

# MEMORANDUM

**To:** Auckland Council: Michael Luong  
**From:** Barker & Associates  
**Date:** 25 March 2020  
**Re:** Drury Centre Plan Change: Planning RFI Response

## Drury Centre Plan Change Request - Kiwi Property no.2 Limited

We write in response to your request dated 5 March 2020 for further information under Clause 23(1) to Schedule 1 of the Resource Management Act 1991 relating to the above private plan change request. This letter sets out our responses to the matters raised in your letter, and is supported by the following attachment prepared by the technical specialists supporting the plan change request:

- Attachment 1: Drury Centre Plan Change Application dated 24 March 2020
- Attachment 2: Drury Plan Change dated 24 March 2020
- Attachment 3: Urban Design Assessment dated 24 March 2020
- Attachment 4: Response to Landscape and Visual Effects Request for Further Information
- Attachment 5: Response to Geotech Request for Further Information
- Attachment 6: Response to Economic Request for Further Information
- Attachment 7: Response to Ecology Request for Further Information
- Attachment 8: Response to Stormwater Request for Further Information
- Attachment 9: Response to Transport Request for Further Information
- Attachment 10: Auckland Unitary Plan and Drury Centre Precinct Provisions for Roads, Open Spaces and Buildings

The requests and our responses are set out below.

## 1.0 PLANNING

### 1.1 TRANSIT ORIENTATED DEVELOPMENT

**Request 1:** *Given the announcement around early station provision (with location of these stations being a separate issue), can you please advise whether and how the plan change request would be altered given the greater certainty now provided over early access to public transport?*

Stantec has undertaken further transport modelling to determine the impact of the transport infrastructure projects that the Government has confirmed funding for, including bringing forward the delivery of the Drury Central train station. This updated modelling now shows that the standard which seeks to stage development with transport upgrades can be significantly simplified. In particular the local upgrades required to enable certain development capacities include:

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- Safety improvements of the Great South Road/Waihoehoe Road intersection (required in approximately 2026); and
- Capacity improvements of the Great South Road/Waihoehoe Road intersection (required in approximately 2038 if there is direct access to the centre from SH1 and 2033 if there is not direct access).

In addition to simplifying the triggers criteria are now proposed to ensure that internal pedestrian and cycling linkages to the Drury Central train station are staged with development. This is discussed further within Section 1.8.3 of this response.

**Request 2:** *Given the importance attached to transit access in managing transport pressures, as well as shaping urban form, has consideration been given to the plan change only coming into effect once the Drury Central train station is operational? Could provision be made for enabling works to occur in the meantime?*

**Urban Design Request 5:** *Please also provide an analysis of urban form and amenity implications of creating a vehicle focussed urban environment in the short to medium term.*

Delaying the Plan Change so that it comes into effect once the Drury Central train station is operational is not necessary nor is this supported. Since the lodgement of the Drury East Plan Change applications the Government has committed to funding the Drury Central Train Station, with construction due to be completed late 2024 **refer Figure 1**. Given it is likely to take two years for the Plan Changes to become operative followed by two years of enabling works to prepare the land at Drury East for development, it is highly likely that the train station will be operational prior to the occupation of any new dwellings, retail or commercial buildings. As there is general alignment between the delivery of the train station and construction of Drury East getting underway it is not necessary to delay the Plan Changes.

Notwithstanding that there is alignment of the timeframes, the proposed delay of the Plan Change is not supported. It is not essential for the Drury Central train station to be aligned with the first dwellings or retail units are occupied to achieve Transit Orientated Development (**TOD**). A TOD is a type of compact community development which focuses on planning mixed-use and high-density development in close proximity to a major public transport station or corridor. Now that there is commitment from the Government to deliver the Drury Central train station by 2024 the Plan Change can with more certainty seek to enable a planning framework that seeks to respond to this through ensuring there are road, walking and cycling connections to the train station at the early stages of development. Auckland Transport's approach to providing public transport services is that they continue to monitor growth and transport conditions and prioritise the necessary infrastructure and service improvements as circumstances demand and budgets and practicalities allow<sup>1</sup>. Therefore, demand will drive the investment in supporting public transport services and a level of development is necessary prior to completion of the train station will provide a population to support investment in supporting bus networks.

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<sup>1</sup> Joint statement of evidence of Alastair Cribbens, Steve Wrenn and Liam Winter on behalf of Auckland Transport for Auckland Unitary Plan Topic 080 and 081 Rezoning and Precincts dated 3 December 2015 pg 14.

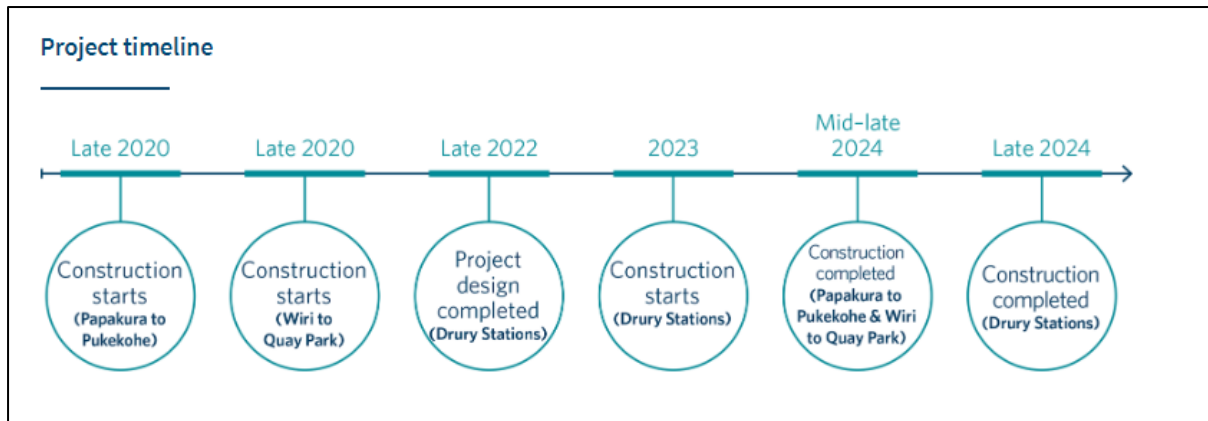


Figure 1: Drury Train Station Project Timeline Source: NZTA

## 1.2 CO-ORDINATION / INTEGRATION ACROSS THREE PLAN CHANGES

**Request P3:** Please advise on the risks associated with implementation of the three plan changes as separate precincts and how those risks are to be mitigated?

**Transport Request 1:** The transport modelling assessment and planning provisions currently speak to all three PPCs being accepted as a package and progressing in parallel. In the event that the PPCs are disaggregated, or deviate from each other in terms of timing as a result of the public notification process/resolution of critical elements, please provide further information as to how the transport effects of each individual PPC can be understood and mitigated and how the provisions may need to be amended as a result. Please confirm to what extent the PPC relies on the PPCs submitted by FHDL

In our view the risks associated with implementation of the three plan changes as separate precincts largely relates to the integrated delivery of transport infrastructure. Since the initial drafting of the Plan Change the Government has announced an infrastructure funding package which brings forward the delivery of many key projects such as the Drury Central train station and the Mill Road corridor.

The results of the updated modelling undertaken by Stantec accounting for the early delivery of now funded infrastructure projects has shown a delay in the timing for unfunded local upgrades that need to occur to enable development. The unfunded local roading projects that are required to enable capacity are now largely confined these to safety and capacity improvements to the Great South Road and Waihoehoe Road intersection. In addition, new provisions are now proposed to require the developers to stage the early delivery of internal linkages to the train station within their precinct or Plan Change area. The precinct provisions for these internal linkages have been developed in an integrated way across the Plan Changes, but do not rely on infrastructure works being undertaken by another party, given that there are options to access the Drury Central train station via interim upgrades to the existing road network.

In parallel with the Plan Changes, the Drury East developers intend to develop an infrastructure funding agreement between themselves, the Council and other relevant parties addressing these required but as yet unfunded local transport upgrades. This funding agreement will minimise the risks with implementation of the three plan changes as separate precincts and is intended to be in place

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prior to a hearing on the Plan Change. If that were to occur there is an option to remove the transport staging provisions from the Plan Change entirely.

The developers have already reached agreement with Watercare around network upgrades required to be installed and these works have physically commenced.

In our view, there are no other risks associated with managing the development of the three Plan Change areas via separate precincts given that the zoning framework and planning provisions have, and continue to be developed, in an integrated manner. However, we provide specific responses to the three potential risks listed on page 2 of the planning RFI:

Issue noted in the Planning RFI	B&A Response
The proposed rules associated with infrastructure delivery and how these may be interpreted if only one or two of the plan changes are operative.	The transport infrastructure rules have been simplified. The upgrades to the transport network would be triggered by one or all of the developments as the rule applies to the entire Drury East area (refer to the precinct plans showing the transport staging boundary). In this regard, there would be no difference if the development progressed concurrently or one development proceeded ahead of the other.
Whether the Oyster and Fulton Hogan plan changes can proceed ahead of the Kiwi Property plan change, given the transport issues involved, should the Kiwi plan change take longer to be made operative	As above, there would be no difference as the transport rule is the same and the rule applies to the entire Drury East area. Separate triggers apply for commercial and residential, so in the event that Kiwi development is delayed, their ability to achieve development in the Drury Centre is not constrained.
How costs are to be shared across the three plan change areas for required (identified) upgrades if development in one of the plan change area exceeds the triggers, but the other plan changes are not operative.	As noted above, the Drury East developers intend to enter into a Development Agreement to fund the necessary local upgrades prior to the Hearing on the Plan Change.

## 1.3 STAGING OF DEVELOPMENT AND INFRASTRUCTURE WITHIN THE PLAN CHANGE AREA

**Request 4:** *The plan change requiring specific internal linkages to be in place at an early stage to provide safe, direct access to the train station from across the three plan change areas by walking, cycling and bus.*

**Transport Request 18:** *Please show the proposed staging for land use and how the proposed transport network, including walking and cycling infrastructure and streets suitable for buses, will be delivered in stages in an integrated way.*

In response to this request and to ensure that the internal linkages which will provide connectivity with the Drury Central Train station are staged with development, additional assessment criteria have been included for roads refer IX8.2(1) (f). The proposed assessment criteria set out the staging of safe and attractive cycle and pedestrian connections to the Drury Central Train Station within the walking catchment of the station within all three Plan Changes. These provisions intend to ensure that connections to the rail station are in place irrespective of where development occurs in the Plan Change area. It is appropriate to provide for this staging through assessment criteria to provide flexibility to accommodate a range of access options at resource consent stage, and taking into account whether other connections are in place. This approach is preferred to showing a detailed staging plan in a precinct plan, given that this would likely change, depending on the rate of development, and the presence of new transport connections delivered by NZTA, Auckland Transport or private developers.

