

DRURY



KIWI PROPERTY HOLDINGS NO.2 LIMITED PRIVATE PLAN CHANGE REQUEST

S32 ASSESSMENT REPORT
AUGUST 2020

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1.0 THE APPLICANT AND PROPERTY DETAILS

To:	Auckland Council
Site Address:	Flanagan Road, Fitzgerald Road and Brookfield Road, Drury
Applicant's Name:	Kiwi Property no.2 Limited
Address for Service:	Barker & Associates Ltd PO Box 1986 Shortland Street Auckland 1140 Attention: Nick Roberts/Rachel Morgan
Legal Description:	Refer to list of properties Appendix 2
Site Area:	95 hectares
AUP Zoning:	Future Urban Zone
Locality Diagram:	Refer to Figure 1
Brief Description of Proposal:	Private Plan Change request to rezone 95 hectares of land in Drury from Future Urban zone to a mix of business and open space zones.

2.0 EXECUTIVE SUMMARY

Kiwi Property no.2 Limited (Kiwi Property) is applying for a Plan Change to the Auckland Unitary Plan - Operative in Part (AUP) to rezone 95 hectares of Future Urban zoned land in Drury East to a mix of Business - Metropolitan Centre, Business - Mixed Use and Open Space-Informal Recreation zones. The Plan Change also includes a precinct which contains provisions that provide for the development of a new, comprehensively planned and transit-orientated centre at Drury that supports high density retail, commercial, residential and employment-generating activities. Specifically, the proposed provisions seek to ensure that development results in a quality public realm, a safe and legible street network that prioritises public and active modes of transport to and within the centre. Additionally, the provisions require development to be staged and coordinated with the delivery of supporting infrastructure.

The Council endorsed the Structure Plan for Drury-Opāheke on 6 August 2019. The zones and transport network proposed in the Plan Change are generally consistent with those in the Structure Plan with the following exceptions:

- A smaller Metropolitan Centre zone is proposed, which is located closer to the Drury interchange;
- A residentially focussed Mixed Use zone has been applied to the land immediately surrounding the Drury Centre instead of the Terrace Housing and Apartment Buildings and Mixed Housing Urban zone;
- The Drury East train station is proposed to locate within the Drury Centre slightly to the south of the location shown in the Structure Plan.

The reasons for these changes are set out in the report below.

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

- Rezoning land in Drury East now will enable the primary centre and supporting residential area to be developed first and provide the amenities and transport solutions necessary to support balanced urbanisation. This Plan Change, together with those for Fulton Hogan Land Development Limited (FHLDL) and Oyster Capital will connect the key employment areas in Drury South and Drury Village and will integrate with development in Drury West.

- Rezoning land in Drury East, and the Drury Centre in particular, enables a transit orientated development to be delivered and integrated with a new Drury Central train station. This will ensure that public transport is delivered early to support travel behaviour change. Enabling intensive development around the Drury Central train station will support an early increase in patronage.
- In terms of effects on residential land supply and demand in existing urban areas, enabling Drury East to be rezoned now based on the Drury East developer's proposed staging will mean that there is no net increase in dwelling capacity in the first 20 years, compared with the current FULSS.
- Kiwi Property and the other entities seeking Plan Changes in Drury East (FHLD & Oyster Capital) have an established track record in commercial and residential development and are uniquely placed to deliver a significant volume of housing and jobs in Drury at pace, and to a high standard.
- When viewed strategically in the context of future urban growth in the southern sector, rezoning Drury East is preferable to rezoning land in Pukekohe now, given that much of the land in Pukekohe is highly constrained, is on high quality soils with well-established horticultural activities, and is located further away from urban Auckland.
- We understand that the Council's primary concern with rezoning land in Drury East is that there is uncertainty of funding for required transport upgrades. To these matters we make the following comments:
 - The Government has recently announced funding for the key transport updates required to support development in Drury as part of its NZ Upgrade Programme. The New Zealand Transport Agency (NZTA) has confirmed the funding and timing for these projects¹ as follows:
 - Mill Road Corridor - \$1.354 billion in funding and opening in stages from 2025/2026;
 - SH1 Papakura to Drury South improvements, including the Drury interchange - \$423 million and complete late-2025;
 - Papakura to Pukekohe electrification - \$371 million with construction starting late-2020;
 - Drury East and Drury West rail stations, park and ride and bus & rail interchange facilities - \$247 million with construction starting 2023.

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

- The technical analysis undertaken in support of this Plan Change, in particular the Integrated Transport Assessment, demonstrates that the land can be developed with targeted local upgrades in place.
- Rules are included within the Plan Change to coordinate the release of development capacity within the Plan Change area with the delivery of required transport infrastructure. This allows much needed residential capacity to be available in the short to medium term. It also allows for consenting and development for preliminary works to proceed without creating any additional demand on infrastructure.
- The Drury East developers intend to develop an infrastructure funding agreement between themselves, the Council and other relevant parties addressing required local transport upgrades. The developers have already reached agreement with Watercare around network upgrades required to be installed and these works have physically commenced.

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

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

- The proposed zoning pattern is generally consistent with the Drury-Opāheke Structure Plan and the three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East;
- The Metropolitan Centre zone will support a wide variety of uses and services for the local community within a walkable distance and provide opportunities to establish new community facilities and a range of public open spaces. The centre will contain the key open spaces and the key retail street that are the focal point for intensive retail, commercial and civic development and pedestrian activity within the precinct;
- The residentially focused Mixed Use zone provides a range of activities to support the Drury centre and will encourage high density residential and employment activities in close proximity to the centre and the proposed train station;
- The extent of business zoned land proposed has been sufficiently sized to support the local needs of the population over the next 30 years. The proposed land uses will contribute to an improvement in the balance of residential and

business growth to support Drury as a self-sustaining community now and into the future;

- Establishing a Metropolitan Centre in Drury East is unlikely to have any adverse effects on existing centres such as Papakura, as the physical constraints and fractured ownership patterns have limited Papakura's ability to deliver Metropolitan Centre services to the southern community;
- The adverse effects of urban development on the natural environment, including the Manukau Harbour, Hingaia Stream and its tributaries can be effectively managed, and key natural features within the Plan Change area will be maintained and enhanced;
- The zoning pattern and proposed Precinct enables a connected and high-quality road network to be established that provides appropriately for all transportation modes; and
- The Plan Change area is able to be serviced by infrastructure, with appropriate upgrades in place.

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

3.0 INTRODUCTION

3.1 BACKGROUND

3.1.1 The Applicant

Kiwi Property is one of the leading property development and investment companies in New Zealand. Over the last 30 years Kiwi Property has developed a number of New Zealand's largest developments and currently owns and manage multiple large-scale retail and office developments in Auckland including existing centres such as Sylvia Park, Lynn Mall and The Base (Hamilton). Kiwi Property focuses on delivering the best retail and workplace experiences possible.

Kiwi Property owns a large portion of land within the Plan Change area (52ha), which includes the following properties:

- 108 Flanagan Road;
- 120 Flanagan Road;
- 133 Fitzgerald Road; and
- 97 Brookfield Road.

The extent of Kiwi's landholdings in relation to the extent of the Plan Change area is shown in blue outline on the below zoning map (**Figure 1**).

Kiwi Property envisages the new Drury Centre as a transit orientated development (TOD) that will become a local community centre as well as regional destination, with a range of retail, dining, and leisure activities that integrate with a diverse portfolio of housing, commercial and employment activities. The Plan Change area will be master planned by Kiwi Property as a sustainable transit-oriented development which creates a vibrant centre and offers a range of amenities for residents, workers and visitors.

4.0 SITE LOCATION AND DESCRIPTION

4.1 SITE DESCRIPTION

The Plan Change area is 95 hectares and is located within Drury East on the southern edge of the Auckland metropolitan area. Drury East is contained by the Papakura urban area to the north, the Hunua foothills to the east, the Drury South Business area to the south, and State Highway 1 to the west.

The Plan Change area includes the Future Urban zone land bounded by Fitzgerald Road, Brookfield Road, Flanagan Road and Waihoehoe Road. Kiwi Property has large landholdings within the Plan Change extent (shown red) and all other properties within the wider Plan Change area are owned by other parties. A locality plan of the plan change area is included as **Figure 1** below.



Figure 1: Aerial map showing the location of the site. Kiwi's landholdings are shown in red and their wider area of interest in blue (Source: Auckland Council Geomaps).

The overall topography of the area is relatively undulating with several elevated ridgelines. The western boundary of the Plan Change area is traversed by the Hingaia Creek and the northern extent of the Plan Change area is traversed by the Maketu Stream, draining ultimately to the Manukau Harbour via Pahurehure Inlet and Drury Creek. Across the Plan Change area there are permanent and intermittent stream tributaries of the Hingaia Stream as well as two seepage wetlands.

Vegetation within the Plan Change area is characterised by exotic pasture used to graze sheep and cattle, crops and exotic trees and shrubs planted for shelter, amenity or as part of gardens. Mature native and exotic trees with a “well-developed understory” have been identified on the site at 120 Flanagan Road. Riparian vegetation along identified streams comprises mainly grasses and weed species, with little continuity.

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

The Plan Change area is situated in close proximity to the Drury interchange between Great South Road and State Highway 1, which provides northern and southern on and off-ramps to the motorway. The railway line is located to the immediate north of the Plan Change area. Although there is no train station at Drury, Council's Drury Opāheke Structure Plan identifies a future station here, and electrification of the line

is intended in the future. We understand that as part of the electrification project a temporary station at Drury Central is likely to be provided.

High Power Transmission lines are located within the extent of the Hingaia Creek reserve area.

4.2 SURROUNDING AREA / LOCAL CONTEXT

The surrounding area is characterised by a mix of activities and building types. To the north of the Plan Change area towards Waihoehoe Road is a mix of suburban scale residential activities and horticultural / rural production activities. The subdivision pattern within this area is finer grained, within the context of a rural area. To the east, south and west of the Plan Change area are larger rural / residential blocks. The Drury Town Centre and light industrial area is located to the north west of the Plan Change area, fronting Great South Road.

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

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

- The Drury Quarry – consented quarry with a 100 year projected supply of roading metal for Auckland
- The existing Drury Light Industrial area to the north of the site –30 hectares of land currently occupied by light industrial activities.
- The Drury South Industrial area to the south of the site – 260 hectares of greenfield land has been rezoned and is currently being constructed as industrial activities, supportive commercial services and recreation/reserve/stormwater management areas, with development currently underway. The area when completed is designed to accommodate 6,900 jobs. The land is zoned Light Industry and Heavy Industry in the AUP.
- Various Special Housing Areas (SHA's), including:
 - Quarry Road – (Drury South Residential Precinct) is a joint Stevenson and Goodman venture which has obtained operative residential zoning to enable approximately 750 houses to be developed over the next 5 – 10 years. Development is currently underway.
 - Hingaia (Hingaia 1, 2 and 3 Precinct) - various developers providing residential development across 57ha in the short-medium term, with provision for a small Local Centre and Mixed Use area at the corner of

Hingaia Road and Harbourside Drive. A decision on this SHA has been released and the land now has operative residential zoning.

- Bremner Road, Drury (Drury 1 Precinct) – operative residential zoning provides for 1000-1500 new homes over 7-9 years and development is currently underway. This zoning has been recently expanded through Plan Change 6 to the Auckland Unitary Plan.
- Bellfield Road, Papakura (Opāheke 1 Precinct) – operative residential zoning which provides for 500 new homes in a mix of typologies and Stage 1 is currently underway.
- Wesley College, Paerata (Franklin 2 Precinct) – operative residential zoning provides for 4550 home over 15 to 20 years and Stage 1 is currently being constructed with residents in occupation.
- Takanini - provision for 2,395 new homes within three SHAs.

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

In terms of educational facilities, 485 Burt Road, Drury has been rezoned Special Purpose School zone, and a Notice of Requirement is currently processing to designate 41 Burberry Road, Drury for a Primary School and Early Childhood Education Centre. We understand that the Government is also investigating the provision of a new secondary school at Drury to cater for growth.

5.0 DESCRIPTION OF THE PLAN CHANGE REQUEST

5.1 DESCRIPTION OF THE PROPOSAL

5.1.1 Approach to the Planning Framework for Drury Centre

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

² Refer A1.6.5 of the AUP.

or lesser degree of regulation than the zone or Auckland-wide provisions, unless there are clear place-based reasons for doing so, which are different to other parts of the region.

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

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

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

5.1.2 Overview of the Proposed Zoning

This Plan Change seeks to rezone 95 hectares of Future Urban zoned land for urban development, which will comprise:

- 35 Ha Business - Metropolitan Centre Zone;
- 51.5 Ha Business – Mixed Use Zone; and
- 8.5 Ha Open Space – Informal Recreation Zone.

The proposed zoning will enable the establishment of a new comprehensively planned and transit-orientated centre at Drury that supports a quality compact urban form. The Business - Metropolitan Centre zone is proposed to apply adjacent to the rapid transit network. The Business - Mixed Use zone is proposed to be applied to the north, east and south of the Metropolitan Centre, which will have a focus on delivering high density and high quality residential and intensive employment opportunities. This provides some flexibility for the centre to grow as demand increases over time while providing a transition to the land to the east of the Plan Change area which is proposed to be rezoned to Terrace Housing and Apartment Building and Mixed Housing Urban zones through the FHLDL Plan Change request.

The Open Space – Informal Recreation zone is proposed on the western boundary of the Plan Change area to respond to the constraints imposed by the topography of the land and to follow and expand the existing Hingaia stream network, which contributes to the ecological values of the area. Retention of this area as open space will provide a natural buffer between the centre and the motorway and provide additional areas for usable and accessible public open space. There is potential in the future to expand the Open Space – Informal Recreation zone further west to adjoin with SH1 to provide a comprehensive open space either side of the Hingaia rather than the Light Industry shown in the Council’s Structure Plan, however, this does not form part of this proposal.

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 as shown in **Figure 3** below. The zoning boundary has been aligned with transmission lines³ 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. There is however, a 20m building setback along the Hingaia stream to align with future esplanade requirements. 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.

³ As far as the applicant is aware there are no plans to move the transmission lines from this area.

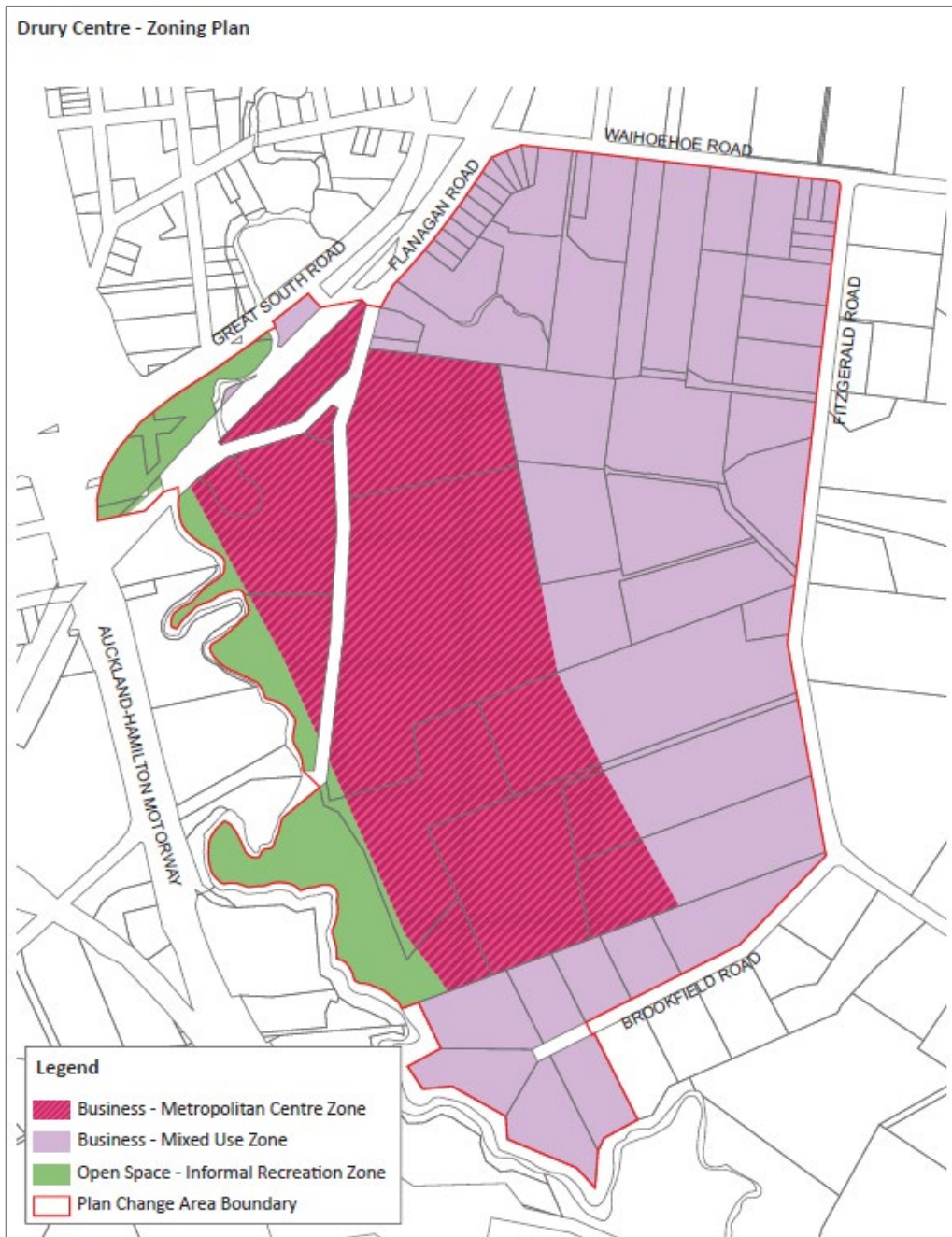


Figure 2: Proposed Zoning Map



Figure 3: The extent of the Open Space – Informal Recreation zone and National Grid Corridor Overlay

5.1.3 Size of the Centre

A more compact Metropolitan Centre zone is proposed than what the Council proposed within the Drury-Opāheke Structure Plan. With the zoning proposed, the land will provide for 35 hectares of centre land to cater for anticipated demand and

will provide significant capacity a wide range of uses, while also ensuring that development is concentrated and supports an efficient urban form.

The proposed size of the Metropolitan Centre zone takes into account the Economic Analysis undertaken by Market Economics (**refer Appendix 8**) which concludes that the retail land that is required at Drury by 2048 is 21 hectares net land. Additional land is then also required for roads, reserves, stormwater detention, commercial office activities, other commercial activities such as hotels, residential activities, healthcare and educational activities, public and community facilities. Further to this, a 15% buffer is also proposed in line with the National Policy Statement on Urban development Capacity directs that Council's make provision for accommodating uncertainty in future growth in their planning. Once provision for other activities and the buffer is included this brings the Metropolitan Centre land requirement up to 33.7 hectares. Some flexibility is required within this land requirement to ensure that the zone boundary sensibly integrates with the surrounding area, by aligning with open space boundaries and future road connections.

In addition to the economic analysis, we have reviewed the size of comparable centres in Auckland to cross-check and inform and the appropriate size of the Drury Centre. The size of comparable centres in Auckland (gross) are as follows:

- Massey North & Westgate combined: 37 hectares;
- Botany: 30 hectares;
- Sylvia Park: 27 hectares;
- Takapuna: 27 hectares.

The Drury-Opaheke Structure Plan identifies a 70 hectare centre in Drury East. As a comparison, a 70 hectare centre would be almost double the size of the largest Town Centre zones in Auckland (Silverdale and Mangere). The only centre in Auckland currently larger than 70 hectares is Albany, and we note that large size of that centre is due to the Metropolitan Centre zoning applying to a large extent of land around the practical extent of the centre (Westfield development).

We further note that the Property Economics report for Council for the Drury-Opaheke Structure Plan states that the Drury Centre would need to be in the order of 24 ha⁴, which we assume is net of roads, open spaces etc. This equates to a gross size for the Drury Centre of 33 hectares, assuming an additional 40 percent land requirements for roads, open space, other uses etc. This is consistent with the findings of Market Economics.

⁴ Refer to page 45 of the Property Economics report, "West Franklin and Drury Future Business Land Assessment", June 2018.

5.1.4 Spatial Location of the Centre

The proposed spatial positioning of the Drury Centre is based on a number of factors. These factors include:

- The existing site features including the presence of streams, flood plains, topography, the transmission lines and the Flanagan homestead.
- The high degree of visibility that the proposed Drury Centre has from the motorway, which will attract customers from a wider catchment, which would not be evident for a centre located further north. We note that exposure and visibility of centre was identified as a key criterion for 'centre success criteria' by the Council in the Drury-Opaheke Structure Plan⁵.
- The ability to deliver the comprehensive and integrated development of the Drury Centre by ensuring that it applies to large contiguous landholdings. This pattern is evident in all recent major centre development in Auckland, including North West, Sylvia Park and Albany. We note that landholdings to the north towards Waihoehoe Road are fragmented.
- The potential for better connectivity through active modes, as there is the potential to extend the high amenity green corridor pedestrian/cycleway required in the Drury South precinct further north along Hingaia Stream with connections to the existing Drury Township.
- The ability to directly integrate a future train station and public transport interchange adjacent to the Drury Centre on the Watercare site, and if the Drury Central Train Station is located further north, the proposed Mixed Use zoning provides opportunities for intensive development around the station and the collector and local road network can effectively connect the station with the wider area.
- Convenient vehicle access into the centre can occur from a number of routes, including Drury Boulevard from the north, a potential direct connection from State Highway 1, collector roads from the south and potential future collector road connections to the west;
- The proposed positioning enables the centre to integrate with the Hingaia Stream Reserve; and
- Locating the Drury Centre within the western portion of the Plan Change area provides a buffer between State Highway 1 and the residentially focused Mixed Use zoning.

5.1.5 Spatial Location of the Centre and the Drury Central Train Station

We acknowledge that the location of the Drury Central train station has not yet been confirmed. In our view, the optimal planning outcome would integrate the location of the Drury Centre with the Drury Central station, and that has been the assumption

⁵ Refer to MRCagney, "Technical Note – Business Land Success Criteria", 16 November 2018.

for this Plan Change and associated reporting. We make the following specific comments in support of the Drury Central Train Station in the location shown in Precinct Plan 2:

- Kiwi Property has been in discussions with Watercare who has confirmed that they are generally supportive of a rail station on the site provided that the pump station can be accommodated.
- A station on the Watercare site would serve a greater residential and employment catchment than a station further north given the flooding constraints evident in the northern area. These constraints would limit the catchment even with an alternative zoning pattern for the centre that extended to Waihoehoe.
- There are some constraints in this location associated with the riparian margin on the Hingaia Stream and flooding, however, we note that these constraints would need to be accounted for as part of future upgrade works to the rail line, and flooding constraints also exist for a more northern location. In our view, these constraints are not fatal and can be managed through detailed design.
- There is more available land around the Drury Centre and on the Watercare site for a transport interchange, park and ride, and supporting high density development immediately proximate to a future rail station. Physical constraints, including the Waihoehoe bridge and the topography, would limit the ability to achieve this if the station was located further north.
- We understand that one of the reasons that the Council/SGA was seeking to locate the Drury Central station further north was to achieve optimal spacing between the Drury Central and Drury West stations. Assuming this remains a consideration, in our view, it is the Drury Centre and any associated rail station that should take precedence over Drury West given that the Drury Centre will be the key employment, retail and civic focus for the wider area. In other words, the location of the Drury Central rail station should inform the location of the Drury West station.

Notwithstanding this, should Auckland Transport and the SGA decide to locate the train station further north, this would contribute to a successful Drury Centre in the Applicant's proposed location and achieve the transit-orientated development objectives of the precinct. We understand that the preferred location is immediately north of the Watercare site and within very close walking distance to the Drury Centre. Connections to the train station can be provided via the Key Retail Street and if required, quality walking and cycling connections via the future road network.

The Plan Change provides opportunities for intensive development around the station and activation of the streets that connect to the station in either location. In particular:

- The Key Retail Street integrates with a transport plaza and future train station on the Watercare site and the zoning provides for intensive development in the walkable catchment of the station;
- A train station in a more northern location would be well connected to the Drury Centre, as required by the precinct provisions, and the zoning provides for intensive development in a walkable catchment of the station, using the following methods:
 - The Mixed Use zoning allows intensive development with a mix of residential and commercial activities;
 - Sub-Precinct E allows for greater height adjacent to this potential location for the train station (32m); and
- Additional provisions apply to the collector and local road network which connect with Drury Central train station to ensure buildings are designed to provide for a range of commercial activities at ground floor. Zoning of the Centre

It is proposed to apply a Metropolitan Centre zone rather than a Town Centre zone to the Drury Centre for a number of reasons.

Context - Existing Centre Network

Economic Analysis undertaken by Market Economics (**refer Appendix 8**) has concluded that Papakura is not fulfilling its Metropolitan Centre role and is unlikely to ever fulfil this role in the future given its location, fragmented land ownership and limited ability to grow. On this basis, relying on Papakura to fulfil the southern Auckland catchments needs for a Metropolitan Centre is likely to see people traveling outside of the catchment to access amenities and employment opportunities. Based on this, Papakura is primarily fulfilling a Town Centre function currently, which creates a gap in the Metropolitan Centre network in south Auckland.

