effects of trade competition.
4. The specific provisions of the Unitary Plan that this submission relates to are:
 - (a) The proposed Private Plan Change 51 – Drury 2 Precinct
5. PAN ’s submission is as follows:
 - (a) The submitter is the owner of Number 38 Burberry Road and Number 341 Jesmond Road.
 - (b) The submitter has owned the land for over 17 years and use the property as their principal place of residence in New Zealand.

- (c) The submitter in accepting that the use of the land surrounding their property is to change from a rural land use to an urban land use and the zoning of their land if the proposed plan is made operative will also change to an urban land use. The submitter then seeks to ensure that the proposed plan change will not detrimentally affect
 - a) their existing use and enjoyment of the land
 - b) the future use and value of the property
 - c) the land will not be physically impacted by the proposed development
- (d) The submitter generally accepts the need for and supports the proposed Plan however seeks some amendments to address specific issues of concern.
- (e) The access to the submitter's property is located at the end of Burberry Avenue, currently a no exit road. Burberry Road connects to SH22 for access to the wider road network.
- (f) The Proposed Plan relies on the utilisation of existing public assets, in particular SH 22 and SH 1 to support the function and viability of the proposed town centre.
- (g) The additional demand placed on these public assets by the Proposed Drury 2 Precinct Plan Change will reduce the level of service to the existing properties and for those using SH22 and SH1 to travel and from Pukekohe and Auckland.
- (h) The Plan identifies essential prerequisites of a realigned Burberry Road and a signalised intersection with SH 22 before any connection of Burberry Road to Auranga A and B1.
- (i) The Plan does not address how the existing Burberry Road residents are to be provided with access.
- (j) The Plan does not address other upgrades that due to the level of demand to Bremner Road, The Bremner Road Bridge, Norrie and access to the Great South Road.

- (k) The Plan also states the funding of infrastructure is critical to achieving the comprehensive and co-ordinated approach to development and yet this Plan is reliant on funding by other parties.
 - (l) The applicant has advised there is an urgent need for development of this type to be enabled to meet the needs of the Auckland Region while in part this is true it is also reliant on taking a share of service existing needs that are currently provided for elsewhere, in Pukekohe, Drury, and Papakura and further afield in Auckland.
 - (m) The provision of a variety of business, employment, service and residential on either side of SH1 and SH22 will result in a considerable amount of concentrated short trip traffic to local destinations generated on the public road network. This volume will inevitably degrade the performance of the State Highways for longer travel destinations.
6. The submitter believes that the proposed Plan will not achieve or meet the above stated objectives for the following reasons
- (a) There has been inadequate consultation on the proposed land use and provision of infrastructure.
 - (b) There is no means within the Plan to provide for key items of infrastructure to be in place before the levels of demand degrade service performance
 - (c) The submitter while an overall supporter of the plan change requires the key infrastructure funding to be in place and implemented before the proposed plan is made operative and the zones can be used.
 - (d) Unless and until the Proposed Plan provisions are amended in accordance with the relief sought below they will not:
 - (i) Promote the sustainable management of resources;
 - (ii) Otherwise be consistent with Part 2 of the Resource Management Act 1991 (“RMA”); or
 - (iii) Be appropriate in terms of section 32 of the RMA

7. PAN seeks the following relief from Auckland Council:

(a) That the Plan be amended by:

- (i) A provision limiting development until required infrastructure upgrades and linkages are in place and not limited to upgrades of SH 1 and SH 2, water, wastewater, stormwater and other methods of transport.
- (ii) That Burberry Road not be stopped until an alternative route is in place.
- (iii) That the alternative access to Burberry Road be of a standard not less than that currently exists

37.1

(b) That any objectives, policies or explanatory passages on which the rules identified above are reliant or based are deleted or amended to the extent necessary in order for Council to appropriately make the amendments sought above

37.2

(c) Such other relief or other consequential amendments as are considered appropriate or necessary to address the concerns set out in this submission.

8. PAN would welcome an opportunity to be heard in support of this submission.

9. If others make a similar submission, PAN will consider presenting a joint case with them.

Dated this 22nd day of October 2020

Elly S Pan



By Nigel Hosken on behalf of Elly S Pan

ADDRESS FOR SERVICE: The offices of Hosken & Associates Ltd, 99 Gloria Avenue, Te Atatu Peninsula, Auckland 0610, Tel 09 834 2571, 0274 770 773,

E-mail nigel@hosken.co.nz

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Counties Power Limited

Organisation name:

Agent's full name: Jeremy Brydon

Email address: jbrydon@align.net.nz

Contact phone number: 092824768

Postal address:
PO Box 147105
Ponsonby
Auckland 1144

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:
See attached submission

Property address:

Map or maps:

Other provisions:

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

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

The reason for my or our views are:
See attached submission

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

Details of amendments: See attached submission

Submission date: 22 October 2020

Supporting documents
Appendix 1 - CP line assets.pdf
201022_10_PPC51_Counties-Power-submisison.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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

Auckland Unitary Plan
PC 51 (Private): Drury 2 Precinct
submission



Quality Control Sheet

Submitter: Counties Power Limited
Asset: Counties Power Electricity Distribution Network
Plan: Auckland Unitary Plan - Proposed Plan Change 51 (Private) Drury 2 Precinct
Document: Submission
Counties Power Contact: Rachel Bilbe, Land Access Coordinator
Consultant Contact: Jeremy Brydon, Planning Consultant, Align Limited
File Reference: COUNT038

Version:

Issue 1.0	22 October 2020	For submission
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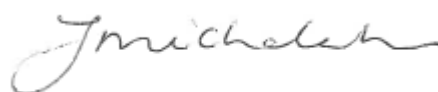
Distribution:

Rachel Bilbe	Counties Power	Email
AC Policy Team	Auckland Council	Online Submission



Produced by:

Jeremy Brydon



Review by:

Jo Michalakakis

Align Limited

Date: 22 October 2020

Limitations:

This report has been prepared for the client according to their instructions. The information in this report should not be used by anyone else, or for any other purposed. Some of the information presented in this report is based on information supplied by the client. Align Limited does not guarantee the accuracy of any such information. Any advice contained in this report is subject to this limitation.

1. Introduction

This document provides a submission on Plan Change 51 (Private): Drury 2 Precinct. The document contains a table with submission points both supporting and requesting the inclusion of additional policies to the following parts of the proposed plan change:

- Objective IX.2 (4);
- Policy IX.3 (1)(b);
- Policy IX.3 (5)(a); and
- New Policies IX.3 (5)(e)&(f).

Overall, Counties Power are strong in their support of the developments and have the ability to supply power to enable this development. Counties Power are well positioned to support the developments from both a funding and forward planning perspective (i.e. have either purchased or identified land for future zone substations and a future option to create a new GXP at Transpower's Drury site in addition to the existing Transpower Bombay GXP). Counties Power is currently constructing a new zone substation at Bombay (at a lower voltage than the Bombay GXP), which combined with its existing Opaheke substation can provide capacity to the development. In addition, once construction of the Quarry Road substation, which is located in Drury, is completed over 2025 - 2030, Counties Power will have additional capacity to supply power any future demands within the area covered by Plan Change 51. Counties Power are also working with Kiwirail to build a 25kV line from Quarry Rd, Drury to Burt Rd to support the Papakura to Pukekohe rail electrification programme which will support the proposed Railway Station in this precinct.

Counties Power wishes to be heard in support of their submission.

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

2. About Counties Power

Counties Power owns, manages, and operates an electricity distribution network in southern Auckland, north Waikato and Hauraki District areas with a system length of 3,200km covering an area of approximately 2,250km². The Auckland Council portion of their network covers 830km² and makes up 37% of the Counties Power network. In the Auckland Region, this includes urban centres such as Pukekohe, Waiuku and Southern Papakura; rural residential areas like Hunua; and rural areas with very low customer density. It also includes Drury West, the area subject to proposed Plan Change 51. The company also provides telecommunications and smart metering services.

Counties Power is 100% consumer owned. All shares are held by the Trustees of the Counties Power Consumer Trust (Trust) on behalf of all local power consumers. The Trust has a total of five Trustees, of which two are required to be elected every two years. Counties Power is managed for the benefit of its

consumers and their communities. The Trust oversees the performance of Counties Power through the appointment of a Board of Directors (Board). The Board and Management of Counties Power consult the Trust on the strategic direction, business plans, and asset management measures and targets. Information about the Trust can be obtained from www.countiespowertrust.co.nz.

By length, 72% of the Counties Power network is rural overhead, however the urban networks supplying Pukekohe, Waiuku, Tuakau, Pokeno, Drury and parts of Papakura comprise a split of overhead and underground assets. Generally, the eastern part of the network is newer, higher in network connection densities and subject to high levels of growth in the areas adjacent to motorway and state highway corridors. The western side of the network is older, more remote, lower density and subject to little growth. The Counties Power network is exposed to a range of environmental conditions, including weather – particularly the harsh coastal environment around the Awhitu peninsula, and vegetation – most notable in the areas around Hunua Ranges, but with effects across the entire network.

3. The Counties Electricity Network

Counties Power has two points of supply from Transpower's National Grid via GXP's at Glenbrook and Bombay. From there, power is distributed to consumers via eight zone substations and our extensive network of lines, cables, transformers and other equipment. The Glenbrook GXP supplies the western substations at 33kV whilst Bombay GXP supplies the eastern 110kV and 33kV.

Counties Power's network is made up of both High Voltage (HV) and Low Voltage (LV) lines made up as follows:

HV network comprises:

- sub-transmission lines (33kV and 110kV) which carry electricity from the Grid Exit Point (GXP) to zone substations or between zone substations. Typically serving 500 to 12,000 customer connections.
- feeder lines (11kV and 22kV) which carry electricity from zone substations to transformers or in some cases direct to customers with a large demand (e.g. some industrial customers). These typically serve 80 to 2,500 customer connections.

LV Network (400V) comprises lines from transformers to individual connection points, typically serving 1 to 20 customer connections.

More than 20 years ago, Counties Power decided to provide for future growth by converting the backbone of its network from 33kV (for sub-transmission) and 11kV (for feeders) to 110kV and 22kV respectively. These voltages carry significant loads with a reasonably unobtrusive overhead line network and have provided the consumer-shareholders of Counties Power with a network that is cost effective to construct, flexible and resilient.

Approximately 11,500 customers (or a quarter of Counties Powers total network load) are in the Hingaia, Drury, Papakura and Hunua areas with this number expected to rise as part of the proposed plan changes currently in motion.

The customers in these areas rely on power from the Counties Power zone substation at Opaheke, which is supplied from the Transpower GXP at Bombay. Electricity is conveyed between these two points by means of two sub-transmission lines operating at 110kV, referred to as the Bombay-Opaheke (west) and Bombay-Opaheke (east) lines, both of which traverse a site owned and designated by Counties Power at 201 Quarry Road, Drury within the Drury South Precinct which is also going through a plan change process.

Within the proposed Drury 2 Precinct area there are currently no overhead lines. The only lines in the area are underground, with the majority being installed to the north as part of the Drury 1 Precinct. Counties Powers line assets for the area can be seen in **Appendix 1**.