While we agree that these provisions are important to support public transport use, we note that no other greenfield Precinct in Auckland includes similar provisions, including Wesley (Franklin 2), and therefore the Applicant is going beyond what would typically be expected under the AUP framework.

It is noted that if a Development Funding Agreement is in place prior to the Plan Change hearing this will negate the requirement to have provisions guiding the staging of internal linkages to the Drury Central train Station.

**Request 5:** *Ensuring a basic level of development / activity around the station environs to help provide a sense of safety and security (such as convenience retail) in the first stages of the development.*

Activation of the area around the Drury Central Train Station sits outside of the Plan Change process. The Plan Change will enable activation around the Plan Change through restricting residential at ground floor and through matters for discretion that guide the development of roads and buildings to ensure these contribute to quality urban outcomes. Notwithstanding this the applicant is committed to working with Auckland Transport to ensure that the public spaces around the Drury Central train station are safe and vibrant.

## 1.4 URBAN FORM AND RAIL STATION LOCATION

### 1.4.1 Train Station Location

**Request 6:** *Please advise how the natural hazard and riparian margin issues would be addressed in the Kiwi preferred station location option.*

**Transport Request 23:** Please confirm whether the potential catchment for the train station from the nearby Auranga development been considered, and if so, whether provision of a quality walking and cycling connection would increase overall public transport mode share and reduce congestion at key constraint points on the network.

**Transport Request 25:** Please provide further information on the proposed train station location by comparing this with the location preferred by the Supporting Growth Alliance. To the report should consider the following:

- developable land area with walking catchment (noting that Council's Structure Plan land-uses are not fixed and can be assumed to be responsive to the location of the station)
- operational considerations including accessibility for FTN and local buses, walking,
- cycling, kiss and ride, and park and ride
- potential park and ride size
- future proofing for four rail tracks
- station spacing (relative to the proposed rail station at Drury West)
- technical rail and engineering specifications (if these differ between the two locations)
- commentary on whether the objectives used to assess the train station location in the Master Plan align with the objectives used by Council and SGA for the Drury Structure Plan

The Drury Central train station location will be confirmed by the Supporting Growth Alliance (SGA) & Auckland Transport through a consultation and Notice of Requirement process, which is separate to the Plan Change. As part of that, detailed environmental and options analysis will be undertaken and will be robustly tested through a statutory process. A final decision on the location may not be known prior to a hearing on the Drury East Plan Change requests. However, this does not affect the processing of the Plan Change as the provisions have been designed to be adaptable to alternative locations. More detail is provided in relation to how the plan changes are adaptable to alternative locations in Section 1.4.2 below.

Notwithstanding this, the applicant has been meeting with Auckland Transport and the SGA and is of the understanding that the northern Waihoehoe Road station location has now been disregarded. We understand that the preferred alternative station location is now located in close proximity to the applicants preferred location on the Watercare site. The applicant continues to support a station locating on the Watercare site to maximise integration with Drury Centre however, it is noted that the current preferred alternative location by AT and the SGA will be able to safely and efficiently connect with the proposed Key Retail Street within the Drury Centre. On this basis further information is not provided in relation to the requests above, which was generally agreed with the Council planner and traffic engineer at a meeting with the Applicant on 13/03/2020.

## 1.4.2 Zoning Pattern and Train Station Location

**Request 7:** Please advise whether the land use zoning and roading pattern proposed in the plan change would be amended, should a train station location closer to that proposed by the SGA ITA was to be

adopted? In particular a more northerly location would suggest that a zoning / density pattern closer to that of the Council's structure plan is appropriate.

**Urban Design Request 7:** *The MP has been designed around the location of a train station immediately to the north east of the SH1 interchange. This differs from other Council reports which suggest a more northern location. Please provide an analysis of the criticality of the train station location and the implications to the proposed urban structure (precinct provisions) if this were to change.*

Locating the Drury Central train station on the Watercare site is strongly preferred by the Applicant, but is not critical to the success of the Drury centre and the transit-orientated development outcomes. Integration can be achieved between the Metropolitan Centre and the future Drury Centre Train Station should it locate on the Watercare site or further north via the Key Retail Street, Station Plaza and high quality local road connections where necessary. We understand that both potential train station locations are within an 800m walking distance of the centre.

The spatial positioning of the Metropolitan Centre provides for direct integration with a station on the Watercare site. Additional Section 32 analysis has been undertaken to assess the location of the Metropolitan Centre relative to the future train station refer Section 11.3.2 of the Section 32 Assessment Report. This analysis has found that applying the spatial layout of the Metropolitan Centre proposed as part of this Plan Change application, is the most appropriate because:

- The Metropolitan Centre zone is proposed to be applied to a large continuous site allowing for the comprehensive development of a centre and supporting infrastructure. This is a consistent approach with newer greenfield 'centres' developed across Auckland such as Westgate and Ormiston;
- The land within Sub-Precinct C and E is highly fragmented and this will prevent the development of a centre of a scale to provide for the future southern Auckland community's social and economic needs and therefore is better suited to a Mixed Use zoning. Developing land in fragmented ownership has been shown to present a significant barrier in achieving greater density along with coordinated development in Auckland and overseas;
- Economic Evidence has shown that this spatial location will benefit from high visibility from the motorway which will attract customers from a wider catchment enhancing the economic success of the centre. Being economically successful is fundamental to the Drury Centre fulfilling its role and function as a Metropolitan Centre - this would be more challenging with a more northerly location where the centre would be less visible and land is more difficult to develop comprehensively;
- The proposed Metropolitan Centre zone extent is broadly located at the confluence of the proposed linear open space networks proposed along the Hingaia and Maketu streams which will eventually extend 4km south and 2.5km east of the centre respectively. These will ultimately support an off-road walking and cycling network linking the centre with the emerging Drury South area as well as the large residential community envisioned in the Fulton Hogan plan change area;
- The location of the Maketu Stream and associated flood prone areas to the north of the Plan Change area presents challenges in maximising the density of development afforded by the Metropolitan Centre zone through requirements to preserve riparian margins as well as



technical constraints on developments due to ground conditions and the need to manage flood risk. Locating the Drury Centre further north would represent a missed opportunity to maximise density in close proximity to the proposed Drury Central rail station to support public transport use as well as more generally supporting greater employment opportunities for the wider sub-region.

If the Drury Central Train Station is located further north, the Plan Change provides opportunities for intensive development around the station and activation of the streets that connect to the station. Noting that our understanding of the SGA and Auckland Transport's preferred location for the train station is very close to the Watercare site. In particular, the Mixed Use zoning allows intensive development with a mix of residential and commercial activities. Sub-Precinct E has also been introduced in response to this RFI to provide more height within the 400m walking catchment train station. Assessment criteria have also been introduced to ensure there is appropriate activation along collector roads and any local roads that provide direct connections to the Drury Central train station.

## 1.5 URBAN DESIGN

**Request 8:** *Please advise as to whether any consideration has been given to incorporating best practice outcomes relating to urban form and urban design. AUP Policy B2.3 A quality built environment should be referenced.*

**Urban Design 17:** *The PC provisions are enabling in relation to the residential intensities to be achieved. Please provide comment on various tools that may be appropriate to ensure development achieves the intensity of use and desirable urban form outcomes associated with transit (e.g. minimum densities, flexible ground floor space, minimum frontage heights along key routes.*

The proposed Plan Change relies largely on standard zones and Auckland-wide provisions to manage the way in which the Plan Change area is used and developed, which is the policy intent of precincts under the AUP. In this regard we note that the AUP sets out a clear hierarchy of provisions in A1 – Introduction. The purpose of precincts is to “enable local differences to be recognised by providing detailed place-based provisions which can vary the outcomes sought by the zone or Auckland-wide provisions and can be more restrictive or more enabling”<sup>2</sup>. In a greenfield context, these place-based provisions relate to specific environmental features that development needs to respond to, and which are justified following a s32 analysis. This approach does not support the use of precincts to provide a greater or lesser degree of regulation than the zone or Auckland-wide provisions, unless there are clear place-based reasons for doing so, which are different to other parts of the region.

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

- Achieving an appropriate urban layout;
- Providing an integrated and connected street network;
- Providing a network of open space which integrates with the natural features of the area; and

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<sup>2</sup> Refer A1.6.5 of the AUP.



- Ensuring development integrates with public transport and that development coordinates with the required infrastructure upgrades.

On balance, this approach enables the Plan Change area to develop to a scale and intensity which is broadly consistent with areas of similar zoning patterns across the region. In response to these requests however, additional assessment criteria have been incorporated to ensure that development of Drury Centre achieves best practice outcomes relating to urban form and urban design in accordance with AUP Policy B2.3 A quality built environment. In particular additional assessment criteria are included to:

- Provide more detailed guidance in relation to the layout of the street network through providing guidance on the length and perimeter of a block;
- Ensure that buildings within Sub-Precinct A, B and D achieve an appropriate level of definition and sense of enclosure to the street by providing a frontage height of at least 8m;
- Ensure that development fronting Collector roads and local roads that provide a direct connection to Drury Central train station, provide a safe and attractive environment for pedestrians;
- Ensure that floor to floor heights enable flexibility for buildings to accommodate varying commercial activities over time; and
- Ensure residential development within Sub-Precinct C and E contributes to achieving attractive and safe streets and open spaces.

## 1.6 OBJECTIVES

Proposed Objective	Further Information Request	Response
Drury Centre is a transport-orientated development that supports high density residential, employment-generating and retail activities close to rapid transport and prioritises public and active modes of transport to and within the centre.	<p>9. The term transit-orientated appears to better reflect the overall intent of the Precinct.</p> <p>Please advise why the term 'transit-oriented' is not used in the objective, rather than the much more general term 'transport orientated'. It is noted that transit-orientated development is not defined in the AU. Please consider whether some explanation of the term may be appropriate.</p> <p><i>Urban Design Request 4:</i> Please provide a rationale for the references to 'transport oriented' rather than 'transit oriented' in the provisions.</p>	Agree that 'transit-oriented' is a more appropriate term. Precinct provisions have been amended accordingly.

