



1206 Great South Road, Drury

**Application for Land Use Consent at 1206 Great South
Road, Drury**

Drury Limited Partnership

17 February 2026

Details and Version Control

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Acknowledgement of Submission



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1 APPLICANT AND SITE DETAILS

Applicant Name:	Drury Limited Partnership
Site Address:	1206 Great South Road, Drury, Auckland, 2578
Legal Description:	Part Lot 1 DEEDS 167
Site Area:	2.4281 ha
Plans:	Auckland Unitary Plan
Zoning:	Future Urban Zone
Overlays:	Natural Resources: High-Use Stream Management Areas Overlay [rp] Natural Resources: High-Use Aquifer Management Areas Overlay [rp] - Bombay Drury Kaawa Aquifer
Controls:	Controls: Macroinvertebrate Community Index - Rural
Designations:	-



2 INTRODUCTION

The following assessment is provided in accordance with the requirements of Section 88 and Schedule 4 of the Resource Management Act 1991 (RMA).

The applicant is seeking land use consents to undertake earthworks and establish a storage yard in the Future Urban Zone at 1206 Great South Road, Drury, Auckland. The storage yard activity will also require consent for stormwater discharge.

Overall, the activity status of the proposal will be a **discretionary** activity and will create adverse effects that are less than minor, and which are consistent with the relevant assessment criteria. The application is also consistent with the objectives and policies of the Auckland Unitary Plan (Operative in Part) (AUP(OP)) and meets the purpose of the RMA.



3 BACKGROUND

The application was lodged with Auckland Council on 13 June 2025 and proposed earthworks across the entirety of the site. In response to discussions with Council, the proposal was revised and provided to Council on 27 August 2025. The current proposal continues to broadly reflect the revised proposal from August 2025. The revised proposal sought consent for an activity not provided for in the Future Urban Zone and this remains the case.

Council, in October 2025, engaged Peter Kensington – Consultant Landscape Architect to undertake a peer review of the applicant’s Landscape and Visual Assessment. Mr Kensington’s memo was provided to the applicant on 3 November 2025. Mr Kensington’s conclusion was that the proposal would *“result in a moderate degree of adverse effects on rural character and amenity values, as experienced by the public and neighbouring residents”*. Specifically, the memo identified persons at 870 Runciman Road as being most affected by the proposal from a visual effects perspective.

Joe Gray provided a response to the memo on 5 November 2025, and this AEE has subsequently been updated to address the minor changes to the proposal itself as well as an updated stance on the adverse effects assessment on persons at 870 Runciman Road.



4 SITE AND SURROUNDING ENVIRONMENT

4.1 Site Description

The subject site is in Drury and is within the Future Urban Zone (FUZ). The site is bounded by Great South Road to the east and other FUZ properties in all other directions. The site is currently used for rural-residential purposes.



Figure 1: Subject site and surrounding environment.

4.2 Natural Environment

The subject site is categorised by pasture in a series of grass paddocks with the boundary of the site containing exotic hedgerows. The topography of the site comprises a relatively flat surfaces in the southern half of the site, with a large depression towards the northern boundary.

An assessment of the freshwater ecological values and constraints on the subject site has been prepared by Boffa Miskell (attached as Appendix C). The assessment determined that the subject site has no freshwater features.



There is a small floodplain affecting a section of the northern boundary of the site. Several overland flow paths originate on the site and drain towards the north. All overland flow paths drain to the same catchment (Ngakoroa Stream).



Figure 2: Flooding on site per Auckland Council GeoMaps

4.3 Built Environment

The site has an existing dwelling and associated structures near the southern boundary. There are two vehicle crossings in the south-west corner of the site – both accessing Great South Road. The southern-most crossing provides direct access to the dwelling on the site, whilst the northern crossing feeds towards the ancillary structures (sheds etc).

4.4 Surrounding Environment

The surrounding environment consists of rural-residential land transitioning towards a light industrial character. All sites immediately adjacent the subject site is within the Future Urban Zone. Further to the north, Drury township is experiencing steady development as the current southern urban boundary of Auckland.



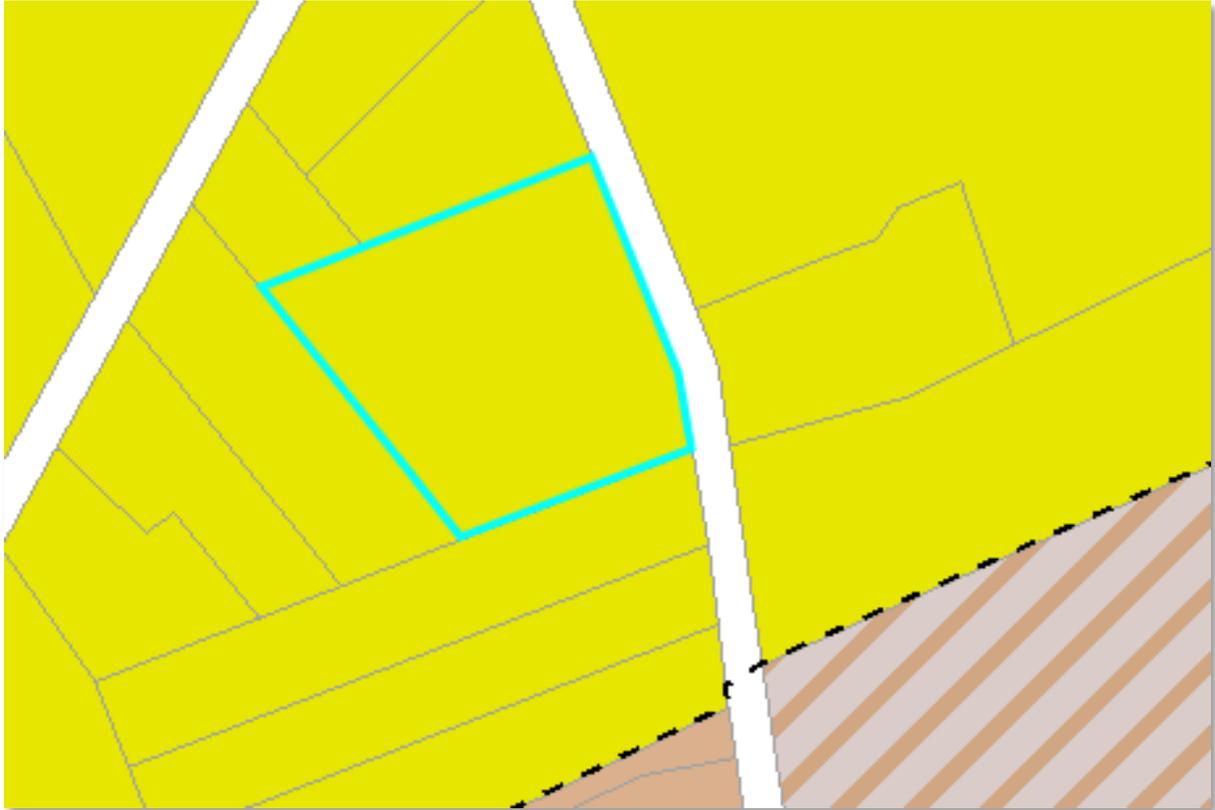


Figure 3: Zoning for the subject site and surrounding environment

The site is adjacent to the following properties identified in Figure 4:

- 1186 Great South Road: currently being utilised for rural industrial and storage purposes
- 872 Runciman Road: currently a rural-residential site, also serving as a hub for the owner's concrete/paving business.
- 870 Runciman Road: currently being utilised as a storage yard alongside residential dwelling.
- 1212 Great South Road: currently a rural-residential site.
- 1187C Great South Road: currently a rural-residential site.
- 1187A Great South Road: currently being developed as a storage yard facility under BUN60417937 (two adjoining lots).
- 1207 Great South Road: currently a rural-residential site.