4. Low carbon development

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

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

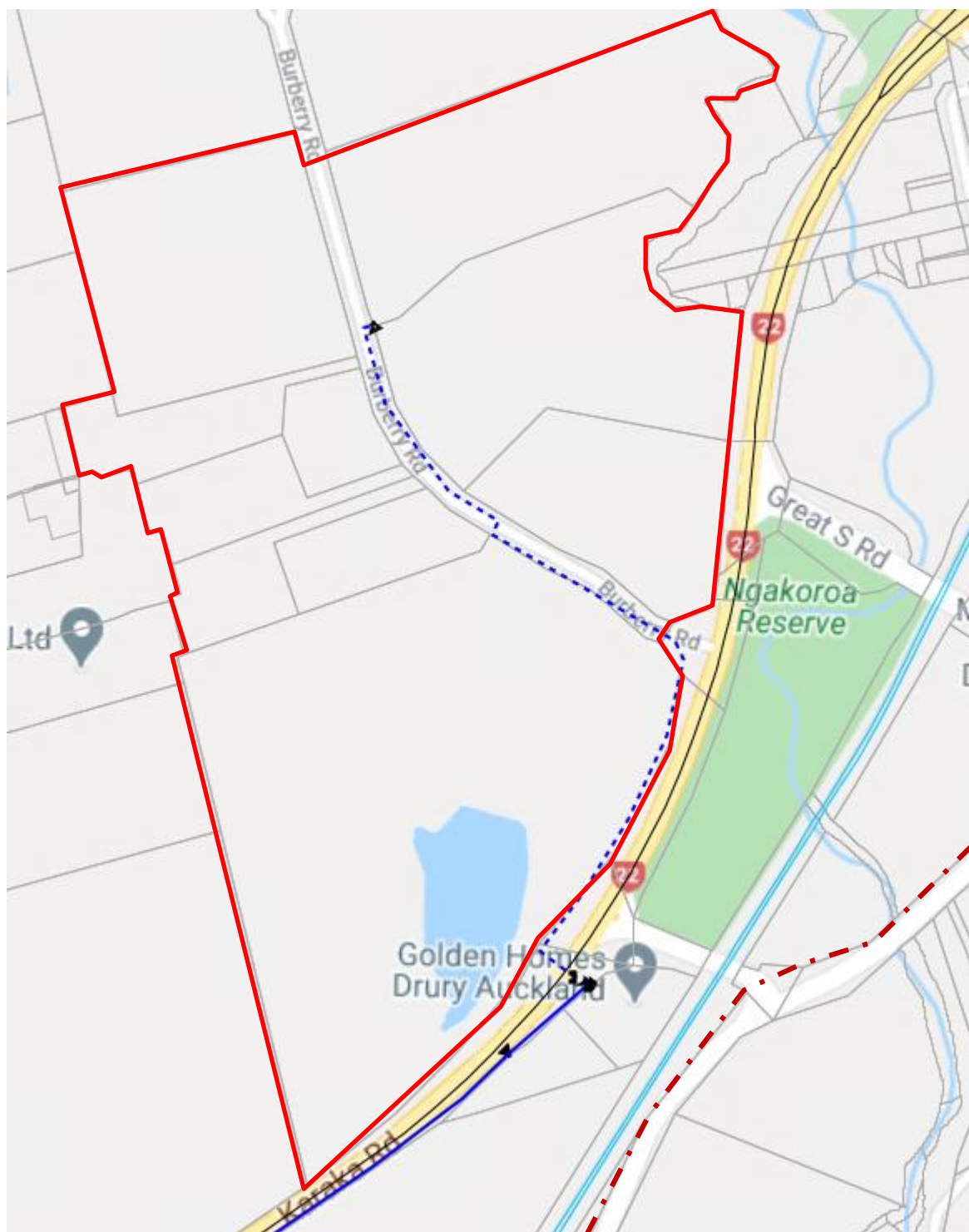
IX Drury 2 Precinct				
Objective/Policy	Provision	Position	Reason for position	Relief Sought
IX Drury 2 Precinct				
Objective IX.2 (4)	Establish the infrastructure necessary to service development within the Precinct in a coordinated and timely way.	Support	<p>There is sufficient capacity projected to supply this area post 2025 once Counties Power's substations at Pukekohe North and Quarry Road have been established, along with the potential to be fed from the existing substation at Opakahe.</p> <p>Counties Power have already installed underground electrical reticulation in the Drury 1 precinct to the north and this reticulation can be extended to supply the proposed area, subject to negotiation and contribution at the developer's expense to allow the electrical infrastructure to be made available in a timely manner.</p>	Include objective as proposed
Policy IX.3 (1)(b)	<p>Enable and design the Town Centre so that it:</p> <p>...</p> <p>(b) Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity; and</p> <p>...</p>	Support	When designing the layout of the Town Centre, consideration should be given to the type and location of landscaping, street trees, street furniture and paving to ensure suitable access to electrical infrastructure for operation and maintenance purposes and minimise any negative effect on supply to the Town Centre and surrounding area.	Include policy as proposed
Policy IX.3 (5)(a)	<p>Require subdivision and development to:</p> <p>(a) Be sequenced to occur concurrently with (and not</p>	Neutral	Provided that the road layout occurs sequentially to allow for electrical reticulation to be installed to serve the development as required the	Include policy as proposed

38.1

38.2

38.3

	precede) required infrastructure provision, including transport upgrades; ...		development can be systematically extended in a timely manner.		
New Policy IX.3 (5)(e)	Require subdivision and development to: ... <u>(e) Enable the reduction of CO₂ emissions by promoting the use of renewable energy.</u>	Support	Central government has set greenhouse gas emissions reductions targets for 2030 and with any new development area comes the ability to promote more sustainable energy types than those currently in wide use.	Include policy as proposed	38.4
New Policy IX.3 (5)(f)	Require subdivision and development to: ... <u>(f) Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.</u>	Support	With electric vehicles becoming more the norm it is important that sufficient charging stations are provided for, while also allowing for further charging stations without the need for significant upgrade when the demand inevitably increases.	Include policy as proposed	38.5
Rules/Standards	Provision	Position	Reason for position	Relief Sought	
IX.4.1 (A1) - (A7)	All	Support		Include rules as proposed	38.6



Existing Counties Power Infrastructure

- 22kV distribution (overhead)
- 22kV distribution (underground)
- . - . Fibre – high criticality (overhead/underground)

Plan area

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Counties Power Limited

Organisation name:

Agent's full name: Jeremy Brydon

Email address: jbrydon@align.net.nz

Contact phone number: 092824768

Postal address:
PO Box 147 105
Ponsonby
Auckland 1144

Submission details

This is a submission to:

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Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:
See attached submission

Property address:

Map or maps:

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Details of amendments: See attached submission

Submission date: 22 October 2020

Supporting documents

Appendix 1 - CP line assets_20201022165006.474.pdf

201022_10_PPC51_Counties-Power-submisison_20201022165718.485.pdf

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Auckland Unitary Plan
PC 51 (Private): Drury 2 Precinct
submission



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

Quality Control Sheet

Submitter: Counties Power Limited

Asset: Counties Power Electricity Distribution Network

Plan: Auckland Unitary Plan - Proposed Plan Change 51 (Private) Drury 2 Precinct

Document: Submission

Counties Power Contact: Rachel Bilbe, Land Access Coordinator

Consultant Contact: Jeremy Brydon, Planning Consultant, Align Limited

File Reference: COUNT038

Version:

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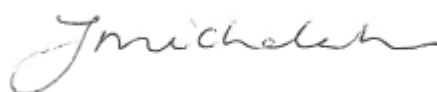
Distribution:

Rachel Bilbe	Counties Power	Email
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Produced by:

Jeremy Brydon



Review by:

Jo Michalakakis

Align Limited

Date: 22 October 2020

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3. The Counties Electricity Network

Counties Power has two points of supply from Transpower's National Grid via GXPs at Glenbrook and Bombay. From there, power is distributed to consumers via eight zone substations and our extensive network of lines, cables, transformers and other equipment. The Glenbrook GXP supplies the western substations at 33kV whilst Bombay GXP supplies the eastern 110kV and 33kV.

Counties Power's network is made up of both High Voltage (HV) and Low Voltage (LV) lines made up as follows:

HV network comprises:

- sub-transmission lines (33kV and 110kV) which carry electricity from the Grid Exit Point (GXP) to zone substations or between zone substations. Typically serving 500 to 12,000 customer connections.
- feeder lines (11kV and 22kV) which carry electricity from zone substations to transformers or in some cases direct to customers with a large demand (e.g. some industrial customers). These typically serve 80 to 2,500 customer connections.

LV Network (400V) comprises lines from transformers to individual connection points, typically serving 1 to 20 customer connections.

More than 20 years ago, Counties Power decided to provide for future growth by converting the backbone of its network from 33kV (for sub-transmission) and

11kV (for feeders) to 110kV and 22kV respectively. These voltages carry significant loads with a reasonably unobtrusive overhead line network and have provided the consumer-shareholders of Counties Power with a network that is cost effective to construct, flexible and resilient.

Approximately 11,500 customers (or a quarter of Counties Powers total network load) are in the Hingaia, Drury, Papakura and Hunua areas with this number expected to rise as part of the proposed plan changes currently in motion.

The customers in these areas rely on power from the Counties Power zone substation at Opaheke, which is supplied from the Transpower GXP at Bombay. Electricity is conveyed between these two points by means of two sub-transmission lines operating at 110kV, referred to as the Bombay-Opaheke (west) and Bombay-Opaheke (east) lines, both of which traverse a site owned and designated by Counties Power at 201 Quarry Road, Drury within the Drury South Precinct which is also going through a plan change process.

Within the proposed Drury 2 Precinct area there are currently no overhead lines. The only lines in the area are underground, with the majority being installed to the north as part of the Drury 1 Precinct. Counties Powers line assets for the area can be seen in **Appendix 1**.

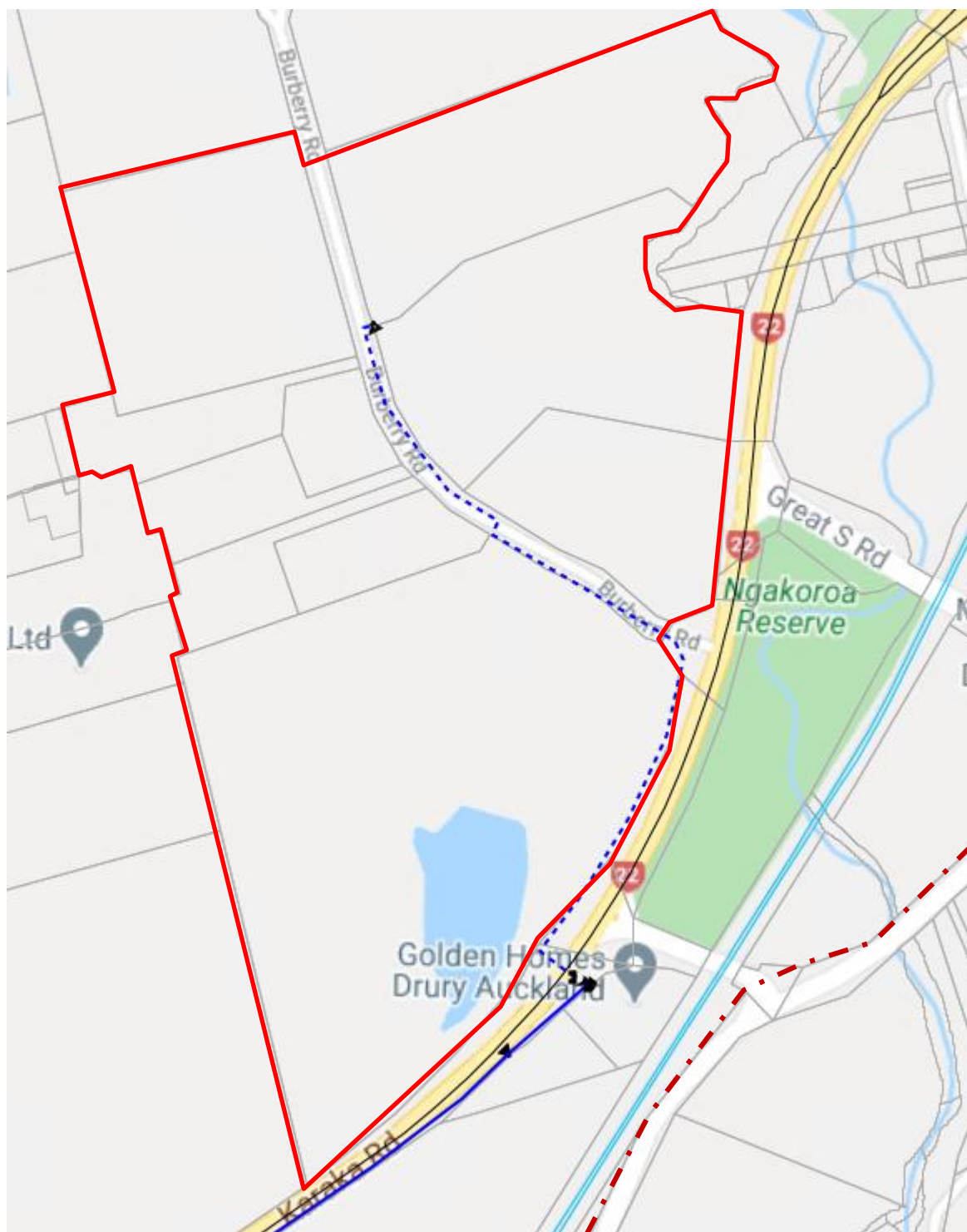
4. Low carbon development

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

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

IX Drury 2 Precinct				
Objective/Policy	Provision	Position	Reason for position	Relief Sought
IX Drury 2 Precinct				
Objective IX.2 (4)	Establish the infrastructure necessary to service development within the Precinct in a coordinated and timely way.	Support	<p>There is sufficient capacity projected to supply this area post 2025 once Counties Power's substations at Pukekohe North and Quarry Road have been established, along with the potential to be fed from the existing substation at Opakahe.</p> <p>Counties Power have already installed underground electrical reticulation in the Drury 1 precinct to the north and this reticulation can be extended to supply the proposed area, subject to negotiation and contribution at the developer's expense to allow the electrical infrastructure to be made available in a timely manner.</p>	Include objective as proposed
Policy IX.3 (1)(b)	<p>Enable and design the Town Centre so that it:</p> <p>...</p> <p>(b) Has well-designed, attractive public streets, that provide the focal point for intensive retail, commercial and civic development, as well as pedestrian activity; and</p> <p>...</p>	Support	When designing the layout of the Town Centre, consideration should be given to the type and location of landscaping, street trees, street furniture and paving to ensure suitable access to electrical infrastructure for operation and maintenance purposes and minimise any negative effect on supply to the Town Centre and surrounding area.	Include policy as proposed
Policy IX.3 (5)(a)	<p>Require subdivision and development to:</p> <p>(a) Be sequenced to occur concurrently with (and not</p>	Neutral	Provided that the road layout occurs sequentially to allow for electrical reticulation to be installed to serve the development as required the	Include policy as proposed

	precede) required infrastructure provision, including transport upgrades; ...		development can be systematically extended in a timely manner.	
New Policy IX.3 (5)(e)	Require subdivision and development to: ... <u>(e) Enable the reduction of CO₂ emissions by promoting the use of renewable energy.</u>	Support	Central government has set greenhouse gas emissions reductions targets for 2030 and with any new development area comes the ability to promote more sustainable energy types than those currently in wide use.	Include policy as proposed
New Policy IX.3 (5)(f)	Require subdivision and development to: ... <u>(f) Provide for the inclusion of vehicle recharging areas within parking areas and for the ability to upgrade additional spaces for increased demand when required.</u>	Support	With electric vehicles becoming more the norm it is important that sufficient charging stations are provided for, while also allowing for further charging stations without the need for significant upgrade when the demand inevitably increases.	Include policy as proposed
Rules/Standards	Provision	Position	Reason for position	Relief Sought
IX.4.1 (A1) - (A7)	All	Support		Include rules as proposed



Existing Counties Power Infrastructure

- 22kV distribution (overhead)
- 22kV distribution (underground)
- . - . Fibre – high criticality (overhead/underground)

Plan area



An Auckland Council Organisation

20 Viaduct Harbour Avenue, Auckland 1010
Private Bag 92250, Auckland 1142, New Zealand
Phone 09 355 3553 Website www.AT.govt.nz

22 October 2020

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

Email: unitaryplan@aucklandcouncil.govt.nz

Re: Proposed Private Plan Change 51 – Drury 2 Precinct

Please find attached Auckland Transport's submission on the Proposed Private Plan Change 51 from Karaka and Drury Limited.