<p>Drury Centre is the pre-eminent centre serving Drury and the wider area and is the primary location for retail, civic, recreation and employment activities, which is the focal point for the community and supports their social and economic well-being.</p>	<p>10. It is noted that the Metropolitan Centre Zone objectives and policies in the AUP do not state a role or 'catchment' for such centres, neither do other Precincts that apply to such centres. Please advise why it is necessary to refer to 'the pre-eminent centre' in the objective.</p>	<p>The reference to "pre-eminent centre" acknowledges that Drury Centre will be a higher order centre servicing a wider catchment. It is appropriate to make this acknowledgment given the Metropolitan Centre zone is being applied to a large area of land that is currently future urban and sits within the middle of a much larger future urban area where other centres have not yet been zoned.</p>
	<p>11. Please advise whether the objective is necessary, having regard to the existing objectives in Chapter H9 of the AUP, for example Objective (5), which covers much the same matters.</p>	<p>The Metropolitan Centre zone is proposed to be surrounded by the Mixed Use zone which provides for a range of retail, commercial and employment generating activities. This objective signals that the Metropolitan Centre is the main focal point where the most intensive retail, commercial and employment generating activities will occur.</p>
	<p>12. It is noted that employment will be located in a range of areas across Drury, and the centre may not be the 'primary' employment centre. Please consider whether the objective should refer to the centre being the primary location of intensive employment activities (e.g. offices).</p>	<p>Agree that it is more appropriate for the precinct provisions to refer to <u>intensive</u> employment activities as this is what the provisions partly enable. Precinct provisions have been amended accordingly.</p>
<p>Development reflects Drury's sense of place by incorporating distinctive natural and built site features, responding to landform and respecting Mana Whenua values.</p>	<p>13. It is noted that Drury is currently a rural area and its sense of place derives from this, yet large scale urbanisation is proposed. Please advise whether the objective would be better directed at developing a sense of place through specific reference to features such as Hingaia Stream, the homestead, views of surrounding hills, as well as developing a street based town centre environment. Please comment on whether Mana Whenua values may be best addressed by a separate objective.</p>	<p>Agree that this objective would be better directed at developing a sense of place. Disagree that Mana Whenua values should be separated out into a separate objective. Mana Wheuna values need to inform placemaking. Precinct provisions have been amended accordingly.</p>

<p>Drury Centre is a street-based retail environment that provides a high quality pedestrian experience, with a particular emphasis on the Main Street.</p>	<p>14. In a transit-orientated development, it is generally accepted that all development should be 'street-focused'; supporting a quality, safe public realm (and as generally anticipated by the Metropolitan Centre zone). Please advise why this objective focuses on the retail component of the centre, and not residential and employment areas as well?</p>	<p>Agree this objective should be made broader to be 'street-focused'; supporting a quality, safe public realm rather than focusing on the retail component of the centre. Precinct provisions have been amended accordingly.</p>
	<p>15. Objective H9.8 of the AUP refers to the terms 'Key Retail Frontage' streets (which are to be the focus for pedestrian activity), and 'General Commercial Frontage' streets. Please explain why these terms are not used, noting that the terms flow through to policies and methods of the Metro Centre zone.</p>	<p>The terms 'Key Retail Frontage' and 'General Commercial Frontage' have not been used as these link to a spatially defined control mapped on the AUP-Viewer. The location of the key retail street is not yet determined so this control cannot be mapped or therefore utilised. Also, it is not appropriate for the vehicle access control to apply to the Key Retail Street yet as the design for the centre is not confirmed and intersecting access/lanes/streets have not been determined.</p> <p>For clarity, the following is proposed to manage the frontage conditions of buildings in the Metropolitan Centre:</p> <ul style="list-style-type: none"> <li>• Key Retail Street: highest level of pedestrian amenity expected consistent with the Key Retail frontage control;</li> <li>• Buildings fronting other local roads in Sub-Precinct A treated as if they are all General Commercial frontages;</li> <li>• Sub-Precinct B: buildings subject to design policies in the Metropolitan Centre zone and the additional policy for large format retail that require a quality street frontage;</li> </ul>
<p>Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the surrounding road network.</p>	<p>16. Please explain why this objective refers to managing impacts on the State Highway and road network, but does not refer in a positive way to supporting public transport use (rail, bus), consistent with Objective 1.</p>	<p>This objective is specifically focused on alleviating any adverse effects on the road network. Transit-orientated development and connections to public transport are addressed in Objective 1 and Policies 4, 6, 7, 15 and 16.</p>

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	17. Please consider whether the objective should refer to achieving a high modal split for access to and from the precinct by train and bus to better reflect the outcomes of the transport assessments.	Disagree. This is a base assumption of the transport modelling and the precinct provisions, both of which include provisions to encourage access to public transport.
Development is supported by appropriate infrastructure.	18. Please advise whether this objective is necessary given similar objectives in the AUP RPS.	The Plan Change is enabling the urbanisation of a greenfield area where supporting infrastructure is still to be developed. The live zoning provides certainty for developers and infrastructure providers to work through the delivery of this infrastructure so that development occurs in a coordinated manner. This objective acknowledges this outcome which is being sought within the precinct.
	19. Please advise whether this objective should rather focus on ensuring development is integrated with necessary infrastructure by early delivery of key 'urban form shaping infrastructure and place making development'.	We are of the view that this objective is sufficiently broad to cover both longer term infrastructure that is required and infrastructure that is required in the shorter term to support placemaking.
Freshwater and sediment quality is progressively improved over time in the Drury Centre precinct.	20. It is noted that 'sediment quality' cannot be improved, but sediment loads can be reduced. Please advise whether the objective should be modified to better reflect the intent of the relevant stormwater management plan.	Disagree. This wording is consistent with Objective E1.2(1) of the AUP.

## 1.7 POLICIES

Proposed Policy	Further Information Request	Response
<b>Land Use</b>		
Provide for the greatest density of retail and commercial activities with supporting community and residential activities within Sub-Precinct A.	21. If the density of development is based upon train station proximity, greater density (height) may also be appropriate within at least part of Precinct C, whether or not an alternative train station to that proposed by Kiwi is ultimately be adopted. Please consider and comment. Refer to comments above relating to the train station location.	Agree that additional height should be provided within the north western portion of the Plan Change area to take advantage of the proximity of this area to the Drury Central train station. It is proposed to introduce a new Sub-Precinct for this area (Sub-Precinct E) and apply a height limit of 32.5 m. The proposed 32m height limit will ensure the Metropolitan Centre continues to be the main

		<p>focus for density and height. It is proposed to retain the 25m height limit within the remainder of Sub-Precinct C to maintain a transition height to the Terrace House and Apartment Building zoned land across Fitzgerald Road within the Fulton and Hogan plan change area.</p>
<p>Recognise that Sub-Precinct B will be the primary location for large format retail activities.</p>	<p>22. As noted below in the queries regarding section 32, has an alternative zoning option been considered for this sub precinct that better reflects the intended urban form? Please comment on whether a specific large format retail sub precinct is consistent with Metro Centre zoning objectives and policies. Is the policy likely to cause confusion as to what objectives and policies take precedence?</p> <p><i>Urban Design Request 6:</i> Please provide a rationale for the inclusion of a large area of large format retail, with large areas of surface carparking as the first stage of development and an analysis of how this pattern of development will support the creation of a quality, compact urban environment and will support the establishment of a transit-oriented environment.</p>	<p>In our view the Metropolitan Centre zone is an appropriate zoning within Sub-Precinct B as this zone enables a range of activities including Large Format Retail, as it is elsewhere in Auckland. The RPS seeks to consolidate retail activities into centres and along identified growth corridors. Therefore, within the Metropolitan Centre zone Large Format Retail is provided for as a permitted activity with additional matters of discretion/assessment criteria to ensure the design of buildings is commensurate with the character of the zone. Consequently, it is our view that this urban form is entirely anticipated and appropriate within the Metropolitan Centre zone.</p> <p>Policy 2 is in keeping with the RPS policy direction to encourage all retail (including large format) to locate within centres. The purpose of this additional policy is to provide additional guidance as to where large format retail should locate within the Drury Centre. The policy seeks to consolidate large format retail to the area furthest away from the Drury Central Train Station. Directing Large Format Retail into Sub-Precinct B positions this retail format further away from the train station encourages finer grain retail to establish close to the train station and along the Mainstreet, to create pedestrian interest and a vibrant heart to the centre.</p>

		<p>In terms of the staging, recent developments in Auckland illustrate that often large format retail does establish first. This is not inconsistent with the concept of a transit-orientated development given that sub-precinct B is located at the southern end of the centre and not immediately adjacent to the train station, and given that the Metropolitan Centre zone gives flexibility for these buildings to adapt to changing needs over time, which an alternative zoning would not.</p>
<p>Provide for high density residential and supporting commercial activities in Sub-Precinct C that recognise the primacy of Sub-Precinct A as the core centre.</p>	<p>23. It is noted that subsequent methods propose a more restrictive list of activities in the proposed Mixed Use zoned area than that provided for in the AUP. Please consider whether this proposed policy support the non-complying activity status proposed for a range of activities otherwise provided for in the Mixed Use zone.</p> <p>24. Precinct C has a mixed use zoning, and as such has an important role in providing for a range of employment opportunities. For example, mention has been made of a medical precinct. The policy does not appear to support and enable the range of employment outcomes sought. Has consideration been given to</p>	<p>Within Sub-Precinct C and E low intensity commercial and industrial land uses which are not generally compatible with residential land use are proposed to have a more onerous activity status than the underlying Mixed Use zone. This is to ensure that the greenfield Mixed Use land is used to more efficiently for more intensive land uses and to manage a reasonable standard of residential amenity. This proposal also recognises that within existing urban areas these types of activities are established and therefor need to be provided for within the Mixed Use which is not the case in greenfield areas. This direction to limit low intensity employment generating activities can be clarified through amending the policy to delete reference to “commercial” and replace with “intensive employment”. Precinct provisions have been amended accordingly.</p> <p>The Council’s Drury-Opaheke Structure Plan shows this area as Terrace Housing and Apartment Building zone. The Terrace Housing and Apartment Building zone is not appropriate however, as it will not enable flexibility for commercial/retail land uses to establish, which would be appropriate given its proximity to the Drury Central train station and</p>