Figure 4: Adjacent properties

Drury – Opāheke Structure Plan 2019

Drury is a key node for future development of residential and business activities as cemented by the recent Future Development Strategy released by Auckland Council. Significant parts of Drury are now ‘live zoned’, but the subject site and surrounding environment are one of the few remaining pockets of Future Urban Zone land.

As indicated by the Drury – Opāheke Structure Plan 2019, this site and the surrounding sites are intended to be zoned in the future as Business – Light Industrial within the ‘south western industrial area’. Plan changes to the Auckland Unitary Plan to provide urban zoning are required to give effect to the Drury – Opāheke Structure Plan 2019.



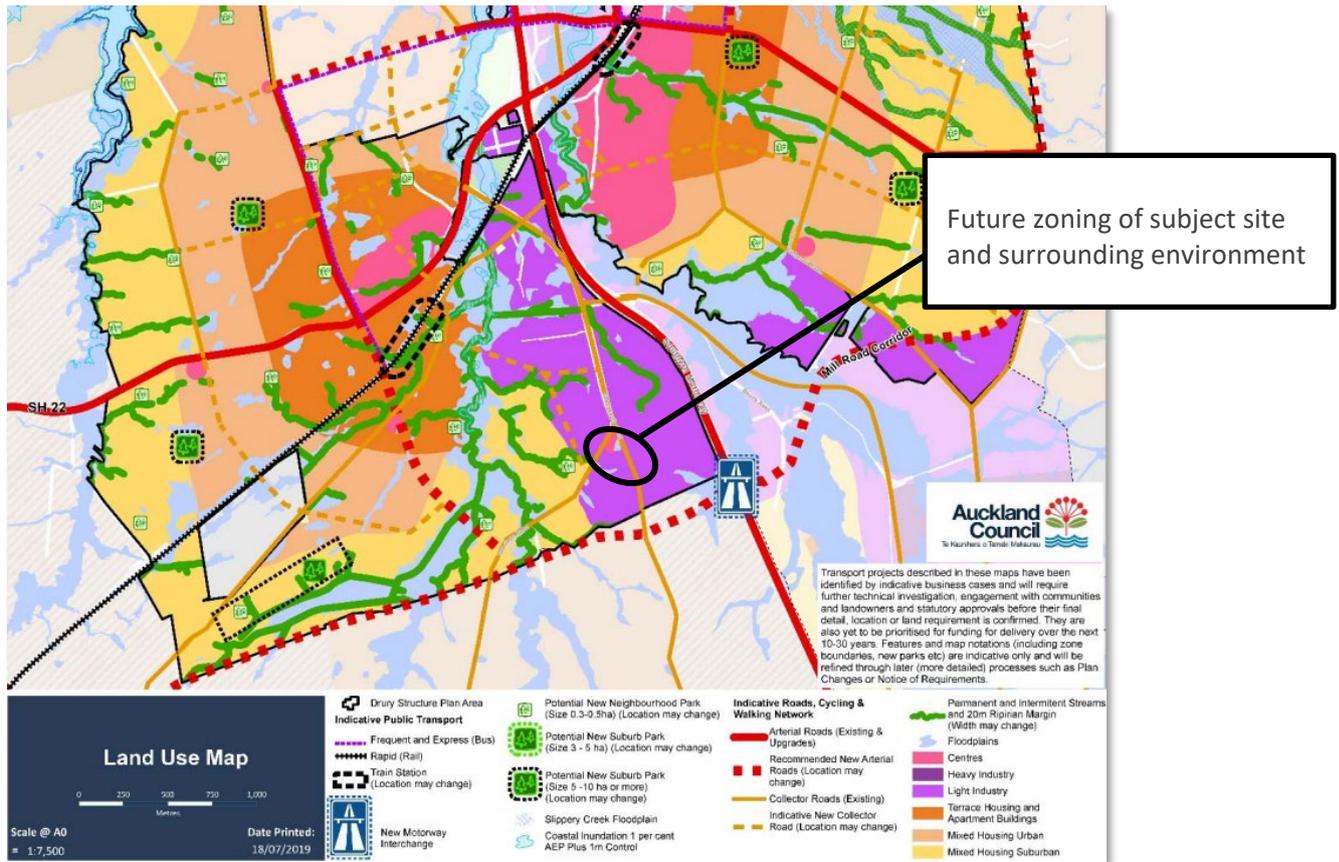


Figure 5: Drury-Opaheke Structure Plan Area, Land Use Map with annotations

4.5 Record of Title and Interest

Copies of the record of title of the site are attached as Appendix A.



5 PROPOSAL

The proposal has two key aspects. Firstly, bulk earthworks are required to create development platforms across the site. Secondly, it is proposed to establish a storage yard once the earthworks have been undertaken. The storage yard is for a civil construction company (Eastern Earthmovers). They require an off-site storage area for the range of equipment and machinery used in their operations.

5.1 Earthworks

Earthworks will be undertaken in two distinct locations within the site. Firstly, earthworks will be undertaken around the existing buildings at the south of the site to provide level platforms for the proposed storage activity. Secondly, earthworks will be undertaken at the north of the site for the development of a dry pond for stormwater management.

Overall, earthworks will be undertaken over an area of 7,500m². Earthworks are generally balanced with a total cut of 2,420m³ and total fill of 2,430m³. It is proposed to strip a 250mm layer of topsoil from the site prior to the recontouring earthworks taking place, which will involve 1,880m³ of topsoil in total. No retaining walls are required as part of the site works.

Erosion and sediment control

Proposed measures for erosion and sediment control have been designed in accordance with Auckland Council design manual GD05 Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region.

The proposed erosion and sediment control measures are subject to Resource Consent for earthworks accordingly. The conditions of consent will require that proposed measures are implemented and maintained in accordance with these guidelines and the approved earthwork drawings.

The site will be progressively stabilised with mulch and seed or gravel as earthwork levels are achieved. Silt control measures will only be removed once the site is considered stable in terms of silt run-off by Auckland Council and the Engineer.

Upon completion of the proposed earthworks an Earthworks Completion Report will be prepared by the Geotechnical Engineer. This report will certify the adequacy of the earthworks and make recommendations on bearing strengths for foundation design purposes.