If you have any queries in relation to this submission, please contact Chris Freke, Principal Planner at Chris.Freke@at.govt.nz, or on 0274661119.

Yours sincerely

Chris Freke
Principal Planner, Urban Development Programmes

cc:
Berry Simons Environmental Law
PO Box 3144
Shortland Street
Auckland 1140

Attention: Simon Berry
Via email: simon@berrysimons.co.nz

Encl: Auckland Transport's submission on Proposed Private Plan Change 51 – Drury 2 Precinct





**FORM 5 – SUBMISSION ON NOTIFIED PROPOSAL FOR PRIVATE PLAN CHANGE 51
DRURY 2 PRECINCT UNDER CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT
ACT 1991**

To Auckland Council
Private Bag 92300
Auckland 1142

From Auckland Transport
Private Bag 92250
Auckland 1142

1.0 Introduction

- 1.1 Karaka and Drury Limited (**the applicant**) has lodged a proposed private plan change (**PPC51** or **the plan change**) to the Auckland Unitary Plan: Operative in Part (**AUPOP**) to rezone 33.65 hectares of land in Drury West from Future Urban zone to 15.29 hectares of Business: Town Centre zone, 13.75 hectares of Residential: Terrace Housing and Apartment Buildings zone and 4.61 hectares of Residential: Residential: Mixed Housing Urban zone. PPC 51 also seeks to introduce a new Drury 2 Precinct across the extent of the plan change area.
- 1.2 Auckland Transport is a Council Controlled Organisation of Auckland Council (**the Council**) and the Road Controlling Authority for the Auckland region. Auckland Transport has the legislated purpose to contribute to an ‘effective, efficient and safe Auckland land transport system in the public interest’¹. In fulfilling this role, Auckland Transport is responsible for:
- a. The planning and funding of most public transport;
 - b. Promoting alternative modes of transport (i.e. alternatives to the private motor vehicle);
 - c. Operating the roading network; and
 - d. Developing and enhancing the local road, public transport, walking and cycling networks.
- 1.3 Auckland Transport is part of Te Tupu Ngātahi Supporting Growth (**SG**) which is a collaboration between Auckland Transport and Waka Kotahi NZ Transport Agency (**Waka Kotahi**) to plan and route protect the preferred transport network in future growth areas such as Drury. In reviewing this plan change, Auckland Transport has had regard to the draft Integrated Transport Assessment dated April 2019, which complemented the Drury – Opāheke Structure Plan. The Drury – Opāheke Structure Plan was prepared by Council and went through a robust

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



process, including three phases of consultation, before being adopted by Auckland Council's Planning Committee in August 2019. The structure plan sets out a pattern of land uses and the supporting infrastructure network for approximately 1921 hectares of Future Urban zoned land around Drury and Opāheke.

- 1.4 The Integrated Transport Assessment completed for the Drury – Opāheke Structure Plan identifies a strategic transport network for the area to support the land use patterns outlined in the Structure Plan. The transport projects it identifies that are relevant to this plan change include, but are not limited to, a new rail station at Drury West with a park and ride facility, connector bus network, and upgrade of Karaka Road/State Highway 22, Bremner Road and Jesmond Road to urban arterials.

- 1.5 Auckland Transport could not gain an advantage in trade competition through this submission.

2.0 Auckland Transport's submission is:

- 2.1 The key overarching considerations and concerns for Auckland Transport are described as follows:

Auckland Plan 2050

- 2.2 The Auckland Plan 2050 (**Auckland Plan**) is a 30-year plan for the Auckland region outlining the long-term strategy for Auckland's growth and development, including social, economic, environmental and cultural goals. The Auckland Plan is a statutory spatial plan required under section 79 of the Local Government (Auckland Council) Act 2009. The plan provides for between 60 and 70 per cent of total new dwellings to be built within the existing urban footprint. Consequently, between 30 and 40 per cent of new dwellings will be in new greenfield developments, satellite towns, and rural and coastal towns.

- 2.3 Transport outcomes identified in the Auckland Plan to enable this growth includes providing better connections, increasing travel choices and maximising safety. To achieve these outcomes, focus areas outlined in the Auckland Plan include targeting new transport investment to the most significant challenges, making walking, cycling and public transport preferred choices for many more Aucklanders and better integrating land use and transport. The high-level direction contained in the Auckland Plan informs the strategic transport priorities to support growth and manage the effects associated with this plan change.

Managing Auckland-wide growth and rezoning

- 2.4 The high-level spatial pattern of future regional development is represented in the Auckland Plan by the Future Urban zone in the AUPOP and further defined through sub-regional level planning including the Drury – Opāheke Structure Plan, to then be enabled through appropriate plan change processes. At the



regional level, PPC 51 and the proposed Drury 2 precinct is one of the major greenfield areas contributing to the overall growth in transport demands in parallel with the on-going smaller scale incremental growth that is enabled through the AUPOP.

- 2.5 This wide scale growth across the region places greater pressure on the available and limited transport resources that are required to support the movement of additional people, goods and services. In this regard, the alignment of the AUPOP enabled growth and plan changes with the provision of transport infrastructure and services is contingent on having a high level of certainty around the funding and delivery of the required infrastructure and services. Without this certainty, Auckland Transport is concerned that there will continue to be significant transport network deficiency in the provision and co-ordination of transport responses to the dispersed growth enabled across the region.

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

- 2.6 Guidance on the sequencing and timing of future urban land identified in the Auckland Plan (i.e. “unzoned” greenfield areas of development) was discussed in the Future Urban Land Supply Strategy 2017 (**FULSS**), subsequently incorporated into the updated Auckland Plan in 2018. This document sets out the anticipated timeframes for “development ready” areas over a 30-year period. The FULSS helps to inform infrastructure asset planning and funding priorities, and in turn supporting development capacity to ideally be provided in a coordinated and cost-efficient way via the release of “development ready” land. In this respect it is noted that the PPC 51 is roughly in step with the staging indicated within the FULSS, however, this land release staging is based on ‘development ready’ land. The analysis undertaken for the FULSS provided for a broad determination of bulk infrastructure requirements, acknowledging the need for more detailed planning through structure planning and bulk infrastructure planning and build, being two processes to have land ready for development.
- 2.7 The urbanisation of future urban land enabled through plan changes (such as PPC 51) that precedes the wider staging and delivery of planned infrastructure and services requires careful consideration of the transport needs . This includes the requirement for applicants/developers to mitigate the transport effects associated with their developments and to provide transport infrastructure needed to service their developments. In addition, there is the need to provide for strategic transport infrastructure to service the whole growth area identified in FULSS or Supporting Growth network that needs to be brought forward because of their development. Any misalignment between the timing to provide infrastructure and services and the urbanisation of greenfield areas brings into question whether the proposed development area is “development ready”.
- 2.8 Addressing the effects arising from development occurring ahead of the provision of the required transport network improvements and services is



dependent on funding to support the planning, design, consenting and construction of the transport infrastructure, services and improvements. There is a need to assess and clearly define the responsibilities relating to the required infrastructure and the potential range of funding and delivery mechanisms including the role of applicants/developers, and the financially constrained environment that Auckland Council and Auckland Transport are operating within. Discussions between the Council, the applicant, other landowners in the Drury area and the Government on this fundamental issue are ongoing, and Auckland Council and Auckland Transport are hopeful that a solution to the infrastructure funding and financing issues can be found. However, at this stage such a solution is not in place.

- 2.9 The plan change proposal (i.e. the amended provisions and the resulting anticipated development enabled by these amendments) will lead to urbanisation in the Drury area and requires the provision (including funding and delivery) of the transport infrastructure and services to the area. The need to coordinate urban development with infrastructure planning and funding decisions is highlighted in the objectives of the National Policy Statement on Urban Development 2020 (**NPS-UD**) which are quoted below (with emphasis in bold):

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) the area is in or near a centre zone or other area with many employment opportunities*
- (b) **the area is well-serviced by existing or planned public transport***
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) **integrated with infrastructure planning and funding decisions;** and*
- (b) strategic over the medium term and long term; and*
- (c) responsive, particularly in relation to proposals that would supply significant development capacity.*

- 2.10 The Regional Policy Statement (**RPS**) objectives and policies in the AUPOP place similar clear emphasis on the efficient provision of infrastructure and on the integration of land use and development with infrastructure, including transport infrastructure. Refer, for instance, to Objectives B2.2.1(1)(c) and (5) and B3.3.1(1)(b), and Policies B2.2.2(7)(c), B2.4.2(6) and B3.3.2(5)(a) (e.g. Policy B3.3.2(5)(a) is to: *“Improve the integration of land use and transport by*



... ensuring transport infrastructure is planned, funded and staged to integrate with urban growth ”).

- 2.11 Auckland Transport considers that the lack of alignment between the release of the subject site and the timing of supporting infrastructure and services is a key issue in assessing the effects associated with the proposal. It is important to ensure that any adverse transport effects can be appropriately mitigated. The assessment of effects should also consider whether it is necessary to limit the scale of growth that can be realistically supported in the initial stages of development based on the extent of mitigation provided by the applicants/developers.

Supporting transport and land use integration opportunities

- 2.12 The integration of transport and land use is a prerequisite to managing potential and actual adverse transport effects, as well as encouraging positive transport effects. In the context of PPC 51 and other plan changes in the Drury area, such as PPC 48 (Drury Centre Precinct), PPC 49 (Drury East Precinct), and PPC 50 (Waihoehoe Precinct), the investigation, planning and delivery of the strategic transport infrastructure and services needed to support the wider growth identified in the Drury – Opāheke Structure Plan area is being undertaken through the Supporting Growth Programme².
- 2.13 The planned transport investments facilitated by planning being undertaken by SG represent a significant investment in new and upgraded transport infrastructure and services. To realise and optimise the benefits of these investments, there is a need to assess and provide or safeguard for the integration of the land use development enabled by the plan change with the immediate and wider transport network and facilities. This integration may take the form of supporting the mutually reinforcing benefits of increased intensity along high quality and accessible public transport corridors, safeguarding the future connectivity of the wider transport network or providing for street frontages and facilities that are consistent with the wider planned transport network requirements.

Cumulative effects

- 2.14 Cumulative adverse effects on the transport network can result from multiple developments that may individually have minor effects but in combination with others result in significant effects. In this case, the transport effects of PPC 51 should be considered in conjunction with the potential effects from plan changes which have been notified concurrently with PPC 51 and also seek to rezone Future Urban zoned land within the Drury – Opāheke

² The Supporting Growth Programme is a collaboration between Waka Kotahi NZ Transport Agency, Auckland Transport and Auckland Council.



Structure Plan area for urban developments that will potentially start at around the same time. Therefore, these plan changes should be read and considered together. These include PPC 48 (Drury Centre Precinct), PPC 49 (Drury East Precinct), and PPC 50 (Waihoehoe Precinct). PPC 46 (Drury South) to rezone land in the wider Drury area for urban developments or higher development yields has also been notified by the Council recently. It is also important from a transport and land use perspective to consider the need to integrate the PPC 51 Precinct Plan with the likely future networks and land uses located on land outside of the Precinct Plan area. The estimated yield of dwellings enabled by the lodged and notified Drury Plan Changes is around 19,000 dwellings.

- 2.15 In addition to the suite of Drury plan changes currently under consideration, over time it is expected that other land holdings will seek to rezone their sites to enable further incremental urbanisation. From the transport viewpoint, this approach of responding to the piecemeal development of non-contiguous and fragmented land ownership patterns is potentially problematic in regard to planning for and securing an integrated transport network. This includes the need to address cross-boundary transport network mitigation requirements and determining the responsibility for the delivery of transport related mitigation where there are multiple property and frontages under different land ownership.

Assessment and identification of effects and mitigation

- 2.16 In the context of PPC 51, the extent, scale and intensity of potential transport effects and the methods for mitigating these effects will require a combination of both wider strategic transport network connections, upgrades and facilities that are programmed in the Drury – Opāheke Structure Plan area and developer mitigation.
- 2.17 The capacity to address the transport effects of PPC 51 is reliant and dependent on a suite of wider strategic transport network connections, upgrades and facilities that are programmed to support the Drury – Opāheke Structure Plan area. The identification and programming of these transport network improvements is being undertaken as part of the Supporting Growth Programme and is subject to a separate investigation, planning and delivery process. Ideally, these transport network improvements would be in place before the land use development is implemented. The scale of the Supporting Growth Programme means that there will be a lag time relating to the planning, design, consenting and construction of the strategic transport network connections, upgrades and facilities.

Given this inter-dependency on a separate process where there is no certainty around funding for all the identified network improvements, there is a need to consider a range of mitigation methods including the potential deferral of development or a review of land development staging to ensure co-ordination and alignment with the required transport network mitigation.