	<p>supporting the employment focus to this area? If a residential focus is intended, then has an alternative zoning been considered?</p> <p><i>Urban Design Request 18:</i> Provide a rationale for the residential focus of the Mixed-Use zone of the Precinct rather than a broader mix of residential and employment uses.</p>	<p>the RPS direction to provide for residential intensification and commercial activity around public transport.</p> <p>To provide flexibility for future land uses within Sub-Precinct E/C and achieve street level activation through Sub-Precinct E the Mixed Use zone has been applied. Should these Sub-Precincts develop with a residential focus, as envisioned by Council's Structure Plan, the additional provisions incorporated within the Precinct will provide for a reasonable level of residential amenity.</p> <p>In relation to whether this Sub-Precinct provides a broader mix of employment uses these are generally consistent with the underlying Mixed Use zone. As previously described a more onerous activity status has been proposed for low intensity commercial and industrial land uses which are not generally compatible with residential land use.</p> <p>Additional Section 32 Analysis has been provided within the Section 32 Assessment Report to support this zoning pattern refer Section 11.3.1.3.</p>
<p>Provide for a future train station and transport interchange in a highly accessible location, which is attractively designed and provides safe and direct access for pedestrians and cyclists.</p>	<p>25. The provision of a train station is not a matter that is controlled by the plan change requestor. The land required or the infrastructure is not controlled by the Requestor. In these circumstances, please advise whether this policy is appropriate.</p>	<p>Agree the provision of a train station is not a matter that is controlled by the plan change requestor. This policy is proposed to be amended to focus on ensuring integration between Drury Centre and Drury Central train station. Precinct provisions have been amended accordingly.</p>
<p><b>Street Network and Built Form</b></p>		
<p>Require collector roads to achieve a highly connected street layout that integrates with the surrounding transport network.</p>	<p>26. It is noted that the Oyster and Fulton Hogan plan changes propose a more directive policy for collector roads, i.e. that the roads are provided generally in the location shown in Precinct plans. Please consider and advise</p>	<p>Agree the proposed policy wording within the Oyster and Fulton Hogan plan changes is more appropriate. Precinct provisions have been amended accordingly.</p>

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	whether the policy and associated methods will ensure connected roading patterns across Precinct boundaries, as implied in the precinct plans.	
Ensure that development provides a local road network that achieves a highly connected street layout and integrates with the collector road network within the precinct, and the surrounding transport network.	27. Please consider whether, in addition to providing a connected road network, the local road network should also support the desired urban form and design outcomes through appropriate block depths and widths and street cross sections.	Agree in part. The local road network should also support the desired urban form and design outcomes through appropriate block depths and widths and street cross sections. This guidance however, is more appropriately provided as assessment criteria. Therefore, matters of discretion and assessment criteria have been updated accordingly.
Require streets to be attractively designed to appropriately provide for all modes of transport by: (a) providing a high standard of amenity for pedestrians in areas where high volumes of pedestrians are expected; and (b) providing for safe separated access for cyclists on arterial and collector roads that link key destinations; and (c) providing a level of landscaping that is appropriate for the function of the street; (d) providing for the safe and efficient movement of vehicles.	28. Please consider and advise whether this policy is necessary, given existing AUP policies on the same matter.	This policy provides a policy linkage for <i>Activity (A1) Development of public or private roads</i> which links to matters for discretion/assessment criteria that require roads to be generally laid out in accordance with the street sections included within Appendix 1 of the Precinct, which are consistent with Auckland Transport guidance.
Manage building height and form where adjacent to public open spaces to minimise shading effects.	29. The policy refers to managing effects on public open spaces. Is this an effect that is already covered by relevant AUP zone policies? As the Precinct methods do not appear to modify the underlying zone-based height in relation to boundary standards, the policy creates some confusion. Please explain the intent of the policy.	This policy is intended to apply to open spaces which are publicly accessible but which are zoned Metropolitan Centre or Mixed Use zone. Therefore, these publicly accessible spaces will not be covered to the AUP policies and methods which apply to spaces subject to an open space zoning. To reduce confusion, it is proposed to update the precinct provisions to refer to “large publicly accessible open spaces”.
	30. It is noted that an assessment criterion for buildings in Sub Precinct A refers to sunlight access to Station Plaza and Homestead	Station Plaza and Homestead Park are proposed to be located within the Metropolitan Centre zone and therefore will not benefit from the

	<p>Park. Is it necessary for this policy to be focused on this particular effect (i.e. sunlight access to identified public plazas in the proposed centre), rather than refer to all public open space?</p>	<p>underlying zone-based height in relation to boundary standards that only apply from defined Open Space zone boundaries. We have amended this criteria to apply to any publicly accessible open space greater than 3000m<sup>2</sup>, which is the minimum size of neighbourhood park, to ensure that all large open spaces receive adequate sunlight access. This criterion will ensure consideration is given to sunlight access to these spaces, which is relevant given they will be surrounded by buildings which have a maximum height limit of 72.5m which may give rise to shading and related amenity effects on adjoining open spaces.</p>
<p>Ensure that Sub-Precinct A is the compact, pedestrian orientated retail core of the precinct with a comprehensively planned mix of large and small-scale retail activities integrated with other commercial and office activities, leisure, tourist, cultural, residential, community and civic services with streets that are open to the sky.</p>	<p>31. This policy provides little additional direction as to how the relevant objective is to be implemented. Please consider the need for this policy, including whether the key qualities could be combined with the next policy.</p>	<p>This policy is seeking to set out guidance for Sub-Precinct A and the outcomes that are sought to be achieved as the core retail centre that follows a street based and fine grain form. The next policy focuses on streetscape activation so it is not appropriate to combine these policies.</p>
<p>Ensure that development in Sub-Precinct A positively addresses and engage with the street by:</p> <ul style="list-style-type: none"> <li>(a) Maximising street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality on the Key Retail Street.</li> <li>(b) Achieving a reasonable level of street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality on other local roads in Sub-Precinct A.</li> </ul>	<p>32. This policy appears to repeat policies 18 and 19 of Chapter H9, while confining their application to sub-precinct A. Please explain the need for a variation to Chapter H9 policies.</p>	<p>Policies 18 and 19 of Chapter H9 link to the Key Retail Frontage Control and the General Commercial Frontage Control. As previously discussed, the terms 'Key Retail Frontage' and 'General Commercial Frontage' have not been used within the Drury Centre Precinct as these link to a spatially defined control mapped on the AUP-Viewer. The location of the Key Retail Street is not yet determined although it will be located within Sub-Precinct A. As the location is not yet known the Key Retail Frontage Control cannot be applied. Consequently, this policy provides direction for the key retail street to establish within Sub-precinct A</p>
<p>Recognise that residential at ground floor may be appropriate on some local roads in Sub-</p>	<p>33. It is noted that there is no specific standard associated with this policy. Its function would</p>	<p>Agree. This policy provides guidance when standard H9.6.5 – Residential at Ground Floor on</p>

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<p>Precinct A away from the Key Retail Street, including where residential adjoins public open space.</p>	<p>appear to provide guidance when a standard is breached.</p>	<p>local streets within Sub-Precinct A is infringed.</p>
	<p>34. Has consideration been given to the loss of flexibility of use of Metropolitan Centre zoned land if ground floor residential is enabled?</p>	<p>The development of the Metropolitan Centre as envisioned within the masterplan will occur over time. This policy is intended to provide flexibility for how the centre might emerge over time and recognises that residential at ground floor may be appropriate in some locations, such as buildings with outlook over the Hingaia Reserve, which is away from the centre core. The assessment criteria that it links to are consistent with the City Centre zone.</p>
<p>Require large format retail activities in Sub-Precinct B to provide for the visual quality and interest of streets and other public places, having regard to the functional requirements of that activity.</p>	<p>35. The Metropolitan Centre zone does not provide for a lesser standard of urban design for large format retail. The policy suggests that the sub-precincts zoning is incompatible with the proposed urban form. Please consider whether the policy needs to be justified, or the zoning amended</p>	<p>As previously discussed, there is a policy direction within the RPS which seeks to consolidate retail activities into centres and along identified growth corridors. Therefore, within the Metropolitan Centre zone Large Format Retail is provided for as a permitted activity with additional matters of discretion/assessment criteria to ensure the design of buildings is commensurate with the character of the zone.</p> <p>Within the Drury Central Precinct there is a policy direction to consolidate any Large Format Retail into Sub-precinct B so that it is located the furthest distance from the Drury Central Train Station. The policy provides for a little more flexibility regarding the design of Large Format Retail in respect of its functional requirements.</p>
<p>Enable residential activities at high densities in Sub-Precinct C that provide quality on-site amenity for residents, including privacy and outlook, outdoor living space and access to daylight.</p>	<p>36. Has consideration been given to an alternative zoning if residential activity is to be the main function of this sub Precinct?</p>	<p>The zoning of Sub-Precinct C is shown within Councils Drury Opaheke Structure Plan as Terrace Housing and Apartment Building. A residentially focused Mixed Use zone will provide more flexibility for employment generating land uses while maintaining a reasonable standard of residential amenity should residential land</p>

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		uses develop. Refer to additional section 32 analysis within Section 11.3.1.3 of the Section 32 Assessment Report.
<b>Infrastructure and Staging</b>		
<p>Ensure that the timing of development in Drury East is coordinated with the transport network infrastructure upgrades necessary to mitigate the adverse effects of development on the following parts of the transport network.</p> <p>(a) The State Highway 1 interchange at Drury;</p> <p>(b) Great South Road from the Drury interchange to the immediate north of Waihoehoe Road;</p> <p>(c) Intersection of Great/South Road and Waihoehoe Road;</p> <p>(d) Waihoehoe Road.</p>	<p>37. This policy does not make reference to any of the public transport infrastructure referred to in the opening objective nor listed in the infrastructure trigger rules.</p>	<p>As previously discussed Stantec has undertaken further traffic modelling to determine the impact of the transport infrastructure projects that the Government has confirmed funding for including bringing forward the delivery of the Drury Central train station. This updated modelling now shows that the standard which seeks to stage development with transport upgrades can be significantly simplified. Accordingly, this policy is now proposed to be simplified to align with the updated standard.</p> <p>We also note that connections to public transport is addressed in Policy 4, 6, 7, 15 and 16.</p>
	<p>38. Has consideration been given to what 'internal' roading needs to be in place early to provide bus, walking and cycling access to the train station?</p>	<p>Agree that it is important that 'internal' pedestrian and cycling connections are in place early to encourage the use of public and active modes of transport. A new policy is proposed to reflect this, and we note that this is the only greenfield precinct where a provision of this kind applies.</p>
<p>Ensure that the following is taken into account when considering adverse effects on the transport network:</p> <p>(a) increased use of public transport will support greater efficiency in the transport network and may provide additional capacity;</p> <p>(b) implementing the southern section of the Mill Road Corridor from the Drury South interchange to Fitzgerald Road, or any further roading upgrades, may provide additional capacity in the transport network and may delay the timing of required</p>	<p>39. It is noted that if anticipated use of public transport is not achieved (such as from poor access to the station and lack of supportive urban form) this may create adverse effects that need to be addressed through other infrastructure investments. Equally, other urban developments in the wider area may take up available capacity of some of the additional network infrastructure to be provided. Have these outcomes been considered in the formulation of the policy?</p>	<p>This policy is proposed to be deleted.</p>