Earthworks management

Standard earthworks management methodologies for a development of this scale will be implemented during the temporary works. These will relate to the management of noise, vibration, dust, and construction traffic to ensure any potential adverse effects are managed within the site and not displaced onto the surrounding environment. There will be ample space retained on the site to accommodate necessary construction vehicles and storage of materials.

An Earthworks Management Plan (EMP) will be prepared and implemented prior to works commencing.

The EMP will include:

- Earthworks traffic management plan
- Final erosion and sediment control plan
- Measures to ensure only clean fill is accepted onsite
- Measures to manage noise and ensure compliance with E25 of the AUP OP; and
- Measures to minimise dust onsite.

5.2 Storage yard

To enable the storage yard facility, the site will be laid down with compacted gravel and areas of landscaping will be provided along the boundaries. The new hardstand areas will comprise of:

- 4,400m² of hardstand platforms – one platform to the east and another platform west of the existing buildings clustered in the south of the site.
- 950m² of hardstand within the area of the existing buildings.

The tenant for the storage yard will be Eastern Earthmovers Limited – an established civil contractor operating largely in south and east Auckland. The site will be used for the storage of trucks, trailers and machinery including bobcats, diggers and rollers. There will be up to four trucks of different sizes stored on site plus four diggers, four steam rollers and two bobcats. Movement of equipment to and from the site will be relatively low volume with expected movements of four truck entrances and exits per day.

The site will be un-manned, and no new buildings or signage is proposed. The yard will operate in daytime hours only; therefore, no lighting is required. No storage of plant and materials will occur within the yard setbacks for the Future Urban Zone (the applicant is willing to accept a condition of consent that ensures this).



The proposed activity will be temporary, until the site is rezoned and/or a further land use consent is approved. A limited duration of 5 years is sought.

Access

The site's existing northern vehicle crossing will be re-constructed approximately 10-15m further north of its current position. This will be the primary vehicle entrance to the site, although the southern vehicle crossing will also be retained for secondary access.

The primary vehicle crossing will allow vehicles to access the storage yard platform and existing buildings. Internal vehicle access has been designed to have a 7m wide carriageway, allowing two-way vehicle movement within a 3.5m wide lane. The vehicle crossing will have a wide splay (16.61m wide at the site boundary) to allow for large vehicles to make a safe turn into Great South Road.

The vehicle access has been designed to allow solely provide vehicle access to the contractor's yard in the south of the site. The northern edges of the vehicle access within the site will be landscaped.

Gates have been proposed for the vehicle access. These are set back from the property boundary to allow for a 19.5m truck to queue outside the road reserve.

5.3 Stormwater management / Flooding

The proposal contains a range of stormwater management measures. The site slopes down from the south towards the north, resulting in a flood plain area along part of the site's northern boundary. A portion of the floodplain will be filled as part of the proposed storage yard, resulting in a shift in the site's flood storage in this location. The civil plans indicate that for the area of the floodplain that is proposed to be filled in, the pre-development storage volume is 55.5m³ whilst the post-development storage volume will be 0m³.

To compensate for the lost storage, a dry pond is proposed in the north-western corner of the site. The site has been designed so that stormwater is directed towards this pond, which will have a total storage volume of 984m³. Stormwater runoff from the storage yard will be directed towards swales which will channel stormwater flows towards the pond at the site's lowest point. The grassed swales will be a mix of 2m and 3m wide. Stormwater collected in the pond will be directed to a scruffy dome outlet structure along the site's northern boundary. The proposed stormwater infrastructure will ensure that there are no changes to the pre-development stormwater scenario for neighbouring properties.



It is also proposed to install a culvert under the primary vehicle crossing to ensure that stormwater flows within the road reserve of Great South Road are not impeded.

5.4 Landscaping

The proposal includes a landscape plan, prepared by Rob Pryor of LA4 Landscape Architects (refer Appendix F). The landscaping proposed for the site is summarised as follows:

- Along the entire length of the site's western boundary, it is proposed to plant karo hedging and massed native planting. This landscape buffer will be approximately 7m deep.
- Massed native planting will be located along part of the site's northern boundary, adjacent to the proposed dry pond.
- The road boundary will be vegetated along its length, with a mix of existing mature trees and shrubs. Karo hedging is also proposed for the first 50m of the primary vehicle access and will be located on the northern side of the accessway.
- No new landscaping is proposed for the southern boundary other than a small strip of native planting in the south-western corner. The south of the site is effectively remaining the same under the proposal, with the retention of the buildings and vegetation in this location.



6 REASONS FOR THE APPLICATION

6.1 Permitted Activities: Auckland Unitary Plan (Operative in Part)

E11 Land disturbance – Regional

- The proposal involves earthworks up to 10,000m² where the land has a slope less than 10 degrees outside of the Sediment Control Protection Area which is a **permitted** activity under E11.4.1(A3). The proposed earthworks area is 7,400m².

6.2 Reasons for Consent: Auckland Unitary Plan (Operative in Part)

E8 Stormwater - Discharge and diversion

*The proposal involves stormwater discharges not otherwise provided for, which is a **discretionary** activity under rule E8.4.1(A10). The new hardstand areas on the site will exceed 5000m².*

E12 Land disturbance – District

- The proposal involves earthworks greater than 2,500m² and is therefore a **restricted discretionary activity** under E12.4.1(A6). The proposed earthworks area is 7,500m²
- The proposal involves earthworks greater than 2,500m³ and is therefore a **restricted discretionary activity** under E12.4.1(A10). The proposed earthworks involve 2,420m³ of cut and 2,430m³ of fill for a cumulative volume of 4,850m³.
 - *The cut volume does not include topsoil stripping of 1880m³*
- The proposal involves earthworks which fail to meet the following core standards under rule E12.4.1 and is therefore a **restricted discretionary** activity under C1.9(2). These infringements are:
Standard E12.6.2(11)
 - The earthworks will be within a 100-year AEP flood plain with ground levels being raised more than 300mm.

E27 Transport

- The proposal includes vehicle access that cannot comply with the following standard and is therefore a **restricted discretionary** activity under E37.4.1.(A2)



- The proposed primary vehicle crossing will be 16.61m wide at the boundary, and Table E27.6.4.3.2 requires all vehicle crossings in the FUZ to be between 5.5m and 6m when providing for two-way movements under Standard E27.6.4.3.
- The proposal includes the construction and use of a vehicle crossing where a Vehicle Access Restriction applies under Standards E27.6.4.1(3). This is due to the site gaining access via an arterial road (Great South Road). This is a **restricted discretionary** activity under E27.4.1(A5).

H18 Future Urban Zone

- The proposal is to establish a vehicle and machinery storage yard on site. As this activity is not provided for within the Future Urban Zone, resource consent is required for a **discretionary** activity under rule C1.7(1).

6.3 Activity Status

The application therefore seeks resource consent for a **discretionary** activity.



7 ASSESSMENT OF ENVIRONMENTAL EFFECTS

7.1 Introduction

When considering an application for resource consent, the consent authority must, subject to part 2, have regard to any actual and potential effects on the environment of allowing the activity. In the Act, the term effect includes both adverse and positive effects.