- 2.18 The above overarching considerations have informed the following specific submission points addressed in Auckland Transport's submission.

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

- 3.1 Auckland Transport's submission seeks to ensure that PPC 51 appropriately manages the effects of the proposal (i.e. the amended provisions and the resulting anticipated development enabled by these amendments) on the local and wider transport network. The specific parts of the plan change that this submission relates to are set out in the main body of this submission and **Attachment 1** and include the following:

- Lack of infrastructure funding to support development;
- Development triggers / provision of transport upgrades and mitigation;
- Land use integration with public transport and active mode networks;
- The transport network proposed within the Precinct Plan;
- The impact of the proposed land use and roading network on the current and future arterial network.
- Noise mitigation.

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

- 3.3 Although all four plan changes (PPCs 48, 49, 50 and 51) have been notified by the Council at the same time, they are being processed separately. Good planning outcomes, particularly those in relation to the transport network, rely on the need to consider effects of all four private plan changes in an integrated manner to ensure sound and integrated planning and decision making. For this purpose, Auckland Transport's submissions on these four private plan changes should be read and considered along with each other. Copies of Auckland Transport's submissions on PPC 48, PPC 49, and PPC 50 are included in **Attachment 2**.

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

4.0 Decisions sought from the Council



- 4.1 Auckland Transport's primary position at this time is that the Council should decline PPC 51 unless the concerns raised in this submission including the main body and **Attachment 1** are appropriately addressed and resolved.
- 4.2 **Attachment 1** provides further detail of the decisions sought from the Council, including alternative relief in the event that Auckland Transport's primary relief (that PPC 51 be declined) is not accepted.
- 4.3 In all cases where amendments to the plan change are proposed, Auckland Transport would consider alternative wording or amendments to the objectives, policies, rules, methods and maps which address the reason for Auckland Transport's submission. Auckland Transport also seeks any further, other or consequential relief required to respond to the reasons for this submission and/or give effect to the decisions requested.
- 4.4 Auckland Transport is available and willing to work through the matters raised in this submission with the applicant.
- 5.0 Appearance at the hearing**
- 5.1 Auckland Transport wishes to be heard in support of this submission.
- 5.2 If others make a similar submission, Auckland Transport will consider presenting a joint case with them at the hearing.



Name: Auckland Transport

Signature:

A handwritten signature in black ink, appearing to read 'CR.'.

Christina Robertson

Group Manager, Strategic Land Use and Spatial Management

Date: 22 October 2020

Contact person: Chris Freke
Principal Planner, Urban Development Programmes

Address service: **for** Auckland Transport
Private Bag 92250
Auckland 1142

Telephone: 0274 661119

Email: Chris.Freke@at.govt.nz

Attachment 1

The following table sets out where amendments are sought to PPC 51 Drury 2 Precinct provisions and AUPOP maps and also identifies those provisions which Auckland Transport supports.

Italics = *PPC 51 notified text*

Strikethrough = ~~proposed deletions~~

Bold and underline = **proposed additions**

Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
39.1 Lack of infrastructure / funding to support development	Entire Plan Change	Oppose	<p>Auckland Transport is concerned that PPC 51 provides no clear indication of how transport infrastructure would be financed and funded. PPC 51 is reliant on major transport infrastructure projects (both bulk infrastructure as well as upgrades to existing infrastructure that is not built to the required urban standard or upgrade to operation services) to be provided by third parties to service and support the rezoning of the precinct area from Future Urban Zone to a mix of Business and Residential zones.</p> <p>The Regional Land Transport Plan 2018-2028 has not identified or allocated funding for major transport infrastructure or new services to support the urbanisation in Drury area before 2028. Even where proposed infrastructure is funded, it will take years to permit, design and</p>	<p>PPC 51 be declined unless the reasons for this submission, as outlined in the main body of this submission and in this table, including Auckland Transport's concerns about transport infrastructure and services funding deficit, are appropriately addressed and resolved.</p> <p>Given that there is no certainty around funding and delivery for required infrastructure improvements, if PPC 51 is not declined, there is a need to consider a range of mitigation methods including the potential deferral of development or a review and implementation of land development staging to ensure co-ordination and alignment with the required transport network mitigation.</p>



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>construct.</p> <p>Developments happening ahead of any supporting transport infrastructure being in place is not sound resource management practice and is contrary to, and does not give effect to, the NPS-UD, which supports out of sequence only when the funding and delivery of transport infrastructures/upgrades are available and being provided to support the development.</p> <p>Moreover, uncoordinated transport infrastructure provision will not result in well-functioning urban environments as anticipated by the NPS-UD and will lead to poor land use-transport integration outcomes.</p>	
<p>39.2 Misalignment of release of development site and the provision of transport infrastructure upgrades</p>	Entire Plan Change	Oppose	<p>Auckland Transport is not supportive of development proposals where there is no provision, or there is inadequate provision, for the necessary infrastructure to enable development to be appropriately serviced, such as the upgrading of the surrounding transport network where it will be required.</p> <p>Auckland Transport does not have funding to provide for any required strategic infrastructure or upgrades to support the development of such land.</p>	Decline PPC 51, or amend the plan change to incorporate provisions and / or identify appropriate mechanisms to provide for the upgrade of Karaka Road and Burberry Road to an urban standard and to ensure that development does not adversely affect the ability to undertake any necessary upgrades to enable Karaka Road to become a future Urban Arterial.



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>As noted above, the Auckland Plan and the FULSS identify Drury West Stage 1 to be considered for release for urban development in 2018—2022 (1st half, Decade One). Drury West Stage 1 is identified as being development ready from 2022. PPC51 is therefore, when the lead times for making operative plan changes are taken into account, roughly in step with the Auckland Plan Development Strategy and FULSS sequencing.</p> <p>Notwithstanding this, the area is still not infrastructure ready. While the new Drury rail stations (including the Drury West station) is a funded project within the New Zealand Upgrade Programme, there is no current funding for the upgrade of Karaka Road or the Karaka Road/Great South Road intersection and upgrades to Bremner Road and Jesmond Road.</p> <p>Auckland Transport is also concerned the PPC 51 accelerated development may adversely affect the ability of the future transport network to be upgraded to address the cumulative effects of growth associated with urbanisation of the Future Urban land within Drury. PPC 51 itself does not propose any protection for likely future widening requirements.</p>	
39.3 Proposed zoning and land use	Entire plan	Support	Auckland Transport supports the proposed centre zoning and residential zoning	



	Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
	pattern	change		mix provided that the proposed network can accommodate this.	
39.4	Upgrade of existing roads to required urban standard	Precinct Plan	Oppose	<p>PPC 51 could lead to development along Karaka Road and Burberry Road without associated frontage improvements. These frontage improvements should ideally be provided for at the time of development by the developer as mitigation of effects generated by each respective site or area.</p> <p>Both roads are currently built, in part, to a rural standard and developers should be required to form the site frontage. Required upgrades would include, without limitation, provision of footpath, kerbs and channels, earthworks to integrate with development levels, cycle facilities, street lights, berm and street trees as well as carriageway widening/upgrading, land vesting and stormwater treatment and conveyance.</p>	<p>Amend PPC 51 to incorporate provisions and / or mechanisms which address the following in relation to the upgrade of Karaka Road and Burberry Road:</p> <ul style="list-style-type: none"> • Vesting and formation of frontage, drainage and carriageway upgrades • Timing of upgrade requirements • Funding and delivery of the above work.
39.5	Staging requirements / ability to stage	Entire Plan Change	Oppose	<p>The applicant has only proposed carrying forward the existing Drury 1 precinct staging provision relating to the intersection of Jesmond Road and State Highway 22. Other than this, there are no new staging requirements proposed.</p> <p>Managing the potential effects of poorly aligned infrastructure and land use will require strong staging related mechanisms to</p>	<p>Amend PPC 51 to incorporate provisions enabling the interim effects of development proceeding ahead of the ultimate planned network to be assessed and addressed, including appropriate additional staging requirements relating to:</p> <ul style="list-style-type: none"> • Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>ensure that the interim effects of the development proceeding ahead of the required transport network and services upgrades are mitigated or avoided. This mitigation needs to be provided by developers in conjunction with or ahead of their development.</p> <p>Auckland Transport is concerned that interim adverse effects may result of the following network improvements are not provided at the right time. This includes:</p> <ul style="list-style-type: none"> • Early provision of proposed north south connector and traffic signals on Karaka Road coupled with the closing of Burberry Road (if confirmed) or work to prevent through traffic using it; • Early active mode access to the proposed new rail station; • Introduction of passenger transport services to the Precinct Plan area • Any interim improvements required to Karaka Road as it transitions from a high-speed rural state highway to an urban arterial. • Any other transport improvements identified as being required to support 	<p>closing of Burberry Road (if confirmed) or work to prevent through traffic using it;</p> <ul style="list-style-type: none"> • Early active mode access to the proposed new train station; • Any interim improvements to Karaka Road; • Introduction of passenger transport services to the Precinct Plan area • Updating the proposed staging provisions to reflect the fact that interim works at the intersection of Jesmond Road and Karaka Road have been undertaken. • Any other transport improvements identified as being required to support proposed development



	Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
39.6				proposed development A minor amendment to the text contained within the plan change is also sought to reflect the fact that the interim intersection improvements at the intersection of Karaka Road and Jesmond Road have been undertaken.	
	Staging requirements-General	Entire Plan Change	Oppose	PPC 51 does not include general provisions which would enable the consideration of the staging applied to subdivision and development proposed. Where network links cross several properties staging can affect the level of interim connectivity leading to adverse effects including the inability to introduce passenger transport services to new urban areas.	Amend PPC 51 to incorporate provisions allowing the staging of subdivision and any associated mitigation related works to be a matter for discretion accompanied by appropriate assessment criteria.
39.7	Roading requirements	Entire Plan Change	Oppose	Auckland Transport seeks a consistency of approach across Private Plan Change precinct provisions to the use of cross sections which outline the standards to be applied to future road construction. This approach should balance the need for flexibility to respond to changing design standards over time and the need for certainty, particularly where roads have to be constructed over time by a number of different developers. Auckland Transport seeks provisions within	Amend PPC 51 to include provisions relating to the minimum road reserve widths and key design elements and functional requirements of new roads and existing roads which need to be upgraded to urban standards including but not limited to: <ul style="list-style-type: none">• Carriageway• Footpaths• Cycleways



39.8

Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>Precinct Plans which indicate overall minimum road reserve widths as well as the functional requirements and key design elements for street design. These should be supported by appropriate activity status, matters for discretion and assessment criteria to provide for instances where these provisions are not met.</p> <p>PPC 51 includes limited material on future road design parameters and Auckland Transport seeks that these be introduced in accordance with the above points.</p>	<ul style="list-style-type: none"> Public Transport (dedicated lanes, geometry etc) Ancillary Zone (Parking, Public Transport stops, street trees) Berm Frontage Building Setback Design Speed
Bus network / public transport provision	Entire Plan Change	Oppose	<p>Auckland Transport requires the future ability to run buses on the collector roads proposed in the plan change area as well as the town centre road link to Jesmond Road. This will enable direct connections between the town centre and both the proposed Drury Central and Drury West rail stations.</p> <p>The Precinct Plan policies and provisions make insufficient reference to the need to provide for the ability to efficiently and effectively provide passenger transport services to the Precinct area and beyond.</p>	Amend PPC 51 to incorporate policies and provisions addressing the need for the future road network to provide for future passenger transport routes including a standard that all collector roads and the town centre road providing access to the west, as well as associated intersections, be designed with a geometry that can accommodate passenger transport vehicles.



	Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
39.9	Active mode permeability to future frequent transport network passenger transport routes and rail stations.	Entire plan change area	Oppose in part	<p>AUPOP Regional Policy Statement provisions in B2.4 and B3.3 seek to integrate land use and transport development with increased intensification around public transport.</p> <p>Jesmond Road is proposed to be upgraded to an arterial road. It will serve as the main north-south connection in Drury West. A future Frequent Transport Network (FTN) route is also proposed along Jesmond Road. When complete, this will provide a high frequency bus service. This will service the northern area of Drury West, both Drury rail stations and connect to the rest of Auckland via the extended FTN. Walkable access to this network is important for the town centre as is access to the future rail station.</p> <p>Collector and local roads and active mode routes need to be developed so that they efficiently and effectively connect the new urban areas including the proposed town centre to this arterial and the future rail stations. This will help maximise the active mode catchments around passenger transport routes and stations.</p>	Amend PPC 51 to incorporate policies, standards and assessment criteria which provide for efficient and effective active mode routes from the Precinct Plan area to future rail stations and FTN routes.
39.10	Active modes / Cycling	IX.10. Precinct Plan	Support in part	Auckland Transport supports the identification within Precinct Plans of future network links that need to provide for separated cycle facilities that	Replace the references to cycle and 3m shared paths with a reference to “separated cycle paths on both sides”.