Context – Growth Expectations

Significant growth is expected for Drury-Opaheke and the surrounding area, and will grow to be similar in size to Rotorua or Napier over the next 30 + years. Given the scale of growth expected it is essential that the Drury Centre efficiently meets the social and economic needs of this community. Relying on Papakura to fulfil this function will require residents in Drury to travel outside of the area for core services, which would not support a sustainable urban pattern.

Policy Context

The Regional Policy Statement (Policy B2.5.2) provides for new metropolitan and town centres, subject to a range of matters, including most relevantly the proximity to existing or planned residential development, achieving a sustainable distribution of centres and managing effects on existing centres. While the Regional Policy

Statement does not detail the characteristics of metropolitan vs town centres, the zone provisions provide some guidance as shown in the comparison table below:

	Metropolitan Centre	Town Centre
Number and spatial distribution	10 metropolitan centres in Auckland typically spaced around 10km apart.	45 town centres in Auckland Distances between town centres vary anywhere between 1km-4km
Typical size (gross)	All metropolitan centres are greater than 20 hectares and are typically around 30 hectares	Large variety in town centre sizes ranging from 2 ha to 30 ha. Average size is 12 hectares.
Activity mix	Policy 17 Encourage a wide range, and a high concentration, of commercial, leisure, tourist, cultural and community activities and civic services in metropolitan centres.	Policy 15 Provide for town centres including new town centres of different scales and locations, that: service the surrounding community's needs for a range of uses, such as commercial, leisure, tourist, cultural, community and civic activities.
Scale of development	Policy 15 Enable significant growth and intensification in metropolitan centres. Standard building height – 72.5m Some variation applied through precincts.	Policy 16 Enable significant growth and intensification in town centres, except for those centres where it would compromise the planning outcomes identified in this Plan for the relevant centre. No standard building height. Building heights applied through height variation control.

Analysis and Reasoning

Based on the above, in our view, the Metropolitan Centre zone would be the most appropriate zone to apply to the Drury Centre for the following reasons:

- The existing network of centres in south Auckland, is not performing its function according to the centre's hierarchy set out in the Unitary Plan. Specifically, Papakura is not currently fulfilling a Metropolitan Centre, nor is it likely to in the future. This creates a gap in centre network that zoning the Drury Centre for Metropolitan Centre will assist to alleviate;
- The expected growth immediately surrounding the Drury Centre is significant in the long term, akin to a mid-sized city in New Zealand. Residents and workers in this area will require convenient access to a wide range of goods, services and social facilities, which would be fulfilled by a Metropolitan

Centre zoning. Encouraging future Drury residents to travel to Papakura for these services would not support a sustainable urban pattern.

- The required size of the Drury Centre, assessed as approximately 33 hectares by Market Economics and Property Economics, is consistent with the average size of Metropolitan Centres in Auckland. Town Centres are typically much smaller.

Further, we note that the Council's economic assessment for the Structure Plan notes the requirement for:

“a new large scaled integrated retail mall / centre to be developed at the Drury interchange in the form of a new large-scale metropolitan centre. This would be akin to Manukau City Centre in the 1970's and Albany, Botany and Sylvia Park more recently... such a development would be sustainable moving forward given the research and analysis in this report, and it is considered judicious for Council to take a proactive approach to ensure any new centre in Drury is integrated and most importantly scaled to efficiently meet the future communities' requirements and aspirations.”⁶

We agree with the findings of the Council's economic expert for the Structure Plan on this point and propose applying a Metropolitan Centre zone to the Drury Centre.

5.1.6 Other Unitary Plan Controls

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

All other existing controls and overlays will continue to apply to the Plan Change area, including:

- Controls: Macroinvertebrate Community Index – Urban;
- Controls: Macroinvertebrate Community Index – Rural;
- Natural Resources: Quality-Sensitive Aquifer Management Areas Overlay; and
- Infrastructure: National Grid Corridor Overlay.

All relevant Auckland-wide and zone rules would apply to future development on the site, in addition to those applying under the overlays and controls noted above.

⁶ Refer to page 45 of the Property Economics report, “West Franklin and Drury Future Business Land Assessment”, June 2018.

5.1.7 Precinct Provisions

It is proposed to apply the 'Drury Centre Precinct' to the Plan Change area, which will alter the provisions of the underlying Business – Mixed Use zone and Business – Metropolitan Centre zone.

The 'Drury Centre Precinct' comprises six sub-precincts. The sub-precincts are summarised below, and shown in the Drury Centre Precinct Plan 1 at **Figure 4**.

- Sub-precinct A is zoned Business - Metropolitan Centre Zone and contains the primary retail area, Main Street and civic and green open spaces. The sub-precinct is the focal point for intensive retail, commercial and civic development and pedestrian activity;
- Sub-precinct B is zoned Business – Metropolitan Centre Zone and is intended to be the primary location for large format retail, although other activities provided for in the Metropolitan Centre zone are not precluded to provide flexibility to incorporate a wide range of activities over time. Development in this sub-precinct should ensure that a quality street environment is achieved;
- Sub-precinct C is zoned Business - Mixed Use Zone and provides for high density residential and a range of commercial activities that will complement the core centre and maximise the efficient use of land close to the rapid transport network. Six-eight storey buildings are enabled in this sub-precinct to provide a transition to surrounding residential zones;
- Sub-precinct D is zoned Business – Metropolitan Centre Zone and provides for the establishment of the Drury East train station and associated Park-and-Ride and transport interchange. A public plaza is provided for that will integrate the train station with the centre and will provide a high quality pedestrian experience; and
- Sub-precinct E is zoned Business – Mixed Use Zone and provides for high density residential and a range of commercial activities that will complement the core centre and maximise the efficient use of land close to the rapid transport network. Eight-ten storey buildings are enabled, and flexible ground floor designs are encouraged in the sub-precinct, reflecting its close proximity to the Drury Central train station; and
- Sub-Precinct F is zoned Business – Mixed Use Zone and applies to the south-eastern part of the Drury Centre Precinct. Additional assessment criteria apply to the staging of pedestrian and cycle connections to the Drury Central Train Station in Sub-Precinct F.

The area to the south and east of sub-precinct B is within the Mixed Use zone and the standard zone and Auckland-wide provisions would apply in that area.

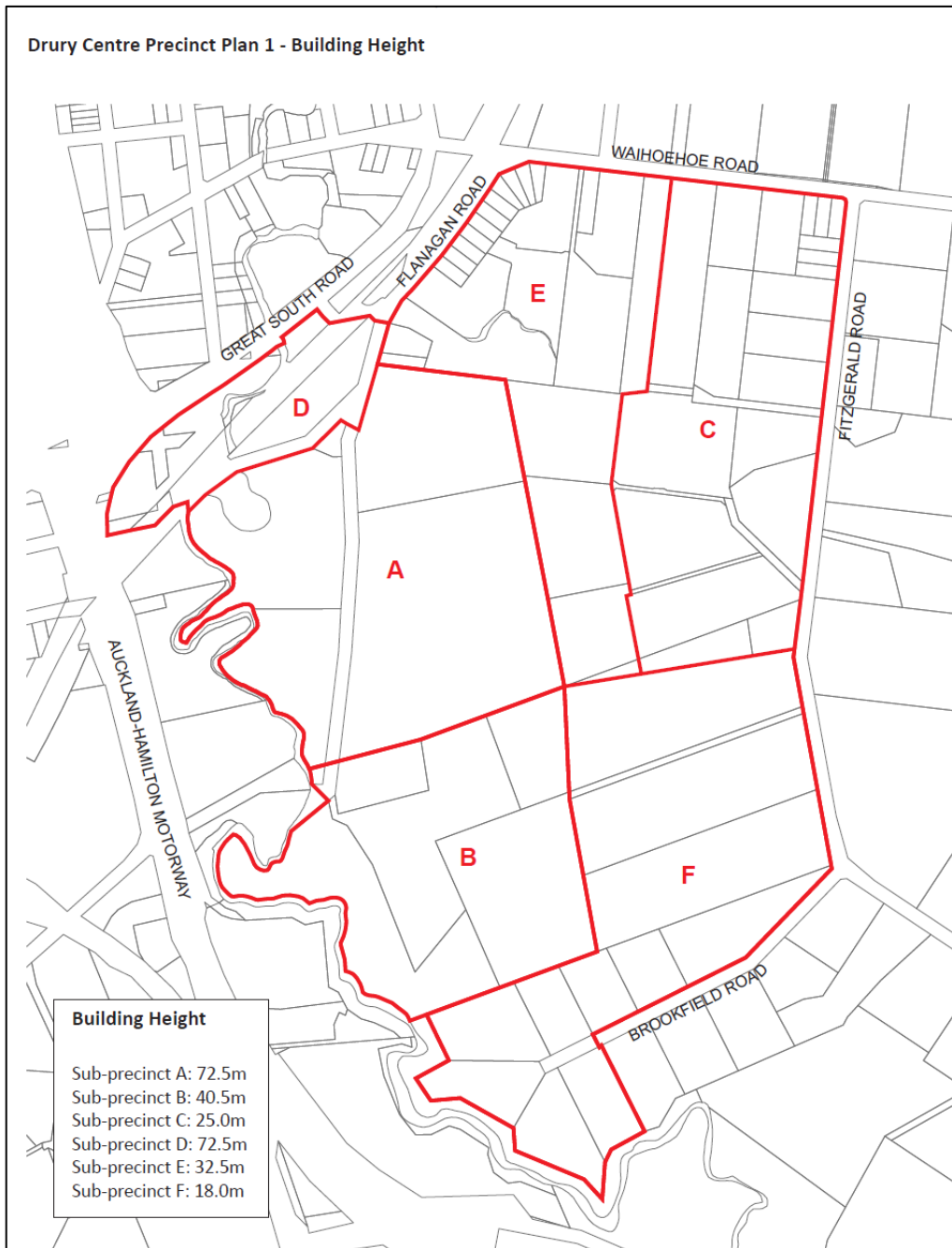


Figure 4: Proposed Drury Centre Precinct Plan 1 showing Sub-Precinct boundaries and building heights

5.1.7.1 Drury Centre Precinct Provisions

A package of provisions, including policies, activity standards, development standards, and associated matters of discretion and assessment criteria are proposed to achieve the objectives of the precinct and the wider Unitary Plan. The full set of objectives and provisions are set out within **Appendix 1** however a summary is provided below.

5.1.7.2 Drury Centre Precinct Objectives and Policies

The proposed precinct contains a comprehensive set of objectives and policies to ensure that the precinct provides for the development of a new, comprehensively planned and transit-orientated centre at Drury that supports high density and intensive employment-generating activities. Specifically, the proposed objectives and policies seek to ensure that development results in a quality public realm, a safe and legible street network that prioritises public and active modes of transport to and within the centre. Additionally, the objectives require development to be staged and coordinated with the delivery of supporting infrastructure.

Building Height

The Precinct provisions provide a coherent height strategy in response to the locational attributes of the site. This strategy can be summarised as:

- Within Sub-precinct A and D, the standard 72.5m height limit of the Metropolitan zone is proposed, reflecting its location in immediate proximity to the proposed rail station and its role as the core retail and activity area within the Drury Centre;
- Within Sub-precinct B a 40.5m height limit within the Metropolitan Centre is proposed to provide for high density activities, consistent with the zone, while providing a transition towards lower intensity residential uses neighbouring the site;
- Within Sub-precinct C a height limit of 25m is proposed to recognise the sites' proximity to the proposed rail station and FTN corridor along Waihoehoe Road and to provide a transition to the surrounding residential zones;
- Within Sub-precinct E a height limit of 32.5m is proposed to recognise the sites' close proximity to the proposed rail station (400m catchment) and FTN corridor along Waihoehoe Road; and
- Within Sub-precinct E the standard Mixed Use zone height of 18m of which 16m is occupiable, which recognises the distance of this area from the FTN and rapid transport and provides a transition between Sub-precinct B and neighbouring sites.

5.1.7.3 Quality Development

Resource consent is required for new buildings and alterations to existing buildings within the Plan Change area as a restricted discretionary activity. The matters of discretion and assessment criteria have been carried through to the precinct and additional matters of discretion/assessment criteria have been incorporated. These additional matters of discretion/assessment criteria 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 ensure that buildings within Sub-Precinct A, B and D:

- Provide adequate sunlight access to publicly accessible open spaces;
- Maximise pedestrian amenity, safety and visual quality along the key retail street;
- Achieve a reasonable level of street activation, building continuity along the frontage, pedestrian amenity and safety and visual quality within Sub-Precinct A;
- Ensure that development in Sub-Precinct B contributes to the visual quality and interest of streets and other public spaces consistent level of amenity expected in Metropolitan Centre zones;
- Ensure that large format retail in particular within Sub-Precinct B provides for the visual quality and interest of streets and other public places, having regard to the functional requirements of these activities;
- Achieve safe and attractive environment for pedestrians and provide opportunities for a range of commercial activities at ground floor along the collector and local roads that lead to the Drury Central Train Station be that via the key retail street and where required, any connecting roads; and incorporates Te Aranga Maori Design Principles.

5.1.7.4 Street Network

Resource consent is required for the development of public or private roads within the Plan Change area as a restricted discretionary activity. The assessment criteria at clause IX.7.2 of the Plan Change provide further guidance to both Council and an applicant as to how the street network should be established across the Plan Change area. In practice, this activity would be included in a resource consent application for subdivision or land use - whichever proceeds first.

Precinct Plan 2 sets out the key new collector roads required to support future development of the Plan Change area. This is based on an orthogonal grid structure with super-block sizes of approximately 350x350m. This will readily support the development of a finer grained, well connected block structure conducive to walking.

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

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

5.1.7.5 Open Space Network

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 see **Appendix 7**. The approach to delivering this open space strategy within the Plan Change area involves applying a range of methods, including zoning some areas the Open Space – Informal Recreation zone, relying on the Auckland-wide provisions, and also incorporating place based provisions into the precinct.

As previously discussed, 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.

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.

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 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 at a broad scale, 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.

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 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..

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 neighbourhood open spaces across the Plan Change area to meet the recreational needs for the future population.

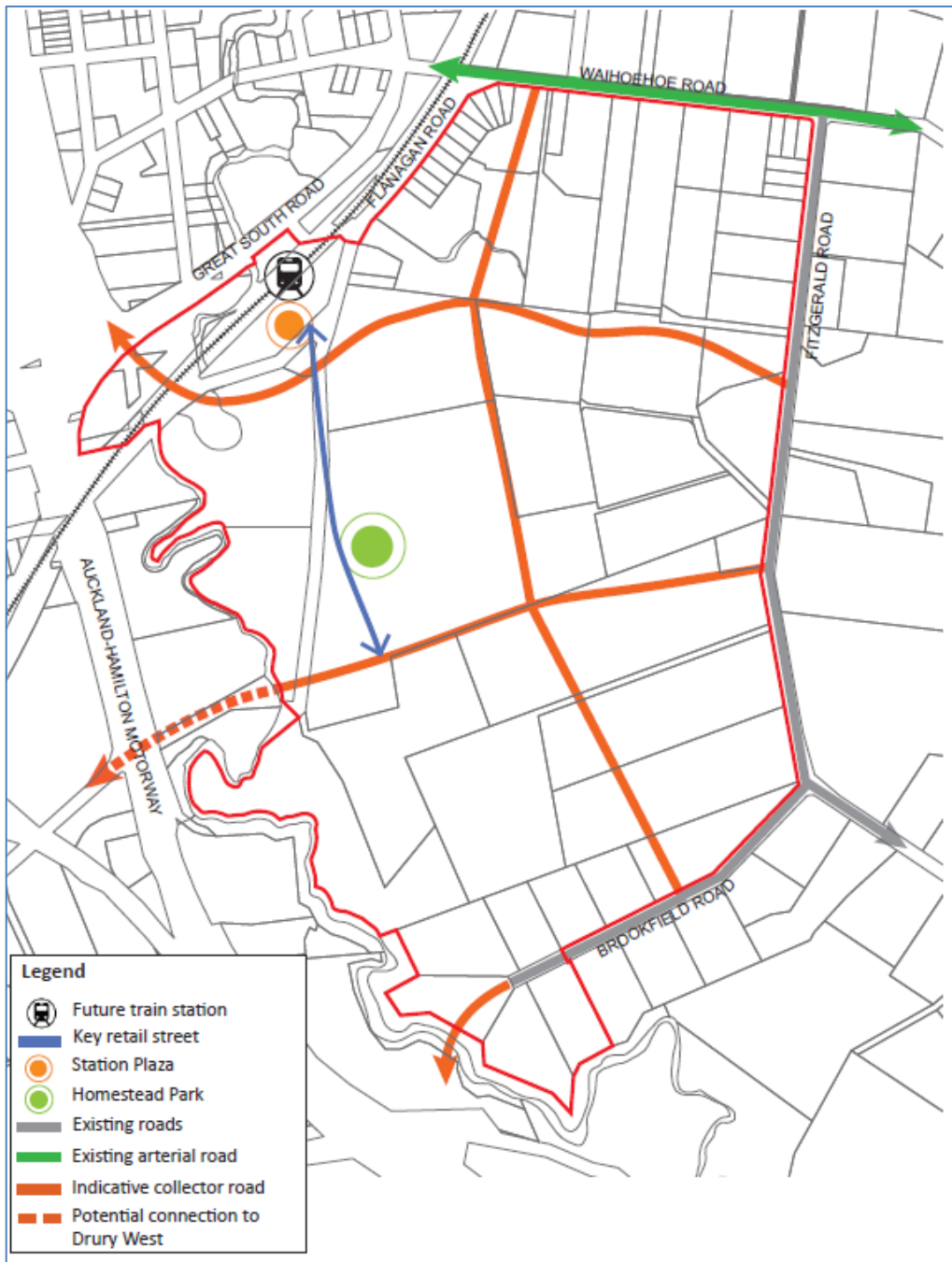


Figure 5: Proposed Drury Centre Precinct Plan 2 showing indicative open space and street network

5.1.7.6 Drury Centre Precinct Notification Provisions

Applications for complying new buildings and alterations to existing buildings are proposed to be considered without public or limited notification or the need to obtain written approval from affected parties unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991. As new development commonly infringes earthwork standards, applications to infringe

earthworks standards are also excluded from notification. Infringements to development standards that provide for amenity internal to the site are also proposed to be processed on a non-notified basis.

5.1.7.7 Coordinating Development with Transport Infrastructure

Development is coordinated with the delivery of required transport infrastructure through the inclusion of a transport staging rule and an external trip generation assessment. The transport staging rule ensures that development does not exceed the dwelling, retail GFA or commercial GFA thresholds until such time as the infrastructure upgrades are constructed and are operational.

Subdivision or development that complies with the transport staging rule for dwellings, retail and commercial is permitted. Subdivision and development that does not comply with the transport staging rule but complies with the external trip generation cap, is a restricted discretionary activity with matters of discretion limited to:

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

Subdivision and development that does not comply with the transport staging rule or the trip generation cap requires resource consent as a full discretionary activity. Discretionary activity status is preferred over non-complying activity status given that it enables all relevant effects to be considered, includes a notification assessment, and reflects that the transport environment changes over time. Discretionary activity status is also considered appropriate given that the provisions are intended to be supported by an Infrastructure Funding Agreement.

Rule E27.6.1 Trip generation is not proposed to apply to the Drury Centre precinct. This is given that more specific trip generation rules are proposed to apply to activities within the precinct.

Sub-Precinct C - Residential Amenity Provisions

Sub-precinct C is intended to be a residentially focussed mixed use area. To provide for this, additional provisions are proposed to apply to ensure development results in quality on site amenity for residents, including additional daylight and outdoor living space development standards, matters of discretion and assessment criteria. In addition, the activities that may not be compatible with residential use have a different activity status than the underlying Mixed Use zone.

5.1.7.8 Ecological Enhancement

Rules are proposed to apply with the Drury Centre Precinct that require riparian margins to be planted either side of a permanent or intermittent stream to a minimum width of 10m measured from the bank of the stream. Any resource consent for subdivision, development or land use which includes a site with a permanent or intermittent stream will trigger the requirement to show compliance with this standard. The special information requirement will direct applications for development, subdivision or land use 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.

An additional rule requiring a 20m building setback is also proposed to ensure that any land use that proceeds ahead of a subdivision aligns with future esplanade reserve requirements.

5.1.7.9 Residential Amenity within Sub-Precinct C

It is proposed to amend the underlying Business - Mixed Use zone as it applies within Sub-precinct C. These amendments are proposed to provide for greater amenity for residential dwellings, while still enabling a broad mix of residential and intensive employment generating activities to establish to maintain flexibility as to how this area will develop. In particular, 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 to maintain a reasonable standard of residential amenity. This proposal also recognises that within existing urban areas these types of activities are established and therefore need to be provided for within the Mixed Use zone. However, this is not the case in greenfield areas.

Additional development standards, matters of discretion and assessment criteria also apply to residential developments within Sub- Precinct C and E to ensure future residents enjoy a reasonable level of residential amenity. In particular the Daylight and Outdoor Living Space Standards from the Residential – Terrace Housing and Apartment Building zones have been applied. Additional assessment criteria is also included for residential dwellings to achieve attractive and safe streets.

5.1.7.10 Provisions for Mana Whenua Values

In preparing the Plan Change the applicant has undertaken extensive consultation with Iwi authorities who have an interest in the Plan Change area. Iwi have also prepared Cultural Value Assessments. The outcomes of this consultation and the assessments have directly informed the development of the Plan Change. The table

below provides an overview of the outcomes sought by Mana Whenua and how these are being provided for within the Plan Change:

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

Overview of outcomes sought and issues raised by Mana Whenua	Plan Change Response
Streams and wetlands	
Protection of the identified permanent and intermittent streams and two seepage wetlands which have been identified.	<ul style="list-style-type: none"> The Auckland-wide rules applying to lakes, rivers and streams (E3) will apply to future development as they relate to any stream works if they are required.
Iwi identified cultural values associated with remnant Stream D at the site visit on 14 August 2019 (identified in the attached map)	<ul style="list-style-type: none"> Stream D is understood to be a remnant of the Hingaia Stream, which has been historically reclaimed and modified. The Kiwi 2048 Masterplan proposes development within the extent of Stream D, to provide access to the centre and achieve a high-quality built environment. The proposed zoning framework provides flexibility on how the masterplan will be implemented and an assessment criterion is proposed that considers how Te Aranga design principles will be incorporated. This provides scope for the applicant to work with iwi on how the cultural values of the remnant stream will be recognised through the design and consenting phases.
Tree/Vegetation Planting	
The riparian margins are degraded and Mana Whenua would like to see these restored to a 20m riparian setback	<ul style="list-style-type: none"> An additional rule in the Plan Change requiring riparian planting to a minimum width of 10m measured from the bank of the stream is proposed. No amendments are proposed to the esplanade reserve and riparian yard requirements of the AUP. These are: <ul style="list-style-type: none"> 20m esplanade reserve for streams greater than 3m in width (E38.7.3.2); 10m riparian yard i.e. no buildings from the edge of all permanent and intermittent streams (required in all zones).
The use of native trees/plants	<ul style="list-style-type: none"> The required riparian planting must be in accordance with an approved riparian planting

	plan identifying the location, species, planter bag size and density of the plants. This will include consideration of native species.
Undertake tree surveys	<ul style="list-style-type: none"> • An ecological assessment prepared by Tonkin & Taylor Ltd has been undertaken to support the Plan Change, which has been provided to Iwi. • No notable trees or Significant Ecological Areas are present within the Plan Change area. • Mature native and exotic trees have been identified on the site at 120 Flanagan Road. Assessment criterion IX8.2(2)(C) is proposed which seeks to ensure that indigenous trees are retained within Homestead Park where possible.
Stormwater Management	
"Treatment Train" approach for dealing with stormwater	<ul style="list-style-type: none"> • A treatment train approach forms part of the approach to stormwater management set out in the Tonkin & Taylor Stormwater Management Plan.
Roof water for reuse and groundwater recharge	<ul style="list-style-type: none"> • In suitable locations roof water will be retained for use as grey water as set out in the Tonkin & Taylor Stormwater Management Plan. • In addition to this, the Plan Change proposes apply the SMAF1 control.
Heritage and Archaeology	
Potential for cultural sites within the Plan Change area	<ul style="list-style-type: none"> • If any sensitive material is discovered the accidental discovery rules under the AUP will apply under E12.6.1. Sensitive material includes in particular any human remains or kōiwi or a Māori cultural artefact/taonga tūturu. A clear process must be followed if any sensitive materials are uncovered.
Design	
Māori Design Principles	<ul style="list-style-type: none"> • The Drury Centre Precinct incorporates an assessment criterion for roads, open spaces and new buildings that require consideration be given to whether the development incorporates Te Aranga Māori Design Principles.
Incorporation of iwi design particularly in relation to the park edge road. Consideration of new/additional redoubt post markers acknowledging iwi	<ul style="list-style-type: none"> • The Drury Centre Precinct incorporates an assessment criterion for roads, open spaces and new buildings that require consideration be given to whether the development incorporates Te Aranga Māori Design Principles.
Contaminated Land	

Remediation of possible contamination within the stream bed	<ul style="list-style-type: none"> No contamination has been identified by on-site testing to date. The requirements of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health will apply to land development at the resource consent stage.
Cultural Monitoring	
Cultural monitoring of earthworks in case of the potential discovery of kōiwi, Māori artefacts or archaeological features	<ul style="list-style-type: none"> If any sensitive material is discovered the accidental discovery rules under the AUP will apply. Conditions for undertaking earthworks including any cultural monitoring will be determined at a resource consent stage and in discussion with iwi.