7.1.1 Permitted Baseline

The permitted baseline is relevant to both the assessment under sections 95A to 95G and section 104 of the RMA. Under these sections, Council has the discretion to disregard those effects.

In this case, the permitted baseline is relevant as the permitted earthworks in the future urban zone for district earthworks is 1,000m² in area and 1,000m³ in volume. The previous section established that the earthworks are a permitted activity in terms of regional earthworks thresholds. Therefore, the proposal will assess the additional earthworks beyond these amounts.

To assist in the assessment of the storage yard activity, a permitted activity assessment has been prepared and is attached as Appendix J. This provides a description of permitted activities that could reasonably be anticipated to be undertaken on the site at 1206 Great South Road once earthworks have been completed and level platforms established.

7.1.2 Receiving Environment

The receiving environment is a mandatory consideration when assessing the potential adverse effects on the environment. The receiving environment beyond the subject site includes permitted activities under the relevant plans, lawfully established activities (via existing use rights or resource consent), and any unimplemented resource consents that are likely to be implemented. The effects of any unimplemented consents on the subject site that are likely to be implemented also form part of this foreseeable receiving environment.

The receiving environment in which the adverse effects of the proposed development has been assessed is described in Section 3 of this report.



7.2 Adverse Effects Assessment

Earthworks

The proposal involves approximately 4,850m³ of earthworks over an area of approximately 7,500m².

The extent of proposed land disturbance is consistent with that experienced by any rural site of this nature and scale within the FUZ. The effects associated with the proposed earthworks will be less than minor for the following reasons:

- Earthworks have been generally balanced across the site, with cut of 2,420m³ and fill of 2,430m³.
- The subject site does not contain any significant landforms, vegetation, or natural habitat that would be adversely affected by the proposed earthworks as indicated by the ecological assessment carried out by Boffa Miskell.
- The applicant proposed to conduct earthworks in accordance with the proposed earthworks plan. Erosion and sediment control mitigation measures, as well as Auckland Council standards to ensure that any adverse effects from earthworks will not extend beyond the site's boundaries.
- An erosion and sediment control plan (ESCP) has been provided which will prevent discharge of sediments from the site while earthworks are underway. Key features of the ESCP include:
 - Dirty water diversion drains leading to a sediment retention pond in the north-west of the site
 - Clean water diversion drain established along the southern boundary of the site
 - Silt fencing along the northern boundary of the earthworks required to construct the dry pond.
 - Chemical treatment within the sediment retention pond. A chemical treatment device will be incorporated into the dry pond. The preparation of a Chemical Treatment Management Plan is proposed to be required as a condition of consent.
- The erosion and sediment control measures will be put in place prior to any earthworks commencing, these will be retained and maintained in good working order until all site works have been completed and the site secured. This will prevent erosion and the generation of discharge of any further sediment from the site.
- A traffic management plan will be in place to ensure that any temporary adverse effects on the traffic network are appropriately mitigated.
- All works and construction will be undertaken during standard hours of operation to minimise noise effects.



Infrastructure

The proposal has the potential to generate adverse effects on infrastructure networks. However, the proposed activity will not require connections to reticulated services, can be adequately supplied with electricity and, stormwater can be adequately managed via the stormwater management strategy described in Section 4 and within the Infrastructure Report attached as Appendix D.

As such, any effects on infrastructure networks are considered less than minor.

Stormwater and Flooding

The proposed finished levels of the storage yard area will ensure that the general fall and conveyance of stormwater remains to the north / north-west of the site. Stormwater from the impervious areas in the south of the site will be directed into swales which will feed flows towards the low point (north) of the site where water will be attenuated in the dry pond before being discharged.

The development will increase run-off in a 1 in 100yr event from what has been modelled, however, the following measures will ensure that potential adverse effects are appropriately reduced:

- The proposed partial filling of the floodplain and associated loss of flood storage will be compensated by the dry pond proposed for the north-western corner of the site.
- This pond is designed to have capacity of 984m³ which will ensure it provides detention as per SMAF Flow-1 and for a 1 in 100yr event.

Overall, any flooding effects will be less than minor.

Water quality

To minimise adverse effects, the following stormwater management measures are proposed:

- New stormwater infrastructure will service the development for the 10-year storm event, as required by the Stormwater Code of Practice.
- Treatment of stormwater discharges will be provided via grassed swales that discharge to a dry basin in the north-west of the site.
- The proposed dry basin will meet SMAF detention requirements, so water will be held back after a rain event and slowly released back over a 24hr period.

Any adverse water quality effects will be less than minor.



Ecology

The site was inspected by Boffa Miskell in March 2025 to determine if there were any potential freshwater ecology constraints on the site. The assessment found that there were no parts of the site that met the NPS-FM definition of a natural inland wetland, therefore, no assessment of the NES-F and AUP-OP regulations pertaining to wetlands was required.

Reverse sensitivity effects on future urban development

Activities incongruent with the planned future character of the site (Light Industrial) have the potential to give rise to reverse sensitivity effects on future urban development in the area. However, the proposed activity is temporary in nature and the site will transition to a more intensive industrial land use when upzoned. Furthermore, the activity proposed is not in itself sensitive to surrounding light industrial uses, vehicle and machinery storage being an expected part of light industrial land use.

As such, there are not considered to be any reverse sensitivity effects on future urban development.

Reverse sensitivity effects on existing rural development

The proposed activity involves storage of vehicles and machinery and is in no way sensitive to the rural production and storage activities that characterise the surrounding rural environment.

As such, there are not considered to be reverse sensitivity effects on existing rural development.

Noise

The proposal is for storage of vehicles and machinery, which will not be operating on site for any length of time beyond that which is necessary to move around the site. As such, the proposal will not result in any noise effects beyond those that can be reasonably anticipated in an area used for rural production and vehicle storage.

As such, any noise effects are considered less than minor.

Transport

The Transport Assessment (attached as Appendix G) has been prepared by CKL and contains an assessment of the proposal. I make note of the following key findings in relation to the site and the proposed storage yard activity:



- The proposed main access will have sight distances of 250m+ to the south and 214m in the north which will meet the appropriate sight distance guidelines of 214m required by Austroads: *Guide to Road Design Part 4A: Unsignalised and Signalised Intersections*. Vegetation will be trimmed from the site's frontage north of the primary vehicle entrance to assist in providing the appropriate sight distance.
 - At most, the sightline extends 1.5m into the site and does not cross the boundary of any other neighbouring sites. All vegetation within the sight line will be removed as part of the proposal and no fences or other visual obstacles will be located along the site frontage to ensure that sufficient visibility is maintained at all times. This is proposed to be required as a condition of consent.
- Although there is direct access to an arterial road, this site only has one road frontage, therefore there are no alternative vehicle crossing options. The site's compliance with the following factors ensures that the direct access to the arterial road will create less than minor adverse effects on the road network:
 - a. the number of vehicle crossings per 50m of road frontage,
 - b. the minimum separation distance between vehicle crossings, and
 - c. the relevant sight distance guidelines.
- The threshold value for the capacity of Great South Road is 580 trips. The estimated peak hour trip generation for the site will be 10 – 11 vehicles per hour. When this is combined with other recently established storage yards in the surrounding environment, these activities will collectively generate 152 peak hour trips. Therefore, the road network has sufficient capacity to accommodate trips from the subject site including when these trips are considered in the wider context.
- The 16.61m wide vehicle crossing is considered to be appropriate in this context, even though it exceeds the maximum width for a two-way movement vehicle crossing. The crossing has been designed to ensure the safe movement of large vehicles on and off the site in line with typical industrial sites. Overall, it will have less than minor adverse effects on the road network.