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>are separated from the general carriageway. Auckland Transport supports the Precinct Plan's identification of some such links.</p> <p>Auckland Transport considers that this notation should also be applied to the proposed town centre roads and Karaka Road as well to any reserve networks that may be created via the submission and hearings process, such as may be required to accommodate streams or the gas pipeline.</p> <p>Auckland Transport also seeks that the references to "cycle and 3m shared paths" be replaced with a more general reference to "separated cycle paths on both sides [of the road]" or similar to provide for future design flexibility.</p>	<p>Apply the requirement to provide separated cycle facilities to the proposed town centre roads and Karaka Road or, as appropriate, to any additional reserve networks arising from submissions.</p>
Precinct road links to the west (Jesmond Road)	IX.10. Precinct Plan	Oppose in part	<p>PPC 51 provides for two collector road links and a town centre road link to its western boundary.</p> <p>The general level of connection is supported. However, there is no material to demonstrate the feasibility of continuing the routes to Jesmond Road in a manner that integrates with wider future development on the west side of Jesmond Road. The future arterial status of Jesmond Road necessitates the identification of key east west routes and associated intersections.</p>	<p>Auckland Transport seeks the following :</p> <ul style="list-style-type: none"> a) That feasible and optimal future network link alignments to the west be confirmed and integrated with wider network requirements. b) That these be identified within the Precinct Plan or by other means where they continue beyond it. c) That the Precinct Plan provides for a direct link from Jesmond Road to the town centre and north south collector road which is

39.11



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			<p>Auckland Transport also considers that there should be a direct east west link from Jesmond Road to the town centre and north south collector network which is capable of accommodating buses.</p> <p>There is a need to provide some certainty and definition of the proposed network which needs to be integrated with that to be applied beyond the precinct.</p>	capable of accommodating buses.
39.12 Town centre and proposed north south Collector road intersecting opposite McPherson Road	IX.10. Precinct Plan	Oppose in part	<p>Auckland Transport supports in general the provision of a North South Collector Road intersecting with Karaka Road somewhere between Great South Road and Jesmond Road.</p> <p>However, there are some concerns over the feasibility of the location proposed given the presence of the lake and non-optimal angle of entry. McPherson Road also has a substandard clearance under the North Island Main Trunk railway line and upgrading it to a major intersection may increase the risk of larger vehicles using it and striking the rail bridge.</p> <p>In addition, no assessment has been undertaken of traffic generation from the proposed town centre and the implications of this on the design</p>	<p>Auckland Transport seeks the following:</p> <ul style="list-style-type: none"> a) That an assessment of the trip generation impacts from the proposed town centre be undertaken to assess its impact on the operation of Karaka Road and any implications for the design of the proposed collector road intersection with Karaka Road opposite McPherson Road. b) That the Precinct Plan and zoning be amended as required to address any issues arising from this exercise. c) That an assessment of the feasibility of the proposed collector road intersection with Karaka Road opposite McPherson Road be undertaken and that an alternative location



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
			of intersections with Karaka Road or impacts on the operation of Karaka Road over time.	be identified within the Precinct Plan in the event that there are unresolved issues associated with it or a better location is identified through the submission process.
39.13 Precinct Plan reference to future traffic signals at the intersection of Town Centre Road and Karaka Road	IX.10. Precinct Plan	Oppose	<p>Auckland has no objection to the provision of an intersection arrangement that prohibits right turning movements at the intersection of the proposed town centre road and Karaka Road.</p> <p>However, Auckland Transport considers that any reference to future signals should be removed unless suitable analysis has been undertaken to demonstrate it will not have adverse effects on the operation of Karaka Road and the proposed traffic signals at Jesmond Road / Karaka Road and the collector road intersection proposed to the east of it.</p>	Amend the Precinct Plan to remove reference to future traffic signals at the intersection of the proposed town centre road and Karaka Road.
39.14 Precinct Plan reference to responsibility for undertaking transport improvements	IX.10. Precinct Plan	Oppose	<p>Auckland Transport opposes references within the proposed Precinct Plan to the responsibility for providing the future potential traffic signals at the intersection of the town centre road and Karaka Road and at the intersection of the proposed Collector Road with Great South Road/Karaka Road resting with "others".</p> <p>The responsibility to provide appropriate access should rest with the relevant developers, recognising that there is an intention to designate for the future provision of a 3-legged signalised</p>	Amend the Precinct Plan to remove reference to the provision of future intersection improvements by "others".



	Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
39.15	Burberry Road/precinct boundary		Support in part	<p>intersection at the intersection of Great South Road and Karaka Road.</p> <p>Auckland Transport supports the position that the current Burberry Road is unsuitable as a future collector due to its proximity to the intersection of Great South Road and Karaka Road.</p> <p>Auckland Transport supports Precinct Plans indicating any future roads planned to be closed as development proceeds. However, some amendments may be required in the event that the Burberry Road proposed closure is confirmed in order to address the following matter.</p> <p>The proposed Precinct Plan boundary excludes the intersection of Burberry Road and should be amended to include this.</p>	Amend the Precinct Plan and zoning as required to address the issue raised.
39.16	First Gas Transmission Line		Oppose	<p>The road and reserve network within the Drury 1 Special Housing Area was designed to largely accommodate the alignment of the First Gas Transmission line within road reserves or local reserves.</p> <p>PPC 51 does not address this issue but proposes a grid road network that could potentially be problematic where the gas line crosses it.</p>	<p>The following assessment is sought along with any consequential changes to the proposed network and Precinct Plan that may be required to better integrate it with the gas transmission line.</p> <p>a) Why the approach adopted for the adjoining urban area in respect of the gas transmission line has not been applied within the plan change area and/or what alternative approach is proposed.</p>



Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
				<p>b) The impacts of the gas transmission line on the proposed network and associated development patterns.</p> <p>c) The identification of a local road and reserve network design that can practically accommodate the gas transmission line.</p>
39.17 Development alongside and access to State Highway 22		Oppose	Until the use and function of State Highway 22/Karaka Road is altered any development along it should note its regional freight role and be considered and designed accordingly. The transport network upgrades, particularly the signalised intersections on Karaka Road, should address the safety issues of general traffic/vehicles turning into the road and be designed and supported by any ancillary road works necessary to avoid adverse effects on the operation of Karaka Road.	Amend the Precinct Plan to include criteria around the need for new access to State Highway 22 Karaka Road or development alongside it to avoid adverse effects on its operation.
39.18 Western Precinct Plan Boundary treatment	Entire plan change	Oppose in part	<p>The Precinct Plan and zone boundary follow property boundaries and propose a north south local road along the western edge of the Precinct Plan area.</p> <p>However, the property boundaries are disjointed, and part of the road would need to be formed on land outside of the Precinct Plan area which is zoned future urban. This may hamper the ability to develop the adjoining land and form the road.</p>	That the western boundary of the Precinct Plan and the north south local road location be assessed as to its appropriateness and the zone boundary and Precinct Plan be amended as required to address any issues.



	Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought					
39.19				The boundary and road location need to be reviewed to ensure that development can proceed in accordance with the Precinct Plan.						
	Consistency of approach and provisions across Drury private plan changes			Auckland Transport seeks a consistency of approach and drafting across the policies and other provisions contained within the Drury private plan changes provided that this exercise does not adversely affect the outcomes it is seeking.	Make necessary amendments to PPC 51 as required to achieve a consistency in approach, including in relation to objectives, policies, rules, methods and maps, across the private plan changes within the Drury growth area.					
39.20	<u>Noise Mitigation</u>	<u>IX.3 Policies</u>	<u>Oppose in part</u>	<u>These additions seek to ensure that noise-sensitive activities in proximity to arterial roads are controlled to address potential health and reverse sensitivity effects.</u>	<u>Add a new policy as follows:</u> <u>Ensure that new activities sensitive to noise adjacent to arterial roads are located, designed and constructed to mitigate adverse effects of road noise on occupants.</u>					
39.21		<u>IX.6 Standards and IX.4.1 Activity table</u>	<u>Oppose in part</u>		<u>Add a new standard to require that the assessed incident noise level to the façade of any building facing an arterial road that accommodates a noise-sensitive space is limited to a given level (Auckland Transport to confirm appropriate level).</u> <u>As a consequential amendment, add a new rule as follows:</u> <table><tr><td><u>(X)</u></td><td><u>Development that does not</u></td><td><u>RD</u></td></tr><tr><td></td><td><u>comply with IX.6.X Noise Mitigation.</u></td><td></td></tr></table>	<u>(X)</u>	<u>Development that does not</u>	<u>RD</u>		<u>comply with IX.6.X Noise Mitigation.</u>
<u>(X)</u>	<u>Development that does not</u>	<u>RD</u>								
	<u>comply with IX.6.X Noise Mitigation.</u>									



39.22

Issue / Provision	Relevant Precinct Provisions	Position (Support / Oppose)	Reasons for submission	Decision / relief sought
	<u>IX.8.2 Assessment criteria</u>	<u>Oppose in part</u>		Add a new assessment criterion as follows: <u>The extent to which noise sensitive activities in proximity to arterial roads are managed.</u>



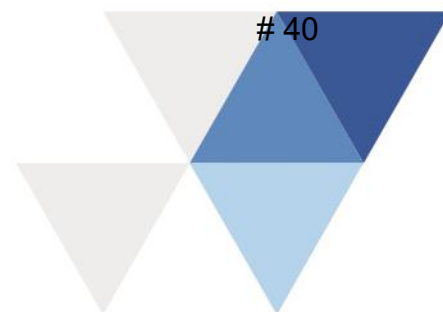
An Auckland Council Organisation

20 Viaduct Harbour Avenue, Auckland 1010
Private Bag 92250, Auckland 1142, New Zealand
Phone 09 355 3553 Website www.AT.govt.nz

Attachment 2

See attached Auckland Transport submissions on:

- Proposed Private Plan Change 48 (Drury Centre Precinct)
- Proposed Private Plan Change 49 (Drury East Precinct)
- Proposed Private Plan Change 50 (Waihoehoe Precinct)



FORM 5

Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991

To: Auckland Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: C/- Beca Ltd
21 Pitt Street
Auckland 1010

Attention: Jess Rose

Phone: 09 308 4565

Email: jess.rose@beca.com

This is a submission on the Proposed Plan Change 51 to the Auckland Unitary Plan ('Plan Change 51').

Introduction

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, and ensuring that the educational needs of new communities are met through purchasing sites and constructing new schools to meet demand as it occurs. The Ministry has an interest in activities that may impact on educational facilities and assets in the Auckland region and on the timing and urban form of development that will generate demand for additional education facilities, including state schools, Māori medium and learning support requirements.

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

The Ministry of Education's interest in the Drury area

In 2019, the Ministry of Education developed the National Education Growth Plan 2030 (NEGP) which provides a co-ordinated approach for addressing school-aged population growth across New Zealand. The NEGP identifies a number of catchments across the country and considers the anticipated demand and growth patterns so that the Ministry can ensure the school network is delivered in the right place at the right time.

Plan Change 51 is one of five recently notified plan change in the Drury area. The NEGP categorises the Papakura-Rosehill-Drury area as 'Blueprint for Growth', being an area where: *"local government planning includes intensive housing development and expansion into outer urban areas in response to, or causing, a large influx of people to move into a particular area. These areas provide opportunities to master plan education infrastructure collaboratively across agencies to integrate into new communities"*.

NEGP anticipates that the school network in the Papakura-Rosehill-Drury catchment will need to support approximately 11,500 to 12,600 students. With the potential need for 4 – 6 new primary schools and at least one new state secondary school in this area by 2030.

Position on this plan change

The Auranga B2 private plan change seeks to rezone approximately 33.65ha of Future Urban zoned land in Drury West to a mixture of Town Centre zone, Mixed Housing Urban zone and Terraced Housing and Apartment Building zone. As proposed, Plan Change 51 will provide capacity for approximately 890 dwellings, which will be in addition to the approximately 2650 dwellings enabled through the now approved Auranga A and B1 plan changes.

The Ministry broadly supports the proposed development in Drury in so far as it will provide much needed housing for the wider Auckland Region. However, the Ministry has an interest in:

- How development is planned and sequenced;
- The supporting infrastructure, such as roading connections; and
- The urban form and amenity provided through connectivity and useable public open space.

As stated in the applicant's Assessment of Environmental Effects, the Ministry has designated a site at 41 Burberry Road, Drury for a Primary School. The Ministry has also purchased land at 401 and 281 Jesmond Road, Drury for the establishment of a Secondary School. The Notice of Requirement for this site is expected to be lodged early in 2021. These sites are located to the north of the proposed plan change area and have been purchased by the Ministry in response to the anticipated development in these areas in the near future. The Ministry has not ruled out the requirement for further school sites in the Drury West area in the future. In addition, the Ministry would support the inclusion of public open space areas that can be support the wider community as part of the master planning exercise.

While the Ministry does not rely on Burberry Road for access to its new primary school site the Ministry supports the inclusion of appropriate walking and cycling facilities are part of the upgraded roading network shown on the Precinct Plan, particularly Burberry Road which may provide a key walking and cycling corridor to the new primary school at the end of Burberry Road, through the Plan Change 51 area. This will help reduce reliance on private motor vehicles and encourage active modes when accessing this school in the future. Communication with the Ministry through the detailed design of this area is important to ensure the best outcomes for the community.