Table 2: Overview of Drury Centre Precinct Provisions

Objective/Policy Direction	Method Summary
<ul style="list-style-type: none"> Ensure that development provides a collector and 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. Require streets to be attractively designed to appropriately provide for all modes of transport. 	<ul style="list-style-type: none"> Restricted Discretionary activity for development of public or private roads and open spaces greater than 1000m². Assessment criteria are proposed to ensure development and subdivision provide an integrated network of streets and open spaces.
<ul style="list-style-type: none"> Development creates a distinctive sense of place by incorporating distinctive natural and built site features, responding to landform and respecting Mana Whenua values. 	<ul style="list-style-type: none"> Building heights are proposed to be modified from those of the underlying zone to reflect and recognise the proposed Metropolitan Centre status of the Drury Centre and to provide a transition to the surrounding residential zones. A design-based approach is proposed with all new buildings and additions and alterations not otherwise provided for requiring assessment to manage the future amenity values of Drury and the design and layout of the train station and transport interchange.

<ul style="list-style-type: none"> Freshwater and sediment quality is progressively improved over time in the Drury Centre precinct. 	<ul style="list-style-type: none"> Proposed rules which require the planting of riparian margins and building to be setback to align with esplanade requirements.
<ul style="list-style-type: none"> Enable residential activities at high densities in Sub-Precinct C and F that provide quality on-site amenity for residents, including privacy and outlook, outdoor living space and access to daylight. 	<ul style="list-style-type: none"> A package of rules and assessment criteria are proposed to enhance residential amenity within Sub-Precinct C.
<ul style="list-style-type: none"> The timing of development in Drury East is coordinated with the transport network infrastructure upgrades necessary to mitigate adverse effects of development on the transport network. 	<ul style="list-style-type: none"> Trigger rules are proposed to ensure that development capacity is staged with the delivery of required transport infrastructure.

5.2 PLAN CHANGE APPROACH FOR DRURY

Kiwi Property, FHLDL and Oyster Capital, collectively have an interest in land within Drury East. Their areas of interest are shown on the plan in **Figure 6**. The Drury East developers have an established track record in commercial and residential development and want to progress development in 'Decade 1' (2018-2027).

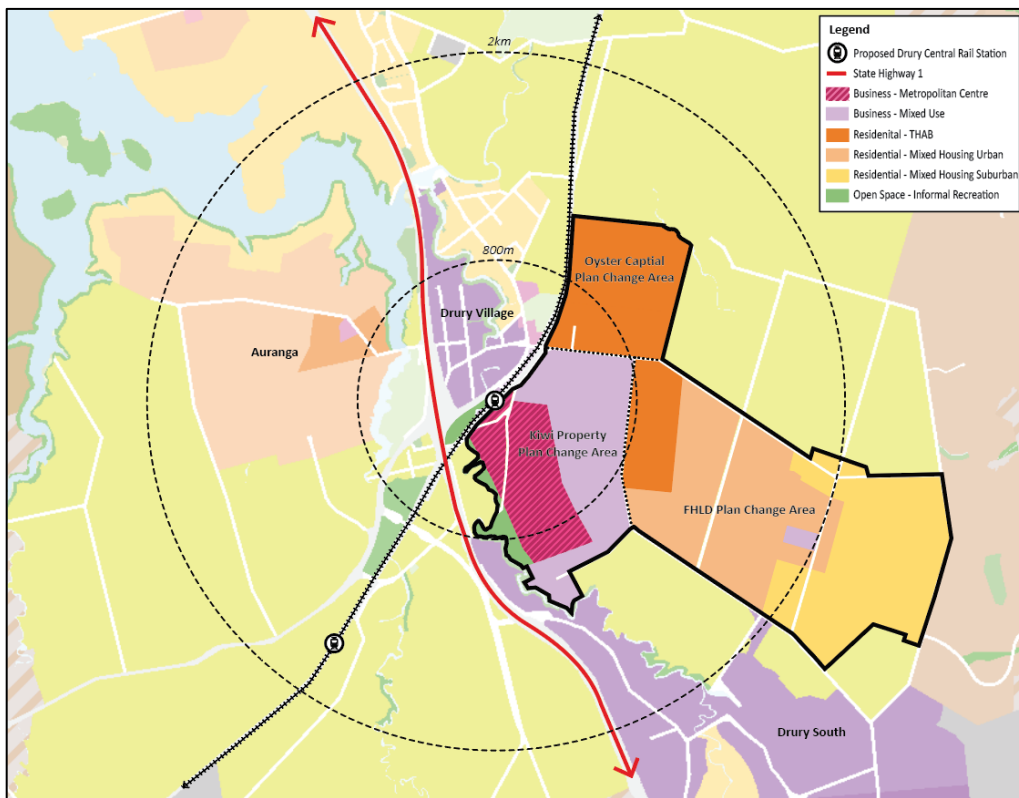


Figure 6: Areas of interest for Drury East developers and proposed zoning pattern across Drury East

Between 2017-2019, Kiwi Property has worked together with FHLDL and Oyster Capital to develop a common vision for Drury East in the form of an agreed Structure Plan. This was used to inform the Council’s Structure Plan process that has recently concluded. The Drury East developers have continued to work together to develop a series of Plan Changes that build on the vision for Drury East within their agreed Structure Plan.

The three private Plan Change requests have been prepared concurrently to allow a wider consideration of the future land use pattern proposed within Drury East and an integrated approach to the planning and delivery of supporting infrastructure. This approach is unique and demonstrates a commitment on behalf of the developers to work together.

The series of private Plan Changes will bring forward the staged release of land at Drury East from what is proposed in the FULSS⁷. The Council has stated that there is insufficient funding available to deliver the transport infrastructure necessary to support the developer’s proposed staging.

The developers agree that securing funding for the required transport projects and coordinating the timing of their construction with development will be crucial. Kiwi Property proposes to work collaboratively with other major landowners in Drury, the

⁷ The Future Urban Land Supply Strategy 2017 (FULSS) states that the Plan Change area will be ‘development ready’ in 2028-2032.

Council and Central Government to resolve this through an Infrastructure Funding Agreement or similar mechanism prior to a Council Hearing on the Plan Change. This will tie in with the Drury Transport Investment Project led by Council and Central Government that is investigating options for funding the necessary transport network projects to accelerate the urban rezoning of future urban land in Drury.

5.3 PURPOSE AND REASONS FOR THE PLAN CHANGE

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

The purpose of the Plan Change, is to enable the development of a new, comprehensively planned and transit-orientated centre at Drury that supports a quality compact urban form. The Plan Change also seeks to provide additional land for housing along with a network of open spaces. The reason for this Plan Change is that the applicant, who is the majority landowner of the Plan Change area, intends to develop their landholdings to increase the supply of retail, commercial and residential capacity within the southern part of Auckland.

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

6.0 TIMING OF THE PLAN CHANGE

6.1 DRURY DEVELOPERS ALTERNATIVE STAGING FOR DRURY

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

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

acknowledged that is not always possible where large-scale infrastructure investment is required.

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

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

The proposed staging proposal for Drury and Pukekohe is shown in **Figure 7 & 8** below:

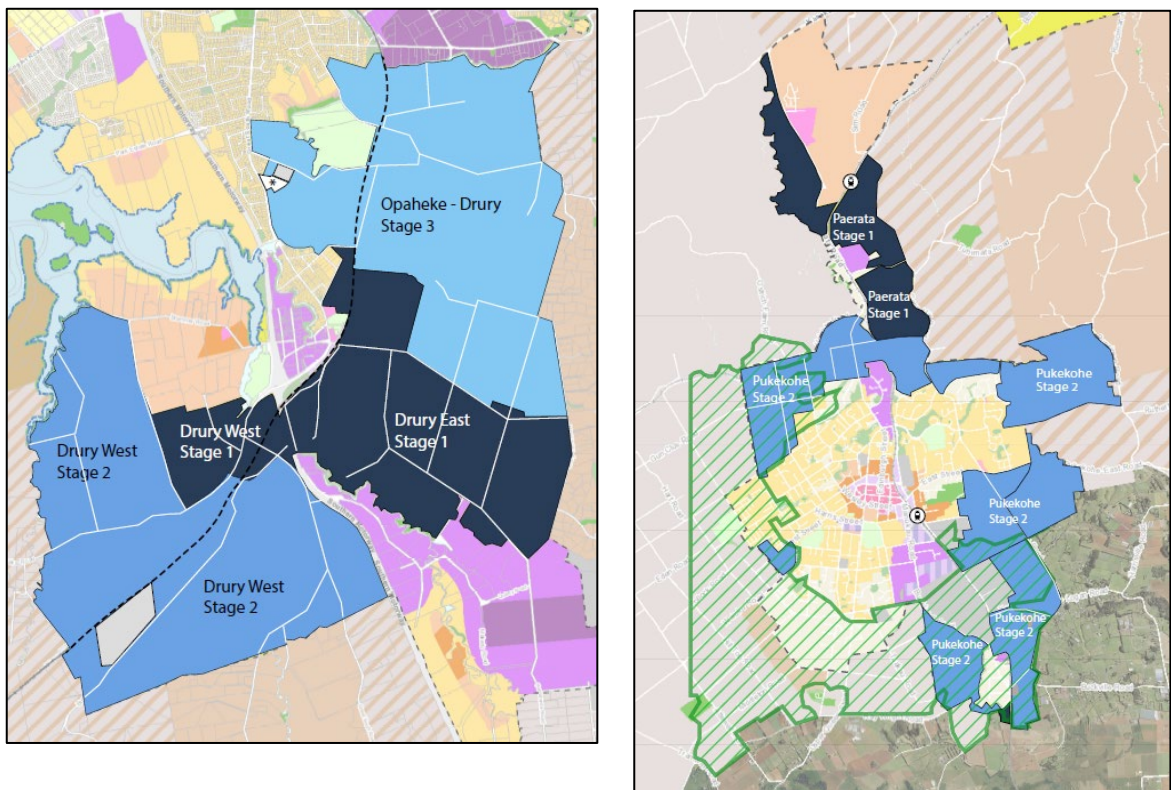


Figure 7 & 8: Alternative staging for Drury- Opāheke (left) and for Pukekohe-Paerata (right).

The key reasons for this alternative staging are as follows:

- Promotes a more connected land use outcome for Drury by concentrating development around existing urban areas at Drury and Drury South;
- Provides for significant amenities and services to be provided in Decade 1 to support the residential catchment;

- Provides for employment land in Decade 1 in Drury to support the residential catchment;
- Integrates with planned public transport, noting that the Drury Central station is proposed to be constructed ahead of the station at Drury West;
- Focuses development around the Drury Interchange, making efficient use of required upgrades and reducing pressure on State Highway 22;
- Recognises the significant constraints to developing land in the floodplains in Slippery Creek, noting that the Council's Stormwater Management Plan for the draft Drury-Opāheke Structure Plan recommends no development in this area⁸;
- Prioritises land for development where large holdings are in single ownership, which can be developed efficiently, which is not the case in for the land to the west of Jesmond Road, or Pukekohe which is in highly fragmented ownership;
- Recognises that developing on prime and elite soils at Pukekohe for low density housing (Single House zone) should not be prioritised and is contrary to policy B2.2.2(2)(j) of the Regional Policy Statement; and
- Brings forward land that can be serviced, and for which meaningful funding contributions can be made by a few large developers.

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

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

An analysis of the Council's proposed staging and the Drury East Developers staging against the staging principles in Appendix 1 of the FULSS 2017 is included within

Appendix 5. It is appropriate to consider this alternative staging proposal based on its merits through the Plan Change process.

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

6.2 EFFECTS ON ACHIEVING INTENSIFICATION IN URBAN AREAS

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

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

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

As stated in the Property Economics and MRCagney reports prepared on behalf of Council to inform the Drury-Opāheke Structure Plan, the catchment for the primary centre and supporting public transport should be maximised to ensure its success⁹. Delaying the residential land around the centre would not achieve this as the centre would be relying on a customer-base from further afield and public transport would have a limited walk-up catchment. These factors would tend to support vehicles as the primary mode of transport to the centre, which would be inconsistent with the policy direction set out in the Government and Council's transport policy documents¹⁰ to prioritise public transport, and support integrated land use and transport planning.

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

⁹ MRCagney Technical Note dated 16 November 2018, 'Success factors for rapid transit network stations'.

¹⁰ Government Policy Statement on Land Transport, Auckland Plan 2050, Regional Land Transport Plan 2018.

7.0 ACCEPTING THE PLAN CHANGE REQUEST (CLAUSE 25)

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

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

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

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

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

- The proposed zoning is consistent with that shown in Council’s own Structure Plan for Drury/ Opāheke.
- While the proposed timing of the rezoning differs from Council’s current proposed staging set out in the Future Urban Land Supply Strategy (FULSS), the more detailed technical analysis undertaken as part of this proposal demonstrates that there is no planning reason for preventing development occurring earlier.
- All necessary statutory requirements have been met, including an evaluation in accordance with S32¹¹ with supporting evidence, and consultation with interested iwi is on-going.
- The Plan Change is considered to be consistent with the sustainable management purpose of the RMA as discussed in the report below.

¹¹S32 of the RMA

The RPS places a strong emphasis on delivering integrated urban development in Future Urban areas (B2.2.1(5)¹² and B2.2.2(7)(c)¹³. This requires that the infrastructure needed to support urban development is delivered at the same time as housing and jobs. The technical analysis prepared to support this Plan Change demonstrates that the area can be serviced with targeted transport infrastructure upgrades in place. The Plan Change area can also be serviced with targeted upgrades to the water supply, wastewater and stormwater networks.

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

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

In addition to the issue of funding required for transport infrastructure, rules are included within the Plan Change to stage the release of development capacity within the Plan Change area with the delivery of required local transport upgrades. This approach to releasing the land for urbanisation is very common throughout the AUP and has been used in many greenfield precincts including at Redhills¹⁴, Puhunui¹⁵ and Wainui¹⁶, and Precincts to name a few. We note that in those cases, funding of the required upgrades was not resolved prior to the Hearing and has been worked through currently in tandem with consenting processes. Therefore, as the Plan Change follows an approach that has been tested through different Schedule 1 processes it is considered to accord with sound resource management practice.

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

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

¹³ B2.2.1(5)(c) Enable rezoning of land within the Rural Urban Boundary or other land zoned future urban to accommodate urban growth in ways that do all of the following: ... integrate with the provision of infrastructure.

¹⁴ AUP Table I610.4.1(A15), I610.6.2 Infrastructure Upgrades and Location of Development - Transport

¹⁵ Include the reference here

¹⁶ AUP Table I544.4.1 (A1), I544.6.2 Infrastructure

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

8.0 POLICY FRAMEWORK

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

8.1 NATIONAL POLICY DOCUMENTS

8.1.1 National Policy Statement on Urban Development Capacity

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

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

The FULSS anticipates that approximately 8,200 dwellings will be provided for in Opāheke Drury with a large centre. Accordingly, the Plan Change enables significant capacity for dwellings and employment consistent with the FULSS (approximately 35 hectares Metropolitan Centre zone and 51 hectares Mixed Use zone), enabling both a range of dwelling types as well as employment opportunities for the increasing population. The analysis in Section 5 and 6 above explain the effect of bringing forward this capacity on existing urban areas.

8.1.2 The Proposed National Policy Statement on Urban Development

In August 2019 the Ministry for the Environment released the proposed National Policy Statement on Urban Development (**NPS – Urban Development**). The NPS – Urban Development will replace the NPS on Urban Development Capacity. The NPS – Urban Development contains objectives and policies that require councils to carry

out long term planning to accommodate growth and ensure well-functioning cities. There is an emphasis on allowing for growth 'up' and 'out' in a way that contributes to a quality urban environment, and to ensure their rules do not necessarily constrain growth. Councils must also enable higher density development in areas close to employment, amenity, infrastructure and demand.

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

While not yet having statutory effect, the Plan Change is consistent with the policy direction within the proposed NPS-Urban Development. The Plan Change provides for a transit orientated Metropolitan Centre to serve the southern Auckland needs. The location is consistent with the proposed policy direction within the proposed NPS-Urban Development as it is beside a planned train station and the Drury interchange. The Plan Change will support good urban outcomes as the proposed rezoning and associated rules is likely to have positive effects on the quality of the built environment, and development within the Plan Change area will integrate well with the wider Drury area. As outlined in Section 11 the Plan Change will not adversely affect the environment as any effects can be appropriately mitigated.

8.1.3 New Zealand Coastal Policy Statement

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

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

8.1.4 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2011 (NPSFM) sets a national policy framework for managing freshwater quality and quantity. The NPSFM was updated in August 2017 to incorporate amendments from the National Policy Statement for Freshwater Amendment Order 2017. The amendments came into

effect on 6 September 2017 and include provisions that seek to improve fresh water quality with a target to increase the proportion of rivers and lakes suitable for primary contact to 90 per cent by 2040. There are also new provisions that enable the use of freshwater for economic wellbeing.

The Objectives of the NPSFM are consistent with the objective and policy framework within the AUP for Freshwater (B7, E1 and E2). A comparative analysis is provided within Appendix 24 to show how the AUP gives effect to the NPSFM. The Plan Change is consistent with AUP objectives and policies for freshwater systems, water quality and integrated management. This is analysed in a detailed assessment of the proposed Plan Change against the objectives and policies freshwater systems, water quality and integrated management are provided in Appendix 6.

It is proposed to apply the Stormwater Management Area Control – Flow 1 (**SMAF 1**) across the Plan Change area to manage the increase in stormwater discharge to sensitive stream environments. Accordingly, an integrated stormwater management approach has been proposed as a ‘Stormwater Management Toolbox’ which incorporates a range of measures to manage potential effects associated with the proposed change in land use and outlines the devices proposed within each of the proposed zones. The ‘Stormwater Management Toolbox’ is proposing a higher standard of stormwater management than what is required within SMAF 1. In particular all roads are proposed to be treated irrespective of whether they are high contaminant or not.

The intermittent and permanent streams present within the Plan Change area have been identified by Tonkin and Taylor (refer to **Appendix 11**). All stream tributaries within the Plan Change Area are highly eroded and degraded. This is attributed to a combination of poor bank stability, unrestricted stock access leading to ongoing agricultural related nutrient inputs, instream channel disturbance, minimal stream channel shading and bare or sparsely vegetated riparian vegetation within the catchment. The Plan Change will enhance streams as Riparian enhancement along the identified streams is required under the proposed Drury Centre Precinct.

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

To facilitate urban development of the land, some stream reclamation may be necessary to construct roads. The effects of reclamation and the adequacy of the mitigation or compensation proposed will be considered as part of the resource consent process under the standard AUP provisions. Where any stream reclamation is required which may result in loss of stream habitat, the effects can be offset through enhancement of other sections of streams within the Plan Change area, or

off site as proposed for under the AUP, to ensure no net loss is achieved. Given that the effects of development on streams and wetlands is comprehensively managed by the rules in E3, in our view, it is necessary to illustrate the stream network on a precinct plan.

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

8.1.5 National Policy Statement on Electricity Transmission 2008

The National Policy Statement on Electricity Transmission sets out the objective and policies to manage the effects of the electricity transmission network. The NPS recognises the importance of the National Grid network by enabling its operation, maintenance, and upgrade, and establishing new transmission resources to meet future needs.

The National Grid Corridor overlay applying under the AUP gives effect to the NPS by controlling the location of activities, and the extent of subdivision and development near the National Grid Line. The site is traversed by two Transpower Transmission Lines - 220kv and 110kv, and the standard measures in D26 National Grid Corridor Overlay will be adhered to in order to avoid reverse sensitivity effects on the National Grid Corridor.

8.1.6 National Planning Standards

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

8.1.7 National Environmental Standards

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

- NES for Air Quality;
- NES for Sources of Drinking Water;
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health.

These NES documents have been taken into account in the preparation of the relevant expert reports and are further discussed in Sections 9 and 10 of the report below.

8.1.8 Discussion Document – Valuing Highly Productive Land

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

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

8.2 COUNCIL STRATEGIC PLANS

8.2.1 Auckland Plan 2050

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

In terms of the form of development, the Auckland Plan takes a quality compact approach to growth and development. The Auckland Plan defines this as¹⁷:

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

¹⁷ Auckland Plan 2050, pg. 206.

Under the Auckland Plan achieving the quality compact approach for future development is twofold. There needs to be sufficient capacity for growth across Auckland and good design needs to be embedded in all development.

The proposed Drury Centre is a transit orientated development that supports a quality compact urban form. The Plan Change provides an opportunity to provide a Metropolitan Centre to service the needs of Drury and the wider southern Auckland area, adjacent to the planned Drury East train station. The Plan Change prioritises access to and within Drury Centre by public and active modes and integrating rail, bus, pedestrian and cycle networks to connect key destinations. The Plan Change also provides for the highest employment-generating activities and residential densities around the future Drury East train station.

New open spaces to serve the new Drury East population are proposed as part of the Plan Change and shown indicatively on the proposed precinct plan. These range from recreational parks, that integrate the existing Hingaia Stream and its wetlands, to civic spaces including a new town square.

The Plan Change introduces a planning framework that seeks to achieve quality urban design outcomes for the Plan Change area. To ensure development is consistent with the overall design strategy for the centre, a design-based approach has been implemented, with all building development requiring assessment against a tailored set of criteria. The precinct also includes provisions to ensure development and subdivision provides the collector and local road networks, cycle and pedestrian networks, open spaces and riparian margins as envisioned in the masterplan. Development standards and the activity status of some land uses are proposed to be modified in Sub-Precinct C, which has a residential land use focus, to enhance residential amenity.

Overall, the Plan Change is consistent with the strategic direction of the Auckland Plan and will contribute to achieving a quality compact approach to urban growth, while ensuring that good design is embedded through the development.

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

8.2.2 Future Urban Land Supply Strategy 2017

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

The FULSS informs the council's infrastructure funding priorities and feeds directly into the council's long-term plans, annual plans and other strategic documents.

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

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

8.2.3 Open Space and Community Facilities

8.2.3.1 General Policies and Action Plans

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

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

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

8.3 REGIONAL POLICY STATEMENT AND PLANS

8.3.1 Auckland Unitary Plan (Operative in Part)

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

The Regional Policy Statement (**RPS**) sets out the overall strategic statutory framework to achieve integrated management of the natural and physical resources of the Auckland Region. The RPS broadly gives effect to the strategic direction set out in the Auckland Plan. Section 75(3)(c) of the RMA states that a District Plan must give effect to any Regional Policy Statement and Section 75(4)(b) states that a District Plan

must not be inconsistent with a Regional Plan for any matter specified in Section 30(1).

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

Of particular relevance to this plan change is the objectives and policies within Chapter B2 in relation to urban growth and form and commercial growth. The following section provides an analysis of how the Plan Change meets these objectives and policies.

8.3.2 B2.2 Urban Growth and Form

Chapter B2.2 of the RPS contains provisions directing urban growth and form in Auckland. Policy B2.2.2(7) of the RPS is enabling of the urbanisation of land within the Future Urban Zone as long as urban growth can be accommodated in ways that support a quality urban form, provide a range of housing types and employment choices and integrate with the provision of infrastructure. There is also the direction to avoid urbanisation without carrying out a structure planning exercise first. Appendix 1 of the AUP sets out the structure planning guidelines which are to be followed when undertaking a structure planning exercise.

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

The Plan Change will see the release of land happen earlier than that proposed in the structure plan. However, as discussed above, more detailed work is continuing as part of the Drury Transport Investment project on the funding, sequencing and delivery of infrastructure in the wider Drury area with the aim of accelerating the key transport projects. The sequencing of the release of land for urban development with the delivery of the required infrastructure is incorporated into the Plan Change through the inclusion of rules that trigger the staged release of development capacity with the delivery of supporting infrastructure.

8.3.3 B2.5 Commercial and Industrial Growth

Of particular relevance to this Plan Change is Chapter B2.5 of the RPS which contains provisions directing commercial growth in Auckland. Policy B2.5(4) of the RPS is enabling of the establishment of new centres following a structure plan process,

having regard to whether there is sufficient population growth to support a sustainable distribution of centres. An Economic Assessment for the Plan Change has been prepared by M.E Consulting and is included as **Appendix 8**.

The Economic Assessment concludes that the amount of growth envisaged for the Drury Future Urban Zone area will support a network of centres within its own right¹⁸. Furthermore, there will need to be a number of centres within the Drury Future Urban Zone area ranging from small Neighbourhood centres up to Town or Metropolitan Centre size. In particular a large Metropolitan Centre of up to 70,000m² to the east of the motorway is required, with up to 33.7ha of Metropolitan Centre zoned land. The required centre needs to offer a broad range of retail goods and commercial businesses to service the needs of the wider Drury FUZ, as well as surrounding rural and established residential areas.