Mana Whenua Values

On the 12th of June 2025, an email was sent to the following mana whenua representatives. The email contained the full development plans for the site and an invitation to provide formal feedback on the cultural values relevant to the site and the proposed activity.

- Jeff Lee, representative of Te Akitai Waiohua



- Lucie Rutherford, representative of Ngaati Tamaoho
- Karl Flavell, representative of Ngaati Te Ata

As it is up to mana whenua to determine their own values, further consultation is ongoing, and the results of this consultation will be passed on to Council post-lodgement.

Rural Character and Amenity Values

The proposed activity is similar to existing storage and rural industrial activities currently being undertaken in the surrounding area. The property immediately to the north at 1186 Great South Road is used for storage of trucks and equipment and the two properties to the west at 870 Runciman Road and 872 Runciman Road are used for the storage of goods and equipment alongside rural-residential uses. Furthermore, the property at 1187A Great South Road is being developed into a storage yard under BUN60417937.

Given the above, the area is clearly in a transition phase between the rural-residential and rural production activities that have historically characterised the area and the light industrial activities that will characterise the area in the future.

I note that under this proposal, the storage yard activity will comprise a small portion of the overall site area. In total, 16,919m² of the site area (total of 24,279m²) will remain as it currently exists. In a percentage, 69.6% of the site will be undeveloped and remain in pasture under this proposal. Of the 7360m² of the site that will be developed, 2,010m² (8.3% of the site) will be developed for the purposes of landscaping and construction of the stormwater network (swales and pond). These aspects of the development will not be out of place in a rural environment and, in the case of the landscaping, have the potential to positively contribute to the character and amenity values.

By utilising a small portion of the site for a storage yard activity and retaining the bulk of the site as pasture, the proposal directly aligns with the purpose of the Future Urban Zone, which is, to provide a transitional zone as the area moves slowly towards urbanisation. The proposed storage yard on the subject site strikes an appropriate balance between transitioning towards the future (urban) use and retaining the existing (rural) character of the area.

In terms of specific effects on visual amenity and landscape values, the Landscape and Visual Assessment provided within Appendix E has concluded that:



- *The site and the immediately surrounding landscape are not high in landscape values or visual amenity*
- *Potential adverse effects of the storage yard facility would be contained and managed on-site through large parts of the site being screened or filtered by the proposed mitigation planting, existing vegetation within adjoining sites and along the Great South Road frontage, in addition to vegetation patterns outside the site.*
- *The form, scale and nature of the development would be akin to similar developments occurring within the surrounding environment and would not appear out of character.*
- *The proposal would not adversely affect the landscape character and visual amenity values of the surrounding area.*

The application is also supported by an Urban Design Memo prepared by Bruce Weir (refer to Appendix I). This memo has been prepared to address the matter of retaining rural character values on the western side of Great South Road.

I note the following key points from the memo prepared by Bruce Weir:

- From an urban design perspective, the key matters to address are:
 - Character – what is it is? and what are the key considerations, and;
 - Edges – principally, is Great South Road an edge? and if so, is it defensible?
- The character of the surrounding environment has already been well established in this AEE. The area has been subject to numerous industrial and commercial developments – particularly to the north of the subject site. As such, Great South Road as a corridor and the surrounding environment in general, is characterised by a number of commercial/light industrial activities.
- The memo concludes that Great South Road is not a defensible edge for the following reasons:
 - Roads can sometimes fulfil the function of an edge, but unless they are of significant scale, they tend to be integrators. This is the case as traffic speeds reduce and the urban character around the road reaches a level of symmetry.
 - Following the completion of the Southern Motorway, the effectiveness of Great South Road as an edge has been severely degraded and its function is more closely aligned to that of an integrator.
 - The edges in the surrounding environment are now considered to be the Southern Motorway (east), the Ngakorua Stream (west). To the north and south there are no defensible edges for



quite some distance, although the designated Drury to Pukekohe link road (300m south of the site) provides an opportunity for a southern edge in the future.

- Given that the proposed activity is in line with the existing character of the area, and that Great South Road is not considered to be a defensible edge, the memo concludes that *“it is simply not possible, nor appropriate to seek to protect rural character on the opposite side of Great South Road in the area of the site”*

Overall, any adverse effects associated rural character and amenity are considered to be less than minor.

7.3 Adversely Affected Persons Assessment

Infrastructure Effects

The assessment of adverse infrastructure effects undertaken in Section 6.2 above is considered sufficient for the purposes of an adversely affected persons assessment. As such any adverse infrastructure effects on persons are considered less than minor.

Natural Hazard Effects

With the exception of flooding effects on 872 Runciman Road (addressed in detail below), the assessment of adverse infrastructure effects undertaken in Section 6.2 above is considered sufficient for the purposes of an adversely affected persons assessment. As such any adverse infrastructure effects on persons are considered less than minor.

Traffic Effects

The assessment of adverse infrastructure effects undertaken in Section 6.2 above is considered sufficient for the purposes of an adversely affected persons assessment. As such any adverse infrastructure effects on persons are considered less than minor.

Amenity Effects

The proposal involves an intensification of the use of the site, which has the potential to adversely affect the amenity values experienced by the owners and occupiers of adjacent properties, however:

1187C Great South Road, 1207 Great South Road, 1212 Great South Road, and 870 Runciman Road

- When the proposed perimeter planting has matured, these properties will be screened from the proposed activity and any nuisance effects relating to vehicle movements will be limited to the



hours of operation of the facility. Furthermore, the proposed activity is not outside what can be anticipated in the surrounding environment and does not represent an unusual nuisance.

- However, prior planting reaching maturity, the level of visual mitigation will be lower. Therefore, in the time that it will take for the planting to establish, there will be a minor adverse effect on persons at 870 Runciman Road.
- For all other site listed above, persons will experience less than minor adverse effects due to the separation distance from the proposed activity and/or the screening provided by the existing vegetation on site which will be retained.

1186 Great South Road and 1187A Great South Road

- These properties are used / will be used for storage yard activities and are in no way sensitive to the proposal from a nuisance or operational perspective.