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<p>upgrades at the Drury interchange and the Great South Road/Waihoehoe Road intersection.</p>		
<p><b>Ecology</b></p>		
<p>Support improvements to water quality and habitat, including by providing planting on the riparian margins of permanent and intermittent streams.</p>	<p>40. It is noted that precinct specific on-site stormwater management methods may be needed. For example, policy support for a higher standard of on-site management of stormwater will be required, if more than SMAF1 type outcome is to be delivered. Please advise as to the adequacy or not of Auckland wide methods given the stormwater management plan outcomes, and whether precinct specific methods are needed?</p>	<p>The SMP is proposing a higher standard of stormwater manager than what is required within SMAF 1. In particular all roads are proposed to be treated irrespective of whether they are high contaminant or not.</p>

## 1.8 METHODS

### 1.8.1 Activity Table

Activity	Further Information Request	Response
<p>(A2) Development of open spaces greater than 1000m<sup>2</sup>: RD</p>	<p>41. It is unclear why this activity is needed – what effect is it is trying to manage? Does the activity apply to private or public open space? Please explain the purpose and implication of this activity.</p>	<p>This activity is intended to apply to open spaces which are publicly accessible but which are zoned Metropolitan Centre or Mixed Use zone. Therefore, these publicly accessible spaces will not be covered to the AUP policies and methods which apply to spaces subject to an open space zoning. To reduce confusion, it is proposed to update the precinct provisions to refer to “publicly accessible open spaces”.</p> <p>The 1000m<sup>2</sup> minimum size ties with the minimum size of a public open space set out within Council’s open space provision policy. Any open space smaller than this would not be treated as a public open space by Council and would be managed privately, noting that the design and</p>



		function of these spaces would be assessed in accordance with the subdivision provisions at resource consent stage.
(A4) Additions and alterations to buildings not otherwise provided for: RD	42. It is unclear whether this activity is a double up with the relevant zone activity tables. Please clarify.	The Drury Centre Precinct includes tailored matters of discretion/assessment criteria for new buildings and for additions/alterations to buildings. This activity provides the link to these tailored matters of discretion/assessment criteria. It overrides the activity from the underlying zone. Additional matters for discretion/assessment criteria which are tied to this activity are also incorporated in response to Planning Request 8.

**1.8.2 Building Height**

*43. Please explain the rationale for the building heights proposed in Precinct Plan 1. In particular the following matters are unclear:*

*a. Why is a 72.5m height limit is appropriate for sub precinct A, when the master plan documents and related material show a medium rise type of development?*

The masterplan is an example of one way in which the Drury Centre could develop. Additional Section 32 analysis has been provided within the Section 32 Assessment report to consider the heights proposed within the masterplan as an alternative option refer Section 11.3.4 of the Section 32 Assessment Report.

*b. Has the Landscape and Visual Effects Assessment considered the visual and urban legibility and identity issues associated with taller buildings in this location?*

A Landscape and Visual Effects Assessment by Boffa Miskell has now been provided, which assesses the effects of taller buildings in the Drury Centre and concludes that there are no visual or landscape reasons for restricting height.

*c. Why has a 25m height limit been proposed for sub precinct C, when much of this land is within the walkable catchment of the proposed train station(s)?*

Agree that additional height should be provided within the north western portion of the Plan Change area to take advantage of the proximity of this area to the Drury Central train station. It is proposed to introduce a new Sub-Precinct for this area (Sub-Precinct E) and apply a height limit of 32m. The proposed 32m height limit will ensure the Metropolitan Centre continues to be the main focus for density and height. It is proposed to retain the 25m height limit within the remainder of Sub-Precinct C to maintain a transition height to the Terrace House and Apartment Building zoned land across

Fitzgerald Road within the Fulton and Hogan plan change area refer Section 11.3.4 of the Section 32 Assessment Report.

### 1.8.3 Staging of Development with Transport Upgrades

**Request 44:** *Can you please explain whether the rule is capable of being administered efficiently and effectively, having regard to these issues?*

**Transport Request 3:** *The Precinct includes rules requiring the delivery of transport infrastructure based on a GFA/dwelling assessment and an external trip generation assessment. It is not clear how these rules will be monitored or how equitable outcomes between beneficiaries (i.e. landowners within the three PPC areas) will be ensured. Please comment on potential risks/challenges associated with monitoring the complex thresholds specified in Tables IX.6.2.1/2 and I/X6.3.1/2, and how these might be addressed.*

We agree that the incorporation of permitted activity standards to coordinate the release of development capacity with infrastructure introduces a level of complexity into the Plan Change. The Drury East Developers are currently progressing a developer funding agreement to confirm the funding of the required local road upgrades. It is our preference that once this funding agreement is in place, that the permitted activity standards to coordinate the release of development capacity with infrastructure could be deleted from the Plan Change. In the interim however, it is important to include the proposed permitted standards to ensure there is transport infrastructure to service development.

As previously discussed Stantec has undertaken further traffic modelling to determine the impact of the transport infrastructure projects that the Government has confirmed funding for including bringing forward the delivery of the Drury Central train station. This updated modelling now shows that the standard which seeks to stage development with transport upgrades can be significantly simplified. In particular the local upgrades required to enable certain development capacities<sup>3</sup> are now limited to:

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

The simplification of the triggers will significantly assist with the administration of the rule. The first local road upgrade is a safety upgrade to the Waihoehoe / Great South Road to provide safe crossing facilities for pedestrians and cyclists on all approaches. This must occur prior to any new dwellings, retail or commercial development. Therefore, this is straightforward to implement/monitor. The second required upgrade is signalisation of the Waihoehoe / Great South road intersection. The dwelling and GFA thresholds are projected to be reached in 2033 or 2038 depending on whether or not direct access is provided from State Highway 1 into the Drury Centre. These timeframes are long

<sup>3</sup> Development capacities are divided into a threshold for dwellings, a commercial GF threshold and a retail GFA threshold. The required local upgrade is required when any of the thresholds are exceeded. The thresholds that are listed for each required local upgrade are cumulative.

term and beyond of the life of the AUP. Therefore, at plan review there will be an opportunity to check whether this rule is still relevant prior to these thresholds being met.

Notwithstanding this, it is recognised that to administer this permitted standard Council will be required to keep a register of the number of dwellings that are new or additional, including valid but unimplemented land use and subdivision resource consents. As the standard requires all vacant lot subdivisions and new dwellings to comply with this standard. This includes vacant lots created via super lots or subdivision for house lots as well as 4+ dwellings in the residential zones or any development in the business zones. Where a developer wants to construct a single dwelling on a site as a permitted activity, that unit would already have been ‘counted’ under the subdivision consent that created the lot. Council has the ability and technology to monitor this - it will just be a matter of putting a system in place.

The RFI also raises concerns that an individual will not be able to determine compliance with the trip generation limits. A transport assessment will need to be undertaken to determine compliance with trip generation limits. Importantly, this is a restricted discretionary activity and not a permitted activity. The purpose of the inclusion of Standard IX6.3 Trip Generation Limit is to provide for developments which are just over the dwelling and GFA thresholds to apply for resource consent as a restricted discretionary activity rather than a full discretionary activity. Therefore, a transport assessment will be required anyway.

The incorporation of permitted activity standards to coordinate the release of development capacity with infrastructure is accepted practice within the AUP. In particular, similar provisions have been included into existing AUP precincts<sup>4</sup>. While it is accepted that this approach introduces complexity to the planning provisions, a live urban zoning is required to be in place to provide enough certainty for developers to fund local infrastructure. We will continue to work with Council to refine the details of transport staging rule prior to notifying the Plan Change.

### 1.8.4 Riparian Margins

Council’s planning, stormwater and ecology experts have all requested further information regarding the required riparian margin rule.

Requests for Further Information: Riparian Planting	
RFI	Request
E11	Further detail is requested as to why the full 20 m anticipated by the Structure Plan is not proposed and the effect this deviation from the structure plan guidance will have in terms of ecological connectivity across the plan change area.
E12	It is not clear why wetlands are excluded from Standard IX.6.4. It is considered that further assessment is required as to the appropriateness of this exclusion given the existing policy provision and direction from national, regional and catchment-specific scales.
E13	The Drury Centre Precinct Plan includes IX.6.4, a standard for riparian planting 10 m wide on the riparian margins of streams. However, the Ecology Report notes that this width will be increased to 20 m along the main channel of the Hingaia and Fitzgerald Streams. There is no apparent mechanism within the plan change to ensure this additional width is delivered.

<sup>4</sup> Drury 1, Franklin, Glenbrook 3, Huapai Triangle, Opaheke 1, Whenuapai 1 &2, Beachlands 1, Karaka North, Clevedon Waterways, Puhinui, Redhills, Wainui and St Lukes

	<p>Further, a number of visuals from the Urban Design Report appear to show sparse riparian planting, and the riparian zone along the Hingaia Stream in particular to be dominated by grass, and to include a cycle-way/footpath within the riparian planting area. It would be envisioned that any riparian planting would consider the greater ecological benefit provided by native trees and shrubs over pasture grasses.</p> <p>The Urban Design Report also notes an additional development standard I1.6.3(2):</p> <p>Any planting required, will be implemented on accordance with a council approved landscape plan and must use eco-source native vegetation, be consistent with local biodiversity and planted at a density of 10,000 plants per hectare. This standard is not proposed within the precinct plan.</p> <p>This introduces some uncertainty as to what riparian planting is actually, proposed and what will comprise this planting.</p> <p>To address this concern, it is recommended that the standard be updated to reflect:</p> <ul style="list-style-type: none"> <li>• 20 m riparian margins along streams and wetlands</li> <li>• Riparian planting to be undertaken in accordance with Appendix 16 of the AUP:OP</li> <li>• Cycleways and pedestrian paths be excluded from the riparian planting area</li> </ul>
E14	<p>Further detail is requested as to what protection measures for revegetation measures are proposed and if any measures are required within the plan change to ensure such measures are adopted, noting that elsewhere similar riparian vegetation standards have specified that such margins must be offered to Council for vesting (at no cost) or are required to be covenanted.</p>
SW 06	<p>Please explain why a 10m wide riparian margin is proposed when the Drury-Opāheke Structure Plan Stormwater Management Plan identified a 20m riparian margin as being appropriate. No evaluation of these two options is provided including their consistency with the objectives and policies of the AUP.</p>
P45	<p>Please advise as to the advantages and disadvantages of a 20m versus 10m wide riparian margin building (set back) for the Hingaia Stream.</p>
P46	<p>Please explain how the revegetation rule would be implemented.</p>

Responses to these requests and also refer to Section 11.3.8 of the Section 32 Assessment Report.