The Plan Change proposes to establish a Metropolitan Centre at Drury East to fulfil the centre requirement for the southern Auckland area, as highlighted in the Economic Assessment. The location of the proposed Drury Metropolitan Centre is consistent with Policy B2.5(4) of the RPS as it is highly visible and connected piece of land being located beside a future train station and the Drury interchange, with no fundamental environmental or natural hazard constraints.

Policy B2.5(4)(c) requires regard to be had to the effects on the function, role or amenity of Metropolitan Centres. These are the 10 Metropolitan Centres identified in the Unitary Plan, they are the largest centres outside the Auckland CBD. Currently the Metropolitan Centre that is intended to serve the southern area of Auckland is located at Papakura, which is only 5km north of the Drury interchange. As discussed in Section 9 below the Economic Assessment has concluded that Papakura is not fulfilling its Metropolitan Centre retail role and will be incapable of significantly expanding its retail role as would be required to adequately meet the future needs of the southern Auckland population.

Overall it is considered that the Plan Change is consistent with B2.5(4) as it will enable the delivery of a centre to fulfil the Metropolitan Centre requirements for the future growth within southern Auckland.

¹⁸ The Drury FUZ is expected to accommodate nearly 28,000 households by 2048, and in addition there are anticipated to be over 1,000 dwellings in the Drury South Industrial area controlled by Stevenson's, and a general intensification of the rural-residential land that surrounds the FUZ. The FULSS indicates that the FUZ land around Pukekohe and Paerata land will provide for a further 7,200 dwellings. Currently in the Papakura Catchment there are around 14,500 households.

8.4 OTHER PLANS

8.4.1 Iwi Planning Documents

A number of Iwi Management Plans have been reviewed as part of the structure planning process. These identify a range of matters, many of which are either reflected in the AUP or referenced in the Cultural Valuation Assessments (“CVAs”) and addendums prepared by Ngāti Te Ata Waiohua, Ngāti Tamaoho, Te Ākitai and Ngāitai ki Tāmaki. Extensive consultation has been undertaken with Iwi to consider the local application of a number of the principles advanced in the Iwi Management Plans and CVAs. These matters are outlined in more detail in the Consultation Report at **Appendix 24**.

9.0 DEVELOPMENT OF THE STRUCTURE PLAN AND PLAN CHANGE

9.1 THE COUNCIL’S DRURY-OPĀHEKE STRUCTURE PLAN

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

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

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

The Council’s Drury-Opāheke Structure Plan applies to the greater Drury- Opāheke as illustrated in **Figure 9**. The total area is about 1921 ha. It includes: Opāheke in the north east, Drury in the south east, and part of Karaka sometimes referred to as Drury West. It adjoins Drury Creek - Pahurehure Inlet and Te-Manuka-O-Hoturoa (Manukau Harbour). It is bisected by State Highway 1 (SH 1), the North Island Main Trunk Line railway, and Transpower’s transmission lines. Land use is predominantly rural including countryside living and some business uses. The existing Drury village is located near the middle but is not part of the Drury – Opāheke structure planning area. The Drury-Opāheke Structure Plan 2019 was reported to, and adopted by Auckland Council’s Planning Committee on Tuesday 6 August 2019. The Structure Plan document is included at **Appendix 4**.

B&A

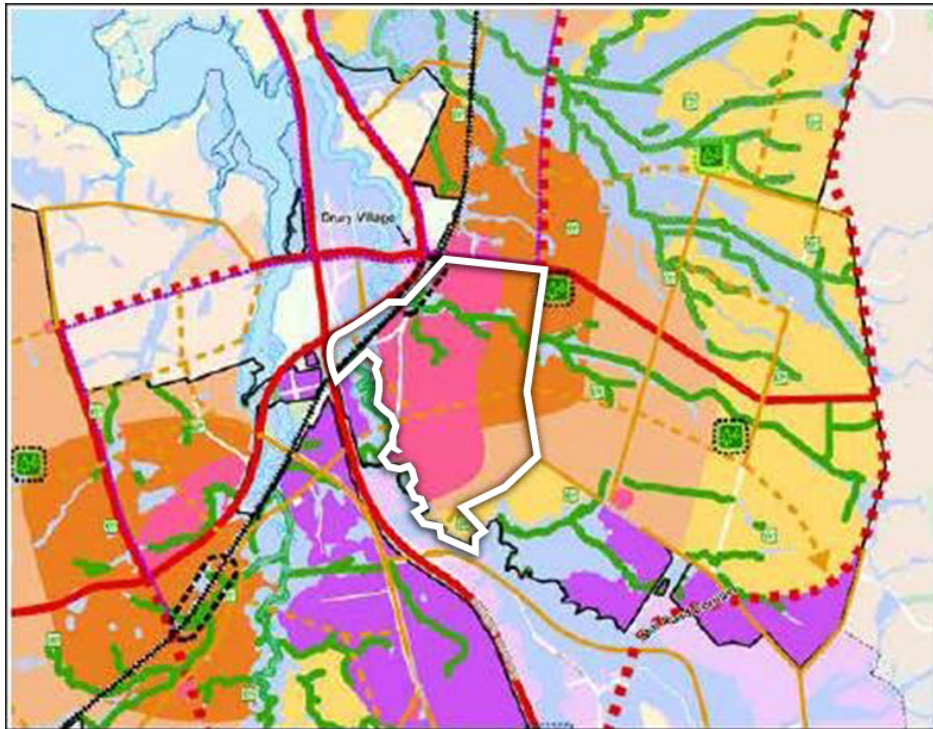


Figure 9: Auckland Council Drury-Opāheke Structure Plan.

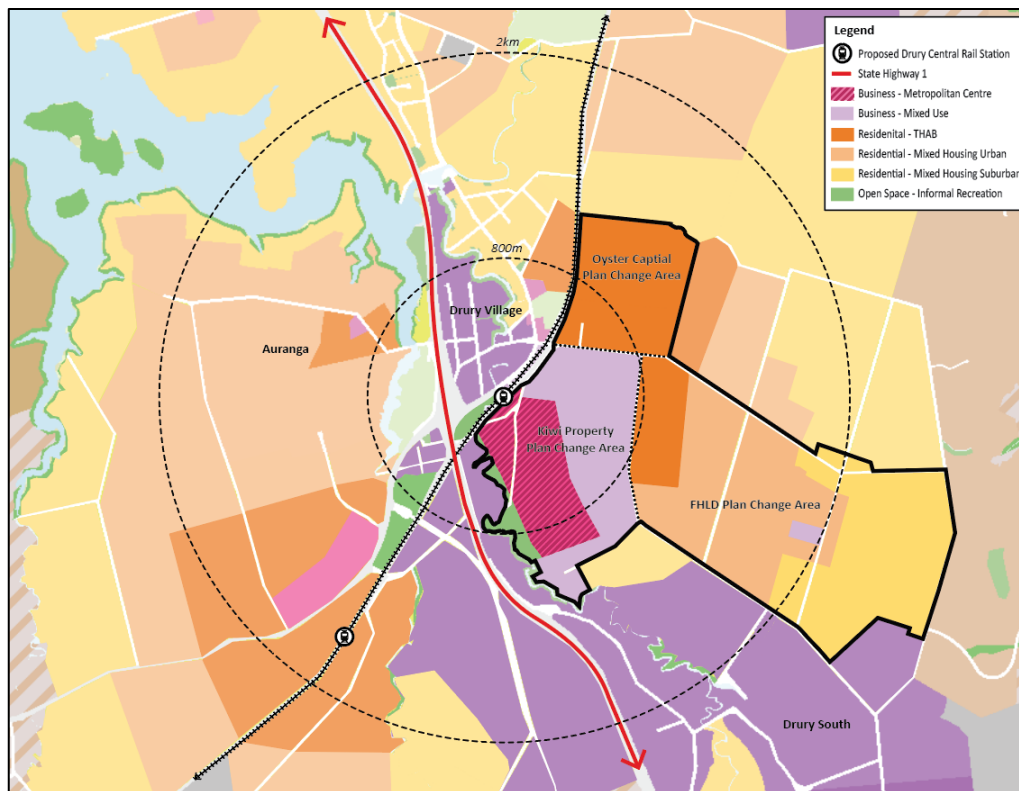


Figure 10: Drury East developers proposed zoning pattern and the Auckland Council Drury-Opāheke Structure Plan land use pattern.

9.2 KIWI'S 2048 MASTERPLAN

Following an iterative and consultative process with the Council and local Drury stakeholders, Kiwi Property engaged an experienced master planning team from Canada, Australia, and New Zealand to develop a concept masterplan for the Plan Change area in 2019. The 2048 masterplan is shown in Figure 11 below and provides indicative collector and local roading patterns, positioning of key access points, roading connections and public open squares and spaces, distribution of land use activities, and general block layout. The proposed zoning pattern for the Plan Change area and the Drury Centre Precinct Plans have been informed by the key aspects of the masterplan document to ensure that the outcomes sought for Drury are able to be successfully implemented.

The masterplan was presented to Council on 14 December 2018, which was generally well received with regards to land use activities, roading connections and site accesses, open space networks and integration of a train station within the centre.

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

With that said, it is important to consider the role of the Masterplan in the wider context of a Plan Change prepared under the RMA 1991. The Masterplan is a living document that has been developed to inform development of the Site over a 30-year timeframe. It is intended that the Masterplan will be reviewed, updated, and enhanced through the development process in response to market conditions, community requirements, and new development opportunities as and when they arise. As such, the Masterplan reflects just one way of how the area could eventually be built out based on current development trends.

As the Masterplan will be subject to ongoing change and refinements over a long period, the proposed Plan Change does not seek to lock in all aspects of the Masterplan as currently envisioned. Instead, the proposed Plan Change provisions are intended to facilitate and support the principles and outcomes expressed in Section 2.2 above along with key structuring elements (e.g. a main retail street and Homestead Park). In that regard, the final development layout including activity mix and the positioning of proposed streets and open spaces will ultimately be determined through the detailed design/resource consent process.



Figure 11: Masterplan for Drury Centre.

9.3 CONSULTATION AND ENGAGEMENT

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

Cultural Values Assessments (CVA's) were prepared by four Iwi (Ngāti Te Ata Waiohua, Ngāti Tamaoho, Te Ākitai, Ngaitai ki Tamaki) with specific

recommendations varying between the reports. Specific concerns were raised around maintaining water quality in runoff, and preservation of any archaeological finds during construction and protection of waterways.

A summary of the consultation with Iwi groups and meeting minutes are attached in **Appendix 24**.

In terms of wider community views, sites within the Plan Change area were individually visited, with an information letter delivered to each site owner (or contact details gathered for each owner). The letter informed each site owner of the intention to undertake a Private Plan Change in Drury, with a Town Centre as the desired outcome. A draft zoning and masterplan were also attached.

In order to further consult with the existing Drury community, an open day was held on March 20 2019. The open day was held at the Drury Town Hall, and explored what the community would like to see within a Town Centre on Kiwi's land. More than 300 people attended the meeting, with the majority being receptive of a Town Centre in that location. In general, the main concerns coming out of the event was for the need for upgraded servicing, improved recreation and community facilities, and better public transport links. Kiwi Property has sought to address these matters through this Plan Change.

10.0 ASSESSMENT OF ENVIRONMENTAL EFFECTS

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

10.1 URBAN FORM AND QUALITY BUILT ENVIRONMENT

An Urban Design assessment of the proposed Plan Change has been undertaken by Barker and Associates and is included at **Appendix 7**. The Urban Design assessment considers the urban design outcomes that are desirable in development of the Plan Change area and undertakes an urban design assessment of the Plan Change provisions.

The Urban Design Assessment assists in defining the likely effects of the proposed design response, secured by the zoning layout and precinct provisions on achieving the quality built environment outcomes sought within the RPS and set out in the Council's Neighbourhood Design Statement for the Southern Structure Area, specifically:

- *Neighbourhoods that vary in density and mix of uses according to their locational attributes.*
- *Neighbourhoods with many safe choices of movement with good access to services and amenity.*
- *Neighbourhoods with many choices of use and activity that reflect the needs of the community and the sub-region.*
- *Neighbourhoods that celebrate their unique identity and are attractive, safe and easily understood.*
- *Neighbourhoods that protect and enhance the natural environment while enabling urbanisation.*

The following assessment outlines how the Plan Change achieves these outcomes.

Neighbourhoods that vary in density and mix of uses according to their locational attributes (RPS B2.2.2(5), B2.2.2(6), B2.2.2(7), B2.3.1(1)(c) and B2.3.2(3))

The development of the Plan Change area presents an opportunity to provide varied neighbourhoods within greenfield areas that promote high-intensity residential, retail and employment uses, and community services, around new centres and public transport corridors. The Urban Design Assessment finds that the Plan Change achieves this outcome through:

- Facilitating the development of a Metropolitan Centre at the centre of a large area of land signalled for future urban development and strategically located in terms of access to the Southern Motorway and the future train station signalled at Drury;
- Enabling a Transit Orientated Development (**TOD**) as the Metropolitan Centre is located within an approximate 10-minute walk (800m) from the proposed Drury Train Station;
- The application of the Mixed Use zone will enable higher residential densities in proximity to the FTN, rail services and Metropolitan Centre; and
- Responding to the physical characteristics of the Informal Recreation zone is applied to a portion of the Plan Change area where there are challenges to potential urban development¹⁹ and further, the application of the Informal Recreation zone creates a buffer between development and the Hingaia Stream.

¹⁹ Two transmission lines, proximity to the Southern Motorway, the 1 in 100-year flood plain and steep topography adjacent to the stream.

Neighbourhoods with many safe choices of movement with good access to services and amenity (RPS B2.3.1(1)(c), B2.3.2(1)(c) & B2.3.2(3))

To promote the well-being of future communities within the Plan Change area the Plan Change needs to facilitate the development of a safe and accessible movement network. The Urban Design Assessment finds that Plan Change achieves this by:

- The inclusion of assessment criteria which provides sufficient direction to both Council and future applicants to ensure the creation of a safe, attractive and accessible Drury Rail Station;
- A policy framework which sets a clear expectation that development will interface positively with the street facilitating street environments that are safe, varied, interesting and inviting for a wide range of users.
- A policy framework, assessment criteria, indicative collector road network and street cross-sections that ensure connectivity and accommodate all forms of movement.
- Provision of safe, universally accessible, and well-connected cycle routes to all amenity and services destinations through making provision for segregated cycle lanes with physical buffers on arterial and collector routes; and
- Provision of safe, universally accessible, and well-connected pedestrian routes to all amenity and services destinations through provisions within the proposed Mixed Use and Metropolitan Centre zones which activate the public realm and maximise opportunities for public surveillance.

Neighbourhoods with many choices of use and activity that reflect the needs of the community and the sub-region (RPS B2.3.1(1)(c), B2.3.1(1)(d) & B2.3.2(3))

The Plan Change presents an opportunity to provide a focal point for the wider southern Auckland community through enabling a wide mix of commercial, retail and residential activities and a vibrant public realm. The Urban Design Assessment finds that the Plan Change achieves this outcome through applying the Metropolitan Centre zone which provides for a wide range of choices and experiences for the wider structure plan area, which is largely zoned to be solely residential use. Further, these services and amenities are accessible to the wider Drury area as the Centre is in close proximity to the proposed train station and the frequent transit routes along Waihoehoe Road.

The application of the Mixed Use zone within Sub-Precinct C will largely facilitate apartment typologies contributing to a diverse mix of housing choice, as the wider structure plan area will largely be developed as terrace or standalone typologies under the MHS/MHU zones. The Mixed Use zone also provides the flexibility to adapt to changing needs by applying a land use pattern that is flexible to changes in market demand over time.

The Urban Design Assessment also concludes that the incorporation of Informal Recreation zoning and assessment criteria for new open spaces over 1000m² in size ensure the development of safe, fit for purpose neighbourhood parks in appropriate locations to support the future residential and commercial population of the Plan Change area.

Neighbourhoods that celebrate their unique identity and are attractive, safe and easily understood (RPS B2.3.1(1)(a))

The Urban Design Assessment concludes that the Plan Change will enable a strong local identity and appropriate visual character while emphasising differences between nodes and communities. This will largely be achieved through the height provisions within the Plan Change. In particular, the Metropolitan Centre height limit that applies in Sub-Precinct A will encourage an identifiable vertical node around a key transportation hub. Further, the proposed building heights throughout the rest of the Precinct will result in a greater variety and a more interesting skyline when contrasted against more monotonous residential development enabled through the MHU or MHS zones and signalled for much of the Structure Plan area.

The Plan change also promotes the health and safety of the future community through policies which seek to achieve legible, safe, inclusive and accessible environments. The resource consent process will ensure these design elements are embedded in the final development.

The Plan Change also includes assessment criteria that encourage Flanagan Homestead to be integrated with open space, while acknowledging the significant changes envisaged through urbanisation of the area.

Neighbourhoods that protect and enhance the natural environment while enabling urbanisation (RPS B2.3.1 (a))

The Plan Change area is a highly modified environment however, the proposed precinct includes provisions over and above the standard Auckland-wide provisions which seek to enhance the natural environment. In particular the proposed precinct includes rules to protect and enhance riparian margins of permanent and intermittent streams. Further the proposed precinct includes street cross sections that contains provision for street tree planting and raingardens to help mitigate adverse effects associated with urbanisation such as stormwater generation/pollution, and increased ambient temperatures. The assessment criteria for new open spaces over 1000m² seeks to ensure that new open spaces within the Plan Change area are designed to support prominent landscape features such as permanent streams.

Summary

Overall, the Plan Change provisions facilitate the redevelopment of the Plan Change area in a way that is consistent with the outcomes sought within the RPS in relation to a quality built environment. The proposal will result in positive effects and will achieve a quality compact urban development and a successful urban form with a suitable level of amenity.

10.2 OPEN SPACE AND COMMUNITY FACILITIES

As Drury East is currently working farmland, it has relatively poor provision for quality public open spaces and community facilities.

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

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

The Drury-Opāheke Structure Plan identifies locations for new neighbourhood and suburb parks of varying sizes. One neighbourhood park is identified within the Plan Change area (between 0.3-0.5ha) to the south of Brookfield Road. A suburb Park is also required just outside the Plan Change area at the junction of Waihoehoe Road and Fitzgerald Road.

Within the Plan Change area, a range of key open spaces are proposed that will cater for the varying needs of the future community, including:

- Hingaia Creek and Maketu Creek Reserves which will provide public access to existing natural watercourses;
- Station Plaza which will provide civic amenity and a central forecourt to public facilities; and
- Homestead Park is intended to retain some of the existing natural and built features of the Flanagan Homestead property.

The Hingaia Creek and Maketu Creek Reserves are proposed to be zoned Open Space-*Informal Recreation*. Station Plaza and Homestead Park are shown as indicative open spaces within the proposed Drury Centre Precinct Plan. These proposed parks will create an integrated public open space network that protects and enhances the existing stream network and is highly accessible to the community offering both visual and recreational amenity.

Additionally, other spaces, including neighbourhood parks will be determined by future development and subdivision applications. The urban subdivision provisions included within Chapter E38 of the AUP will apply within the Plan Change area including Policy E38.3(18) which requires subdivision to provide for the recreation and amenity needs of residents by providing for open spaces which are prominent, sufficiently sized to cater for future residents and enable pedestrian and/or cycle linkages. This will ensure that there are provisions in place to ensure there is accessible open spaces of a range of sizes to service the future population

In relation to social facilities, the Plan Change is making provision for a new Metropolitan Centre to service the wider South Auckland area. This will provide a range of commercial, community and entertainment facilities for future residents of the Plan Change area.

New schools will be required to service urban growth in Drury and the Ministry of Education is currently undertaking a needs assessment. The Ministry of Education will designate the land for future schools as required.

In summary, the proposed open space, amenities and social facilities, are and will be accessible by active and public modes of transport, and are or will be of a sufficient size to cater for the social and cultural needs and well-being of future residents of the Plan Change area.

10.3 ECONOMIC

An Economic Assessment for the Plan Change has been prepared by M.E Consulting and is included as **Appendix 8**. The report provides an assessment to inform planning for the provision of retail and centre space in Drury, and in particular the future layout of centre zoning in the area.

Centre Requirements for Southern Auckland

The Economic Assessment concludes that the amount of growth envisaged for the Drury Future Urban Zone area will support a network of centres within its own right. In particular, a logical centre network for the southern catchments is:

- A large Metropolitan Centre of up to 70,000m² to the east of the motorway, which will require up to 33.7ha of Metropolitan Centre zoned land and offer a broad range of retail goods and commercial businesses to service the needs of the wider Drury Future Urban Zone area, as well as surrounding rural and established residential areas.
- A local centre west of the motorway, adjacent to the train station of up to 16,000m², requiring up to 5ha (net) of land. The Drury local centre would primarily support the local retail needs of the Drury West population, as well as

a smaller share of the needs of the rural population in the area between Drury and Kingseat.

- A network of small neighbourhood centres. Indicatively there might be between two and four of these centres on each side of the motorway, and another in Drury South.

In addition to outlining the centre requirement the Economic Assessment concludes that the Plan Change area stands out as a suitable location for the required Metropolitan Centre serving households in the south. The reasons for this are summarised below:

- The Plan Change area is located at the centre of a large area of Future Urban Zoned land that is anticipated for urban development in the relative short term. There are live zonings in place and Plan Change requests Immediately surrounding the plan change area that will accommodate a significant number of dwellings and workers;
- Spatially, the land immediately adjacent to the interchange is a logical location for a Metropolitan Centre as it enables Drury to provide households from Pukekohe and Waiuku with Metropolitan Centre level goods and services, as it is closer than Manukau City;
- The Plan Change area is highly connected as it sits adjacent to Great South Rd the interchange with State Highway 1 and it is also adjacent to the rail line, meaning that overall accessibility is good from both sides of the motorway;
- The land has a high degree of visibility from the motorway so will attract customers from a wide catchment - something that is not possible at Papakura; and
- Most of the subject land is elevated above the 1 in 100 year flood plain and therefore not subject to the significant flooding issues experienced elsewhere in the Drury-Opaheke area, and initial investigations on geotechnical, ecological, visual landscape, transmission corridors, heritage and archaeology have not identified any constraints to achieving feasible urban development of the subject land from 2018.

The Plan Change responds to these recommendations through making provision for a Metropolitan Centre at Drury East, surrounded by the Mixed Use zone to allow for potential expansion of the centre over time.

Impact on Vitality of the wider network of Existing and Proposed Centres

The Economic Assessment addresses effects of the delivery of a Metropolitan Centre at Drury East on the network of proposed and existing centres in the wider Drury area. As the full potential of an establishing Metropolitan Centre will not be reached until some point in the future, the centre will be developed initially to a scale that

allows for a degree of flexibility, while also minimising the potential impacts on the surrounding retail centre network. To ensure that there is capacity for the centre to develop so that it fulfils the strategic role as a Metropolitan Centre in the long term, however, it is important that sufficient land is zoned to achieve this purpose in the short term.

Impact on Role, Function and Amenity of Papakura Metropolitan Centre

Currently the Metropolitan Centre that is intended to serve the southern area of Auckland is located at Papakura, which is only 5km north of the Drury interchange. The Economic Assessment has concluded that Papakura is not fulfilling its Metropolitan Centre retail role and will be incapable of significantly expanding its retail role as would be required to adequately meet the future needs of the southern Auckland population.

Currently, over 30% of core retail and hospitality demand that arises within the Papakura primary catchment leaks out to other centres. Physical constraints and fractured land ownership patterns make it extremely difficult for a retail centre type developer to build the type of development that might catalyse a change within Papakura. The lack of visibility, through traffic, supporting employment base and opportunities for expansion further impact on Papakura's future as a Metropolitan Centre.

As there is little potential for these constraints to be avoided, the Economic Assessment concludes that Papakura will be incapable of significantly expanding its retail role as would be required to adequately meet the future needs of the southern Auckland population. Given the current leakage of retail and hospitality demand the potential impacts of the development of Drury Centre on Papakura will be low. By simply capturing a portion of the retail and hospitality leakage, a large centre at Drury will be able to be successful, while limiting impacts on Papakura centre.

Furthermore, the Economic Assessment concludes that if there is no alternative Metropolitan Centre developed in the south, the large new pool of consumers will continue to travel out of the area to access high level retail and commercial centres; or some other location is chosen to provide new supply locally. This will result on adverse effects on the future population who will not have a locally accessible supply of Metropolitan Centre types of activities, as well reduced local employment opportunities.

Impact on the Role, Function and Amenity of the Pukekohe Town Centre

Market Economics has undertaken a robust assessment of the effects of the Drury Centre on the Pukekohe Town Centre over time. This analysis has found that Pukekohe is a large centre playing an important relative role within its catchment area. Pukekohe centre has multiple components to its retail offering, including a

main street area, two mega centres, and other retail distributed across the business zoned areas. Within this, it has a strong comparison goods retail component.

The analysis found that the large relative role of Pukekohe is likely to continue, and to increase, into the future due to the large amounts of future urban growth zoned land around the edges of Pukekohe and around Drury in the northern part of the catchment area.