872 Runciman Road

- This property is located north of the subject site.
- Any potential adverse amenity effects will be less than minor because:
 - It will be screened from the proposed activity with perimeter planting and any nuisance effects relating to vehicle movements will be limited to the hours of operation of the facility.
 - I note that vehicles will not be operating in close proximity to this property given the location of the storage yard activity in the south of the site, the significant buffer and the location of the primary vehicle entrance on the eastern side of the subject site.
- Any potential adverse flooding effects will be less than minor because:
 - Although the gravelling of parts of the site will increase the impervious surfaces, sheet flows from the hardstand areas will be captured via swales. The swales will direct stormwater flows to the dry basin which provides attenuation to pre-development levels for an up to the 100-yr event.
 - Generally, stormwater captured in the dry basin will be discharged via the existing 225mm line. During large rainfall events, discharges from the dry basin will sheet flow at the same volume and in the same manner as per the existing situation, thus providing no change to the current situation downstream of the site.

7.4 Conclusion

For these reasons, it is considered that the proposal's adverse effects on the environment and persons



on adjacent land regarding land use will be less than minor and the relevant assessment criteria will be achieved, except for persons at 870 Runciman Road, who will experience minor adverse effects prior to maturity of the proposed planting on the western boundary.



8 NOTIFICATION ASSESSMENT

8.1 Public Notification

Section 95A of the RMA specifies the steps the Council must follow to determine whether to publicly notify an application, as:

- The applicant is not requesting public notification and does not relate to the exchange of recreation and reserve land;
- Public notification is not precluded by applicable rules and national environmental standards and the application is not exclusively for a controlled activity and/or boundary activity;
- Public notification is not required under applicable rules and environmental standards and will not result in environmental effects that are more than minor; and
- There is nothing exceptional or unusual about the application to warrant public notification as the proposed buildings, site works, subdivision and infrastructure servicing are appropriate to and anticipated within the Auckland Unitary Plan.

The application may be processed without public notification.

8.2 Limited Notification

If the application is not publicly notified under section 95A, the Council must follow the steps in section 95B to determine whether to limitedly notify the application, as:

- There are no known affected protected customary rights groups, customary maritime title groups, or persons under a statutory acknowledgement.
- Limited notification is not precluded by all applicable rules and national environmental standards and the application is not exclusively for a controlled activity.
- The application is not for a boundary activity but the proposal will adversely affect persons to a degree that is minor in the case of 870 Runciman Road.
- There is nothing exceptional or unusual about the application that warrant limited notification for the same reasons identified in the public notification assessment above.

The application may be processed with limited notification of 870 Runciman Road.

8.3 Notification Conclusion

Based on the reasons above, it is considered that the application must be limited notified.



9 STATUTORY ASSESSMENT

Under section 104(1) of the RMA, the Council must, subject to Part 2, have regard to the following matters when assessing a resource consent application and any submissions received.

9.1 Section 104(1) (a)

Council must have regard to the actual and potential effects on the environment of allowing the activity.

As assessed in Section 5 above, the proposal will have actual and potential effects that are less than minor and acceptable.

9.2 Section 104(1) (ab)

Council must have regard to any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity.

In this case, the proposal is not of a scale or nature that would require specific offsetting or environmental compensation measures to ensure positive effects on the environment.

9.3 Section 104(1) (b)

Council must have regard to the relevant provisions of operative or proposed national, regional and district planning documents as well as other regulations.

An assessment of the relevant statutory documents that corresponds with the scale and significance of the effects that activity may have on the environment has been provided below.

Auckland Unitary Plan (Operative in Part)

E1 Water quality and integrated management

- The proposed discharge will address water quality effects at the point of discharge via the proposed network of grassed swales, this will reduce sediment and other contaminants within stormwater runoff (E1.2(1), E1.2(3), E1.3(8), E1.3(9), E1.3(11)).
- Tangata whenua will be given the opportunity to identify cultural values potentially affected by the proposal (E1.2(1)).



- Due to the proposed treatment and flow attenuation, there are not anticipated to be any significant adverse effects on downstream water quality, ecology or bank stability (E1.2(1), E1.2(3), E1.3(1)).
- A comprehensive approach has been taken to stormwater management on site and the proposed mitigation strategy addresses all flows generated on site, the water quality of those flows and any downstream effects (E1.2(1), E1.2(3) E1.3(10)).
- Contaminants from the change in activity will be managed with the proposed network of swales, which are considered to offer adequate treatment (E1.2(1), E1.2(3) and E1.3(12)).
- Stormwater flow and treatment will be addressed on site and is not reliant on any offsite infrastructure assets (E1.2(1), E1.2(3) and E1.3(13)).
- The proposed stormwater management strategy is considered the best practicable option as it will not require any active treatment of stormwater, uses green infrastructure (grassed swales), adequately addresses water quality issues and does not preclude the future development of a (E1.2(1), E1.2(3) and E1.3(14)).

E11 Land disturbance – Regional and E12 Land disturbance - District

- The proposed earthworks can be undertaken in a manner that is consistent with the matters over which Council has restricted its discretion under E12.8.1(1), E11.8.1(1) and C1.9(3).
- The proposed earthworks will be undertaken in accordance with Objectives E11.2(1)-(3) and Objective E12.2(1) because adverse effects on the environment and the safety of people have been avoided mitigated. Sediment generation from land disturbance will be minimised with the ESCP.

E27 Transport

- The access provided for the site has been demonstrated to be safe and efficient – in line with the proposed activity and appropriate for the location (E27.2(4), E37.3(20)).
- The new vehicle crossing will be able to operate safely with neighbouring land uses given the adequate sight distances and separation from other vehicle crossings (E27.2(6), E27.2(20)).
- The activity will not generate trips that could result in significant adverse effects on the transport network, including when these trips are considered in combination with other storage yard activities in the vicinity (E27.3(1)).



- The site is required to have vehicle access from an arterial road as it has no other road boundaries. The location and design of the vehicle access is appropriate and will ensure the continuation of the safe and efficient operation of the arterial road (E27.3(21)).

H18 Future Urban Zone

- A full assessment of the proposal against the objectives and policies contained in H18 Future Urban Zone is provided below:

Objective H18.2(1) – Land is used and developed to achieve the objectives of the Rural – Rural Production Zone until it has been rezoned for urban purposes.

Policy H18.3(1) – Provide for use and development which supports the policies of Rural – Rural Production Zone unless that use and development is inconsistent with policies H18.3(2) to (6)

- In regard to the objectives and policies of the Rural Production Zone:
 - a) The proposed activity, being a commercial activity that can support a range of rural activities, is fundamentally enabled by H19.3.2(1) and H19.3.3(1).
 - b) The proposed civil contractors storage yard activity and required development of the site to facilitate this use is not considered inappropriate in the context that this land has been earmarked to pass out of productive use, therefore, the proposal is aligned to Objective H19.3.2(2).

Objective H18.2(2) – Rural activities and services are provided for to support the rural community until the land is rezoned for urban purposes.

Policy H18.3(2) – Enable activities that are reliant on the quality of the soil or require a rural location to operate or which provide for the day to day needs of the local rural community.

- In alignment with Objective H18.2(2), although the primary commercial activities carried out by the tenant are civil contracting services, the vehicles and machinery stored at the yard will be able to support rural activity in the area. For example, the machinery can be used to carry out earthworks on a rural site.
- Policy H18.3(2) is not applicable as the proposal does not diminish the opportunity to operate activities that are reliant on the quality of soil or require a rural location.