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

Decision sought

The Ministry requests the following decision:

- Amendments to the proposed IX. Drury 2 Precinct Chapter (requested changes are underlined):

40.1

<p><i>Policy IX.3 (2) Incorporate the following elements of the Precinct Plan in the design of any subdivision and development:</i></p> <p><i>(a) The pattern, hierarchy and function of roads, including the town centre's main street and links to the State Highway network, and future rail station <u>and schools</u>;</i></p> <p><i>(b) Public open spaces and pPedestrian and cycle linkages <u>to public open spaces and schools</u>;</i></p> <p><i>(c) Linkages within the Precinct and to adjacent land including the Drury 1 Precinct;</i></p> <p><i>(d) Key intersections;</i></p> <p><i>(e) The amenity feature of the lake associated with the Town Centre;</i></p> <p><i>(f) Open space areas; and</i></p> <p><i>(g) Key retail and commercial frontages.</i></p>	40.1
<ul style="list-style-type: none"> Amendments to ensure there is provision of appropriate public open space to support the surrounding community. The retention of: <ul style="list-style-type: none"> Standard IX.6.2 Transport Infrastructure Requirements. These standards will help ensure appropriate transport infrastructure is provided prior to significant development occurring in the area. It will also enable greater ability to stage the provision of education facilities as development progresses. Standard IX.6.4 Site Access. This standard helps protect the functionality and safety of 3m shared footpaths and/or protected cycle lanes to be provided through the plan change area. The objectives and policies relating to the provision of safe and legible walking and cycling connections through communities as this will decrease reliance on private motor vehicles for travel to and from school and have health and safety benefits for communities. 	40.2
	40.3
	40.4
	40.5
<ul style="list-style-type: none"> Given the scale of residential development in Drury as a result of this private plan change and the other plan changes in Drury, the Ministry requests regular engagement with Auckland Council and Karaka and Drury Ltd to keep up to date with the housing typologies being proposed, staging and timing of this development so that the potential impact of the plan changes on the school network can be planned for. 	40.6
<ul style="list-style-type: none"> Any consequential amendments required to give effect to the matters set out in this submission. 	

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



Jess Rose
Planner – Beca Ltd

(Consultant to the Ministry of Education)

Date: 22 October 2020

The following customer has submitted a Unitary Plan online submission.

Contact details

Full name of submitter: Susan Andrews

Organisation name: Heritage New Zealand Pouhere Taonga

Agent's full name:

Email address: sandrews@heritage.org.nz

Contact phone number: 09 307 9920

Postal address:

Submission details

This is a submission to:

Plan change number: Plan Change 51 (Private)

Plan change name: PC 51 (Private): Drury 2 Precinct

My submission relates to

Rule or rules:

Please see attached submission.

Property address: Please see attached submission.

Map or maps: Please see attached submission.

Other provisions:

Please see attached submission.

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

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

The reason for my or our views are:

Please see attached submission.

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

Details of amendments: Please see attached submission.

Submission date: 22 October 2020

Supporting documents

HNZPT Submission PPC51 - Drury 2 Precinct.pdf

Attend a hearing

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

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

Declaration

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

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

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

No

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



HERITAGE NEW ZEALAND
POUHERE TAONGA

22nd October 2020

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

Dear Sir or Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

PROPOSED PLAN CHANGE 51 (PRIVATE): DRURY 2 PRECINCT

To: Auckland Council

Name of submitter: Heritage New Zealand Pouhere Taonga

1. This is a submission on the following proposed private change to the Auckland Unitary Plan (Operative in Part) (the proposal):

PC 51 (Private): To rezone 33.65 hectares of land in Drury West in the area generally bounded by Drury Creek to the east, Future Urban Zoned land to the west and Karaka Road/State Highway 22 to the south and south east, from Future Urban zone to 15.29 hectares of Business: Town Centre zone, 13.75 hectares of Residential: Terrace Housing and Apartment Buildings zone and 4.61 hectares of Residential: Residential: Mixed Housing Urban zone.

The proposal also introduces a new precinct to the Auckland Unitary Plan (Operative in Part) to manage the future layout of main roads in the precinct; ensure upgrades to the immediately surrounding road network, add additional amenity-related standards in the Business: Town Centre zone, enable additional building height and require planting of riparian margins and management of stormwater from roads and other impervious surfaces.

2. Heritage New Zealand could not gain an advantage in trade competition through this submission.

- Heritage New Zealand is an autonomous Crown Entity with statutory responsibilities under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage.

3. The specific provisions of the proposal that Heritage New Zealand's submission relates to are:

- The plan change in its entirety.

4. Heritage New Zealand's submission is:

- Heritage New Zealand wishes to have the proposed plan change provisions amended.

5. The reasons for Heritage New Zealand's position are as follows:

- 5.1 The Drury area has a number of notable historical associations relating to Māori settlement and activity, early European settlement, the New Zealand Wars, development of transport and industry, and rural activities from the mid-19th to the mid-20th centuries.
- 5.2 Heritage New Zealand supports the proposed esplanade reserve located along the eastern coastal edge of the proposed plan change area adjacent to Drury Creek. Coastal edges often contain archaeology and the provision of esplanade reserves ensure that the archaeology is not destroyed through development.
- 5.3 In order to avoid damage to archaeological sites from plant and tree roots, Heritage New Zealand requests that the planting proposed in the precinct provisions within the riparian margins of the watercourses be subject to an archaeological assessment, prior to development of a planting plan, so that the planting can avoid archaeological sites.
- 5.4 While no archaeological sites are currently recorded within the remainder of the precinct, the area is considered to potentially contain archaeological remains pertaining to both Māori settlement (midden) and 19th century European settlement.
- 5.5 Recent research indicates the presence of a Māori settlement area nearby south of the precinct, and the coastal inlet bounding the area to the east was also reportedly a former portage for Māori waka¹.
- 5.6 To ensure the historic heritage values of the area and the potential impacts of future development on these values are fully understood, evaluated and mitigated, Heritage New Zealand consider that additional archaeological field survey and assessment should be completed.
- 5.7 As stated in the Assessment of Environmental Effects (AEE)²:
 - 5.7.1 the site of the Commissariat Redoubt is located in proximity to the plan change area, and that while its delineated extent of place is limited to the extent of the Esplanade Reserve north of Bremner Road, 'the site could potentially extend further than this' (at 2.16.4.);
 - 5.7.2 the topography of the area creates a particular environment that would have been attractive for Māori settlement (at 2.16.5. in reference to Council's DOSP Heritage Report); and
 - 5.7.3 CIAs previously provided in relation to the plan change area raised concerns that there may be potential for the existence of kōiwi in the vicinity (at 6.4.11.).

41.1

¹ Robert Brassey, Principal Specialist Cultural Heritage, Auckland Council, pers. comm.

² Tollemache Consultants Ltd, 'Auranga B2 Private Plan Change Request, Planning Assessment: Assessment of Environmental Effects', Application to Auckland Council pursuant to Schedule 1 of the Resource Management Act 1991, Auranga, Drury, May 2020

- 5.8 Ideally, Heritage New Zealand would seek that the archaeological field survey and assessment should be completed prior to the Plan Change to inform areas that may be set aside if archaeological remains are discovered. However, the AEE states that impacts on archaeological remains can be managed through the resource consent and subdivision process. Therefore, as an alternative to the survey taking place prior to the Plan Change being granted, Heritage New Zealand seeks that provisions be included that ensure that this occurs at the subdivision stage. 41.1
- 5.9 An archaeological assessment at the subdivision stage will ensure that any archaeological remains in situ can be incorporated into the subdivision plans and inform green space locations, building platform locations and road layout.
- 5.10 Reliance on the Accidental Discovery Protocol provisions of the Auckland Unitary Plan is only appropriate in the instance where it has been established by a professional archaeologist that the potential for archaeological remains is low. The AEE states that there is archaeological potential in the area and archaeological assessments will inform where reliance on an Accidental Discovery is appropriate and where archaeological authorities under the HNZPT 2014 will be necessary.
- 5.11 While potentially outside of the scope of this process, Heritage New Zealand also believes that Auckland Council and the applicants should explore the potential of commissioning a heritage interpretation plan for the wider Drury area subject to the four separate plan changes, including ideas for place-shaping, place-naming, colour schemes, design references, public artworks and other heritage interpretation. With the proposed esplanade reserves, riparian setbacks, and new road layouts it may be possible to develop a heritage trail to support local identity and enhance public understanding of historic heritage places through improved public access, continuous esplanade reserves, presentation, interpretation and maintenance of significant historic heritage as suggested in the Structure Plan for the area. 41.4
- 5.12 Heritage New Zealand supports mana whenua in the exercising of kaitiakitanga and would ask that appropriate provisions are incorporated in the precinct plan to address any Māori cultural heritage values that may have been identified. 41.3
- 6. Heritage New Zealand seeks the following decision from the local authority:**
- Accept the proposed plan change with amendments as outlined below:
 - Include provisions within the precinct plan to require archaeological assessment of the area are undertaken by a suitably qualified professional including an evaluation, by a suitably qualified heritage consultant of the wider heritage landscape through the resource consenting process. 41.1
 - Amend the provisions requiring the riparian margins of permanent or intermittent streams to be planted to a minimum width of 10 metres to ensure exclusion of impacts on archaeological site extents, as assessed by a professionally qualified archaeologist. 41.2
 - Include appropriate provisions within the precinct plan to address any Māori cultural heritage values identified. 41.3

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

Yours sincerely



Sherry Reynolds
Director Northern Region

Address for Service:

Susan Andrews

PO Box 105 291, Auckland

09 307 9920

sandrews@heritage.org.nz

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

TO: Auckland Council

SUBMITTER: Drury South Limited

SUBMISSION ON: Proposed Plan Change 51 (Private): Drury 2 Precinct to the Auckland Unitary Plan ("**PC51**").

Introduction

1. Drury South Limited ("**DSL**") owns approximately 257ha of land within the Drury South Industrial Precinct, located to the south east of the PC51 land. DSL is in the process of developing its land for largely industrial purposes.
2. DSL could not gain an advantage in trade competition through this submission.
3. DSL is directly affected by effects of PC51 that:
 - (a) adversely affect the environment; and
 - (b) do not relate to trade competition or the effects of trade competition.

Scope of submission

4. The submission relates to PC51 in its entirety, but is particularly focused on Table IX.6.2.

Nature of submission

5. DSL supports further urban development in the Drury area and is supportive of PC51, subject to appropriate provisions being included within PC51 to ensure that PC51 does not adversely affect others in the area.

Reasons for submission

6. PC51, if amended to address the issues DSL has identified:
 - (a) will promote sustainable management of resources, and therefore will achieve the purpose and principles of the Resource Management Act 1991 ("**RMA**");
 - (b) will meet the reasonably foreseeable needs of future generations;
 - (c) will enable social, economic and cultural wellbeing;
 - (d) will avoid, remedy or mitigate adverse effects on the environment; and

- (e) represents the most appropriate way to achieve the objectives of the Auckland Unitary Plan, in terms of section 32 of the RMA.

Specific reasons for submission

7. Without limiting the generality of paragraph 6 above, DSL is particularly concerned to ensure that the transport effects of PC51 are appropriately managed.
8. Transport was a key consideration through the development of the Drury South Industrial Precinct that has detailed transport provisions including various transport upgrades external to the Precinct to ensure that transport effects are appropriately managed. DSL seeks to ensure that a framework is established under PC51 that similarly and appropriately manages transport effects.
9. Rule IX.6.2 states that:

All subdivision and development (including construction of any new road) must be undertaken concurrent with the following planned and funded infrastructure OR must not precede the upgrades outlined in Table IX.6.2.1.
10. However, the only upgrade identified in Table IX.6.2.1 is an upgrade to the intersection of State Highway 22 ("**SH22**") and Jesmond Road whereas the Precinct Plan shows three further intersection upgrades with SH22 as being required. The Burberry Road intersection with SH22 is apparently a requirement of previous stages of the Auranga development. The Precinct Plan suggests that the other two intersections will be upgraded "by others". It is not clear why "others" should be undertaking and funding upgrades to enable and benefit the PC51 area.
11. The transport assessment which supports PC51 seems to assume that the provision and funding of these upgrades will be addressed as part of later development and subdivision processes instead of being directly addressed in the PC51 provisions. As a result the transportation upgrade proposed in Table IX.6.2 is inadequate in scope and nature to ensure that there are not adverse effects on the Drury South Industrial Precinct and the wider road network.

Decision sought

12. DSL seeks confirmation of PC51 subject to Table IX.6.2.1 being amended to include the following additional upgrades:
 - (a) The intersection of the new collector road with SH22 opposite Great South Road must be upgraded by a fully signalised intersection.
 - (b) Such further other orders, relief or other consequential or other amendments as considered appropriate and necessary to address the concerns set out above.
13. DSL wishes to be heard in support of this submission.

42.1

14. If others make a similar submission consideration would be given to presenting a joint case with them at any hearing.

DRURY SOUTH LIMITED by its solicitors and authorised agents Russell McVeagh:



Signature:

Daniel Minhinnick

Date:

22 October 2020

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**SUBMISSION ON PLAN CHANGE 51 – DRURY 2 PRECINCT (AURANGA B2),
DRURY WEST – AUCKLAND UNITARY PLAN BY
KĀINGA ORA HOMES AND COMMUNITIES**

TO: Auckland Council
Private Bag 92300
Victoria Street West
Auckland 1010

Submission via email: unitaryplan@aucklandcouncil.govt.nz

KĀINGA ORA HOMES AND COMMUNITIES (“**Kāinga Ora**”) at the address for service set out below makes the following submission on Plan Change 51 – Drury 2 Precinct, Drury West (“**PC51**”) to the Auckland Unitary Plan Operative in Part (“**AUP:OP**”).