The positioning of Pukekohe within the urban centres structure is likely to have an effect on household travel and time efficiency, and sustainability, as households travel to meet their retail needs. Households currently travel long distances to Pukekohe as a key southern retail destination, which is likely to generate inefficient patterns for households in Auckland's southern urban area. This may be exacerbated in the future if further growth occurs through the future urban expansion in the northern parts of the catchment near Drury (under the current centre structure).

The closest Metropolitan Centre, as an intended large retail destination, is Papakura, which is to the north of Pukekohe. However, Market Economics earlier research has estimated that Papakura is currently underperforming in the Metropolitan Centre role, with its function closer to that of a Town Centre. Constraints in Papakura mean it is unlikely to fulfil a larger relative role in the future.

As a consequence, Pukekohe, *under the existing centres network*, is likely to meet a sizeable portion of this future demand across these large geographic distances. This is likely to generate non-optimal household travel efficiency for future households in the northern part of Pukekohe's catchment area in the areas of future urban expansion around Drury.

In terms of direct retail impacts on Pukekohe's role in providing core retail and hospitality services to its community, Market Economics finds that the development of a Metropolitan centre on the Kiwi land to the east of the southern motorway at Drury is expected to reduce turnover in the Pukekohe Town Centre by between 7.5% and around 10% of core retail and hospitality spend depending on when the centre opened (2023 or 2028). However, this direct impact is short-lived and of a scale that would not affect its overall role, function and amenity as a Town Centre, noting that core retail and hospitality spend accounts for 45% of total spend within the Pukekohe Town Centre.

The modelling carried out in section 6 of the Market Economics report points to market growth in the surrounding Future Urban area off-setting these impacts within 1-2 years such that Pukekohe's core retail and hospitality role will be larger than the pre-impact sales levels by between 6% and 10% within 5 years. On this basis, staging provisions within the Drury Centre precinct are not practical or justified given the short-term nature of the effects and the minor scale of the impact, being approximately 10% of less than half of spend within the Pukekohe Centre.

Based on the above analysis, in our opinion, the development of a Metropolitan Centre at Drury would not adversely affect the function, role and amenity of the Pukekohe Town Centre, and both can develop simultaneously. Indeed, the analysis suggests that the Pukekohe Town Centre is likely to grow over time rather than retract given the scale of growth planned for the immediately surrounding area. On this basis, no staging provisions are proposed within the Plan Change.

Summary

The Plan Change enables the provision of a Metropolitan Centre within the southern Auckland catchment. The Plan Change will affect the role of Papakura as a Metropolitan Centre, however this is a role that Papakura is currently struggling to fulfil. As this is unlikely to change in future, reliance on Papakura to fulfil the southern Auckland catchments needs for a Metropolitan Centre will see people traveling outside of the catchment to access amenities and employment opportunities. Conversely, the Pukekohe Town Centre is performing well and effectively meeting the needs of its catchment. The development of the Drury Centre will affect the Pukekohe Town Centre to a modest degree in the short term, however, this will be quickly compensated for by the demand created by the growth expected in the surrounding Future Urban areas.

Central Drury is an appropriate location for a Metropolitan Centre because it is easily accessible within the catchment it would serve and there are large greenfield sites available to provide unconstrained development potential to enable a centre of an appropriate size to be constructed. Overall, the proposed size, location and function of the Drury Centre is likely to have a positive effect on the ability of the existing and future community to provide for their own economic and social well-being. Any adverse effects on the amenity and vitality of the Papakura Metropolitan Centre and the Pukekohe Town Centre would be minor given that the Papakura centre is not currently fulfilling that role and the growth planned around the Pukekohe Town Centre. On this basis, the Drury Centre is unlikely to cause any noticeable change from the existing environment.

10.4 TRANSPORT

An Integrated Transport Assessment (ITA) was undertaken by the Strategic Growth Alliance (SGA) in support of Council's Drury-Opāheke and Pukekohe-Paerata Structure Plans, outlining the transportation effects of the proposed Structure Plan areas in further detail. The SGA ITA however is limited in the level of detail provided given that it focuses on the full development beyond the year 2048 and does not provide a detailed breakdown of the intermediate years. As Kiwi Property is proposing to undertake development in stages an ITA has been prepared by Stantec for the Plan Change application and is included at **Appendix 10** to this report.

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

Key matters addressed in the ITA include the following:

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

These matters are addressed in turn below.

10.4.1 Access to the Plan Change Area

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

Discussions have been held with NZTA during the development of the access strategy and these are planned to continue during this Plan Change process. The ITA indicates that direct access to the Drury Interchange is the desired outcome for many reasons, including wayfinding, legibility, convenience and operational performance. However, the ITA also identifies an alternative access location at Firth Street which offers a solution from an operational perspective. This can be used should insurmountable difficulties prevent the direct connection.

Initial access to the Plan Change area is envisaged to be via a new road, “Drury Boulevard” which will connect via a new interchange at Waihoehoe Road.

For full development, in 2048+ it is anticipated that there will be multiple access options to/from the Plan Change area, including a potential Pitt Road Overpass, Station Road, Waihoehoe Road, Fitzgerald Road and a potential Brookfield / Quarry Road connection to State Highway 1 as shown in Figure 12 below. These are considered the main connections, with various Local Road connections assumed as well.

The ITA also indicates that the future Mill Road corridor and its connection to Fitzgerald Road will further improve the Plan Change area access and connection to the wider region. SH1 and the future Mill Road will provide linkage to the north and

south, while Great South Road and Waihoehoe Road provides links to the east and west.

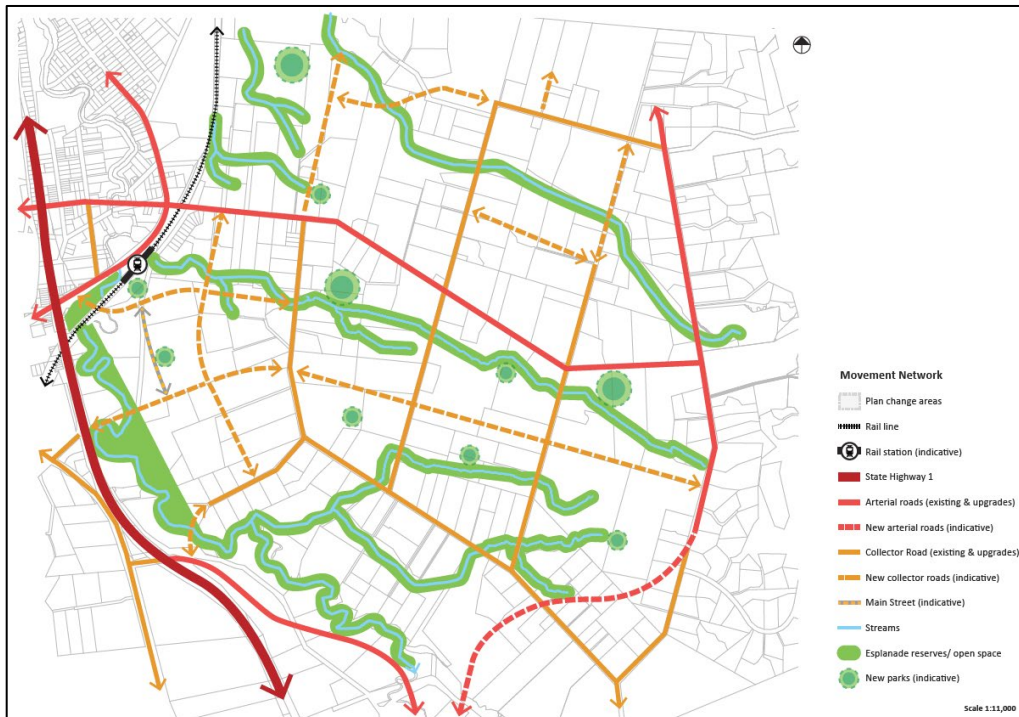


Figure 12: Drury East Movement Network (indicative)

10.4.2 Effects on the External Transport Network

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

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

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

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

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

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

The ITA recommends that additional number of dwellings and commercial GFA (in sqm) within the Drury East development area should not exceed the thresholds outlined in **Table 10.5.2.1 and 10.5.2.2 below**, until such time that the identified infrastructure upgrades are constructed.

Table 10.5.2.1: Threshold for Development with 'Access A' as shown on IX.10.3 Drury Centre: Precinct Plan 3 not constructed

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

			road interection (western arm only).
6,428	107,650m ²	60,000m ²	<ul style="list-style-type: none"> Capacity upgrade of the Waihoehoe / Great South road interection (on all approaches).

Table 10.5.2.2 Threshold for Development with 'Access A' as shown on IX.10.3 Drury Centre: Precinct Plan 3 constructed

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

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

10.4.3 Proposed Transport Network – Internal Road Network

The Plan Change area is proposed to be serviced by a combination of collector and local roads. The indicative location of collector roads and where these will intersect with the existing road network is shown indicatively on proposed Precinct Plan 2. The

location of these roads are principles-based are not intended to be precise. It is expected that the location of these roads would be confirmed through the resource consent process.

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

Additional assessment criteria have been included for roads *refer IX8.2(1) (d)*. The proposed assessment criteria set out the staging of interim and permanent cycle and pedestrian connections to the Drury Central Train Station, generally within the 400m walking catchment of the station. This will ensure that safe access is provided to the Drury train station once operational, regardless of where development starts in the precinct.

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

10.4.4 Proposed Transport Network – Public Transport

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

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

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

10.4.5 Transport Summary

The effects of the Plan Change on the existing and future transport network have been assessed in the ITA and are determined to be acceptable. The ITA has shown that extent of development enabled by the can be accommodated on the surrounding road network while maintaining acceptable levels of safety and efficiency through the next three decades. Additional upgrades are required within the first two decades however, the Plan Change includes rules to sequence development with the delivery of this infrastructure. The Plan Change will enhance accessibility all modes of transport within the Plan Change area by providing a connected an integrated road network which provides for cyclists and pedestrians and creates linkages to the new Drury Central train station.

10.5 VEGETATION AND ECOLOGY

An Ecological Assessment prepared by Tonkin & Taylor Ltd has been undertaken to support the Plan Change and is included as **Appendix 11** to this report. This includes an assessment of ecological values of freshwater and terrestrial ecosystems.

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

10.5.1 Aquatic & Freshwater Ecology

The Plan Change area falls within the Hingaia Stream catchment. The Hingaia Stream meanders along the entirety of the western boundary of the Plan Change Area. Across the Plan Change area there are permanent and intermittent streams as well as two seepage wetlands. The streams located on site are identified as Stream A-G on the map included as **Appendix 11** of the Ecological Report.

Most streams were identified as being subject to modification and degradation resulting from agricultural and horticultural land use, with little riparian vegetation present. The streams exhibit abundant macrophyte growth which is an indicator of nutrient enrichment. The Hingaia Stream, which forms the western extent of the Plan Change area, provides connectivity to the wider catchment, and is an important migratory pathway for native fish. Overall, the ecological values of intermittent and permanent watercourses and wetlands present within the Plan Change area are considered in the Ecological Assessment to have low to moderate value.

It is intended that the Hingaia Stream and tributaries along the eastern bank will be retained and enhanced. Retained streams and wetlands across the site will be planted to have riparian margins of no less than 10m.

While the intention is to retain and enhance aquatic habitats within the Plan Change area it may be necessary to modify some streams and wetlands to facilitate urban development. Impacts to stream or wetland habitat will require resource consents allowing the further consideration of the effects under the standard AUP provisions within Chapter E3 Lakes, rivers, streams and wetlands once the final development layout has been confirmed. Where any reclamation is required, which may result in loss of aquatic habitat, the effects can be offset through enhancement measures or the creation of new stream habitat through diversion.

It is noted that Stream D is expected to be reclaimed however this is a remnant stream does not meet the AUP definition of a river/stream. Therefore, it will not trigger any additional assessment under the AUP.

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

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

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

10.5.2 Terrestrial Ecology

Vegetation within the Plan Change area is predominately grazed pasture grasses, with exotic trees planted as shelter belts or for domestic gardens. No areas of Significant Ecological Areas (SEA) or notable trees are identified on the site under the AUP, although it is noted that a relatively large expanse of marine and terrestrial

SEA's are located on the foothills to the west. Riparian vegetation along identified streams comprised mainly grasses and weed species, with little continuity.

Mature native and exotic trees with a "well-developed understory" have been identified on the site at 120 Flanagan Road. It is proposed to retain the majority of planted native vegetation adjacent to the homestead, through incorporating this into the proposed "Homestead Park".

Existing vegetation on site is identified as being a potential habitat and food source for native avifauna, bat, and lizard populations, as well as common non-native bird species. The marine environment downstream of the Plan Change area is within a SEA and comprises a variety of marshes (ranging from mangroves to saltmarsh) and freshwater vegetation that provides an important roosting habitat for birds. The waterways also provide an important migratory pathway for freshwater fish.

Terrestrial vegetation is considered to be of low to moderate value located within isolated pockets across the site, with the area of highest value located in the future Homestead Park. The marine environment downstream of the Plan Change area is within a SEA and sensitive to changes in upstream land use.

The Plan Change will result in loss of vegetation to facilitate land development; however, this will be kept to a minimum and will be avoided where possible. It is intended that some of the mature trees located within Homestead Park will be retained to minimise effects on terrestrial fauna. There is also considerable potential to restore habitats at the site as part of the proposed riparian planting standard within the Plan Change.

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

10.5.3 Stream Erosion and Sedimentation

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

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

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

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

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

10.6 FLOODING AND STORMWATER MANAGEMENT

10.6.1 Flooding

The Plan Change area is identified on Council's GIS mapping system as being subject to overland flow paths and flood plains, and is within flood prone areas. A Stormwater Management Plan has been prepared by Tonkin & Taylor, and is included as **Appendix 12**. The SMP reports on the Flood Risk Assessment carried out within the Plan Change area to identify any flooding effects associated with development of the Plan Change area and whether there is any need to provide flood mitigation measures.

The flood risk assessment involved developing an integrated flood model that takes into account the proposed development within the Fulton and Hogan Plan Change area. This model also assumes that the Great South Road culvert has been upgraded

in accordance with one of the options proposed in the Great South Road Upgrade assessment²⁰.

A Flood Risk Assessment was carried out on the integrated flood model. The results of this modelling show that the existing flood extent is along the Hingaia Stream (western boundary) and along the Fitzgerald stream adjacent to the northern boundary of the Metropolitan Centre. Development will result in some localised changes to flood levels (increases and decreases) within the Plan Change area. For the 10yrCC storm event there were several locations where flood level increases were observed outside the Plan Change area including:

- the main Hingaia Stream branch to the south and west of the Plan Change Area near Brookfields Road (increases up to 60 mm);
- the confluence of the minor tributaries to the west of the Cossey Road and Fitzgerald Road intersection (increases up to 150mm); and
- the existing Drury Township downstream of the Plan Change Area (increases up to 80 mm).

Following lodgement of the Plan Change, additional flood modelling was undertaken to assess the potential flooding mechanisms and effects caused by a “development only flood’ scenario. This scenario assumes extreme rainfall (2, 10, 100 year ARI rainfall) in the lower catchment only (over existing Drury and Plan Change Areas). The analysis shows that the total number of properties flooded are unchanged, for the ‘Development only’ as well as Catchment models for the scenarios analysed. This confirms there is no additional flood risk to habitable floor or properties with the proposed development in place.

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

10.6.2 Stormwater Management

A Stormwater Management Plan has been prepared by Tonkin & Taylor, and is included as **Appendix 12**. The SMP aims to align the proposed stormwater management approach for the Plan Change area with the requirements of the Auckland Unitary Plan (AUP), taking into account the catchment specific issues, constraints and opportunities.

²⁰ The Great South Road culvert upgrade assessment is included within the Stormwater Management Plan undertaken by Woods for the Fulton and Hogan Plan Change.

Stormwater Management – Quality

The findings of the SMP are that the impacts on stormwater management – quality, from the land use change from rural to urban can be managed through the use of green infrastructure to treat contaminants at source. This will include the following:

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

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

In addition to this, the SMP proposes stormwater quality treatment for all roads, and not just high use roads as required by the Section E9 of the AUP. This goes beyond what is required by the AUP and is generally consistent with the approach of the Council's regional Network Discharge Consent.

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

Stormwater Management – Flow

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

The SMP identifies the following following stormwater management strategy for providing hydrological mitigation in accordance with the Stormwater Management Area Flow 1 (SMAF1) requirements set out in Table E10.6.3.1.1 of the AUP²¹:

- Utilise rainfall harvesting for retention for residential buildings and industrial/commercial where there is re-use demand and infiltration is not possible;
- Permeable pavements will be used for private or shared driveways on residential lots, or within the public realm where necessary, to mitigate runoff from other impervious areas;
- Bio-retention devices such as raingardens and vegetated swales are proposed to be used for roads, carparks and public spaces where practicable for hydrological mitigation;
- Communal underground detention tanks (i.e. under common driveways) are proposed to be used where required in space-constrained applications to achieve the required detention volume;
- Where infiltration and water reuse are not feasible to provide retention then the required retention volume will be achieved as detention storage.

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

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

Stormwater Management – Conveyance

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

The piped network will collect the developed catchment and convey rainfall events up to and including the 10-year ARI rainfall event which will discharge to the

²¹ Retention (volume reduction) of at least 5 mm of runoff depth from impervious surfaces and detention (temporary storage); and

A drain down period of 24 hours for the difference between the pre-development and post-development runoff volumes from impervious surfaces in the 95th percentile, 24 hour rainfall event minus the achieved retention volume. Where infiltration features and stormwater reuse are not feasible options, it is recommended that retention volumes are added to the detention volumes for hydrological mitigation purposes.

downstream receiving environment. Any excess flows or secondary flows will be conveyed using roads and overland flow paths. Vegetated swales will be used on roads as they provide an alternative conveyance route and visual amenity, when compared to a piped network.

Discharge of stormwater to the stream environment will be managed to minimise changes to stream hydrology. The downstream receiving environment will be protected from erosion through the use of green outfalls and riparian buffer planting.

Overall, it is considered that the proposed methods for the conveyance of stormwater will ensure that the effects of urban development on the Hingaia Stream and its tributaries are acceptable.

10.7 SERVICING

An infrastructure report prepared by Blue Barn Consulting Engineers details how the Plan Change area can be serviced and is included at **Appendix 13** to this report. The specific servicing requirements are detailed below.

10.7.1 Wastewater

The land within the Plan Change area is not currently serviced by any piped wastewater reticulation. The options for wastewater servicing of the Plan Change area have been discussed with Watercare Services Limited and the Drury East developers. Watercare Services Limited has confirmed that the development enabled by the Plan Change can be serviced in the future through planned upgrades.

Watercare Services Limited has confirmed that there are solutions for wastewater within the area which can be sized to accommodate the additional discharge from the planned growth within the Drury East area. An infrastructure funding agreement has been reached between the applicant and Watercare Services Limited.

In addition, the Plan Change proposes to insert an assessment criterion for new buildings to ensure that there is adequate capacity existing stormwater and public reticulated water supply and wastewater network to service the proposed development. This is consistent with the provisions within the residential zones.

10.7.2 Water Supply

The land within the Plan Change area is not currently serviced by any piped water supply network. A new watermain is currently being laid by Drury South Ltd to service their development, which will connect to a Bulk Supply Point located adjacent to the existing Watercare Services Limited pump station. Watercare Services Limited has confirmed that the Bulk Supply Point is sufficiently sized to accommodate the required supply of potable water for domestic and firefighting purposes for the Plan

Change area. This local reticulation would be fully funded by the landowners within the subject area as part of the normal land development process.

10.7.3 Other Utilities

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

10.7.4 Transpower Transmission Lines

There are two Transpower Transmission Lines which traverse the western portion of the Plan Change area adjacent to the Hingaia Stream. These lines are covered by the National Grid Yard Overlay under the AUP which will restrict the location of structures, extent of land disturbance, including earthworks and the operation of construction machinery in relation to those transmission lines.

The proposed zoning pattern has taken into account the extent of the presence of the transmission lines. The Metropolitan Centre zone is on the boundary of the transmission lines.

10.8 HERITAGE AND ARCHAEOLOGY

10.8.1 Archaeology

An assessment of the archaeological and heritage values of the Plan Change area has been undertaken by Clough & Associates, and their report is included as **Appendix 14** of this report. The Archaeology Assessment involved a desktop review of the Plan Change area, and a visual inspection and ground surface examination during two separate site visits.

The Archaeology Assessment identifies five archaeological sites within the study area which are recorded on Auckland Council's Cultural Heritage Inventory (identified as R12/742, R12/755, R12, 967, R12/1122 and R12/1125 on **Figure 13**). None of these sites are scheduled under the AUP OP. The report recommends that development is planned to avoid these archaeological sites, however where sites cannot be avoided by planned development, recordings of any identifiable remains should be undertaken to mitigate any adverse effects on archaeological and historic heritage values.

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

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

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

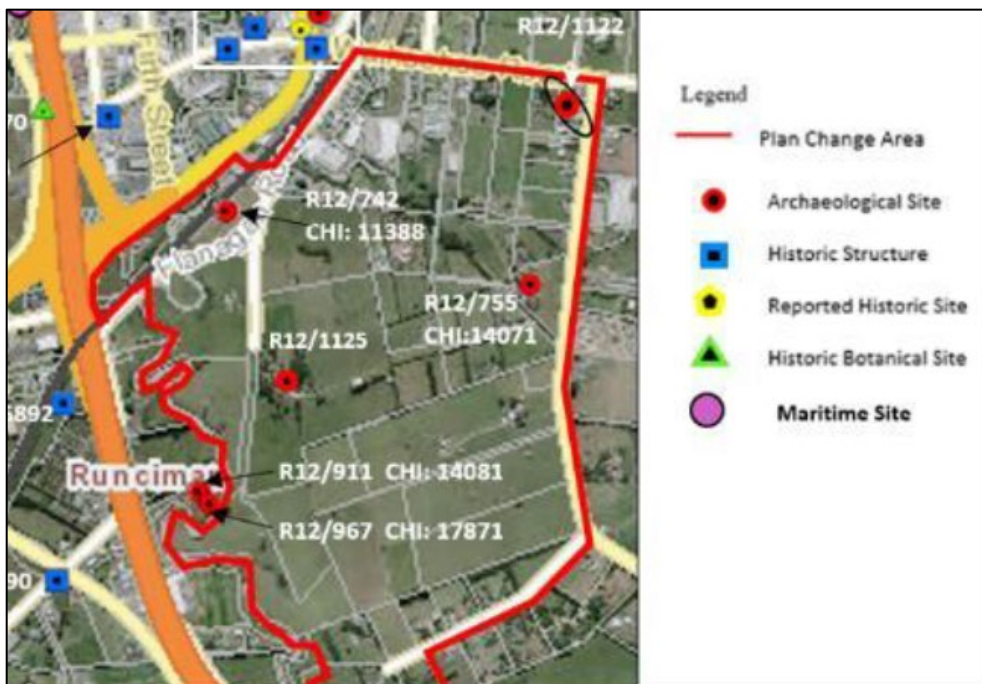


Figure 13: Map showing the Plan Change area in red and the recorded archaeological sites in the general area (source: NZAA ArchSite).

10.8.2 Heritage

The historic heritage value of the Flanagan Homestead was assessed in a separate report prepared by Matthews & Matthews Architects, which is included as **Appendix 15** of this report. The report considers that the homestead holds “*considerable local historical significance*” and has the potential to become a focus for the community within the new town centre. The Heritage Assessment finds that retaining and

adapting the Flanagan house, in-situ if practicable, or in an alternative position nearby, would retain an important connection with the history of this area.

The intention is to retain the Homestead for a community purpose within an open space area, with no formal protection or scheduling proposed under the AUP. Future development of this property is likely to involve retention of the house in its existing location, or if necessary, relocating the building to an alternative location nearby. This would be assessed through a future resource consent application noting that assessment criterion IX7.2(2)(b) of the Plan Change encourages the existing Homestead building to be retained, repurposed and incorporated into a high amenity open space which forms a focal point for Drury Centre.

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

10.9 CULTURAL VALUES

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

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

Three Iwi groups, Ngati Te Ata, Ngāi Tai Ki Tāmaki and Te Akitai have prepared Cultural Valuation Assessments.

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

- Ongoing degradation of waterways through further development, loss of habitat and increased stormwater runoff;
- Loss of mature vegetation and natural habitats for native species;
- Extent of earthworks and potential to disturb kōiwi, Maori artefacts or archaeological features;
- Protection of streams including provision for stream management plans and special policy requirements (greenspace, infrastructure, wider riparian margins);
- Treatment of stormwater prior to discharge;
- Unforeseen adverse impacts to the environment;
- Sustainability;
- Ongoing engagement has been requested; and

- Meaningful cultural interpretation occurs through incorporation of place names (e.g. streets and parks) and if and as appropriate cultural art and design elements to offset the impacts to the cultural and natural landscape.

These matters have been considered and addressed in developing the Plan Change where possible, particularly with respect to the development layout and zoning pattern. The AUP Auckland-wide provisions along with the proposed riparian planting rule will manage freshwater quality. Further, the Plan Change presents an opportunity to restore and enhance the aquatic and freshwater quality values in the Plan Change area.

10.10 LAND CONTAMINATION

A preliminary Environmental Site Investigation report has been prepared by Engeo Limited, and is included as **Appendix 20** to this report. Overall the Land Contamination Assessment concludes that the Plan Change area is suitable for future residential and commercial development.