Objective H18.2(3) – Future urban development is not compromised by premature subdivision, use or development.



Policy H18.3(4) – Avoid subdivision that will result in the fragmentation of land and compromise future development

- The proposal is consistent with Objective H18.2(3) and Policy H18.3(4) for the following reasons:
 - a. No fragmentation of the land will occur via subdivision, as subdivision is not proposed.
 - b. The temporary nature of the proposed activities on the site ensure that future urban development will not be compromised by the proposal. A 5 year consent duration is sought, signalling the temporary nature.

Objective H18.2(4) – Urbanisation on sites zoned Future Urban Zone is avoided until the sites have been rezoned for urban purposes.

- The following factors demonstrate the activity is not urban:
 - a. The proposal does not require any public infrastructure above what already exists on the site in order, a trait that is generally at odds with an urban environment.
 - b. The proposed activities will involve hardstand and physical structures (but not permanent buildings), but this does not automatically qualify it as an urban activity. A storage yard is not a prohibited activity within a rural zone, and it has the potential to support rural activities.
 - c. The proposal is for a temporary activity. Urban activities tend to require a permanency that is not present in this proposal.
- Given that the established rural character and amenity can be maintained, it is considered that the proposed use and development of the site is not at odds with the existing or intended environment of the FUZ.
- Additionally, the *High Quality* decision found that Policy H18.3(6) implements Objective H18.2(4) and the following is noted against each of the policy's sub-clauses:

Policy H18.3(6) – Avoid subdivision, use and development of land that may result in one or more of the following:

- a) *Structures and buildings of a scale and form that will hinder or prevent future development*



- No new permanent structures are proposed; therefore, any structures on site that have the potential to hinder or prevent future development will be easily transportable and can be removed.

- b) *Compromise the efficient and effective operation of the local and wider transport network***
 - The proposal will not compromise the efficient and effective operation of the local and wider transport network. An assessment of the transport network has been provided as part of this applicant and concluded that associated effects will be acceptable.

- c) *Require significant upgrades, provisions or extension to the wastewater, water supply, or stormwater networks or other infrastructure.***
 - No upgrades are required to the reticulated three waters infrastructure to allow the proposal to occur.

- d) *Inhibit the efficient provision of infrastructure***
 - No public infrastructure is provided to facilitate the proposed activity and there is no evidence to suggest that the proposal will inhibit the efficient provision of infrastructure.

- e) *Give rise to reverse sensitivity effects when urban development occurs***
 - In this instance, the proposed activities would not be out of place in a light industrial area and would not give rise to reverse sensitivity effects.

- f) *Give rise to reverse sensitivity effects in relation to existing rural activities or infrastructure***
 - It has been demonstrated that the proposed activities are not sensitive to rural activities and will therefore not give rise to reverse sensitivity effects.

- g) *Undermine the form or nature of future urban development.***
 - The site will ultimately remain in a state that allows for a variety of future urban development. Subdivision that could potentially fragment the site is not proposed nor is infrastructure or other development that could undermine the form or nature of future urban development.

Policy H18.3(3) – Require subdivision, use and development to maintain and complement rural character and amenity.



- An assessment of the adverse effects of rural character and amenity was provided by Mr Pryor. Mr Pryor notes that the surrounding rural character and amenity value is low due to the established activities in the area.
- It has also been established, via urban design expert Bruce Weir, that Great South Road does not form a defensible edge. Therefore, the rural character and amenity values of the site must take into account the changes to character and amenity that have arisen from the establishment of large storage yard facilities to the north / north-west.
- The temporary nature of the proposal, the brief views of the site and proposed planting on the site boundary will ensure the development maintains and complements the rural character and amenity of the area – which has been heavily impacted by the existing uses along Great South Road. Therefore, the proposal is not inconsistent with Policy H18.3(3).

Policy H18.3(5) – Prevent the establishment of more than one dwelling on a site except for the provision for minor dwellings and workers’ accommodation.

- This policy is not applicable as no residential development is proposed.

B2 Urban growth and form

- The objectives and policies of chapter B2 of the RPS that are pertinent to this proposal are contained in B2.2 Urban growth and form. The proposal is not inconsistent with the other provisions of chapter *B2 Urban growth and form* and an exhaustive objectives and policies assessment is considered unnecessary, as well as detracting from the key points of this proposal.
- Objectives B2.2.1(1), (2), (3), (4), (5) and Policy B2.2.2(4) focus on the location of urban growth, asserting the importance of urbanisation occurring within the Rural Urban Boundary. I note that this site is within the Rural Urban Boundary, and as demonstrated, the proposed activities do not represent urbanisation; therefore, the proposal is not considered contrary to the objectives and policy listed above.
- Policies B2.2.2(1), (2), (3), (5), (6) and (9) are not relevant considerations for this proposal.
- Policy B2.2.2(7) focus on enabling urban growth in particular locations via rezoning. As mentioned above, the proposed activity is not considered to be an urban activity or represent a form of urbanisation. It is also not proposed to re-zone the site for urban purposes within this application.



- Policy B2.2.2(8) is notable for this proposal. As the High Court noted in the *High Quality* decision, Policy B2.2.2(8) “is one of the few in B2.2 which refer expressly to land that is zoned Future Urban, although other policies in B2 are of general application”. For clarity, B2.2.2(8) is as follows:
“Enable the use of land zoned future urban within the Rural Urban Boundary or other land zoned future urban for rural activities until urban zonings are applied, provided that the subdivision, use and development does not hinder or prevent the future urban use of the land.”

- The *High Quality* decision made it clear that although rural activities are preferred in the FUZ, Policy B2.2.2(8) does not preclude non-rural activities from occurring. As the *High Quality* decision states, “B2.2.2(8) does contemplate that there may be subdivision, use and development in the Future Urban Zone provided it does not hinder or prevent the future urban use of the land”. In this case, the non-rural proposal is an acceptable activity within the FUZ, it does not propose subdivision that would fragment the land, it does not result in the degradation of soil or water, and it does not impact public infrastructure. All these factors combined mean that the proposed activities do not hinder or prevent the future urban use of the land, therefore, the proposal is consistent with Policy B2.2.2(8).

B3 Infrastructure, transport and energy

- In terms of infrastructure and energy, it is not proposed to impact the wider infrastructure or energy networks as a result of the proposal. There are no requirements for new or additional public infrastructure connections or upgrades. Therefore, the proposal is not inconsistent with provisions contained in B3.2 Infrastructure and B3.4 Energy. An exhaustive assessment of the objectives and policies would be unnecessary and detract from the key points at hand.
- In terms of B3.3 Transport, the transport effects of the proposal have been assessed and the conclusions are that any adverse transport effects of the proposal will be less than minor. Furthermore, the existing transport network will be able to function safely and efficiently during (and after) the proposed five-year consent duration.