### *Spatial Extent of the Planted Setback*

Further information has been requested by Council’s Ecologist and Stormwater Expert in relation to the spatial extent of the required planted riparian margin. The Drury - Opāheke structure plan generally proposes a 20m riparian restoration margin along streams while noting that the actual width of the riparian restoration margin will be subject to more detailed investigation at the Plan Change Stage and may differ from 20m<sup>5</sup>.

In response to this request for further information additional analysis is provided within the Section 32 Assessment Report to support the inclusion of the proposed 10m planted riparian margin

<sup>5</sup> Drury - Opāheke structure plan pg 21

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requirement. In summary a 10m planted riparian margin is still the preferred option for the following reasons:

- The 10m minimum required planted riparian margin ensures that indigenous biodiversity along streams is restored to enhance the ecological values of streams, while maintaining flexibility for appropriate development of cycle and pedestrian paths which must be located outside of planted riparian margins and generally within the wider esplanade reserve;
- The 10m minimum required planted riparian margin aligns with Auckland Regional Council Technical Publication TP148 Riparian Management Guideline (Becker et al., 2001) which recommends a 10m riparian buffer width based on research undertaken into what constitutes a sustainable riparian zone that is self-seeding and able to minimise weed growth;
- The 10m minimum required planted riparian margin also aligns with the Auckland Design Manual which recommends a 10 m width planted on each stream bank with wider strips of 20 m or more are encouraged for larger rivers<sup>6</sup>; and
- The proposed precinct provisions are consistent with those incorporated within other greenfield precincts within the AUP<sup>7</sup> which incorporate a 10m planted riparian margin.

### *Spatial Extent of Building Setback from Streams*

Request 45 of the Planning RFI notes that the Hingaia stream would likely be subject to esplanade reserve requirements should the adjoining sites be subdivided and has questioned whether a building setback should be introduced to align with the esplanade requirement. We agree that it is sensible to introduce a 20m building setback along streams greater than 3m in width to align with the esplanade reserve requirements under the subdivision provisions. Therefore, Standard IX6.4 Riparian Margins has been updated accordingly.

### *Implementation of the Riparian Planting Rule*

Further detail has been requested by Council's planner (Request 46) regarding when planting should occur, how much planting is required and whether planting can occur in stages as development proceeds. Riparian margin planting of streams is required as a permitted activity standard. As the plan change area is a greenfield environment, an application for land modification, development and subdivision which adjoins a permanent or intermittent stream will trigger the requirement to show compliance with this standard. The special information requirement will direct applications for land modification, development and subdivision to be accompanied by a riparian planting plan identifying the location, species, planter bag size and density of the plants. Council will then approve the planting plan as part of the consent application.

### *Protection of Riparian Planting*

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<sup>6</sup> <http://www.aucklanddesignmanual.co.nz/regulations/technical-guidance/wsd/guidance/conceptdesign/enhancingthereceivingenvironment/riparianbuffers>

<sup>7</sup> Birdwood 2, Clarks Beach, Drury 1, Drury South, Flat Bush, Franklin 2, Glenbrook 3, Hingaia 1,2 & 3, Long Bay, Redhills and Whenuapai 3 (Proposed)

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Further detail has been requested by Council's Ecologist (Ecology Request 14) regarding what protection measures for revegetated areas are proposed<sup>8</sup>. The ecologist has suggested that riparian margins should be offered to Council for vesting or protected through covenanting.

No specific rules are included within the Plan Change to protect the required planted riparian margins because this can be effectively managed via conditions on the resource consent that are enforceable by the Council. There is also the option to vest the riparian margin and this would be at Council's discretion as part of the resource consent process, although we note that the Council often has limited funds to do this.

### *Application of Riparian Planting Rule to Wetlands*

Wetlands are dynamic and complex environments and therefore unlike streams technical analysis, including soil sampling, is required to determine the edge of a wetland from which a required planted riparian margin would apply. Consequently, there is not enough certainty to apply the riparian planting rule to wetlands as a permitted activity standard.

## 1.8.5 Streams

***Request P47:*** Please advise whether the stream locations should be shown on a precinct plan.

***Ecology Request E15:*** It is requested that the Drury Centre Precinct be updated with a precinct map that shows all watercourses within the plan change area

It is not proposed to map the streams on the precinct plan. The precinct plans are drawn within illustrator and are not spatially accurate. Therefore, depicting the streams on precinct plans will not assist with determining compliance with the planted riparian margin rule or required esplanade setback. In any case, E3 of the AUP effectively manages streams, and in our opinion, there is no resource management reasons for taking a place-specific approach to this matter given that it would not link with any specific method in the Drury Centre precinct.

## 1.8.6 Stormwater Management

***Request P48:*** Please advise if stormwater provisions need to be added to the precinct provisions following the assessment of stream erosion risks that is underway, and if so the wording of these provisions.

A stream erosion assessment has been tried based on the Auckland Council Stream Erosion Risk Tool however issues have been encountered with the tool, that mean this assessment cannot be completed within the timeframes of the RFI response. The technology and understanding in this area are evolving but is not ready yet. And we will continue to work with Council to complete this assessment prior to the hearing of the Plan Change.

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<sup>8</sup> Kiwi E14, Fulton and Hogan E16, Oyster E13



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Notwithstanding the issues being encountered with the analysis it would not be possible to identify any additional measures to avoid/mitigate effects at this stage because these will need to be discussed with Mana Whenua to seek their views.

## 1.9 SECTION 32 ANALYSIS

RFI	Request	Response
P49	Please provide an analysis as to the costs and benefits of the modified zoning pattern for the centre, relative to the pattern indicated in the Structure Plan.	Refer to additional section 32 analysis within Section 11.3.1.1 of the Section 32 Assessment Report.
P50	Please provide an analysis of the costs and benefits of the different zone options, noting that Town Centre zones generally make use of a height variation control which can be used to enable extra height.	Refer to additional section 32 analysis within Section 11.3.1.2 of the Section 32 Assessment Report.
P51	Please provide an analysis of the zoning options for the land east of the centre, in particular whether the residential targets set out in the structure plan remain realistic with the mixed use zoning, the potential employment that could be accommodated by a mixed use zoning compared to a residential zoning and the resulting built form outcomes.	Refer to additional section 32 analysis within Section 11.3.1.3 of the Section 32 Assessment Report.
P	Please provide further detail on the "costs" (Theme 1 Option 3).	Refer to additional section 32 analysis within Section 11.3.1.4 of the Section 32 Assessment Report.
P52	Please explain the risks to plan change implementation in the event that Council is not in a position to undertake the monitoring required and if an appropriate development / funding agreement cannot be completed across all affected land owners in the three Precincts?	Refer to Section 11.3.5 of the Section 32 Assessment Report.
P53	Does the proposed method address other infrastructure to be provided by Council (eg social and community facilities) or Watercare?	<p>As noted above, the Applicant has already entered into an agreement with Watercare and the works are already underway to service the area.</p> <p>The provision of other social facilities will require on-going discussions with Council's community facilities team. This is not different to planning for schools and healthcare in greenfield areas undertaken by the Ministries of Education and Health.</p> <p>The Drury-Opaheke Structure Plan was the appropriate time to undertake a needs assessment and for Council to start planning for these essential social facilities. We understand</p>

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		that the Ministry of Education is already well underway with this. Planning for the provision of these facilities will occur separately but alongside the Plan Change process.
P54	Please advise whether the proposed staging rule is an efficient and effective method of implementing the objective, particularly objective 1, in comparison to other possible options?	Refer to Section 11.3.5 of the Section 32 Assessment Report.

## 2.0 URBAN DESIGN

The Urban Design requests for further information and our responses are set out below.

RFI Number	Request	Response
UD4	Both the UD Assessment and the accompanying MP report place considerable emphasis on the critical role of the provision of rail transport and the train station as structuring elements in the new centre and a mechanism for providing transit and facilitating the quality, compact approach to growth and development. The UD assessment sets out a summary of the higher order planning framework that seeks to achieve quality, compact urban outcomes. The MP has been conceived and is described as a Transit Oriented Development (“TOD”). However, the proposed PC provisions make reference to ‘transport oriented development’ without an emphasis on the role of transit as outlined in both the UD Assessment and MP report. All development can be described as ‘transport oriented’ as access is essential for all development. Critical to achieving a quality, compact urban form is a shift away from car-dominated urban environments. Please provide a rationale for the references to ‘transport oriented’ rather than ‘transit oriented’ in the provisions.	Agree that ‘transit-oriented’ is a more appropriate term. Refer Section 1.6 of this letter.
UD5	The MP outlines staging that will be car-oriented in the short term, moving to a more transit oriented development pattern in the future (p.7 and p.28), with the delivery of the train station anticipated in the last stage of development (2024 – 2030)(p. 35). Please provide an analysis of the challenges to transitioning to a transit oriented form of development and modal	Refer Section 1.1 of this letter.