Background

1. Kāinga Ora was established in 2019 as a statutory entity established under the Kāinga Ora-Homes and Communities Act 2019. Kāinga Ora consolidates Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown entity and is required to give effect to Government policies.
2. Kāinga Ora is now the Government’s delivery entity for housing and urban development. Kāinga Ora will therefore work across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:
 - (a) being a world class public housing landlord; and
 - (b) leading and co-ordinating urban development projects.
3. Kāinga Ora’s statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
 - (a) provide people with good quality, affordable housing choices that meet diverse needs; and

- (b) support good access to jobs, amenities and services; and
 - (c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
4. Kāinga Ora is focused on delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures.
 5. The public housing portfolio managed by Kāinga Ora in Auckland comprises approximately 30,100 dwellings¹. Auckland is a priority to reconfigure and grow Kāinga Ora's housing stock to provide efficient and effective public and affordable housing that is aligned with current and future residential demand in the area, and the country as a whole.
 6. Kāinga Ora has a shared interest in the community as a key stakeholder, alongside local authorities. Kāinga Ora's interests lie in the provision of public housing to persons who are unable to be sustainably housed in private sector accommodation, and in leading and co-ordinating residential and urban development projects. Kāinga Ora works with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.
 7. In addition to its role as a public housing provider, Kāinga Ora also has a significant role as a landowner, landlord, rate payer and developer of residential housing. Strong relationships between local authorities and central government are key to delivering government's priorities on increasing housing supply.
 8. Policy decisions made at both central and local government level have impacts on housing affordability. The challenge of providing affordable housing will require close collaboration between central and local government to address planning and governance issues to reduce the cost of construction, land supply constraints, infrastructure provisions and capacity as well as an improved urban environment.
 9. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing. These include the provision of services and infrastructure and how this may

¹ As of 30 September 2019

impact on Kāinga Ora existing and planned housing, community development and Community Group Housing (“**CGH**”) suppliers.

10. In addition to the above, Kāinga Ora will play a greater role in urban development in New Zealand. The legislative functions of Kāinga Ora, as outlined in the Kāinga Ora Act, illustrate this broad mandate and outline two key roles of Kāinga Ora in that regard:
 - a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
 - b) providing a leadership or coordination role more generally.
11. Notably, Kāinga Ora’s statutory functions in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first time buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.

Scope of Submission

12. The submission relates to PC51 in its entirety.

The Submission is:

13. Kāinga Ora **supports** the plan change **in part**, which seeks to rezone land within the spatial extent of the Proposed Drury 2 Precinct (“**the Proposed Precinct**” or “**Precinct**”) from Future Urban Zone (“**FUZ**”) to a combination of Residential – Terrace Housing and Apartment Buildings Zone (“**THAB**”), Residential – Mixed Housing Urban Zone (“**MHU**”) and Business – Town Centre Zone (“**TCZ**”). This is subject to Kāinga Ora’s relief being granted and matters raised in its submission being addressed.
14. Kāinga Ora seeks a number of amendments to PC51 which are set out in further detail in this submission below and set out in:
 - (a) **Attachment 1** – Table 1: Identifies the specific provisions of PC51 which Kāinga Ora either supports, seeks amendment to, or opposes; and
 - (b) **Attachment 2** – Proposed re-zoning to be included in PC51.
 - (c) **Attachment 3** – Proposed Height Variation Control
15. In particular, but without limiting the generality of the above:

16. Kāinga Ora supports in part the proposed rezoning of land at this time, which is sequenced with the Future Urban Land Supply Strategy 2017 (“**FULSS**”) to have a timing of ‘2018 – 2022’. However, the structure plan and FULSS also identify that the extent of land between Karaka Road, Jesmond Road and Burberry Road is within the 2018-2022 sequencing. Kāinga Ora is therefore opposed in part to the spatial extent of proposed rezoning under PC51, which has excluded properties with a Jesmond Road street address.
17. Omission of this land adjacent to the Proposed Precinct (including Kāinga Ora land at 85 Jesmond Road) may compromise the opportunity for coordinated urbanisation and development on FUZ land, as a result of the differing land use standards that would apply between urbanised land (as currently proposed for rezoning) and the balance of FUZ land adjacent to the western extent of the proposed precinct. This may also undermine opportunities for the establishment of a centre that is aligned with the zoning pattern identified within the Drury-Opāheke Structure Plan 2019.
18. Kāinga Ora therefore considers it appropriate to include the following land within the spatial extent of land sought to be rezoned under PC51:(refer **Attachment One** for proposed zoning):
 - (a) The inclusion of 41 Jesmond Road, Drury as TCZ as this aligns with the identified location of the future centre under the Drury-Opāheke Structure Plan 2019².
 - (b) The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as THAB zoning; and
 - (c) The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as THAB zoning.
19. Kāinga Ora considers Policy 3(c) and (d) of the National Policy Statement on Urban Development 2020 (“**NPS:UD**”) to be of relevance to the intensity of land use proposed within PC51. Policy (3) encourages building heights of at least six storeys within a walkable catchment to existing and planned rapid transit stops. Policy (d) encourages building heights and density of urban form commensurate with the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services. In relation to features and connections sought to be established within the proposed precinct and through the planned-establishment of the Drury West

43.1

43.2

² Figure1: The Drury – Opāheke Structure Plan 2019 Land Use Map 2019

rail station, Kāinga Ora submit it is appropriate to apply a 19.5m Height Variation Control over the extent of the proposed THAB zone (both within the Proposed extent of the Drury 2 precinct and THAB zoning sought within Kāinga Ora's submission – refer **Attachment Three**), to better-provide for design flexibility in achieving six storey development in proximity to centres and rapid transit stops.

43.2

Relief Sought

20. Kāinga Ora seeks the following decision from Auckland Council on PC51:

- (a) The land east of Jesmond Road (identified in **Attachment Two** to this submission) be rezoned as part of the PC51 process.
- (b) That the proposed provisions of the Proposed Precinct be deleted or amended, to address the matters raised in this submission and its attachments so as to provide for the sustainable management of the Region's natural and physical resources and thereby achieve the purpose of the Resource Management Act 1991 ("**the Act**" or "**RMA**").
- (c) Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.
- (d) Any other alternative or consequential relief to give effect to this submission.

43.1

21. In the absence of the relief sought, PC51:

- (a) is contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;
- (b) will compromise the opportunity for coordinated urbanisation and development of land that is sequenced for urbanisation;
- (c) will undermine opportunities for the comprehensive development and establishment of a centre that is aligned with the zoning pattern identified within the Drury-Opāheke Structure Plan 2019; and
- (d) will in those circumstances impact significantly and adversely on the ability of people and communities to provide for their social, economic and cultural wellbeing.

22. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.
23. Kāinga Ora wishes to be heard in support of this submission.
24. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at hearing.

Dated this 22 day of October 2020



Brendon Liggett
Manager – Development Planning
Kāinga Ora Homes and Communities

ADDRESSES FOR SERVICE:

Campbell Brown Planning Ltd

PO Box 147001

Auckland

Attention: Michael Campbell

Email: michael@campbellbrown.co.nz

Kāinga Ora – Homes and Communities

PO Box 74598

Greenlane, Auckland

Email:

developmentplanning@kaingaora.govt.nz

Attachment 1

Table 1: Identifies the specific provisions of PC51 which Kāinga Ora either supports, seeks amendment to, or opposes.

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
	<i>Note: Kāinga Ora's submission relates to PC 51 in its entirety. Where provisions within the proposed Drury 2 Precinct are not included in this submission table, those provisions are supported in part, subject to the relief sought by Kāinga Ora.</i>			
1.	Spatial application of Zoning within the Drury 2 Precinct	Support in part	<p>The proposed THAB zoning is aligned with the zoning indicated on the Drury-Opāheke Structure Plan 2019, and will promote and enable a compact urban form with an efficiency of land use and residential development in proximity to the proposed centre to the south. Kāinga Ora also supports in part the proposed timing of the rezoning of land, which is sequenced with the 'Future Urban Land Supply Strategy 2017 ('FULSS') to have a timing of '2018 – 2022'. However, the structure plan and FULSS also identify that the extent of land between Karaka Road, Jesmond Road and Burberry Road is within the 2018-2022 sequencing.</p> <p>Kāinga Ora is therefore opposed in part to the spatial extent of proposed rezoning under PC51, which has excluded properties with a Jesmond Road street address. Omission of this land adjacent to the Proposed Precinct (including Kāinga Ora land at 85 Jesmond Road) may compromise the opportunity for coordinated urbanisation and development on FUZ land, as a result of the differing land use standards that would apply between urbanised land (as currently proposed for rezoning) and the balance of FUZ land adjacent to the western extent of the proposed precinct. This may also undermine opportunities for the establishment of a centre that is aligned with the zoning pattern identified within the Drury-Opāheke Structure Plan 2019.</p>	<p>Approve the plan change, subject to the following land being included for rezoning (refer Attachment Two for proposed zoning):</p> <ul style="list-style-type: none"> The zoning of 41 Jesmond Road, Drury as Business – Town Centres Zone. This aligns with the identified location of the future centre under the Drury-Opāheke Structure Plan 2019; The zoning of 85 Jesmond Road, Drury (owned by Kāinga Ora – Homes and Communities) as Terrace Housing and Apartment Buildings Zone; and The zoning of the balance of land north of 85 Jesmond Road on the eastern side of Jesmond Road as Terrace Housing and Apartment Buildings Zone.
2.	Drury 2 Precinct Plans	Support in part	Kāinga Ora considers Policy 3(c) and (d) of the National Policy Statement on Urban Development 2020 ("NPS:UD") to be of relevance to the intensity of land use proposed within PC51.	Approve the plan change subject to:

43.1

43.2

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
			<p>Policy (3) encourages building heights of at least six storeys within a walkable catchment to existing and planned rapid transit stops. Policy (d) encourages building heights and density of urban form commensurate with the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services.</p> <p>In relation to features and connections sought to be established within the proposed precinct and through the planned-establishment of the Drury West rail station, Kāinga Ora submit it is appropriate to apply a 19.5m Height Variation Control (provided for under H6.6.5(2) of the AUP(OP)) over the extent of the proposed THAB zone (both within the proposed extent of the Drury 2 precinct and THAB zoning sought within Kāinga Ora's submission – refer Attachment Three), to better-provide for design flexibility in achieving six storey development in proximity to centres and rapid transit stops.</p> <p>Kāinga Ora supports the spatial extent of the precinct as-notified.</p>	<ul style="list-style-type: none"> the inclusion and application of a 19.5m Height Variation Control in the proposed zoning area; retaining the spatial extent of the precinct boundaries
3.	IX.2 Objective (3)	Support in part	<p>Kainga Ora generally supports the objective to provide for development that results in an integrated transportation network. However, the objective limits such integration to 'pedestrian' linkages through the precinct.</p> <p>The objective should be reworded to be consistent with Policy IX.3 (1)(b):</p> <p><i>"Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides pedestrian multi-modal linkages through and between the Precinct, adjoining Precincts and to future planned public transport facilities."</i></p>	Retain Objective 3 with proposed amendment.

43.3

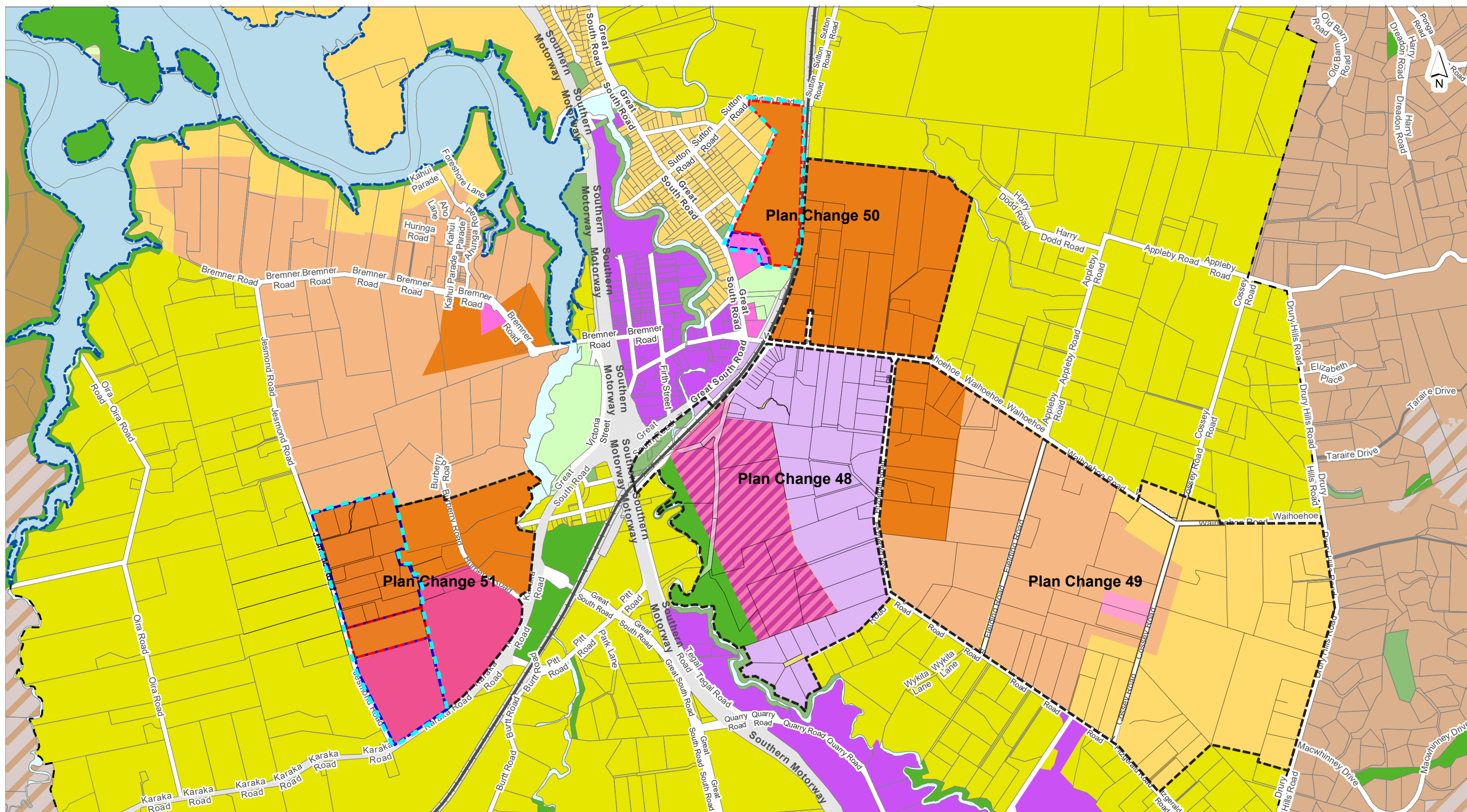
	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
4.	IX.3 Policy (4)(h)	Support in part	<p>Kāinga Ora generally supports the policy as-notified, but considered the policy to be prescriptive in its application of perimeter block design principles, which may not be appropriate in every development situation within the precinct.</p> <p>The policy should be amended:</p> <p><i>"Be designed according to incorporate perimeter block principles where car parking is provided behind buildings except for kerbside parking."</i></p>	Retain Policy 4(h) with proposed amendment.
5.	IX.3 Policy (5)(a)	Oppose in part	<p>Kāinga Ora generally supports the need to ensure subdivision and development is adequately serviced by infrastructure.</p> <p>However, Kāinga Ora is opposed to the policy as-notified as it is vague in specifying what 'transport upgrades' are being referred to, as well as directive in implying that 'upgrades' will be required.</p> <p>The policy may also have an unintended consequence for substantive decision making on subdivision consent applications, where the sequencing of development is dependent on wider (publicly-funded) infrastructure that may be delayed. In such a situation, temporary infrastructure-related effects can often be mitigated through temporary mitigation, while not incurring economic implications for developers due to unreasonable development constraints and/or delays.</p> <p>As Standard IX.6.2 does requires particular transport upgrades to occur, the policy should be amended to reflect this:</p> <p><i>"Be sequenced to occur concurrently with (and not precede) required infrastructure provision, including transport upgrades"</i></p>	Retain Policy 5(a) with proposed amendment.