B9 Rural environment

- The proposal does not restrict the establishment and operation of rural activities (including rural production) by generating reverse sensitivity effects as the storage activity is unaffected by rural effects such as noise and odour (B9.2.1(3), B9.2.1(4), B9.2.1(5), B9.2.2(2))
- The proposal does not represent an urbanisation of rural areas, as addressed above (B9.2.2(1)).



National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land does not apply as the land has been zoned for future urban purposes.

9.4 Section 104(1)(c)

Council must have regard to any other matter that it considers relevant and reasonably necessary to determine the application.

Drury-Opaheke Structure Plan

The proposed activity is consistent with the Drury-Opaheke Structure Plan, which envisages that future light industrial activities in the area are undertaken on generally flat pieces of land in areas zoned for future urban development. The proposed storage facility represents an appropriate transition between the existing rural environment and the future urban environment and will not have undue effects on amenity of character values.

Outcomes sought for South western industrial area

Section 3.13.10 of the Drury-Opaheke Structure Plan contains a range of key outcomes sought for the industrial area that the site is located within. An assessment of the proposal against each outcome is provided below.

Outcome: promote an innovative and employment focussed creative business environment

The proposal is not contrary to this outcome, as the proposed activity is temporary and will not restrict the site from being used to contribute to this outcome once the site is live-zoned.

Outcome: achieve high employment densities in locations that are within walking distance of the stations

The subject site is not located particularly close to any proposed transit stations, as reflected in the proposed zoning for the site – industrial rather than high density residential. The use of the site for storage yard purposes will not inhibit this outcome from being achieved in the future as residential land becomes live-zoned.



Outcome: protect and enhance the blue-green network that supports the area including through water sensitive design, greenways, riparian enhancement margins and avoiding bulky buildings and outdoor storage areas close to streams

There are no streams on site, and therefore the outdoor storage areas proposed are not located close to any streams which aligns with this outcome. The stormwater features of the site are connected to the wider network of streams and freshwater features though. With this in mind, the proposed stormwater management system includes grassed swales and other measures to ensure that any potential adverse effects on the wider catchment are mitigated.

Outcome: provide for a high standard of building design amenity where the industrial zone boundary is either: on a street (with a residential zone on the other side of the street), or is adjoining an open space zone; including avoidance of excessively bulky buildings close to the street or open space

Under the Drury-Opaheke Structure Plan, the subject site is proposed to be entirely surrounded by other Business – Light Industrial sites. The nearest residentially zoned site will be approximately 100m west of the subject site boundary. Nevertheless, the proposal is not contrary to this outcome as no new buildings are proposed for the site.

Outcome: provide for a high standard of building design amenity and landscaping adjacent to SH 1 as viewed from SH 1

This is not applicable to the site, as it is not located adjacent to SH 1.

Outcome: provide a high standard of building design and amenity along the main Great South Road spine and particularly around the proposed centre on Great South Road

No new buildings are proposed as part of this application, and the existing buildings are almost entirely screened by the existing vegetation/landscaping along the front boundary of the site. Additional landscaping is proposed for the northern part of the site's front boundary as this area has generally lower levels of existing landscaping. Overall, the proposal is not contrary to this outcome, and it will not restrict this particular outcome from being achieved in the future.

Outcome: promote the cultural and heritage values of the area



The cultural values of the area are to be determined by mana whenua. There will continue to be opportunities for mana whenua to articulate their cultural values in relation to the site. At this stage, no formal feedback has been received from mana whenua.

Outcome: provide for good walking and cycling connections to the nearby residential areas and centres

This outcome is first and foremost addressed via upgrading transport corridors owned and operated by Auckland Council. Whilst privately owned sites can contribute as well, this proposal will not have a close relationship to the main commercial centres or residential areas, so it makes little sense to include provision for walking or cycling routes as they will likely be of little to no use. The proposed (partial) use of the site as a storage yard does not restrict the opportunity for walking and cycling connections within Great South Road.

Outcome: avoid urban development in the 1 in 100-year floodplain.

The proposed development on the site is not considered 'urban development', therefore this outcome is aligned with. Nevertheless, there is development proposed within the floodplain on the site. Any adverse effects related to the filling of the floodplain will be entirely mitigated by the dry pond proposed on site.

Precedent Effects

The assessment produced by Peter Kensington includes the following comments regarding precedent:

"I have a concern that this application, if granted, could start to 'chip away' at this rural-urban interface and introduce an activity that begins to erode, rather than maintain and enhance, rural character and amenity values. This may lead to a precedent that might result in a fundamental change in landscape character of the wider area. I am particularly concerned about this issue in relation to how the site is viewed in the context of the properties which are located to the west of Great South Road, to the north of the RUB and both south and north of Runciman Road. This triangle area of properties has a consistency of existing landscape (rural) character and amenity values"

An assessment of precedent/plan integrity effects is acknowledged as being a relevant consideration under s104(1)(c) in the *High Quality* decision. However, the paragraph above infers that this application is the first of its kind within Drury's Future Urban Zone land. The reality is that there have been



numerous resource consents granted in this locality which have introduced new activities to the landscape.

The *High Quality* decision outlines that “Council has also granted resource consent to some applicants to carry out activities in the zone such as the establishment of a self-storage facility; on a temporary basis, a business assembling pre-fabricated homes; and the construction and operation of a purpose-built warehouse and distribution centre”. The decision goes on to note that “the other consents do tend to undermine the Council’s submissions as to precedent/plan integrity effects”.

Saddlebacks’ view is that the precedent has been set before the application was made at this site. The area of Future Urban Zone land in this location includes the following development:

- 1159 Great South Road: has earthworks and land use consents to establish and operate a storage and lock up facility.
- 1186 Great South Road: has an underlying land use consent from 2009 for the storage of caravans across 1162m² of the site. Additionally, a consent is currently being sought to authorise the extension of the industrial activity on site.
- 1187A Great South Road: currently being developed as a storage yard facility under BUN60417937 (two adjoining lots).

The above examples show that this application is not the ‘start’ of this particular type of activity in the FUZ, and Council have already set the precedent for this location via the consents granted on other sites. Concluding that this application would introduce a precedent would be to ignore the development already authorised.



10 CONCLUSION

The application is for a land use consent to provide bulk earthworks and establish a storage yard facility across the site. Based on this assessment of the proposal, it is considered that:

- The proposal's adverse effects are less than minor, except for temporary effects on persons at 870 Runciman Road, which will be minor until planting matures.
- The proposal is either consistent with or not contrary to the relevant objectives and policies of the AUP(OP) and other relevant documents.
- There are reasons to limited notify this application for 870 Runciman Road.

It is requested that draft conditions are shared for review prior to the issuing of the resource consents.

Please contact us should you require further information or clarification in relation to this application.



Appendix A Record of Title



Appendix B Earthworks Plan



Appendix C Ecological Values Assessment



Appendix D Infrastructure Report



Appendix E **Landscape and Visual Assessment**



Appendix F Landscape Plan



Appendix G Transport Assessment



Appendix H Correspondence with Mana Whenua



Appendix I Urban Design Memo



Appendix J Permitted Baseline Assessment