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	<p>shift for users where a car-oriented urban centre is established, rather than establishing a transit oriented urban framework up-front. Please also provide an analysis of urban form and amenity implications of creating a vehicle focussed urban environment in the short to medium term.</p>	
UD6	<p>Please provide a rationale for the inclusion of a large area of large format retail, with large areas of surface carparking as the first stage of development and an analysis of how this pattern of development will support the creation of a quality, compact urban environment and will support the establishment of a transit-oriented environment.</p>	<p>Refer to Section 1.7 of this letter And Section 6.2.3 of the Urban Design Report.</p>
UD7	<p>The MP has been designed around the location of a train station immediately to the north east of the SH1 interchange. This differs from other Council reports which suggest a more northern location. Please provide an analysis of the criticality of the train station location and the implications to the proposed urban structure (precinct provisions) if this were to change.</p>	<p>Refer to Section 1.4 of this letter and Section 11.3.2 of the Section 32 Assessment Report.</p>
UD8	<p>Figure 11 in the MP shows the urban design concept that underpins the proposed Precinct framework. It depicts the 600m and 800m radius around the identified train station location. A large proportion of the catchment area is either within the proposed open space corridor or outside the Plan Change area to the north of Great South Road. The topographical changes in the area present some challenges to creating good accessibility and public address on both sides of the train station in the location proposed. Please provide an analysis of the constraints and ability to achieve a transit node that supports the full catchment area.</p>	<p>Refer to Section 1.4 of this letter.</p>
UD9	<p>An important element of the proposed urban structure is the creation of 'Railway Plaza' adjacent to the railway station and forming the public realm linkage between the railway station and the proposed 'main street' axis through the Centre. Both the railway station and plaza (Sub-precinct D) are located outside the Kiwi Property land and delivery will be by others. Please provide an analysis of the constraints to delivering this critical urban infrastructure element (particularly with consideration to</p>	<p>As discussed, in Section 1.4 the Drury Central train station location will be confirmed by the Supporting Growth Alliance (SGA) &amp; Auckland Transport through a consultation and Notice of Requirement process, which is separate to the Plan Change. Until such time the final design and delivery of civic spaces to link the train station to the Centre cannot be confirmed.</p> <p>The Plan Change however, includes provisions to ensure that pedestrian and cycling connections are in place early to link the centre with the train</p>

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	the topographical constraints) and the risks these pose to delivery of the urban structure and form outcomes sought for the Precinct. Please advise how critical the delivery of this infrastructure is to the rationale for the other sub-precincts.	station. In addition, the Plan Change includes assessment criteria to guide the final design of Station Plaza and how it integrates with the public transport interchange.
UD10	In assessing the proposed PC provisions, the UD Assessment has been informed by the MP. The MP (including the 3D modelling) depicts a predominant 'perimeter block' form that does not extend to the heights enabled in the Business – Metropolitan Centre zone. Buildings up to the maximum permitted height of 72m are more likely to adopt a podium tower configuration. Please provide further analysis of the urban structure and form outcomes that may be anticipated if the maximum heights are utilised within the Precinct and the implications for urban amenity outcomes.	Refer to Section 6.5.2 of the Urban Design Report.
UD11	Please provide a rationale for the proposed zone boundary between the Business – Metropolitan Centre zone and the Open Space – Informal Recreation zone. This would be assisted by the precinct plan being overlaid on an aerial photograph showing the existing contours and a plan showing the Precinct Plan overlaid on the MP.	The boundary between the Open Space – Informal Recreation zone and the Business – Metropolitan Centre zone has been designed to align with the extent of the overhead transmission lines. The zoning boundary has been aligned with transmission lines rather than the extent of the National Grid Corridor Overlay. The National Grid Corridor overlay provisions restrict any sensitive activities developing however the overlay does not restrict all development. Therefore, the inclusion of the land within the eastern portion of the National Grid Corridor overlay allows flexibility for the development of roads along the edge of the centre.
UD12	Please provide a plan that clearly depicts the location of the overhead powerline corridor location in relation to the proposed Open Space – Informal Recreation zone. Are there any plans for these power lines to be relocated?	Refer to Figure 3 within the Section 32 Assessment Report.  As far as the applicant is aware there are no plans to move the transmission lines from this area .
UD13	Please confirm how the neighbourhood reserves that are described and depicted in the MP and UD Assessment will be required by the PC provisions.	The Kiwi 2048 Masterplan for the Plan Change area sets out an open space strategy which includes Station Plaza, Town Square, Homestead Park and Valley Park. The approach to delivering

<p>UD14</p>	<p>The public realm strategy set out in the MP identifies a number of key public open spaces with differing functions and characters. These include: Station Plaza; Town Square; Homestead Park; Valley Park; and Hingaia Creek Reserve. The proposed Precinct provisions provide for the Hingaia Creek Reserve by zoning the corridor Open space – Informal Recreation. The location of Station Plaza and Homestead Park are indicated on the Precinct Plan 2 with assessment criteria relating to their design and delivery. If the other open spaces (Town Square and Valley Park) are important parts of the public realm strategy, should they also be indicatively shown on Precinct Plan 2 with requirements for their design and delivery?</p>	<p>this open space strategy within the Plan Change area involves applying the Open Space – Informal Recreation zone, relying on the Auckland-wide provisions and also incorporating place based provisions into the precinct.</p> <p>The Open Space – Informal Recreation zone is proposed to apply to the land adjoining the Hingaia Stream along the western portion of the Plan Change area identified as Hingaia Stream Reserve in the Kiwi 2048 Masterplan. This land has significant topographical constraints for development, significant ecological values and it is located under the National Grid Corridor Overlay. Therefore, the extent of open space that will form the Hingaia Stream Reserve can be identified now as it is not appropriate for urban development.</p> <p>Throughout the rest of the Plan Change area the final development layout and positioning of proposed open spaces will be guided through the Plan Change provisions but determined at the detailed design/resource consent process. The approach within the Plan Change in providing for these open spaces seeks to provide a balance between providing enough certainty to carry through key elements of the Kiwi 2048 Masterplan, while allowing flexibility to finalise design and location when undertaking detailed design.</p> <p>Station Plaza and Homestead Park are two open space elements of the Kiwi 2048 Masterplan. Station Plaza provides for integration between the Drury Central Train Station and Homestead Park incorporates the significant vegetation and Flanagan Homestead into an open space setting. These two open spaces are intended to be linked by the proposed “main street’ which has been developed to form the focus of retail and commercial activity within the site. As the proposed location and role for these two open spaces is generally fixed, indicative locations for these open spaces are identified on Precinct Plan 2. Guidance as to how these spaces are intended to be developed is provided by assessment criteria identified under provision IX.7.2(3) of the Plan Change.</p> <p>Valley Park and Town Square will provide a recreation green space and an urban square within the centre. The Kiwi 2048 Masterplan shows one option of how these open space roles can be achieved however, through the detailed</p>
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		<p>design phase alternative approaches may be explored. To allow this flexibility indicative locations for these open spaces have not been shown on a precinct plan. The development of these open spaces however, will require resource consent and the design and location will be guided by policy 14 and amended assessment criteria IX8.2(2) which provides further guidance to both Council and an applicant as to how the open spaces should be established across the Plan Change area and requires open space to incorporate distinctive natural features.</p> <p>The E38 Subdivision – Urban provisions also apply within the Plan Change area and include policies and assessment criteria to guide the provision of open space generally across the Plan Change area. These provisions will ensure that there is adequate provision of open space across the Plan Change area to meet the recreational needs for the future population.</p> <p>Refer to Attachment 10 for a complete set of the AUP and Plan Change provisions that apply to roads, open space and buildings.</p>
UD15	<p>A number of criteria are provided for the design of Station Plaza and Homestead Park.</p> <p>Please provide an analysis of the importance of the scale of the spaces and their shape factor, with reference to public space benchmarking to determine whether additional requirements should be included in the Precinct provisions.</p>	<p>Refer to Section 6.4.6 and Appendix 2 of the Urban Design Report.</p>
UD16	<p>The UD Assessment is structured around key themes set out in the Structure Plan. The Structure Plan also includes a Neighbourhood Design Statement (the “NDS”). The assessment would benefit from more direct reference and commentary in relation to the NDS.</p>	<p>Refer to Section 4.7 and Section 6 of the Urban Design Report.</p>
UD17	<p>In relation to Theme 1, the PC provisions are enabling in relation to the residential intensities to be achieved. Please provide comment on various tools that may be appropriate to ensure development achieves the intensity of use and desirable urban form outcomes associated with transit (e.g. minimum densities, flexible ground floor space, minimum frontage heights along key routes).</p>	<p>Refer to Section 1.5 of this letter and Section 6.2 of the Urban Design Report.</p>

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UD18	Also, in relation to Theme 1, please provide a rationale for the residential focus of the Mixed-Use zone of the Precinct rather than a broader mix of residential and employment uses.	Refer to Section 1.7 of this letter and Section 11.3.1.1 of the Section 32 Assessment Report.
UD19	In relation to Theme 2, please provide confirmation of how active transport mode connections will be made to the employment hub of Drury South.	<p>The proposed Metropolitan Centre zone extent is broadly located at the confluence of the proposed linear open space networks proposed along the Hingaia and Maketu streams which will eventually extend 4km south and 2.5km east of the centre respectively. These will ultimately support an off-road walking and cycling network linking the centre with the emerging Drury South area as well as the large residential community envisioned in the Fulton Hogan plan change area.</p> <p>In addition, the Plan Changes sets out cross-sections for various street typologies across the Plan Change area (<b>Appendix 1</b> of the Plan Change). On the major vehicle routes through and around the Plan Change area provision has been made for segregated cycle facilities with physical buffers. Footpath widths vary depending on location and function of the road.</p>
UD20	Also, in relation to Theme 2, please advise what the implications are of limitations placed on accessing arterial roads (Waihoehoe Road) in creating the activated built edges sought.	<p>The nature of the restrictions of vehicle restrictions accessing an arterial road would likely encourage the development of rear servicing lanes accessed via proposed connector or local roads intersecting with Waihoehoe Road in the longer term. In the short term there are also a number of existing vehicle crossovers along Waihoehoe Road which would likely be retained and utilised to facilitate vehicular access and development. As such there are no specific limits to creating active built edges. Regardless, the land fronting Waihoehoe Road is proposed to be zoned Business – Mixed Use. Within this zone, matters of discretion for all new buildings (H13.8.1(3)) would be relevant. These matters of discretion include, among other things, the design and appearance of buildings fronting public streets, the maintenance and enhancement of amenity for pedestrians, measures to limit visual effects of any blank walls, and the extent of glazing fronting public streets. In addition, for any residential development within Sub-Precincts C and E, additional assessment criteria (IX.8.2(4)) would also apply. Relevant matters for assessment include:</p>



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		<p>(b) <i>Whether residential development contributes to achieving attractive and safe streets and open spaces. Methods to achieve this include:</i></p> <p>(i) <i>Providing windows and entrances to the street to encourage passive surveillance;</i></p> <p>(ii) <i>Use of soft landscaping and planted elements to the street; ...</i></p>
UD21	In relation to Theme 3, please advise where the private open space requirements have been derived from / their rationale.	Refer to Section 6.4.3 of the Urban Design Report.
UD22	In relation to Theme 4, reference is made to the height enabled creating a distinctive character. Please advise whether there are other aspects of the urban form that will be secured by the proposed Precinct provisions that will contribute to a distinctive sense of place (e.g. creation of a distinctive collective skyline, use of vegetation to contribute to local character / identity, response to existing topography, visual connections to key features in the wider landscape).	Refer to Section 6.5.2 of the Urban Design Report.
UD23	Also, in relation to Theme 4, there is no reference to the various cultural impact statements submitted with the PC request and the various recommendations made about urban design and cultural input. In particular, how Te Aranga Maori Design Principles have been integrated with the overall masterplanning. Please advise how the recommendation are reflected in the urban design framework and resulting plan change provisions.	In preparing the Plan Change the applicant has undertaken extensive consultation with Iwi authorities who have an interest in the Plan Change area. Iwi have also prepared Cultural Value Assessments. The outcomes of this consultation and the assessments have directly informed the development of the Plan Change. Refer to Section 5.1.8.10 of the Section 32 Assessment Report which provides an overview of the outcomes sought by Mana Whenua and how these are being provided for within the Plan Change.
UD24	In relation to Theme 5, additional commentary should be provided about how the masterplanning has responded to landscape patterns and features – e.g. natural landforms, visual connections to wider landscape and how biodiversity will be strengthened through planting strategies.	Refer section 2.4 to 3.3. of the Civitas Masterplan.