43.4

43.5

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought	
			<i>within Standard IX.6.2 necessary to support development within the precinct;</i>		
6.	IX.3 Policy (5)(b)	Oppose in part	<p>Kāinga Ora generally supports the need to ensure subdivision and development is adequately serviced by infrastructure.</p> <p>However, Kāinga Ora is opposed to the policy as-notified as it is predetermining upgrades to existing roads being required. Whether such upgrades are required should be effects-based, taking into consideration the upgrades specifically identified within the precinct as being required.</p> <p>The policy should be amended:</p> <p><i>"Implement the transport network connections and elements as shown on the Precinct Plan, including by providing new roads and upgrades of existing roads and intersections;"</i></p>	Retain Policy 5(b) with proposed amendment.	43.6
7.	IX.6.2 (1) Transport infrastructure Requirements	Oppose in part	<p>Kāinga Ora opposes in part the notified wording of the standard as it contradicts the non-complying activity status that development preceding the upgrades identified in Table IX.6.2.1 would otherwise have under Activity Table IX.4.1 (A6).</p> <p>Kāinga Ora request that the relationship between these two provisions is clarified and amended as-required to avoid administrative ambiguity regarding the proposed precinct.</p> <p>It is suggested that the phrase "...OR must not precede the upgrades outlined in Table IX.6.2.1" be deleted.</p>	Retain proposed provision subject to clarification and/or amendment sought.	43.7
8.	IX.6.3 (2) Riparian Planting	Support in part	Kāinga Ora supports in part the provision of riparian planting to assist in ecological enhancement and giving effect to Policy 6(b).	Retain proposed provision subject to amendment sought.	43.8

	Issue / Provision	Position (Support / Oppose)	Reasons for submission	Relief sought
			<p>However, the standard should be reworded to clarify that a planning plan is required:</p> <p><i>“(2) The riparian planting plan (to give effect to compliance with Standard IX.6.3(1)) Any development or subdivision of land that contains a stream must:</i></p> <p><i>(a) include a plan identifying the location, species, planting bag size and density of the plants;</i></p> <p><i>[...]”</i></p>	



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Proposed Rezoning Map Plan Change 50 and 51

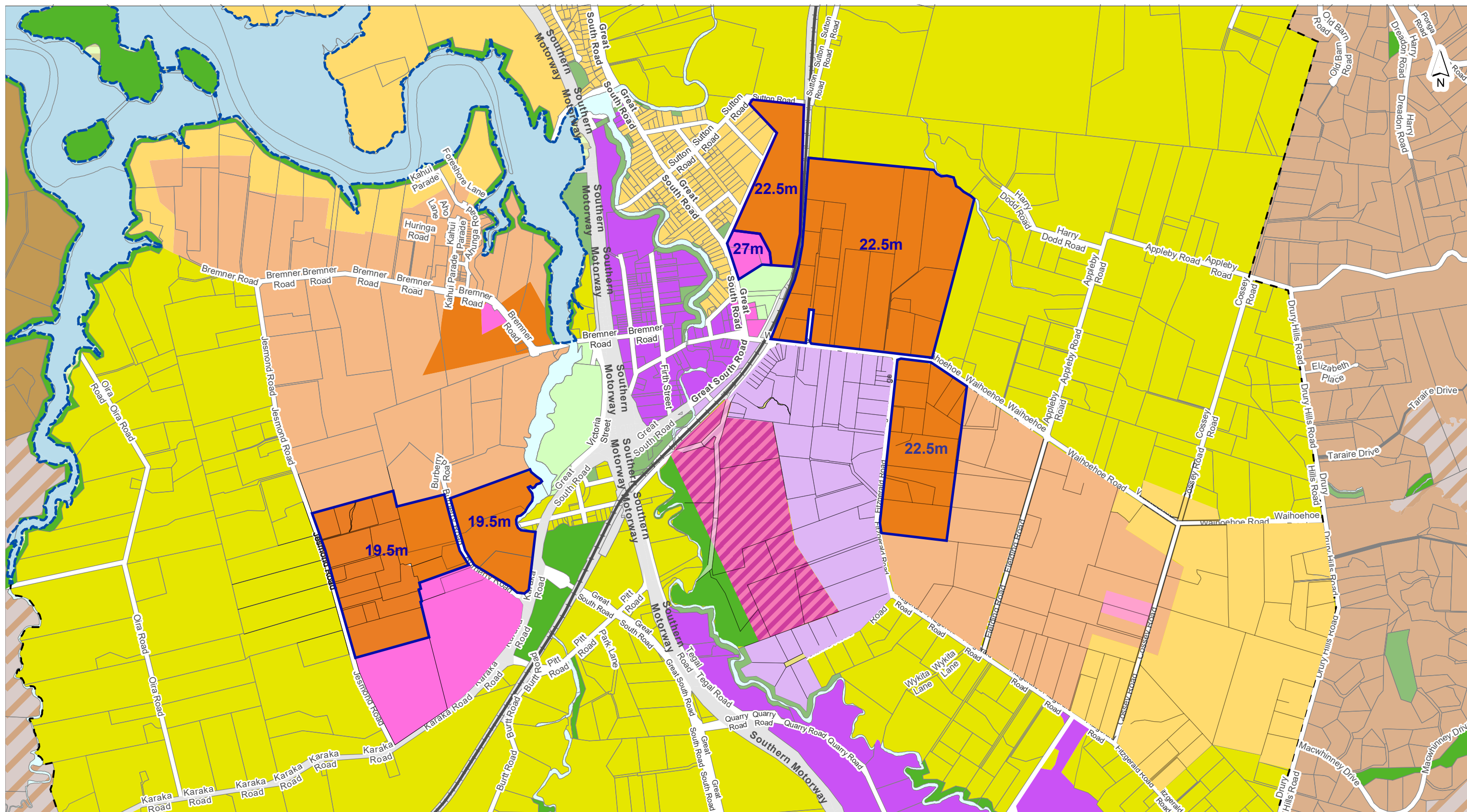
0 150 300 450
Meters

Scale @ A3
= 1:15,000

Date Printed:
29/09/2020

Legend

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



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Proposed Rezoning Map Height Variation Control

0 150 300 450
Meters

Scale @ A3
= 1:15,000

Date Printed:
29/09/2020

Legend

- | | |
|--|---------------------------|
| Metropolitan Centre Zone | Local Centre Zone |
| Mixed Use Zone | Neighbourhood Centre Zone |
| Terraced Housing and Apartment Building Zone | Open Space Zone |
| Mixed Housing Urban Zone | Height Variation Control |
| Mixed Housing Suburban Zone | |



SUBMISSION ON PLAN CHANGE 51 (PRIVATE): DRURY 2 PRECINCT

To: Auckland Council

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

INTRODUCTION

1. This is a submission on Proposed Private Plan Change 51: Drury 2 Precinct (**PPC51**) to the Auckland Unitary Plan (Operative in Part) (**AUP**).
2. PPC51 seeks to rezone 33.65 hectares of land in Drury West from Future Urban Zoned land to a mixture of Business: Town Centre zone, Residential: Terrace Housing and Apartment Buildings zone and Residential: Mixed Housing Urban zone. PPC51 also seeks to introduce a new precinct to the AUP which would see an expansion of urban development that is planned in the Drury 1 precinct.
3. The Submitter could not gain an advantage in trade competition through this submission.
4. This submission relates to the entire PPC51.
5. The Submitter's key interests are to ensure the protection, preservation and appropriate management of natural and cultural resources in a manner that recognises and provides for Mana Whenua interests and values and enables positive environmental, social and economic outcomes.
6. The Submitter **opposes in part** PPC51 on the basis that:
 - (a) There has, thus far, been no meaningful engagement with Mana Whenua on PPC51;
 - (b) Instead, the applicant attempts to rely on consultation with Mana Whenua that took place as part of the proposed Drury-Opāheke Structure Plan, and the submission that was prepared by Ngāti Te Ata and Ngāti Tamaoho as part of that process;
 - (c) As a result, Mana Whenua have not had the opportunity to provide input into the design and detail of the proposal to ensure that their values are reflected in PPC51, and that adverse environmental, social and cultural effects are avoided, remedied or mitigated;

- (d) The Submitter considers that PPC51 will result in adverse cultural, social and environmental effects.

Consultation

7. The Submitter considers that consultation undertaken by the applicant with Mana Whenua has been insufficient and disingenuous.
8. In response to a request from the Council for further information, the applicant states that they are under no obligation to consult with iwi. The applicant refers to hui that took place as part of the Drury-Opāheke Structure Plan process, and have attached a copy of a submission that Ngāti Tamaoho and Ngāti Te Ata prepared on the Drury Opāheke Structure Plan.
9. The Submitter co-authored the submission on the structure plan providing high level support for the location of a town centre in Drury West. The Submitter **does not accept** that this submission provides support for PPC51, or that it demonstrates meaningful consultation has taken place with Mana Whenua. We note the following in this regard:
 - (a) The applicant has made no effort to continue a dialogue or partnership with Mana Whenua since Ngāti Tamaoho signed the submission which was drafted by the applicant on 2 May 2019. Ngāti Tamaoho consider that that applicant essentially considered that it “had what it needed” after we had signed the submission, and from then on all consultation ceased. The applicant has made no effort to consult with us since May 2019.
 - (b)
 - (c) The Submitter signed the submission on the basis of good faith. Ngāti Tamaoho took the applicant on his word that he would partner with Mana Whenua as the development progressed to a greater level of detail and planning. Unfortunately for Mana Whenua, this has not eventuated.
 - (d) The submission and previous hui that took place between Mana Whenua and the applicant relate to the Drury-Opāheke Structure Plan. They do not relate to PPC51. There is unavoidably a much greater level of detail needed in a plan change application than a structure plan. This is precisely why the Council undertakes the rezoning in a two-step process. The submission therefore does not (and cannot) give support to PPC51.
10. The Submitter requests a decision on PPC51 that confirms the following, at a minimum:
 - (a) Ongoing participation, consultation and engagement in the project moving forward | 44.1
 - (b) Acknowledgement within the project design of the history of Mana Whenua in the PPC51 area | 44.2
 - (c) Te Aranga Principles incorporated in design concepts | 44.3
 - (d) Iwi monitoring | 44.4
 - (e) Natural and cultural landscaping accounted for in the project design | 44.5

- | | | |
|-----|--|-------|
| (f) | A minimum of 20 meter riparian margin for all waterways especially those to contain walkways / cycleways | 44.6 |
| (g) | A minimum of a two-treatment train approach for all stormwater prior to discharge to a waterway | 44.7 |
| (h) | Roof capture for reuse and groundwater recharge | 44.8 |
| (i) | Park edge design adjacent to all waterways | 44.9 |
| (j) | Native trees and plants only within the precinct | 44.10 |
| (k) | Ridgelines hilltops and wetlands protected | 44.11 |
| (l) | Sustainable development reflected in the design and outcomes. | 44.12 |
11. The Submitter seeks the following decision from Auckland Council:
- (a) **Reject PPC51** unless the issues addressed in this submission can be adequately addressed.
12. The Submitter wishes to be heard in support of their submission.
13. The Submitter would consider presenting a joint case if others make similar submissions.

22 October 2020

Lucie Rutherford
R.M.A Officer
Ngati Tamaoho
rmaofficer@tamaoho.maori.nz