The Land Contamination Assessment found that based on a review of aerial photos, inspections of the Plan Change area and limited soil sampling on Kiwi Property owned sites that the historical and present land uses have predominantly been maintained as pastoral land, with low density residential development occurring from the 1980's, and commercial/industrial activities located in the northern portion of the site.

The sampling undertaken on the available Kiwi sites indicated the following possible contaminant sources:

- The presence of asbestos on site was found in one out of eight soil samples for 133 Fitzgerald Road which was below the adopted human health criteria, and the potential for asbestos containing materials (ACM) to be present within site building materials was noted for 64-66 Fitzgerald Road and 44 Flanagan Road;
- Heavy metal concentrations which were marginally above regional background levels for volcanic soils in one sample for 133 Fitzgerald Road, which may not meet the AUP definition of "cleanfill" for off-site disposal or re-use;
- Undocumented fill was observed in several locations on the properties at 44 and 120 Flanagan Road, and further investigation would be required to determine whether the fill contains any contaminants;
- It is possible that one or more activities listed on the Ministry for the Environment's (MfE's) Hazardous Activities and Industries List (HAIL) have occurred on the site at 44 Flanagan Road, due to the location of two large tanks on-site which may have historically contained fuel, and a number of agricultural containers observed.

Although no obvious evidence of contamination (e.g. waste products, stained soil, bare soil patches, odours) was observed on-site during these investigations, further investigation is required to confirm other potential contaminants which may include (but are not limited to), the presence of asbestos pipes, farm races, timber and steel workshops, stockpiled fill, burn pits, former dairy farm areas, and structures/buildings associated with farm activities.

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

10.11 GEOTECHNICAL

A preliminary Geotechnical Report has been prepared by Engeo Limited to inform the Plan Change and a copy is included as **Appendix 20** of this report. The findings of the geotechnical report are based on published geotechnical and geological information, Auckland Council's GeoMaps database, Aerial photographs, previous investigations by Engeo and a site walkover. Hand auger boreholes and machine boreholes were undertaken within the Kiwi Property owned sites.

From this, the report concludes that the ground conditions are generally suitable for the type of residential and commercial development proposed, with no obvious significant geotechnical hazards observed. The report does however identify that some localised soft and organic deposits are anticipated within the vicinity of creeks and tributaries on the site, as well as very expansive surface soils on the property at 133 Fitzgerald Road which will require specific foundation design for future buildings. Although geomorphic features were observed on the western slopes of the site towards Hingaia Creek, including toe erosion, local slumping, soil creep and headscarps, the undulating slopes of the Creek do not appear to be subject to slope instability beyond the areas identified in the report.

Detailed geotechnical investigations will be required as part of future resource consent applications regarding management of groundwater, earthworks design and building foundation design within the Plan Change area.

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

10.12 AIR QUALITY

An Air Quality Assessment has been prepared by Tonkin + Taylor to support the Plan Change application, and is included as **Appendix 21**. The report assesses the effects of the introduction of emission sources of air pollutants to the area that could affect local air quality. It also assessed the effects on proposed activities in the Plan Change area, that may be sensitive to emissions, from existing emission sources in adjacent areas.

The report concludes that effects on local air quality as a result of developing the land for urban activities, including effects from construction earthworks and combustion emissions from both road traffic and domestic residential heating will be minimal. Further, impacts of existing adjacent discharges to air (including surrounding horticultural, agricultural and industrial activities, surrounding road and wastewater infrastructure) on sensitive activities within the Plan Change area will also be minimal.

10.13 NOISE

An Acoustic Assessment has been prepared by Marshall Day Acoustics to support the Plan Change application, and is included as **Appendix 22**. The report has assessed the noise limits applicable to the site under Chapter E25 of the AUP, and any potential adverse effects as a result of rezoning the land for urban development.

Overall, the acoustic report considers that the acoustic controls applying to sites within the Metropolitan Centre and Mixed Use zones are more stringent than those that apply within the Future Urban zone. Therefore, the acoustic effect of the proposed change will be an improvement over the current permitted noise limits and will achieve a level of acoustic amenity typical of centres in Auckland, without compromising the amenity of properties outside of the Plan Change area. The acoustic effects of the Plan Change will be appropriately managed through standard noise controls of Chapter E25.

10.14 VERSATILE SOILS

A Versatile Soils Assessment has been prepared by AgFirst to support the Plan Change application, and is included as **Appendix 23**.

Overall, the Soils Assessment concludes that the soil types that are found on the property have good fertility levels but moderate to poor drainage capacity so that the majority of the property (40ha-46ha) would be suitable for dry stock farming only.

10.15 LANDSCAPE AND VISUAL AMENITY

A Landscape and Visual Effects Assessment has been undertaken by Boffa Miskell to support the Plan Change application and is included as **Appendix 28**.

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

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

- The Plan Change provides for the retention, restoration and enhancement of the main watercourses as natural features of the urban landscape that will structure the form of development and establish linear, connected open space;
- The Height to Boundary Standard within the underlying Metropolitan Centre zone will assist in setting and stepping taller development back from the stream corridor whilst enabling an urban interface;
- While future earthworks will reduce the more intimate rolling nature of the topography the broad ridge and valley structure of the Plan Change area will be retained;
- The Plan Change seeks to retain the trees surrounding the Flanagan Homestead which have landscape presence given their high point, age and scale;
- All other vegetation which will be removed relates to rural/rural lifestyle use and is not of sufficient value to warrant protection or retention;
- The positioning of the Main Retail Street to align along the main north / south ridgeline will reflect the site's natural topography in the urban form of the future centre; and
- The positioning of the Homestead Park and Station Plaza open space further reinforce this connection to the site's original topography and natural as well as cultural heritage.

The Landscape Assessment further concludes that in terms of the height limits enabled by the Plan Change, the proportional potential future height and scale of the future Metropolitan Centre and Mixed Use zones will sit comfortably away from the Hunua Ranges landscape backdrop.

Boffa Miskell has also undertaken a detailed assessment of the potential visual amenity effects of the Plan Change. The Visual Effects Assessment notes that the specific nature of the visual effects arising from the Plan Change will depend on the future more detailed masterplanning and design of specific development proposals.

Any development proposal will require resource consent and be subject to a range of assessment criteria including those that address visual amenity and interface outcomes.

The Visual Effects Assessment identifies the visual catchment for future development within the Plan Change area. This catchment is extensive and includes the west facing slopes of the Hunua Ranges, as well as the adjacent public road network including the adjacent section of SH1 proximate to the Drury Interchange.

The Visual Effects Assessment finds that the primary established viewing audience with the potential to be adversely affected by the introduction of buildings up to the heights enabled by the Metropolitan Centre and Business – Mixed Use zones are those people living in rural residential properties on the west facing slopes of the Hunua Ranges including in Drury Heights and properties located on Elizabeth Place and Taraire Drive as well as, to a lesser extent, further south on Macwhinney Drive. The assessment concludes however, that the separation distance between these established Hunua Foothills / Ranges properties and the future town centre means that potential adverse effects from dominance, loss of privacy or shading will be avoided. It is not considered that simply seeing taller development in the context of their wider views will result in any high degree or even moderate level adverse visual effects.

In addition, the Visual Effects Assessment finds that the heights enabled by the Plan Change provide an opportunity to take on an urban form that signals an urban heart to the Drury East community, in terms of future urban form and the declinational nature of the centre relative to its more sub-urban residential surrounds.

10.16 SUMMARY OF EFFECTS

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

11.0 SECTION 32 ANALYSIS

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

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

11.1.1 Objectives of the Plan Change

The purpose of the Plan Change, is to enable the development of a new, comprehensively planned and transit-orientated centre at Drury that supports a quality compact urban form. The Plan Change also seeks to provide additional land for housing along with a network of open spaces. Kiwi Property intends to develop their landholdings to increase the supply of retail, commercial and residential capacity within the southern part of Auckland.

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

- (1) Drury Centre is a transit-orientated development that supports high density residential, employment-generating and retail activities close to rapid transit and prioritises public and active modes of transport to and within the centre.*
- (2) Drury Centre is the pre-eminent centre serving Drury and the wider area and is the primary location for retail, civic, recreation and intensive employment activities, creating a focal point for the community and supporting their social and economic well-being.*
- (3) Development of the Drury Centre creates a distinctive sense of place, including by incorporating distinctive natural and built site features and responding to landform. Drury Centre is a street-based environment that provides a high quality pedestrian experience, with a particular emphasis on the Key Retail Street.*
- (4) Access to the precinct occurs in an effective, efficient and safe manner that manages effects on State Highway 1 and the effectiveness and safety of the surrounding road network.*
- (5) Development is supported by appropriate infrastructure.*
- (6) Freshwater and sediment quality is progressively improved over time in the Drury Centre precinct.*

11.1.2 Assessment of the objectives against Part 2

Section 5 of the RMA identifies the purpose of the RMA as being the sustainable management of natural and physical resources. This means managing the use,

development and protection of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being and health and safety while sustaining those resources for future generations, protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

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

- The proposed urbanisation of the Plan Change area will provide opportunities for new Metropolitan Centre with motorway access and beside a future train station to service the employment, retail, entertainment and commercial requirements of the growing southern Auckland population.
- The Plan Change will provide quality housing opportunities on land adjoining the Metropolitan Centre and the future train station, enabling communities to meet their own social well-being.
- The natural resources of the Plan Change area, including in particular, the Hingaia and Maketu Streams and their tributaries will generally be maintained and enhanced, such that they will be sustained for future generations.
- Where stream reclamation may be required to facilitate urban development in the future, the effects can be offset through enhancement of other sections of streams within the Plan Change area to ensure no net loss is achieved.
- The Auckland-wide provisions in relation to stormwater and stream management will ensure that the life supporting capacity of ecosystems would be protected while at the same time mitigating the adverse effects of development on the environment.

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

The Plan Change does not compromise the recognition of, or provision for these matters of national importance for the reasons set out in Section 9 of the report

above. In particular, the proposal responds to the matters identified as being of importance to Mana Whenua as identified in the Cultural Impact Assessments, there is no protected historic heritage on the site, and the proposal will not involve significant risks from natural hazards.

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

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

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

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

11.2 APPROPRIATENESS OF THE PROVISIONS TO ACHIEVE THE OBJECTIVES

11.2.1 The Objectives

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

- Identifying other reasonably practicable options for achieving the objectives;
- Assessing the efficiency and effectiveness of the objectives;

- Summarising the reasons for deciding on the provisions.

As the proposed Plan Change is amending the AUP (District Plan), the above assessment must relate to the provisions and objectives of the proposed Plan Change, and the objectives of the AUP to the extent that they are relevant to the proposed Plan Change and would remain if the Plan Change were to take effect²².

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

Within the RPS:

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

Within the Business Zones -

- Provide a strong network of centres that are attractive environments and attract ongoing investment, promote commercial activity, and provide employment, housing and goods and services, all at a variety of scales;

²² RMA s32(3)

- Ensure business activity is distributed in locations, that is accessible and is of a form and scale that provides for the community's social and economic needs;
- Moderate to high intensity residential activities and employment opportunities are provided for, in areas in close proximity to, or which can support the Metropolitan Centre Zone and the public transport network.

Within the Open Space Zones:

- Recreational needs are met through the provision of a range of quality open space areas that provide for both passive and active activities.

Within the Auckland-wide Provisions:

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

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

- Theme 1: Land Use Pattern and Timing of Development in Drury-Opaheke
 - Issue 1.1: Land Use Pattern – Zoning Layout
 - Issue 1.2: Land use Pattern – Centre Zoning
 - Issue 1.3 Land use Pattern – Sub-Precincts C, E and F
 - Issue 1.4: Timing of Development in Drury-Opaheke
- Theme 2: Location of the Centre Relative to the Train Station
- Theme 3: Staging of Internal Linkages to the Drury Central Train Station with Development
- Theme 4: Building Heights
- Theme 5: Coordinating the development of land with transport infrastructure in Drury East
- Theme 6: Achieving integrated and quality development

- Theme 7: Residential amenity in Sub-Precinct C and E
- Theme 8: Riparian Planting Rule

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

11.3 OTHER REASONABLY PRACTICABLE OPTIONS FOR ACHIEVING THE OBJECTIVES

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

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

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

- B2.7.1 (2) Public access to and along Auckland’s coastline, coastal marine area, lakes, rivers, streams and wetlands is maintained and enhanced.
- B2.7.1 (1) Recreational needs of people and communities are met through the provision of a range of quality open spaces and recreation facilities.
- H9.2(4) Business activity is distributed in locations, and is a scale and form, that (a) provides for the community’s social and economic needs; (b) improves community access to goods, services, community facilities and opportunities for social interaction; and (c) manages adverse effects on the environment, including effects on infrastructure and residential amenity.
- H13.2(6) Moderate to high intensity residential activities and employment opportunities are provided for, in areas in close proximity to, or which can support the City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and the public transport network.

11.3.1.1 Issue 1.1: Land Use Pattern – Zoning Layout

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

Option 1: Rezone the Plan Change Area in accordance with the indicative zoning layout in Councils Drury-Opāheke Structure Plan

This option involves rezoning the Plan Change area to incorporate a larger centre (70 hectares) that extends across Hingaia Stream and across Waihoehoe Road in the north. This zoning pattern aligns with the indicative zoning layout in Councils Drury-Opāheke Structure Plan.

Option 2: Preferred option – Proposed Plan Change

This option proposes a more compact Metropolitan Centre zone is proposed than what the Council proposed within the Drury-Opāheke Structure Plan. With the zoning proposed, the land will provide for 35 hectares of centre which does not extend across Waihoehoe Road nor does it extend across the Hingaia stream.

Table 11.3.1.1.1: Summary of Options Analysis Addressing S32(2) Matters

	Option 1: Apply the Indicative Zoning Layout in Council’s Drury-Opāheke Structure Plan	Option 2: Apply the Zoning Layout as per the Proposed Plan Change
Benefits	Applies a land use pattern that is consistent with the Drury-Opāheke Structure Plan and therefore the community’s expectations.	The size of centre (35 hectares) is consistent with the Economic Assessment undertaken by Market Economics to inform this Plan Change which concludes that a centre of 33.7 hectares (gross) is

	Option 1: Apply the Indicative Zoning Layout in Council's Drury-Opāheke Structure Plan	Option 2: Apply the Zoning Layout as per the Proposed Plan Change
	<p>Provides for high density residential and commercial activities surrounding the broad location for the Drury Central train station.</p>	<p>required with some flexibility to ensure that the zone boundary sensibly integrates with the surrounding area, by aligning with open space boundaries and future road connections.</p> <p>The size of centre (35 hectares) is also consistent with economic analysis undertaken by Property Economics for the Drury-Opāheke Structure Plan which states that the Drury Centre would need to be in the order of 24 ha²³, which we assume is net of roads, open spaces etc. This equates to a gross size for the Drury Centre of 33 hectares, assuming an additional 40 percent land requirements for roads, open space, other uses etc.</p> <p>Through providing for a centre which has been sized in accordance with the expected demand this will enable higher density development and more efficient use of greenfield land.</p> <p>The size of this centre within this option is consistent with the size of comparable with other centres in Auckland including Massey North & Westgate (combined: 37 hectares), Botany (30 hectares), Sylvia Park (27 hectares) and Takapuna 27 hectares.</p> <p>This zoning layout takes into account the constraints to developing the land along the Hingaia Stream and under the National Grid Corridor Overlay through applying an open space zone rather than a centre zoning.</p>

²³ Refer to page 45 of the Property Economics report, "West Franklin and Drury Future Business Land Assessment", June 2018.

	Option 1: Apply the Indicative Zoning Layout in Council's Drury-Opāheke Structure Plan	Option 2: Apply the Zoning Layout as per the Proposed Plan Change
Costs	<p>The Centre is double the size of the size recommended by Market Economics within their assessment to inform this Plan Change and also the assessment undertaken by Property Economics to inform the Councils Drury-Opāheke Structure Plan.</p> <p>The size of the layout of the Centre proposed within this option is not comparable to other comparable centres in Auckland.</p> <p>Providing for a larger centre than what is required will result in lower density development and inefficient use of greenfield land.</p> <p>The zoning boundary of the Centre extends across the Hingaia Stream and under the National Grid Corridor Overlay. This land is highly constrained and therefore the level of development anticipated by the Centre zoning will not be able to be achieved.</p>	<p>Applies a land use pattern that varies from the Drury-Opāheke Structure Plan and therefore the community's expectations.</p>
Efficiency & Effectiveness	<p>Providing for a 70 hectare centre is greater than what is required at 2048 and is likely to result in low density retail and commercial development, contrary to all AUP objectives that seek to achieve a quality compact urban form.</p> <p>This option is inefficient and not in keeping with B2.2.1(3) and B2.5.1 (1) as the centre has been size to exceed future demands.</p>	<p>This option is efficient as it is most in keeping with B2.2.1(3) and B2.5.1 (1) as the centre has been size to meet future demands which will eventually result in higher density development and more efficient use of greenfield land in the long term.</p> <p>Efficiently enables the centre to be developed initially to a scale that allows for a degree of flexibility, while also minimising the potential impacts on the surrounding retail centre network while ensuring there is sufficient land set aside for the centre to develop so it can effectively fulfil the strategic role as a Metropolitan Centre in the long term.</p>

	Option 1: Apply the Indicative Zoning Layout in Council's Drury-Opāheke Structure Plan	Option 2: Apply the Zoning Layout as per the Proposed Plan Change
		This option is effective and in keeping with B2.7.1 (2) and B2.7.1 (1) as the highly constrained land along the Hingaia Stream has been set aside to be utilised as public open space which provides for the community's future recreational needs and provides public access to the Hingaia Stream.

Option 2 is preferred. Rezoning the subject land in accordance with the pattern proposed as part of this Plan Change is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The Centre has been sized to meet future demand which will result in higher density development that makes efficient use of greenfield land in the longer term in keeping with B2.2.1(3) and B2.5.1 (1); and
- The proposed zoning pattern is consistent with objectives B2.7.1 (1) and B2.7.1 (2) in that the plan change sets aside land for open space to meet the needs of future residents in and around Drury Centre and provides public access along waterways.

11.3.1.2 Issue 1.2: Land Use Pattern – Centre Zoning

The options analysis provided below is in addition to the reasoning and analysis set out in **Section 5.1.6** of the report above that provides detailed reasoning and analysis of a Metropolitan Centre vs a Town Centre zoning for the Drury Centre.

Option 1: Zone the centre Business – Town Centre

This option involves applying a Business – Town Centre zone to the centre and applying the height variation control to provide for greater height.

Option 2: Preferred option – Proposed Plan Change (Zone the centre Business – Metropolitan Centre).

This option involves applying a Business – Metropolitan Centre zone to the centre.

Table 11.3.1.2.1: Summary of Options Analysis Addressing S32(2) Matters

	Option 1: Zone the Centre Business – Town Centre	Option 2: Zone the Centre Business – Metropolitan Centre
Benefits	<p>If the existing function of the Papakura Metropolitan Centre and the other land use and spatial considerations are not taken into account, a Town Centre zoning would support the Papakura Metropolitan Centre as the primary centre for the southern area of Auckland.</p> <p>This option can provide for variation in height across the centre through the application of the height variation control. In reality this has little benefit however as the Drury Centre Precinct can also be used to alter height limits.</p>	<p>Strategic location for a Metropolitan Centre as the Plan Change area is located beside the Drury interchange, adjacent to the railway and at the centre of a large area signalled for urban development. Future transport infrastructure (e.g. Drury Rail station) has the potential to transform the area into a key public transport interchange serving the wider southern Structure Plan area and support further intensification of residential, commercial and civic uses.</p> <p>A Metropolitan Centre is required to service the existing and future residents of southern Auckland, given the constraints at Papakura which will prevent this centre ever fulfilling this role.</p> <p>A Metropolitan Centre zone signals that the Drury Centre will be a community hub and signals that investment in these services will be required to meet the needs of the surrounding community.</p> <p>The Metropolitan Centre zoning enables taller buildings of up to 72.5m in height which will differentiate Drury Centre as a distinct and identifiable node of built form amongst the surrounding medium-rise and low-rise mixed-use and residential zonings.</p> <p>The provision of a Metropolitan Centre at Drury will service southern Auckland reducing the need to travel to Metropolitan Centres further afield such as Manukau and help address associated effects such as traffic congestion on the Southern Motorway.</p>

	Option 1: Zone the Centre Business – Town Centre	Option 2: Zone the Centre Business – Metropolitan Centre
Costs	<p>Economic Analysis undertaken by Market Economics to inform this Plan Change application has shown that Papakura is not currently fulfilling a Metropolitan Centre, nor is it likely to in the future. This creates a gap in centre network which this option will not fulfil as it will result in an additional Town Centre not a Metropolitan Centre.</p> <p>This option fails to utilise a highly strategic location beside the Drury interchange, adjacent to the railway and at the centre of a large area signalled for urban development for a Metropolitan Centre to service the higher order centre needs of the growing southern Auckland community.</p> <p>In failing to fulfil the gap for a Metropolitan Centre for southern Auckland this option will see southern Auckland communities having to travel to Metropolitan Centres further afield such as Manukau resulting in associated effects such as traffic congestion on the Southern Motorway.</p> <p>Future and existing residents of the Drury-Opāheke will have to commute to Manukau to access the services, amenities and employment opportunities that Metropolitan Centres offer.</p>	<p>There may be short term effects on the retail capacity of the Pukekohe Town Centre, however, these will be short lived, and would be present with a Town Centre zoning for the Drury Centre.</p>
Efficiency & Effectiveness	<p>A Town Centre zoning would not make as efficient use of land in a strategic location next to the motorway interchange and beside the railway line to achieve a quality compact urban form in accordance with B2.2.1 (1).</p> <p>The proposed Town Centre zoning will not fulfil the higher order centre needs of the growing southern Auckland community and</p>	<p>The proposed Metropolitan Centre zoning makes efficient use of land in a strategic location next to the motorway interchange and beside the railway line to achieve a quality compact urban form in accordance with B2.2.1 (1).</p> <p>The proposed Metropolitan Centre zoning will ensure the future centre can develop as a higher order centre to service the needs of the growing southern Auckland</p>

	Option 1: Zone the Centre Business – Town Centre	Option 2: Zone the Centre Business – Metropolitan Centre
	therefore will not efficiently achieve H9.2(4).	community and therefore will efficiently achieve H9.2(4).

Option 2 is preferred. Rezoning the subject land Metropolitan Centre zone is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed zoning pattern is consistent with B2.2.1 (1) as it utilises land within a strategic location, next to the Drury Interchange and adjacent to the railway line to develop a transport orientated Metropolitan Centre to service the existing and future demands of residents of southern Auckland, which Papakura cannot meet.

11.3.1.3 Issue 1.3: Land Use Pattern – Zoning of Sub-Precincts C, E and F

Option 1: Zone Sub-Precincts C and E Residential – Terrace Housing and Apartment Building Zone

This option will apply the Residential – Terrace Housing and Apartment Building zone within Sub-Precinct C, E and F.

Option 2: Preferred option – Proposed Plan Change (Zone Sub-Precincts C and E Business – Mixed Use zone)

This option will apply the Business – Mixed Use zone within Sub-Precinct C, E and F. Sub-Precinct C and E will be subject to additional standards and assessment criteria to ensure a reasonable level of residential amenity.

Table 11.3.1.3.1: Summary of Options Analysis Addressing S32(2) Matters

	Option 1: Zone Sub-Precincts C and E Residential – Terrace Housing and Apartment Building Zone	Option 2: Sub-Precincts C and E Business – Mixed Use Zone with additional controls
Benefits	<p>Applies a zoning that is consistent with the Drury-Opāheke Structure Plan and therefore the community’s expectations.</p> <p>The Terrace and Housing and Apartment Building zone provisions will provide a reasonable standard of amenity for residents particularly</p>	<p>The application of the Mixed Use zone, along with the greater height limits included within the proposed precinct, provide for greater development capacity than Option 1. The flexibility in land use allows this option to cater for market demand.</p> <p>Typical residential densities obtainable through the Mixed-use</p>

	Option 1: Zone Sub-Precincts C and E Residential – Terrace Housing and Apartment Building Zone	Option 2: Sub-Precincts C and E Business – Mixed Use Zone with additional controls
	<p>in regard to access to daylight and outdoor living space.</p> <p>This zoning would provide for reasonably intensive living opportunities close to future rapid transport.</p>	<p>zone provisions are considerably higher than that obtainable under the THAB zone provisions due to more flexible standards around building coverage, setbacks, private open space, Height-in-relation-to-boundary. This is enables maximise density in proximity to the FTN, rail services and centres. However, the additional controls proposed ensure that a good standard of amenity for residents will be provided.</p> <p>The Mixed-use zone’s activity emphasis on high density housing and smaller scale commercial uses will enable more street level activation and vitality throughout the day promoting safer, more amenable and inviting routes through to the Centre and public transport services.</p> <p>Provision of Mixed Use zoning around the centre provides flexibility to provide for employment generating activities in addition to residential, which would make efficient use of land close to public transport.</p>
Costs	<p>The Terrace Housing and Apartment Building zone does not provide any flexibility for commercial and retail use if the centre eventually requires flexibility to grown beyond the current zoning or other employment generating activities are sought.</p> <p>Typical residential densities obtainable through the Mixed-use zone provisions are considerably higher than that obtainable under the THAB zone provisions due to more flexible standards around building coverage, setbacks, private open space, Height-in-relation-to-boundary. Therefore this option</p>	<p>This option applies a zoning that is inconsistent with the Drury-Opāheke Structure Plan and therefore not consistent with the community’s current expectations.</p>

	Option 1: Zone Sub-Precincts C and E Residential – Terrace Housing and Apartment Building Zone	Option 2: Sub-Precincts C and E Business – Mixed Use Zone with additional controls
	does not enable density to be maximised in proximity to the FTN, rail services and centres.	
Efficiency & Effectiveness	Inefficient as maximum densities are not enabled in proximity to the FTN, rail services and centres which would not achieve B2.4.1 (3).	<p>Is consistent with B2.3.1 (1) and will effectively achieve a quality built environment as the zoning and precinct provisions will effectively integrate with future development in the wider neighbourhood.</p> <p>This option is effective as it enables intensification through the Mixed Use zone and enables maximise density in proximity to the FTN, rail services and centres which is consistent with B2.4.1 (3).</p> <p>This option is effective as the application of the Mixed Use zone enables flexibility for land use to meet future demand whether it be residential or commercial in accordance with B2.5.1 (1) and B2.4.1 (4).</p>

Option 2 is preferred. Rezoning the subject land Business – Mixed Use zone is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed zoning framework enables residential intensification in proximity to the FTN, rail services and centres which is consistent with B2.4.1 (3).