## 3.0 ECOLOGY

The Ecology requests for further information and our responses are set out below.

RFI	Request	Response
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<p>E10</p>	<p>Section 4.1 of the Ecology Report notes that increased impervious surfaces has the potential to change the volume of and rate at which stormwater enters the receiving environment.</p> <p>It is considered that further information is required to assess the effect of this change on the life-supporting capacity of the receiving environment which includes areas of the Manukau Harbour scheduled within the AUP:OP as Significant Ecological Areas (SEA).</p> <p>Section 4.2.5.2 of the Drury-Opāheke Structure Plan notes that stream erosion is a significant issue because the resulting sediment is a major contaminant. It is considered that further, more detailed, site specific stream erosion assessments may be required, either now or at a time preceding development, to prevent exacerbating stream erosion issues.</p> <p>It is noted that Stormwater Management Area Flow 1 (SMAF 1) provisions will apply within the plan change area, but no corresponding assessment has been provided as to if this represents the best practicable option and adequately manages this potential effect.</p>	<p>Refer to Section 1 of the Ecology Response memo.</p>
<p>E11</p>	<p>The Drury-Opāheke Structure Plan envisions the restoration of 20 m riparian margins along streams, although it also notes that the actual width provided would be subject to more detailed investigation. The proposed precinct proposes a minimum of 10 m of riparian restoration along streams, without any corresponding detailed investigation or assessment of the effect of this change.</p> <p>Further detail is requested as to why the full 20 m anticipated by the Structure Plan is not proposed and the effect this deviation from the structure plan guidance will have in terms of ecological connectivity across the plan change area.</p>	<p>Refer to <i>Section 1.8.4 Riparian Margins</i> of this letter and Section 11.3.8 of the Section 32 Assessment Report.</p>
<p>E12</p>	<p>The Drury Centre Precinct Plan includes IX.6.4, a standard for riparian planting for streams. The Ecology Report identifies at least 2 wetlands within the Plan Change area, which are subject to the same provisions of the NPS:FM, AUP:OP and</p>	<p>Refer to <i>Section 1.8.4 Riparian Margins</i> of this letter and Section 11.3.8 of the Section 32 Assessment Report.</p>

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	<p>Drury Structure Plan that seek the maintenance and enhancement of the ecological values of wetlands.</p> <p>It is not clear why wetlands are excluded from this standard. It is considered that further assessment is required as to the appropriateness of this exclusion given the existing policy provision and direction from national, regional and catchment-specific scales.</p>	
<p>E13</p>	<p>The Drury Centre Precinct Plan includes IX.6.4, a standard for riparian planting 10 m wide on the riparian margins of streams. However, the Ecology Report notes that this width will be increased to 20 m along the main channel of the Hingaia and Fitzgerald Streams. There is no apparent mechanism within the plan change to ensure this additional width is delivered.</p> <p>Further, a number of visuals from the Urban Design Report appear to show sparse riparian planting, and the riparian zone along the Hingaia Stream in particularly to be dominated by grass, and to include a cycle-way/footpath within the riparian planting area. It would be envisioned that any riparian planting would consider the greater ecological benefit provided by native trees and shrubs over pasture grasses.</p> <p>The Urban Design Report also notes an additional development standard I1.6.3(2):</p> <p>Any planting required, will be implemented on accordance with a council approved landscape plan and must use eco-source native vegetation, be consistent with local biodiversity and planted at a density of 10,000 plants per hectare. This standard is not proposed within the precinct plan.</p> <p>This introduces some uncertainty as to what riparian planting is actually, proposed and what will comprise this planting.</p> <p>To address this concern, it is recommended that the standard be updated to reflect:</p> <ul style="list-style-type: none"> <li>• 20 m riparian margins along streams and wetlands</li> </ul>	<p>Refer to <i>Section 1.8.4 Riparian Margins</i> of this letter and Section 11.3.8 of the Section 32 Assessment Report.</p>

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	<ul style="list-style-type: none"> <li>• Riparian planting to be undertaken in accordance with Appendix 16 of the AUP:OP</li> <li>• Cycleways and pedestrian paths be excluded from the riparian planting area</li> </ul>	
E14	<p>The Drury-Opāheke Structure Plan notes that protection of the riparian planting is envisioned through esplanade reserves or other methods. No mention of protection measures is contained within the application material.</p> <p>Further detail is requested as to what protection measures for revegetation measures are proposed and if any measures are required within the plan change to ensure such measures are adopted, noting that elsewhere similar riparian vegetation standards have specified that such margins must be offered to Council for vesting (at no cost) or are required to be covenanted.</p>	Refer to <i>Section 1.8.4 Riparian Margins</i> of this letter and Section 11.3.8 of the Section 32 Assessment Report.
E15	<p>It is requested that the Drury Centre Precinct be updated with a precinct map that shows all watercourses within the plan change area. It is common practice for all streams to be shown in precinct as they provide both an opportunity and constraint for future development to respond to.</p>	Refer to <i>Section 1.8.4 Streams</i> of this letter.

## 4.0 STORMWATER MANAGEMENT

The Stormwater requests for further information and our responses are set out below.

RFI	Request	Response
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01	Stormwater Planning	<p>Please provide an assessment of how the proposed plan changes meet the outcomes of the NPS-FM and the related matters in the AUP Regional Policy Statement.</p> <p>How does the s32 report acknowledge and address methods to meet regional policy statement objectives that are relevant to the plan change areas, including B7.3 E1.3.8 and E1.310? Please update if necessary.</p>	<p>Refer to Section 8.1.4 of the Section 32 Assessment Report. Refer to Section 1 of the Ecology Response memo.</p>
02	Stormwater quality	<p>Please clarify how objectives in the AUP for water quality will be met. The Planning report (pg46) emphasises that high contaminant generating roads and carparks will be treated (treatment of these roads is covered by region wide rules in Chapter E9 AUP). However, it is unclear how many roads are anticipated to meet the thresholds to trigger E9 rules and if additional roads should be treated to meet the proposed objective.</p> <p>There is also reference in the Drury East – Fulton Hogan request (page 46) to a treatment train approach and secondary treatment but it is unclear if this is part of the approach to treat high contaminant generating roads or is an additional response applied to all roads to meet objectives E1.3.8 and E1.3.8 and meet Schedule 4 NDC requirements greenfield developments.</p> <p>A matrix showing what tools will be used in what proposed land use zone to avoid any adverse effects on water quality should be included in the SMPs as part</p>	<p>Refer to Section 1 of the Stormwater memo.</p>

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		of identifying how adverse effects will be mitigated and how these achieve AUP policies for water quality.	
03	Water quality	Please more fully describe how the water quality policies in E1 will be achieved, and what options have been considered to meet the policies.	Refer to Section 8.1.4 of the Section 32 Assessment Report. Refer to Section 1 of the Ecology Response memo.
04	Hydrology Mitigation	<p>Please provide an assessment of the degree to which SMAF1 avoids or remedies changes in hydrology which will result from the urban land uses proposed in the plan changes.</p> <p>A Regional Erosion Threshold Metric risk assessment identifies areas at risk of erosion and provides some quantification of the amount of erosion caused, however it does not address how effects will be avoided, remedied or mitigated.</p> <p>Identification of measures to avoid effects and mitigate should also be made and the BSTEM model is appropriate for this task. More detail on this tool is being supplied to the applicants.</p>	Refer to Section 2 of the Stormwater memo.
05	Flooding	<p>Please address the matters identified and discussed in the memo to Healthy Waters from Tonkin and Taylor dated 19 Feb 2020.</p> <p>We note that all applicants need to explain what the effect cumulatively across developments will be on the Drury township flooding and parts of the catchment that interact with the Slippery Creek floodplain.</p>	Refer to Section 3 of the Stormwater memo.
06	Riparian Margins	Please explain why a 10m wide riparian margin is proposed when the Drury-Opaheke Structure Plan Stormwater	Refer to <i>Section 1.8.4 Riparian Margins</i> of this letter and Section 11.3.8 of the Section 32 Assessment Report.

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		<p>Management Plan identified a 20m riparian margin as being appropriate. No evaluation of these two options is provided including their consistency with the objectives and policies of the AUP.</p>	
07	<p>Ecological corridors and blue green network.</p>	<p>Please clarify what the ecological corridors are and how they contribute to meeting objectives and policies of the AUP.</p> <p>They are mentioned briefly but there is no description on how these align to the Blue-Green network identified in the Drury-Opaheke Structure Plan, nor are the streams or corridors noted specifically in the precinct plan or stormwater management plan.</p> <p>Planning provisions to enable the ecological corridor are not provided in the precinct plan nor is an assessment given in s32 assessment reports.</p>	<p>Refer to Section 3 of the Ecology Response memo.</p>
08	<p>Development staging</p>	<p>Please explain if and how the precinct plan is to manage flood risks (such as staging of development in conjunction with flood mitigation measures).</p> <p>Flood attenuation is proposed in the SMP but there are no precinct plan provisions to ensure that flood attenuation is provided or when it would be appropriate to not have flood attenuation.</p>	<p>Refer to Appendix A of the Stormwater Memo.</p>



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