11.3.1.4 Issue 1.4: Timing of Development in Drury- Opaheke

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

Option 1: Do nothing

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

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

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

Option 3: Preferred option – Proposed Plan Change

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

11.3.1.5 Evaluation of Other Reasonably Practicable Options

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

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

	Option 1: Do nothing (wait for Council to rezone the land)	Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council’s Structure Plan	Option 3: Preferred option – the proposed Plan Change
Benefits	Removes the cost of initiating a plan change for the applicant. Allows the Council to progress a wider plan change for the future land use for the Drury Opāheke area in accordance with the structure plan.	Stages the release of land for development in a manner that is consistent with the Drury-Opāheke Structure Plan and therefore the community’s expectations.	Enables the staged development of the Plan change area as infrastructure upgrades are complete, providing additional business and residential capacity from the short term. Provides greater certainty for the council, community, developers and landowners about the nature, extent and pace of development of Drury Centre.
Costs	This option does not add to Auckland’s housing and business land supply to accommodate growth in the short term and is therefore likely to have a negative impact on economic growth and employment	Taking into account the timeframes required to process a plan change and prepare the land for urban development, this option is likely to result in a significant delay in the redevelopment of land, where there are efficient and effective infrastructure solutions	Cost to developers, the Council, Auckland Transport and Watercare to provide the necessary infrastructure to service the plan change area ahead of the current timetable. These costs however, will eventually need to be realised when the land is urbanised.

	Option 1: Do nothing (wait for Council to rezone the land)	Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council's Structure Plan	Option 3: Preferred option – the proposed Plan Change
	<p>opportunities s32(2)(a)(i)-(ii).</p> <p>Taking into account the timeframes required to process a plan change and prepare the land for urban development, this option is likely to result in a significant delay in the redevelopment of land, where there are efficient and effective infrastructure solutions available now that are either funded by the Government or can be partially funded by major landowners in Drury East. The Council may lose the opportunity to secure early funding for required upgrades if there are delays to zoning.</p>	<p>available now that can be funded by the Government or partially funded by major landowners in Drury East. The Council may lose the opportunity to secure early funding for required upgrades if there are delays to zoning.</p>	<p>Therefore, the eventual costs are simply being brought forward to align with the \$2.4 billion investment in transport infrastructure planned for Drury by the Government.</p>
Efficiency & Effectiveness	<p>This option is not efficient or consistent with B2.2.1(3) and the requirements of the NPS-UDC as no additional business and residential capacity is enabled in the short – mid-term despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.2.1(5) and B3.2.1(5). Therefore, delays to rezoning the land unjustifiably 'lock up' land for urban development that could be efficiently developed sooner to support an increase in housing capacity.</p>	<p>This option is not efficient or in keeping with B2.2.1(3) and the requirements of the NPS-UDC as no additional business and residential capacity is enabled in the short – midterm despite analysis being prepared to show that the Plan Change it is consistent with the RPS, particularly, B2.2.1(5) and B3.2.1(5). Therefore, delays to rezoning the land unjustifiably 'lock up' land for urban development that could be efficiently developed sooner to support an increase in housing capacity.</p>	<p>This option is efficient as it brings forward the release of land that can be serviced and is able to be developed efficiently by an experienced development company, who controls large land holdings in the Plan Change area and who can make meaningful infrastructure funding contributions, contributing to an increase in housing capacity and choice in the short to medium term accordance with B2.2.1(3) and B2.4.1(4).</p> <p>The alternative staging option that brings forward the release of land at Drury East is</p>

	Option 1: Do nothing (wait for Council to rezone the land)	Option 2: Rezone the Plan Change Area in accordance with the timeframes in Council's Structure Plan	Option 3: Preferred option – the proposed Plan Change
			efficient as it provides for significant amenities, employment and services to be provided in Decade 1 to support the residential catchment in accordance with B2.4.1 (3).

11.3.1.6 Summary of Reasons for Deciding on the Provisions

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

- The proposed zoning pattern will ensure that the sufficient development capacity is provided to accommodate residential, commercial and social facilities to support growth in the medium to long term in accordance with B2.2.1(3) while enabling some residential and commercial development in the short term.
- Evidence has been prepared that demonstrates that the Plan Change area can be adequately serviced with identified upgrades in place and therefore is consistent with B2.2.1(5) and B3.2.1(5).

11.3.2 Theme 2: Location of the Centre Relative to the Future Drury Central Train Station

The AUP objectives which have particular relevance for Theme 2 include:

- B2.2.1 (1) A quality compact urban form that enables better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects.
- B2.3.1 (1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.

- B2.3.1 (3) The health and safety of people and communities are promoted.
- H9.2(4) Business activity is distributed in locations, and is a scale and form, that (a) provides for the community's social and economic needs; (b) improves community access to goods, services, community facilities and opportunities for social interaction; and (c) manages adverse effects on the environment, including effects on infrastructure and residential amenity.

In determining the most appropriate method for achieving the proposal, consideration has been given to the following other reasonably practicable options. These options are based on a ~35 ha Metropolitan Centre, that has been determined as being sufficient to meet the likely future needs of the catchment, as extensively detailed in the report above.

Option 1: Apply the Metropolitan Centre zone along Flanagan and Waihoehoe Roads

This option involves extending the Metropolitan Centre east along Flanagan and Waihoehoe Roads to the junction of Waihoehoe Road and Fitzgerald Road. This zone pattern will ensure that the Metropolitan Centre has more road frontage and integrates with the future Train Station if it is located further north. This zoning pattern is shown in Figure 14 below and is overlaid with the GIS flooding extents.

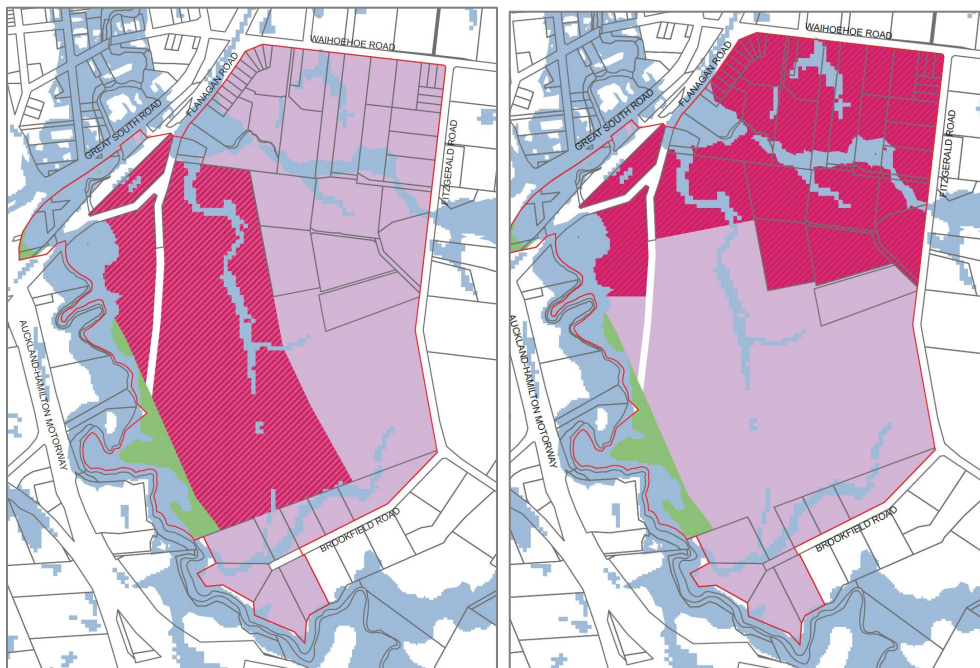


Figure 14: Alternative Metropolitan Centre layout and Proposed Metropolitan Centre Layout with Floodplains.

Option 2: Preferred option – Proposed Plan Change

This option involves applying the spatial layout of the Metropolitan Centre proposed as part of this Plan Change application, as shown in Figure 2.

Context – Land Ownership

Land ownership is one factor of many that need to be considered when assessing the most appropriate location for the Metropolitan Centre zone. With that said, the analysis below demonstrates that this is a particularly important factor to consider for a new centre in the Drury context, noting that integrated development is critical to its success.

In Option 2, the Metropolitan Centre zone extent is within the Applicant's ownership as indicated in Figure 14 showing amalgamated site boundaries. In Option 1, there are 41 lots, clusters of which are in typical suburban sizes, including the land closest to the railway line and adjacent to Fitzgerald Road. Many of the lots are also rural lifestyle blocks.

Amalgamating lots for development typically occurs over a long time horizon and can be costly²⁴. While this issue is not fatal to development, it would be restrictive, and would make it significantly more challenging to achieve an integrated pattern of urban development in a reasonable timeframe, without direct government involvement via designations and financing. This is clearly evidenced in the challenges faced by agencies tasked with revitalising existing centres.

Amalgamated land-holdings have the benefit of enabling comprehensive development of the site and fulfilment of the potential afforded by the Metropolitan Centre zone, along with the provision of necessary enabling infrastructure and amenities to support the new commercial and residential population. Importantly, amalgamated landholdings enable development of the centre to be responsive to market demand, and enable the funding of necessary infrastructure to be shared and negotiated efficiently.

Because of these challenges, almost all of the recent centre developments in Auckland have been developed by a single entity, including Westgate, Ormiston, Sylvia Park, Botany and Albany. While many of these centres reflect the dominant retail design trends of the time, they do reflect the market realities of development and the efficiencies gained by developing large landholdings in single ownership.

11.3.2.1 Evaluation of Other Reasonably Practicable Options

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

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

²⁴ See for example Fredrickson, C. (2016) *Density through amalgamation? Battling the sticky cadastre*

	Option 1: Apply the Metropolitan Centre zone along Flanagan and Waihoehoe Roads	Option 2: Proposed Plan Change zone extents
Benefits	<p>This option will ensure that a Metropolitan Centre integrates well with the future Drury Central Train Station whether it be located on the Watercare Site or further north.</p> <p>This spatial location for the Metropolitan Centre maximises road frontage along existing roads however, it is less visible from the motorway.</p>	<p>This option will ensure that the Metropolitan Centre integrates well with the future Drury Train Station and public transport interchange if it locates on the Watercare site or further north. A station on the Watercare site is preferable as it will serve a greater catchment, with more available land for development and less physical constraints.</p> <p>This option applies the Metropolitan Centre to a large continuous landholding which enables the delivery of the comprehensive and integrated development of the Drury Centre.</p> <p>This spatial location of the Metropolitan Centre zone has a high degree of visibility from the motorway which will enable the centre to attract customers from a wider catchment. The economic viability of the Drury Centre will be essential for it to fulfil its function and role as a Metropolitan Centre.</p> <p>If the Drury Central Train Station is located further north towards Waihoehoe Rd, the proposed Mixed Use zone along with the provisions within Sub-Precinct E provide opportunities for intensive development and an activated street network leading to the station that will mean it is well integrated with the Key Retail Street in the Drury Centre. In reality, and as development occurs over time, the entire Plan Change area will be perceived as the Drury Centre, irrespective of the zoning, and the critical matter for the Plan Change is ensuring the Train Station & transport plaza are well connected with the surrounding area.</p>

	Option 1: Apply the Metropolitan Centre zone along Flanagan and Waihoehoe Roads	Option 2: Proposed Plan Change zone extents
		<p>The zoning layout is based on a masterplan by Civitas which takes into account the existing site features including the presence of streams, flood plains, topography, the transmission lines and the Flanagan Homestead.</p> <p>This spatial positioning of the Metropolitan Centre will enable the centre to integrate with the Hingaia Stream reserve to a greater extent than Option 1.</p> <p>Applying the Metropolitan Centre along the Hingaia Stream will allow for better connectivity through active modes, as there is the potential to extend the high amenity green corridor pedestrian/cycleway required in the Drury South precinct further north along Hingaia Stream with connections to the existing Drury Township.</p> <p>Despite not having the same frontage to existing roads as Option 1, convenient vehicle access into the centre can occur from a number of routes, including Drury Boulevard from the north, a potential direct connection from State Highway 1</p> <p>This location of the Drury Centre provides a buffer between State Highway 1 and the residentially focused Mixed Use zoning.</p>
Costs	The landholdings along Flanagan Road and Waihoehoe Road are fragmented and therefore this reduces the feasibility for achieving comprehensive and integrated development. Further analysis of this cost is provided in the context section above.	This spatial location of the Drury Centre has less frontage to existing roads than the spatial layout within Option 1, however a network of streets can be created by development that connects the centre with the wider area.

	Option 1: Apply the Metropolitan Centre zone along Flanagan and Waihoehoe Roads	Option 2: Proposed Plan Change zone extents
	<p>This spatial positioning of the Drury Centre will have less visibility from the motorway than Option 2 and therefore will be seen by a smaller catchment which. Visibility of the centre is important to its economic success.</p> <p>This location of the Drury Centre provides less of a buffer between State Highway 1 and the Mixed Use zoning than Option 2.</p> <p>This option does not take into account the existing site features in determining the zone layout including the presence of streams, flood plains, topography, the transmission lines and the Flanagan Homestead.</p> <p>This spatial positioning of the Metropolitan Centre will not enable the centre to integrate with the Hingaia Stream reserve to the same extent as Option 2.</p>	
Efficiency & Effectiveness	<p>This option is inefficient and ineffective at achieving H9.2(4)(a) because the fragmented land ownership will make the development of a comprehensive and integrated Metropolitan Centre of a scale to provide for the future southern Auckland community's social and economic needs unfeasible.</p> <p>This option is not effective at achieving B2.3.1 (1)(a) because the zoning layout is not based on a masterplan that has identified the unique qualities of the site it has simply been aligned to maximise frontage to existing roads.</p>	<p>This option is effective at achieving H9.2(4)(a) because the Metropolitan Centre zone is applied to a large contiguous site allowing for the comprehensive development of a centre that is of a scale to provide for the future southern Auckland community's social and economic needs.</p> <p>This option is efficient and effective at achieving H9.2(4) as it enables the Drury Centre to locate where it can most effectively improve community access to transport, community facilities and opportunities for social interaction. This spatial layout of the centre enables optimal integration with the Hingaia Stream Reserve and the future high amenity green corridor pedestrian/cycleway that connects</p>

	Option 1: Apply the Metropolitan Centre zone along Flanagan and Waihoehoe Roads	Option 2: Proposed Plan Change zone extents
		<p>Drury South to the existing Drury Village.</p> <p>This option is efficient at achieving B2.2.1 (1) and B2.3.1 (1) as it can integrate with both potential locations of the future Drury Central Train Station. Convenient vehicle access can be achieved into the centre from a number of routes.</p> <p>This option is effective and in keeping with B2.3.1(3) and H9.2(4)(c) as the spatial layout of the Metropolitan Centre zone maximises the health, safety and amenity of future residents within the Mixed Use zone through providing a transition between this zone and the motorway.</p> <p>This option is effective at achieving B2.3.1 (1)(a) because the zoning layout is based on a masterplan by Civitas which takes into account the existing site features including the presence of streams, flood plains, topography, the transmission lines and the Flanagan Homestead.</p>

11.3.2.2 Summary of Reasons for Deciding on the Provisions

Option 2 is preferred. Applying the spatial layout of the Metropolitan Centre proposed as part of this Plan Change application, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The Metropolitan Centre zone is proposed to be applied to a large continuous site allowing for the comprehensive development of a centre that is of a scale to provide for the future southern Auckland community’s social and economic needs in accordance with H9.2(4)(a). The alternative centre layout will apply to fragmented land which will prevent the development of a Metropolitan Centre at the pace and scale required to service the community’s needs.
- This spatial location of the Metropolitan Centre is in keeping with B2.2.1 (1) and B2.3.1 (1) as it will allow for integration with the future Drury Centre Train Station should it locate on the Watercare site or further north. The spatial positioning of

the centre provides for direct integration with a station on the Watercare site, and if the Drury Central Train Station is located further north towards Waihoehoe Rd, the proposed Mixed Use zoning provides opportunities for intensive development around the station and the collector and local road network can effectively connect the station with the wider area. In reality, over time, the entire Plan Change area will be perceived as the Drury Centre, irrespective of the zoning.

- This zoning layout is in keeping with B2.3.1 (1)(a) as it is based on a masterplan by Civitas which takes into account the existing site features including the presence of streams, flood plains, topography, the transmission lines and the Flanagan Homestead.
- This spatial layout of the centre enables optimal integration with the Hingaia Stream Reserve and the future high amenity green corridor pedestrian/cycleway that connects Drury South to the existing Drury Village which is in keeping with H9.2(4).
- 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.
- This spatial layout of the Metropolitan Centre zone achieves B2.3.1 (3) and H9.2(4)(c) as it maximises the health, safety and amenity of future residents within the residentially focused Mixed Use zone through providing a transition between this zone and the motorway.

11.3.3 Theme 3: Staging of Internal Linkages to the Drury Central Train Station with Development

The AUP objectives which have particular relevance for Theme 3 include:

- B2.2.1 (1) A quality compact urban form that enables all of the following: (a) a higher-quality urban environment; (b) greater productivity and economic growth; (c) better use of existing infrastructure and efficient provision of new infrastructure; (d) improved public transport and reduced adverse effects; € greater social and cultural vitality; (g) reduced environmental effects.
- B2.3.1 (1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- B2.3.1(2) Innovative design to address environmental effects is encouraged.

- B2.3.1(3) The health and safety of people and communities are promoted.
- H9.2(4) Business activity is distributed in locations, and is a scale and form, that (a) provides for the community’s social and economic needs; (b) improves community access to goods, services, community facilities and opportunities for social interaction; and (c) manages adverse effects on the environment, including effects on infrastructure and residential amenity.

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

Option 1: Do nothing

This option does not include provisions to stage the delivery of interim and permanent cycle and pedestrian connections to the Drury Central Train Station with development.

Option 2: Preferred option – Proposed Plan Change

This option involves applying provisions proposed as part of this Plan Change application, including the inclusion of assessment criteria that ensure the delivery of interim and permanent cycle and pedestrian connections to the Drury Central Train Station, generally within the walking catchment of the station, are staged with development.

Evaluation of Other Reasonably Practicable Options

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

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

	Option 1: Do nothing – no provisions to stage the construction of local connection to the Drury Central train station	Option 2: Proposed Plan Change – assessment matters setting out how pedestrian and cycle connections can be provided to the Drury Central train station over time
Benefits	There is more flexibility for the developer to decide when is an appropriate time to construct connections to the Drury Central Train Station.	<p>Requiring connections between the Metropolitan Centre and the Drury Central train station from the early stages of development will support an increase in public transport uptake supporting more efficient use of public transport.</p> <p>Requiring effective integration between the Metropolitan Centre and the train station from the early</p>

	Option 1: Do nothing – no provisions to stage the construction of local connection to the Drury Central train station	Option 2: Proposed Plan Change – assessment matters setting out how pedestrian and cycle connections can be provided to the Drury Central train station over time
		<p>stages of development will encourage transport mode shift.</p> <p>Greater connections between the train station and the centre will enhance the accessibility of the centre from people using the train to travel to the centre from further away. This may positively impact the economic growth of the centre.</p>
Costs	<p>As this option will not require effective integration between the Metropolitan Centre and the Drury Central train station at the early stages of development this could limit the ability to achieve transport mode shift. The lack of integration with the train station could deter public transport use with people opting to drive to the centre instead.</p> <p>A lack of integration between the centre and the train station will deter people from its use impacting public transport patronage and efficient use of infrastructure in the early stages of development.</p> <p>A disconnected environment between the train station and the centre could limit the accessibility of the centre from people using the train to travel from further away. This may impact the economic growth of the centre.</p>	<p>The construction of the Drury Centre train station could fall behind and the developer may be in a position of having to build a connection to a non-existent station. This is mitigated by including the term ‘operational train station’ in the staging assessment matters.</p> <p>This option provides less flexibility to the developer and imposes more costs potentially.</p>
Efficiency & Effectiveness	<p>This option will not efficiently or effectively achieve B2.2.1 as a lack of connections between the centre and the train station at the early stages of development will not support public transport use resulting in inefficient use of public transport.</p>	<p>This option will efficiently and effectively achieve B2.2.1 because requiring connections between the Metropolitan Centre and the Train Station from the early stages of development will increase public transport patronage contributing to transport mode choice.</p>

	Option 1: Do nothing – no provisions to stage the construction of local connection to the Drury Central train station	Option 2: Proposed Plan Change – assessment matters setting out how pedestrian and cycle connections can be provided to the Drury Central train station over time
	This option is not effective at achieving B2.3.1 (1) as it does not require a mix of transport choices for people wanting to access Drury Centre from the early stages of development.	This option is effective at achieving B2.3.1 (1) as it supports a mix of transport choices for people wanting to access Drury Centre. This option effectively and efficiently achieves B2.3.1(3) as the integration with the station will result in a quality and safe environment.

11.3.3.1 Summary of Reasons for Deciding on the Provisions

Option 2 is preferred. Requiring connections to the train station from the early stages of development within the Plan Change, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- Sequencing the delivery of internal pedestrian and cycle connections to the Drury Central train station with development will increase public transport patronage and provide transport mode choice in accordance with B2.2.1.
- Requiring effective integration between the Metropolitan Centre and the Drury Central Train Station from early in the development will promote the success of the centre by increasing its accessibility through increasing the transport choices people have to access the centre in accordance with B2.3.1 (1).

11.3.4 Theme 4: Building Heights

The AUP objectives which have particular relevance for Theme 3 include:

- B2.2.1(1) A quality compact urban form that enables better use of existing infrastructure and efficient provision of new infrastructure, improved public transport and reduced adverse effects.
- B2.3.1(1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.

- H9.2(2) Development is of a form, scale and design quality so that centres are reinforced as focal points for the community.
- H9.2(3) Development positively contributes towards planned future form and quality, creating a sense of place.
- H9.2(4) Business activity is distributed in locations, and is a scale and form, that (a) provides for the community's social and economic needs; (b) improves community access to goods, services, community facilities and opportunities for social interaction; and (c) manages adverse effects on the environment, including effects on infrastructure and residential amenity.
- H9.2(5)(a)(i) A network of centres that provides: a framework and context to the functioning of the urban area and its transport network, recognising: the regional role and function of the city centre, metropolitan centres and town centres as commercial, cultural and social focal points for the region, sub-regions and local areas;
- H13.2(6) Moderate to high intensity residential activities and employment opportunities are provided for, in areas in close proximity to, or which can support the City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone and the public transport network.

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

Option 1: Apply the Standard Zone Height Limits

This option involves applying the height limits of the underlying zones (18m within the Mixed Use zone and 72.5m within the Metropolitan Centre Zone).

Option 2: Apply the Height Limits proposed in the Kiwi Masterplan 2048

This option involves applying the height limits proposed within the Kiwi Masterplan 2048 by Civitas. The height limits proposed within the Kiwi Masterplan 2048 will result in a predominantly mid-rise built form with heights ranging from 1-2 storeys to 10 storeys refer Figure 15 below.

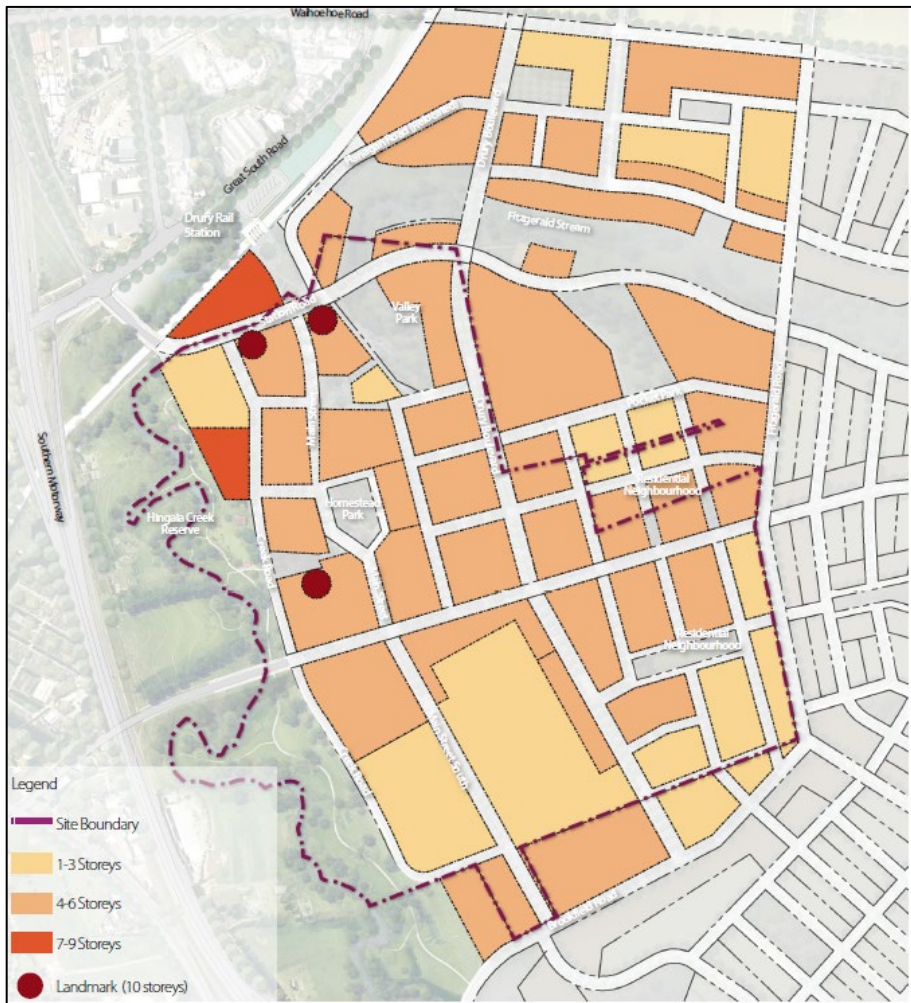


Figure 15: Height limits proposed within the Kiwi Masterplan 2048.

Option 3: Preferred option – Proposed Plan Change

This option involves applying the height limits proposed as part of this Plan Change application, ranging from the standard Mixed Use zone height of 18m, to 25m within Sub-Precinct C, 32.5m within Sub-Precinct E, 40.5m within Sub-Precinct B and up to 72.5m in Sub-Precincts A & D.

11.3.4.1 Evaluation of Other Reasonably Practicable Options

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in Table 11.3.4.1.

Prior to evaluating these options, it is important to note that the Kiwi Masterplan 2048 illustrates one way that the site can be developed over time. The key urban structuring aspects of this Masterplan have been included in the Plan Change, including the location of the Key Retail Street, relative to open spaces and public transport and the location of the core activity area (which has been converted into

the Metropolitan Centre zoning extent). The height limits shown in the Masterplan have been informed by a range of factors, including market feasibility and developer aspirations. This does not necessary convert directly into planning provisions, where it is appropriate on this matter, to consider a wider range of resource management matters, including for example:

- The need to achieve an efficient use of land close to public transport;
- The need to provide flexibility to respond to changes in market over time;
- In making a rule, the need to have regard to the actual or potential effect of the rule on the environment, including any adverse effect.

These matters were not factored into the assessment of optimal building heights under the Kiwi Masterplan 2048, but are relevant consideration for a s32 analysis under the RMA 1991.

Table 11.3.4.1: Summary of Options Analysis Addressing S32(2) Matters

	Option 1: Apply the standard zone heights	Option 2: Apply the heights from the Kiwi Masterplan 2048	Option 3: Preferred option – the proposed Plan Change heights
Benefits	This option applies height limits within the Plan Change area which are consistent with what is envisioned within the underlying zone, which is a benefit in terms of the consistent administration of the AUP.	This option may result in environmental benefits for the surrounding properties as it imposes lower height limits than options 1 and 3 limiting any potential adverse effects which may be generated from higher buildings within the Plan Change area.	Expert landscape analysis has shown that the proposed height limits will not result in adverse visual or landscape effects, in particular the separation distance between the viewing audience in the established Hunua Foothills / Ranges properties and the future centre means that potential adverse effects from dominance, loss of privacy or shading will be avoided. Furthermore, the expert landscape analysis concludes that simply seeing taller development in the context of wider views will not result in any high degree or even moderate level adverse visual effects. Expert landscape analysis has shown that the proposed height limit will

	Option 1: Apply the standard zone heights	Option 2: Apply the heights from the Kiwi Masterplan 2048	Option 3: Preferred option – the proposed Plan Change heights
			<p>result in visual change that will have positive outcomes because the heights will provide an opportunity to take on an urban form that signals an urban heart to the Drury East community, in terms of future urban form and the declinational nature of the centre relative to its more sub-urban residential surrounds.</p> <p>This option has environmental and social benefits as it more efficiently uses land in close proximity to the proposed train station and FTN corridor along Waihoehoe Road through enabling greater development potential within Sub-Precinct C.</p> <p>This option will result in Environmental benefits as it provides an appropriate stepped transition between the 72.5m height limit that applies within the Metropolitan Centre zone, the surrounding lower intensity Mixed Use zone and the THAB zone that applies within the Oyster and Fulton and Hogan Plan Change areas.</p>
Costs	This option will result in environmental and social costs as it does not enable a greater development potential to be realised within Sub-Precinct C and E in recognition of the	This option is an inefficient use of greenfield land located beside a train station and FTN where expert landscape analysis has shown there is no	The higher height limits will enable buildings which are more visible than Option 1 and 2 however, the zone and Plan Change criteria will

	Option 1: Apply the standard zone heights	Option 2: Apply the heights from the Kiwi Masterplan 2048	Option 3: Preferred option – the proposed Plan Change heights
	<p>proximity to the proposed train station and FTN corridor along Waihoehoe Road.</p> <p>This option will result in Environmental costs as it does not provide an appropriate transition between the 72.5m height limit that applies within the Metropolitan Centre zone, and the surrounding lower intensity Mixed Use zone, which has a 16m height limit.</p>	<p>adverse visual or landscape effects from allowing greater height.</p> <p>The lower Metropolitan Centre will not provide a legible urban form that signals the presence of an urban centre, relative to the surrounding suburban development, to the same extent as Option 3.</p>	<p>ensure development exhibits quality design.</p>
Efficiency & Effectiveness	<p>This option is not in keeping with B2.2.1 (1) or B2.3.1 (1) as the standard Mixed Use height limit within Sub-Precinct C will not result in development that is an efficient use of land that is in close proximity to the proposed train station and FTN corridor along Waihoehoe Road.</p> <p>This option is not effective at achieving B2.3.1 (1)(a) as it applies standard height limits rather than height limits which are based on the physical characteristics of the Plan Change area and its setting.</p>	<p>This option is not as effective at achieving H9.2(2) as the lower height limits will produce a less legible urban form as development will not be of a scale and urban form to reinforce the centre as a focal point for the community.</p> <p>This option is inefficient and not in keeping with B2.2.1 (1) and B2.3.1 (1) as maximum densities are not enabled in proximity to the FTN, rail services and centres despite the Visual and Landscape Effects Assessment determining that the Plan Change area can support greater height.</p>	<p>This option is effective at achieving H9.2(2) as it applies height limits that will produce a legible urban form where Drury Centre is reinforced as a community focal point for the wider community.</p> <p>This option is efficient and in keeping with B2.2.1 (1) and B2.3.1 (1) as a greater height limit is enabled within Sub-Precinct C to increase the development potential of land that is in close proximity to the proposed train station and FTN corridor along Waihoehoe Road.</p> <p>This option is effective at achieving B2.2.1 (1) and H9.2(4)(c) as the Expert landscape analysis has shown that the proposed height limits will not result in adverse visual or landscape effects, furthermore the height limits provide for an appropriate transition</p>

	Option 1: Apply the standard zone heights	Option 2: Apply the heights from the Kiwi Masterplan 2048	Option 3: Preferred option – the proposed Plan Change heights
			<p>between the Metropolitan Centre zone and the surround lower intensity zones.</p> <p>This option is effective at achieving B2.3.1 (1)(a) as it applies bespoke height limits which are based on the physical characteristics of the Plan Change area and its setting.</p>

11.3.4.2 Summary of Reasons for Deciding on the Provisions

Option 3 is preferred. Applying a bespoke height strategy within the Plan Change area as outlined within Section 5.1, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed height limits reinforce the role of Drury Metropolitan Centre within the centres hierarchy through ensuring a legible urban form where Drury Centre is reinforced as a focal point for the wider Drury East community, and reinforces the centre as a focal point for the community in accordance with B2.3.1 (1)(b) and H9.2(2).
- The proposed height limits are consistent with B2.2.1 (1) and B2.3.1 (1) as it enables efficient use of land within a strategic location, next to the Drury Interchange and adjacent to the future train station and FTN along Waihoehoe Road.
- Expert landscape analysis has shown that the proposed height limits will not result in adverse visual or landscape effects, furthermore the height limits provide for an appropriate transition between the Metropolitan Centre zone, the surrounding lower intensity Mixed Use zone and the THAB zone that applies within the Oyster and Fulton and Hogan Plan Change areas. Therefore, these height limits are consistent with the direction within B2.2.1 (1) and H9.2(4)(c).
- The proposed height limits are consistent with H9.2(3) because they signal the planned future form and context, given the Plan Change area sits in the middle of the southern Auckland FUZ.
- The proposed height limits respond to the physical characteristics of the Plan Change area and its setting and therefore are effective at achieving B2.3.1 (1)(a).

11.3.5 Theme 5: Coordinating the development of land with transport infrastructure

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

- B2.2.1(5) The development of land within the Rural Urban Boundary, towns, and rural and coastal towns and villages is integrated with the provision of appropriate infrastructure.
- B3.2.1(5) Infrastructure and land use planning are integrated to service growth efficiently.
- B3.3.1(1)(b) Effective, efficient and safe transport that integrates with and supports a quality compact urban form.
- E27.2(1) Land use and all modes of transport are integrated in a manner that enables: (a) the benefits of an integrated transport network to be realised; and (b) the adverse effects of traffic generation on the transport network to be managed.
- IX.2(1) Drury Centre is a transit-orientated development that supports high density residential, employment-generating and retail activities close to rapid transit and prioritises public and active modes of transport to and within the centre.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11.3.5.1 Evaluation of Other Reasonably Practicable Options

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

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

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

	Option 1: Do nothing – no staging provisions	Option 2: Deferred zoning – when all the local infrastructure upgrades are operational	Option 3: Deferred zoning – when Drury Central Train Station is operational	Option 4: Transport staging rule	Option 5: External trip cap	Option 6: Preferred option – Proposed Plan Change
	<p>with the delivery of transport infrastructure.</p> <p>However, if a funding agreement was in place this cost would be eliminated.</p>	<p>prior to the signalisation and capacity upgrades to the Waihoehoe Road/ Great South Road intersection being required.</p> <p>This option is blunt and does not enable consenting to progress for land modification or development, which would create unnecessary delays in the development process.</p>	<p>construction of Drury East getting underway.</p> <p>It is not essential for the Drury Central train station to be aligned with the release of development capacity as demand will drive the investment in supporting public transport services and therefore a level of development prior to completion of the train station will provide a population to support investment in supporting bus networks²⁵.</p> <p>This option does not address traffic effects on the local road network. While the train offers an alternative travel mode</p>	<p>residential or retail GFA is unrealised.</p> <p>This option may result landowners and developers competing to use up development capacity. This will be mitigated if there is a development/funding agreement in place.</p>	<p>This option may result in landowners and developers competing to use up vehicle trip capacity and is potentially better suited where the land is within single ownership. This will be mitigated if there is a development/funding agreement in place.</p> <p>Small scale developments will have to prepare Integrated Transport Assessments to show compliance with the vehicle tip cap.</p>	<p>Council will be required to keep a register of the number of dwellings that are new or additional, including valid but unimplemented resource consents to create lots or develop multi units within Drury East. As the standard requires all vacant lot subdivisions to comply with this standard therefore all dwellings and GFA can be counted through subdivision consents.</p> <p>Although there are risks with this approach Council has the ability and technology to monitor this it will just be</p>

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

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

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	Option 1: Do nothing – no staging provisions	Option 2: Deferred zoning – when all the local infrastructure upgrades are operational	Option 3: Deferred zoning – when Drury Central Train Station is operational	Option 4: Transport staging rule	Option 5: External trip cap	Option 6: Preferred option – Proposed Plan Change
						to any new dwellings, retail or commercial development.

11.3.5.2 *Summary of Reasons for Deciding on the Provisions*

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

11.3.6 **Theme 6: Achieving integrated and quality development**

The AUP objectives which have particular relevance for Theme 6 include:

- B2.3.1 (1) A quality built environment where subdivision, use and development do all of the following: (a) respond to the intrinsic qualities and physical characteristics of the site and area, including its setting; (b) reinforce the hierarchy of centres and corridors; (c) contribute to a diverse mix of choice and opportunity for people and communities; (d) maximise resource and infrastructure efficiency; (e) are capable of adapting to changing needs; and (f) respond and adapt to the effects of climate change.
- B2.3.1(3) The health and safety of people and communities are promoted.
- B3.3.1(1) Effective, efficient and safe transport that: (a) supports the movement of people, goods and services... (e) facilitates transport choices, recognises different trip characteristics and enables accessibility and mobility for all sectors of the community.
- E27.2(2) An integrated transport network including public transport, walking, cycling, private vehicles and freight, is provided for.
- E27.2(5) Pedestrian safety and amenity along public footpaths is prioritised.
- E38.2(6) Subdivision has a layout which is safe, efficient, convenient and accessible.

11.3.6.1 *Other Reasonably Practicable Options for Achieving the Objectives*

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

Option 1: Rely on the underlying Auckland-wide provisions

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

New buildings and alterations and additions not otherwise provided for are controlled by the policies, development standards, matters of discretion and assessment criteria in the underlying Business – Metropolitan Centre and Business – Mixed Use zones only.

Option 2: Preferred option – Proposed Plan Change

The proposed Drury Centre Precinct includes a bespoke set of provisions to guide the development of buildings, roads and open spaces within the precinct:

- Development of public or private roads and open spaces greater than 1000m² are restricted discretionary activities subject to matters of discretion and assessment criteria in the Drury Centre precinct (refer to **Appendix 1**), in addition to those contained within the underlying Auckland-wide provisions (E38 Subdivision – Urban, E27 Transport);
- New buildings and alterations and additions not otherwise provided for are controlled by specific policies, matters of discretion and assessment criteria in the Drury Centre precinct (refer to **Appendix 1**), in addition to those contained within the underlying Business – Metropolitan Centre and Business – Mixed Use zones only;
- Sub-precinct C includes provision for additional height up to 25m;
- Within Sub-precinct B a 40.5m height limit within the Metropolitan Centre is proposed;
- Additional matters of discretion and assessment criteria are proposed for infringements to Standard H9.6.5 – Residential at Ground Floor that enable residential to establish at ground floor on local streets within Sub-Precinct A, as long as the design of dwellings contributes to the amenity of adjoining streets or open space and provides for privacy for occupiers of the dwelling (refer to **Appendix 1**).

11.3.6.2 Evaluation of Other Reasonably Practicable Options

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in Table 11.3.6.1.

Table 11.3.6.1: Summary of Options Analysis Addressing S32(2) Matters

	Option 1: Rely on the underlying zone and Auckland-wide provisions	Option 2: Proposed Plan Change
Benefits	A less complex set of planning provisions will apply within the Plan Change area.	<p>Expectations and requirements of key stakeholders, land owners and land developers can be clearly set out within the proposed precinct.</p> <p>Increases the amenity values of the Plan Change area as the future residents will enjoy the planned open spaces and connected street network which offers safety to pedestrians and cyclists.</p> <p>Ecological benefits associated with riparian enhancement.</p> <p>The proposed building heights within the Precinct provide the opportunity for a greater variety of building heights across the Plan Change area and a more interesting skyline.</p> <p>The 40.5m height limit proposed within Sub-precinct B provides for high density development consistent with the Metropolitan Centre zone, while providing a transition towards lower intensity industrial and residential uses neighbouring the Plan Change area.</p>
Costs	Landowners, developers, the Council and Community will not have clear expectations about where the future street and open space network will be located.	Cost to future applicants to prepare resource consent applications assessing additional planning provisions and implementing the requirements.
Efficiency & Effectiveness	<p>Ineffective as the indicative primary road network and open space network are not shown in the plan so piecemeal and ad hoc development may occur.</p> <p>Without the guidance of a precinct, the Plan Change area is unlikely to be developed in a comprehensive and coordinated manner.</p>	<p>This option is the most effective option as the precinct provisions ensure that development will occur in an integrated and co-ordinated way.</p> <p>The proposed precinct meets Objective B2.3.1(1)(a) of the RPS as it ensures that subdivision, use and development will respond to the</p>

	Option 1: Rely on the underlying zone and Auckland-wide provisions	Option 2: Proposed Plan Change
	<p>Area - specific approaches are not considered, which is less effective in achieving B2.3.1(1)(a).</p>	<p>intrinsic qualities and physical characteristics of the site.</p> <p>This option is effective as the provisions seek to ensure adequate provision of public open space in accordance with Objective B2.7.1(1).</p> <p>This option is effective as the provisions seek to ensure development provides a connected street network which promotes safe cycling and a walkable urban form in accordance with B3.3.1(1) and B2.3.1(3).</p> <p>Efficient as the proposed provisions provide certainty for landowners, developers, Council and the community about the where parks and streets will generally be located.</p> <p>The proposed precinct meets Objective B2.3.1(1)(a) of the RPS as it ensures that subdivision, use and development will respond to the intrinsic qualities and physical characteristics of the site.</p>

11.3.6.3 Summary of Reasons for Deciding on the Provisions

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

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

- The proposed precinct provisions are consistent with B2.7.1(1) as they will ensure that development provides open space to meet the needs of future residents;
- The proposed precinct provisions are consistent with B3.3.1(1) as it provides a connected street network which provides for the safe, effective and efficient movement through the precinct and facilitates transport choice.

11.3.7 Theme 7: Residential Amenity in Sub-Precinct C and F

The RPS objectives which have particular relevance for Theme 7 include:

- B2.3.1(1)(e) A quality built environment where subdivision, use and development do all of the following: are capable of adapting to changing needs.
- B2.3.1(3) The health and safety of people and communities are promoted.
- B2.4.1(2) Residential areas are attractive, healthy and safe with quality development that is in keeping with the planned built character of the area.
- H13.2(8) A mix of compatible residential and non-residential activities is encouraged.
- H13.2(9) Business – Mixed Use Zone zoned areas have a high level of amenity.

11.3.7.1 Other Reasonably Practicable Options for Achieving the Objectives

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

Option 1: *Rely on the underlying Business- Mixed Use zone provisions*

The underlying Business - Mixed Use zone applies within Sub-precinct C and F unaltered. Therefore, there is no additional development standards to provide for residential amenity nor are there restrictions on land use activities that are not compatible with residential use.

Option 2: *Preferred option – Proposed Plan Change*

Under this option the underlying Business - Mixed Use zone is proposed to be altered to provide for greater amenity for residential dwellings establishing within Sub-Precinct C. A restricted activity status is proposed to apply to land use activities within Sub-Precinct C which are not compatible with residential use (refer to **Appendix 1**). Additional development standards, matters of discretion and assessment criteria also apply to residential developments within Sub- Precinct C to ensure future residents enjoy a reasonable level of residential amenity (refer to **Appendix 1**).

11.3.7.2 Evaluation of Other Reasonably Practicable Options

Each of these alternatives is discussed below and a summary of the s32(2) matters for the options are set out in Table 11.3.7.1.

it is considered more appropriate to consider the extent to which the options would give effect to the relevant objectives of the AUP Regional Policy Statement and the Auckland – wide provisions; as opposed to the Plan Change itself (which would otherwise result in circular reasoning).

Table 11.3.7.1: Summary of Options Analysis Addressing S32(2) Matters

	Option 1: Rely on the underlying zone and Auckland-wide provisions	Option 2: Proposed Plan Change
Benefits	<p>A less complex set of planning provisions will apply within the Plan Change area.</p> <p>This option allows a broader mix of commercial and industrial activities however, these activities will detract from the amenity of any residential developments that develop within the sub-precinct.</p>	<p>Future residents within Sub-Precinct C will enjoy a good standard of amenity through ensuring dwellings have access to daylight and outdoor living space above ground level.</p> <p>Enables a broad mix of residential and commercial activities while avoiding land use activities establishing within Sub-Precinct C which are incompatible with residential development.</p>
Costs	<p>No requirements to provide future residents within Sub-Precinct C with a standard of residential amenity in relation to access to outdoor living space and daylight.</p>	<p>Cost to future applicants to prepare resource consent applications assessing additional planning provisions and implementing the requirements.</p>
Efficiency & Effectiveness	<p>If Sub-Precinct C is developed primarily to provide for high density residential use it will not efficiently or effectively achieve B2.4.1(2).</p>	<p>This option is efficient and effective as it recognises that Sub-Precinct C needs to provide for the amenity requirements for a broad range of residential and employment generating activities land use activities which may change over time as the centre develops therefore it is in keeping with B2.3.1(1)(e).</p> <p>This option is more efficient in achieving Objectives B2.3.1(3), B2.4.1(2) and H13.2(9) as it ensures that the residential developments within Sub-Precinct C provides healthy and safe living environments.</p>

	Option 1: Rely on the underlying zone and Auckland-wide provisions	Option 2: Proposed Plan Change
		Effective as it manages the potential for reverse sensitivity between residential and non-residential uses in Sub-Precinct C which is consistent with H13.2(8).

11.3.7.3 Summary of Reasons for Deciding on the Provisions

Option 2 is preferred. The implementation of a new Drury Centre Precinct, with objectives, policies, rules, matters of assessment and assessment criteria to ensure a reasonable level of residential amenity in Sub-Precinct C, is the most appropriate mechanism for achieving the objectives of the AUP for the following reasons:

- The proposed precinct provisions are consistent with B2.3.1(3) and B2.4.1(2) as they have been designed to ensure quality residential development within Sub-precinct C which ensures the health and safety of future residents is promoted.
- The proposed precinct provisions are consistent with B2.3.1(1)(e) as the Business – Mixed Use zoning provides the flexibility for Sub-Precinct C to be used for commercial activities if required however, the additional precinct provisions ensure it is also suitable for residential activity.

11.3.8 Theme 8: Riparian Planting Rule

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

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

11.3.8.1 Other Reasonably Practicable Options for Achieving the Objectives

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

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

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

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

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

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

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

11.3.8.2 Evaluation of Other Reasonably Practicable Options

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

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

	Option 1: Status Quo	Option 2: Require 20m of Riparian Planting along Streams and Wetlands	Option 3: Proposed Plan Change
Benefits	<p>A less complex set of planning provisions will apply within the Plan Change area.</p> <p>Less costs associated with developing along streams as there is no requirement to provide riparian planting.</p>	<p>This option will enhance the ecological values of streams through requiring planted riparian margins along both sides of permanent and intermittent streams however, it does not provide flexibility for the layout of cycle and pedestrian paths.</p> <p>Increased aesthetic and amenity values for communities as a result</p>	<p>This option aligns with guidance within the TP148²⁶ which recommends a 10m riparian buffer width based on research undertaken into what constitutes a sustainable riparian zone that is self-seeding and able to minimise weed growth and the Auckland Design Manual.</p>

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

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	Option 1: Status Quo	Option 2: Require 20m of Riparian Planting along Streams and Wetlands	Option 3: Proposed Plan Change
		of riparian planting along streams.	<p>This option will enhance the ecological values of streams through requiring planted riparian margins along both sides of permanent and intermittent streams and is consistent with the rule included in other greenfield precincts within the AUP²⁷.</p> <p>The proposed rule does not stop a greater riparian margin being planted but it does allow more flexibility.</p> <p>As there is a 20m esplanade reserve requirement development effectively has to be setback 20m from streams however, by only requiring a portion of this to be planted this allows flexibility to provide cycle paths and footpaths along permanent streams outside of the riparian planted margin.</p> <p>Increased aesthetic and amenity values for communities as a result of riparian planting along streams compared with Option 1.</p>
Costs	No requirements to provide riparian planting along streams within the Plan Change area and therefore the ecological	In requiring greater riparian margins along permanent streams than what is recommended within TP148 ²⁸ and the	This requirement for riparian planting will increase the costs when developing along streams.

²⁷ 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)

²⁸ Auckland Regional Council Technical Publication TP148 Riparian Management Guideline (Becker et al., 2001)

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

11.3.8.3 Summary of Reasons for Deciding on the Provisions

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

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

11.4 RISK OF ACTING OR NOT ACTING

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

12.0 CONCLUSION

This report has been prepared in support of Kiwi Property's request for a Plan Change to the provisions of the AUP to rezone 95 hectares of land within Drury East for urban activities.

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

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

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

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